



Foreign Account Tax Compliance Act (FATCA) Foreign Financial Institution (FFI) Registration

Under the final FATCA regulations, all FFIs are required to register with the IRS. The FFI Registration System will be open from August 19, 2013 through April 25, 2014 to register and obtain a Global Intermediary Identification Number ("GIIN")
Deloitte delivers a wide range of compliance and advisory services to organizations with FFIs, including assistance with entity registration requirements.

Who can benefit?

Any organization that has identified FFIs in their structure can benefit from services available to facilitate compliance:

- Multinational financial services companies
- Non-FSI companies: A foreign entity acting as a holding company, treasury center or captive finance company would generally fall within the definition of an FFI.
- Companies with small staffed back offices, or whose compliance team is currently utilized.
- Companies that do not want to incur training for staff for a one-time project.

Have you gone through the entity classification process?

- If you answered "No," then Deloitte can assist you in going through this process. But you must perform this step before registering your FFI's.
- If you answered "Yes," you are ready to proceed with registration.



Service highlights

- Outsourcing entity registration can:
 - Reduce impact on existing workload using our Entity Registration process
 - Leverage Deloitte's trained staff with deep technical knowledge to perform data entry in forms unfamiliar to existing team members
 - Include a defined quality process, with specific quality reviews, prior to submission
 - Provide ongoing assistance in managing new FFI agreements
- Our team is dedicated to FFI enrollment services, focused on consistency and quality



Why now?

- The IRS expects to open the FFI Registration System on August 19, 2013.
- Beginning on August 19, FFIs can start setting up their profiles and adding entities without actually committing to signing or registering until January 1.
- On or after January 1, 2014, FFIs can finalize their registrations through April 25, 2014 and obtain their GIIN. The GIIN will then appear on the first IRS FFI list expected on June 2, 2014.

Failure to register in a timely manner may be costly as without a signed FFI agreement with the IRS, firms will be forced to withhold 30% on U.S. sourced FATCA withholdable payments.



Why Deloitte?

Highly trained staff using an off-shore model with U.S. leadership:

- Leadership in FATCA.
- Tested Entity Registration process, allowing for real-time review of the information posted to the Registration System.
- Team boasts broad experience in information reporting and in managing multiple entity return filings.
- Established Centers of Excellence involving integrated teams in the U.S. and India that are experienced in delivering large engagements.

Deloitte offers deep financial services industry knowledge and progressive insights into the key regulatory trends affecting FATCA compliance.

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