



Frequently Asked Questions (“FAQs”) - UAE Ministry of Finance FATCA CRS System

Disclaimer

- This document is designed to provide guidance with registering on the UAE Ministry of Finance FATCA/CRS system and undertake subsequent relevant actions in line with each entity’s obligations under FATCA and CRS.
- This document does not constitute legal or tax advice.
- The UAE FATCA and CRS domestic legislation shall take precedence over the information contained in this document.
- Information contained in this document is not a substitute for
 - (i) reviewing and considering the relevant applicable laws in their entirety and in detail.
 - (ii) obtaining appropriate legal and tax advice.
- You should consider obtaining legal and tax advice as required to determine your obligations under the domestic UAE FATCA and CRS legislation.

Category	Question	Response
Registration	I do not have a UAE Pass account, is there an alternative mechanism to register on the system?	UAE PASS is required to login to the FATCA CRS system. Users need to download the UAE PASS application and activate it by validating the One Time Password (OTP) sent to the mobile number and email address used to register with UAE PASS. You will be asked to specify the email address for use with FATCA/CRS after logging into the FATCA/CRS portal.
Registration	Is it possible to register on and access the FATCA CRS system as a user from outside the UAE?	Users can create UAE PASS accounts by registering as a 'Visitor'. It is possible to create a UAE PASS account using a foreign phone number. The account is active after validating the OTP received to the email address and phone number.
Registration	Do I need to do a fresh registration on the FATCA CRS system if I have previously registered on AEOI portal (in previous years?)	Yes, a fresh registration is required on the FATCA CRS system in order to fulfill your FATCA and CRS requirements for CY2022 reporting.
Registration	Where do I access the FATCA CRS system and register my Reporting Financial Institutions?	The link to access the system along with user guides and other relevant documentation will be available on the UAE Ministry of Finance (UAE MoF) AEOI webpage: https://mof.gov.ae/fatca-and-crs/
Registration	I am a UAE Reporting Financial Institution and have applied for a Global Intermediary	Having a published GIIN is a prerequisite for registration on the FATCA CRS system. The IRS publishes the IRS



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	Identification Number ("GIIN") with the Internal Revenue Service ("IRS") recently. Can I register on the FATCA CRS system?	Foreign Financial Institutions List ("FFI list") on a monthly basis. If you have recently applied for a GIIN, it may take a few weeks before your GIIN is published and available for registration on the FATCA CRS system.
Registration	I am a UAE Reporting Financial Institution for the purposes of FATCA and CRS but do not have a Global Intermediary Identification Number ("GIIN"). Can I register on the FATCA CRS system?	Having a GIIN is a mandatory requirement for UAE Reporting Financial Institutions that have FATCA reporting requirements. It is, however, an optional field for registering for the CRS. You may refer to the IRS website to obtain a GIIN for FATCA purposes.
Registration	I am not sure if I fall into the scope as a Reporting Financial Institution for FATCA and/or CRS purposes. Can the UAE Ministry of Finance assist in determining my legal entity classification?	UAE MoF does not provide tax or legal advice. Please reach out to your tax and legal advisor. For more information on the UAE FATCA and CRS Regulations and other guidance, please visit the UAE MoF AEOI webpage https://mof.gov.ae/fatca-and-crs/ .
Registration	Who from my organization will have access to register and login to the FATCA CRS system? How do I add more users from my organization and assign them different roles?	The Admin user is the first user that registers on the system and 'creates' a Group. The Admin user is then able to assign roles to users in that Group. These are: <ul style="list-style-type: none"> ● Maker ● Checker ● Maker + Checker ● Viewer ● Admin (can act as Maker and/or Checker, depending on task). <p>A user may be assigned a Maker + Checker role. It is important to note that this user can never "Check" his own work.</p> <p>E.g. If the user completed the registration and "Submits for Checking" that same user is not able to "Check" the work. Another Checker user in the Group is required to do so.</p>
Registration	What is a 'Group'? Do I need to create one if I only have (1) Reporting Financial Institution? Can I register my UAE Reporting Financial Institution without it?	A 'Group' is a group of entities or Reporting Financial Institutions that have registered on the FATCA CRS system. A Group may consist of just (1) Reporting Financial Institution. In order to register an entity or Reporting Financial Institution on the FATCA CRS system,



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		<p>the user will first have to create a Group. Once the Group has been created, you will be able to add Reporting Financial Institutions to the Group and complete the Reporting Financial Institution's registration.</p> <p>Where a Reporting Financial Institution is regulated by more than one UAE Regulatory Authority, a separate Group needs to be set up for the Reporting Financial Institution for each UAE Regulatory Authority.</p> <p>You cannot have a Reporting Financial Institution multiple times in the same group. An Admin user may create more than one Group as per the requirements of their organization.</p>
Registration	Does a 'Group' still have to be created, if it's just one Reporting Financial Institution with one regulator?	In order to register an entity or Reporting Financial Institution on the FATCA CRS system, the Admin user will first have to create a Group. Once the Group has been created, you will be able to add Reporting Financial Institutions to the Group.
Registration	Does my Group need to be approved by my UAE Regulatory Authority or UAE MoF?	<p>No, a Group does not need to be approved by the UAE Regulatory Authority or UAE MoF. Once a Group is created by the Admin user, the Admin user can immediately proceed to add other users, assign user roles and "Add entities" by clicking into the Group name.</p> <p>Approvals will be required when Reporting Financial Institutions are added to Groups via the “Add entities” functionality.</p>
Registration	I am not a Reporting Financial Institution for FATCA and CRS purposes. Do I still need to register on the FATCA CRS system?	Your Regulatory Authority (or Licensing Authority) may require you to register on the FATCA CRS system to declare your legal entity classification for the purposes of FATCA and CRS.
Registration	I am a Reporting Financial Institution which is regulated by more than one UAE Regulatory Authority, how do I register?	You need to set up a separate Group for the 2nd registration (and therefore 2nd UAE Regulatory Authority) as the same Reporting Financial Institution cannot appear twice within the same Group.



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Registration	I am a Reporting Financial Institution registered with the IRS for FATCA purposes. How do I know the date of registration	You may login to the IRS FATCA portal in order to view the registration details. Alternatively please reach out to the IRS to obtain further guidance.
Registration	I have recently received a new GIIN, but am unable to register to the Portal because my FATCA GIIN is not being recognized by the system. How can I register to the Portal and file my returns?	<p>You will not be able to register in the Portal until your GIIN has been added to the IRS FFI public list (https://apps.irs.gov/app/fatcaFfiList/flu.jsf). The list is refreshed on a periodic basis by the IRS and as soon as the new list is published, this will be reflected in the system.</p> <p>In the case that you became a Reporting Financial Institution during 2023, you will not have reporting obligations for Calendar Year 2022 (i.e. your first reporting obligation will be in regards to Calendar Year 2023 data).</p>
Registration	Can we amend registration details or submissions made in the previous year, and how can this be made?	<p>All entities are required to do a fresh registration this year, regardless of their registration status in previous years.</p> <p>Previous filings made in the previous FATCA CRS system cannot be amended at this time. Please ensure you are registering and reporting for your CY2022 FATCA and/or CRS obligations upon system go-live.</p>
Registration	Do we have an option of modifying the entity registration details (after validation) or the data submission made during the current year, and how can this be made?	Reporting Financial Institution registration details can be modified after validation, modifications will be sent to UAE Regulatory Authority for approval. Submitted reports can be retracted and new reports can be submitted to the UAE Regulatory Authority (under certain conditions).
Registration	<p>I am a UAE Reporting Financial Institution that conducts activities regulated by more than one UAE Regulatory Authority.</p> <p>Which UAE Regulatory Authority should we register with?</p>	A Reporting Financial Institution that is regulated by more than 1 UAE Regulatory Authority is required to register and report to all UAE Regulatory Authorities separately. E.g., If you are a Reporting Financial Institution regulated by the Central Bank of the UAE and the Securities and Commodities Authority, you will be required to report to both RAs. A separate Group needs to be set up for the Reporting Financial Institution for



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		<p>each UAE Regulatory Authority. You cannot have the same Reporting Financial Institution registered to different UAE Regulatory Authorities multiple times in the same Group.</p> <p>The above would need to be followed if the same Reporting Financial Institution is required to report to more than 2 UAE Regulatory Authorities (i.e. more Groups will need to be created for each UAE Regulatory Authority for the same Reporting Financial Institution).</p>
Registration	I am a Reporting Financial Institution outside the UAE, do I need to register on the FATCA CRS system?	Only UAE Reporting Financial Institutions are required and able to register on the FATCA CRS system. This is indicated by GIINs that end in .784. The only exception is in the case of a Sponsoring Entity (see next question).
Registration	I am a Sponsoring Entity outside the UAE for a Sponsored Entity in the UAE; will the system allow me to register for FATCA?	The FATCA CRS system allows the registration of UAE Sponsored Entities. When registering on the system, you will be required to provide the GIIN of the Sponsored Entity. Following this, you will then be required to provide certain information of the Sponsoring Entity and the system will accept data from non-UAE Sponsoring Entities (on the basis that data is registered and matching with the U.S. IRS records).
Registration	I am an entity in the UAE that became a Reporting Financial Institution for FATCA and CRS purposes in January 2023. Does this mean I have to register and report on the FATCA CRS system for CY2022?	Your Licensing/Regulatory Authority or the Ministry of Finance may require you to register and declare your legal entity classification on the FATCA CRS system for the purposes of CY2022. Please note that you will, however, not be required to report for CY2022 if you were not a Reporting Financial Institution for FATCA and/or CRS purposes for that calendar year.
Registration	I am a UAE Reporting Financial Institution that has FATCA and CRS obligations. Do I register my Reporting Financial Institution separately per compliance type? (i.e. separately for FATCA and CRS?)	You can select both Compliance Types (FATCA and CRS) while registering the Reporting Financial Institution on the system, declare their classification and register the Reporting Financial Institution accordingly. A separate Group will be required if the Reporting Financial Institution is regulated by more than one UAE RA.
Registration	I need to change my Checker user to a Maker	The user roles may be amended as and when required.



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	user (or vice versa). Am I able to do so?	The Group Admin user needs to select the Group and select Settings.
Registration	A registered user has left our organization. Is there a way to change their user ID (email)?	Users may be added and removed as and when required. The Group Admin user needs to select the Group and select Settings.
Registration	If I am an Admin user who creates a Group and adds additional users to the Group, will the system notify the users that they have been added?	There will be a system generated email notification that all users added to the Group will receive. They will then be able to follow the link and register / login via UAE PASS to the FATCA CRS system.
Registration	Why does the FATCA CRS system have a Maker and Checker?	As with many other reporting systems, the FATCA CRS system requires a four-eye review for any activities conducted on the system. The Maker Checker workflow ensures that all work is being reviewed before it is submitted to the UAE Regulatory Authority, including Reporting Financial Institution registration and data submission (annual or nil returns).
Registration	What can a 'Viewer' do in the system?	A 'Viewer' is able to see the Group and the actions that have been taken by Admin, Maker and Checker users. A Viewer cannot perform any actions in the system.
Registration	How many users (at minimum) do I need in order to register my Reporting Financial Institution? Do different Groups need different users?	The FATCA CRS system requires a minimum of 2 users to be registered in order to undertake any activities. The first user is the 'Admin' user, who is able to add additional users to the Group. The Admin user can be a Maker and/or a Checker. The Admin user can then be an additional user (who can be a Maker and/or a Checker). This requirement is regardless of how many Groups are created. i.e., the same users can be added to different Groups.
Registration	Can I register (2) Admin users on the system only to act as a Reporting Financial Institution Maker and Reporting Financial Institution Checker of the Group?	Yes, a group must have two non-viewer users. The options are as follows in order to carry out the Maker Checker functions. <ul style="list-style-type: none"> • Admin and a Maker/Checker.

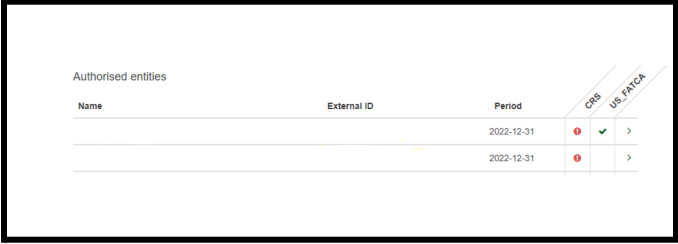


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		<ul style="list-style-type: none">• Admin and a Maker.• Admin and a Checker.• Two Admin. <p>It is recommended there are at least two Admin. This will mean the users can still be added, changed and removed should one administrator be unavailable.</p>
Registration	How do I know if my Reporting Financial Institution has been approved by the UAE Regulatory Authority?	<p>Once the Reporting Financial Institution registration has been completed by the Reporting Financial Institution Maker and approved by the Reporting Financial Institution Checker user, it will be sent to the UAE Regulatory Authority For approval.</p> <p>Once approved by the UAE Regulatory Authority, the Reporting Financial Institution will appear in the list of 'Authorized entities' under the 'Entities' tab for that Group. In addition, the registered Group users will also be notified via email that the Reporting Financial Institution registration has been approved.</p>
Registration	How do I know if my Reporting Financial Institution has been rejected by the RA?	<p>If the Reporting Financial Institution registration has been rejected, the entity will appear in the list of 'Rejected by RA' entities. The UAE Regulatory Authority may provide comments as to why the registration was rejected. These comments will be visible under the same tab. In addition, the registered Group users will also be notified via email that the Reporting Financial Institution registration has been rejected.</p>



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Data Submission / Reporting	How do I check my return has successfully been submitted?	<p>The Entities screen will show the following</p> <p>A red circle with a white exclamation mark if a return has not been submitted and checked</p> <p>A green tick if you have submitted a return and it has been checked</p> 
Data Submission / Reporting	I am unsure about the data that I should fill into the FATCA and CRS reports - where could I find further information?	<p>Please refer to the FATCA and CRS UAE Regulations that may be found on the UAE Ministry of Finance FATCA CRS webpage: https://mof.gov.ae/fatca-and-crs/.</p> <p>It is your responsibility to determine your reporting obligations and you may be subject to enforcement actions if you do not meet these requirements.</p> <p>Please ensure you have downloaded the latest FATCA and CRS templates directly from the FATCA CRS system before filling out and uploading back into the FATCA CRS system. Please refer to the “instructions details” tab in the FATCA and CRS filing templates which will provide you with instructions for each data field in each tab with respect to the values that need to be provided.</p> <p>If the data you upload contains errors, you are able to view the error report and you will need to correct the errors before the submission is accepted.</p>
Data Submission / Reporting	I am a Reporting Financial Institution in the UAE regulated by both SCA and Central Bank. Do I need to submit separate FATCA / CRS reports and risk assessments or will a single submission be sufficient?	<p>If you are a Reporting Financial Institution that is regulated by one or more UAE Regulatory Authorities, you are required to submit a separate FATCA / CRS report for each UAE Regulatory Authority. This also applies to the risk assessment. To do this, the Reporting Financial</p>



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		Institution will first need to register the Reporting Financial Institution in two separate ‘Groups’.
Data Submission / Reporting	I received data validation errors when attempting to upload my CRS and/or FATCA filing templates. What do I need to do next?	<p>If there are any data validation errors with uploaded filing, the system will generate an error report detailing the specific error(s). The Maker user will need to review the error descriptions provided and update the filing/data accordingly and re-upload.</p> <p>The “instructions details” tab in the FATCA and CRS filing templates will provide you with instructions for each data field in each tab with respect to the values that need to be provided.</p>
Data Submission / Reporting	Are the FATCA and CRS reporting templates the same as last year? (CY2021)	The FATCA and CRS reporting templates have been amended from last year as per the FATCA CRS regulations in the UAE. These reporting templates will be available for download from the system upon go-live. Please ensure that you download the reporting templates and fill them out as per the filing instructions provided. The system will not accept any data reported in the previous year template. The system will also not accept any templates that have been modified – you must download fresh templates at the time of reporting and complete those.
Data Submission / Reporting	Is there a specific list of 'CRS reportable jurisdictions' that is available for CY2022 for the purposes of the CRS?	The definition of a CRS Reportable Jurisdiction is all jurisdictions except for the UAE and USA.
Data Submission / Reporting	How long do I have to resubmit my FATCA/CRS annual report if the system shows that there are errors in the data upon first upload by the Reporting Financial Institution Maker?	Once the Reporting Financial Institution Maker uploads data for FATCA and/or CRS purposes, the FATCA CRS system will immediately provide a list of errors (visible on the screen and available for download as a .csv). The Reporting Financial Institution Maker is required to correct the data and re-upload the corrected data into the FATCA CRS system. The Reporting Financial Institution Maker must upload a report with no errors for Reporting Financial Institution Checker approval by the stipulated deadline.



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Data Submission / Reporting	<p>I am a UAE Reporting Financial Institution and have demonstrated efforts to obtain a U.S. TIN (for FATCA reporting purposes) for my pre-existing account holder to my UAE Regulatory Authority.</p> <p>Can I use one of the TIN reporting codes provided in the FATCA excel templates for CY2022? (refer to 'U.S. TIN' tab)</p>	<p>UAE Reporting Financial Institutions are required to comply with all FATCA domestic requirements in the UAE.</p> <p>UAE Reporting Financial Institutions will be considered in compliance with their FATCA obligations under the IGA, despite not obtaining U.S. TINs for pre-existing accounts, as long as the UAE Reporting Financial Institution has used the TIN reporting codes published by the IRS that describe scenarios to explain why the UAE Reporting Financial Institution failed to obtain a U.S. TIN and evidences that reasonable attempts to obtain U.S. TIN have been made on an annual basis.</p>
Data Submission / Reporting	<p>I am a Reporting Financial Institution that does not maintain any financial accounts, and hence, will be filing a nil return. Do I need to submit an excel sheet?</p>	<p>If you are a UAE Reporting Financial Institution that does not maintain financial accounts for the purposes of CRS and/or FATCA, you may submit a nil return by clicking on the 'Reports' tab and clicking on 'Submit nil return' for the relevant compliance type.</p>
Data Submission / Reporting	<p>What is the CY2022 reporting deadline for FATCA and CRS?</p>	<p>The reporting deadline for FATCA CRS data reporting (and nil returns) along with all other relevant documentation will be published on the UAE MoF AEOI webpage shortly. The webpage can be accessed: https://mof.gov.ae/fatca-and-crs/</p>
Data Submission / Reporting	<p>Will my previous FATCA and CRS filings be visible on the new FATCA CRS system?</p>	<p>Prior year filings and data will not be visible on the system at this time.</p>
Data Submission / Reporting	<p>Will I be able to resubmit my data if I receive errors or warnings when I upload the file the first time?</p>	<p>If there are any input validation errors with uploaded filing, the system will generate an error report detailing the specific error(s). The Reporting Financial Institution Maker user will need to review the error descriptions provided and update the filing/data accordingly and re-upload. Your data will not be accepted with errors. Your data will be accepted with warnings, but it is recommended to resolve these before final submission. The “filing instructions” tab in the FATCA and CRS filing templates will provide you with instructions for each</p>



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		data field in each tab with respect to the values that need to be provided.
Data Submission / Reporting	Is the error report generated by the system when I upload data an exhaustive report?	<p>When data is uploaded in the system, certain fields are validated first, which may result in errors. Once these errors are rectified and data re-uploaded, the validations may run on other fields, resulting in a different set of errors.</p> <p>It is important to note that the system will not accept data until all errors have been resolved.</p>
Data Submission / Reporting	Can I amend my filing after the Reporting Financial Institution Maker user has uploaded an error free file and the Reporting Financial Institution Checker user has approved it?	<p>If you have submitted your error free data to the UAE Regulatory Authority (i.e. uploaded by Reporting Financial Institution Maker user and approved by Reporting Financial Institution Checker user), the Reporting Financial Institution Maker user will be able to retract the submission and replace it with an amended filing up until the stipulated reporting deadline.</p> <p>After the stipulated reporting deadline has passed, the Reporting Financial Institution can no longer amend or edit any data submitted.</p>
Data Submission / Reporting	I have submitted the annual reports for FATCA / CRS (both Maker user submitted and Checker user approved) and the status is in progress for “UAE Regulatory Authority Approval”. Are there any further actions required from me?	<p>If you have submitted your FATCA/CRS reports and risk assessments with the status of 'UAE Regulatory Authority Approval', no further action is required.</p> <p>In the case that the UAE Regulatory Authority rejects your submission, you will be notified and may be required to resubmit to complete your obligation.</p>
Risk Assessment	Will I be required to complete a Risk Assessment Questionnaire again this year?	<p>All Reporting Financial Institutions are required to complete a Risk Assessment questionnaire (per UAE Regulatory Authority) on an annual basis as per the FATCA and CRS requirements in the UAE.</p> <p>Reporting Financial Institutions will be informed once the Risk Assessment questionnaire is available in the system and can be accessed.</p>



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Miscellaneous queries	I am unsure what my legal entity classification is, what should I do?	<p>You must assess your own entity classification under both FATCA and CRS to assess whether you have reporting obligations under these regimes.</p> <p>Please note that where you have identified that you are not a Reporting Financial Institution, you are not required to register for reporting purposes. However, please note that your UAE Regulatory Authority may still require you to provide a legal entity classification using the FATCA CRS system. You may be liable for enforcement actions if you have declared an incorrect status.</p>
Miscellaneous queries	Where can I find more information published by the UAE Ministry of Finance on FATCA and CRS matters?	Please refer to the UAE Ministry of Finance webpage on Automatic Exchange of Information containing useful information and contact details for UAE Regulatory Authorities. https://mof.gov.ae/fatca-and-crs/

For Help and Support

Please contact your Regulatory Authority:

- UAE Ministry of Finance (UAE MoF) - info@mof.gov.ae
- UAE Central Bank (UAE CB) - crs@cbuae.gov.ae
- Abu Dhabi Global Markets (ADGM) - fatca.crs@adgm.com
- Dubai International Financial Center (DIFC) - info@difc.ae
- Securities and Commodities (SCA) - sca_fatcarp@sca.ae

Or, contact 800533336 or email info@mof.gov.ae for technical questions / support desk.