



NEW REQUIREMENTS: FATCA TIN Validations for Reporting Periods 2017 – 2019

As per FATCA IGA agreement between the United Arab Emirates and United States of America, Financial Institutions (FIs) are required to obtain a US TIN for all preexisting account holders for calendar year 2017 data. For reportable years prior to 2017, for preexisting account holders a TIN was not required to be provided (nine zeros “000000000” was used in the absence of a TIN), and a date of birth was only required if this was already held by the FI.

US IRS Notice 2017-46 has stated, that in relation to reporting for the calendar years 2017, 2018 and 2019, any failure to report TINs for preexisting accounts will not be determine as significant non-compliance providing that the FI:

- (1) obtains and reports the date of birth of each account holder and controlling person whose U.S. TIN is not reported;
- (2) requests annually from each account holder any missing required U.S. TIN; and
- (3) before reporting information that relates to calendar year 2017, searches electronically searchable data maintained for any missing required U.S. TINs.

In addition to Notice 2017-46, the US IRS has provided guidance that in instances where a TIN is not held and the FI has complied with points (1) to (3) above, that FIs should include in any data submitted, nine capital letter A’s (“AAAAAAAAA”) in the absence of a valid TIN.

Based on the above, the following TIN requirements are applicable from the date of issuing this notice:

A TIN must be:

- **Nine consecutive numerical digits without hyphens or other separators (e.g., “123456789”)**
- **In the absence of a valid TIN, nine capital letter A’s (AAAAAAAAA) must be used with a date of birth**
- **So long as nine capital letter A’s (AAAAAAAAA) is provided and a date of birth is also provided, this will be ACCEPTED. Where nine capital letter A’s (AAAAAAAAA) are provided and no date of birth is given, this will be REJECTED.**

22 February 2018