

FATCA Proposed Regulations Timelines

February 2012

FATCA Timeline – For FFIs (for Agreements effective July 1, 2013)

	2012	2013	2014	2015	2016	2017
FFI Governance		<ul style="list-style-type: none"> ◆ Jan 1 2013 – FFI can enter into FFI Agreement online (Note 1) ◆ Jul 1 2013 – IRS encourages FFIs to sign up by July 1 2013 to ensure readiness by Jan 1 2014 	<ul style="list-style-type: none"> ◆ Jul 1 2014 – Certify completion of review of pre-existing high value individual accounts (Note 2) 	<ul style="list-style-type: none"> ◆ Jul 1 2015 – Certify completion of account identification procedures and documentation requirements for all other pre-existing individual accounts 	<ul style="list-style-type: none"> ◆ Jan 1 2016 – Two-year transition period ends for "Limited FFIs" and "Limited Branches" 	
Due diligence for pre-existing accounts			<ul style="list-style-type: none"> ◆ Jul 1 2014 – Complete due diligence for any pre-existing account holder that is a prima facie FFI ◆ Jul 1 2014 – Complete due diligence for high value accounts 	<ul style="list-style-type: none"> ◆ Jul 1 2015 – Complete due diligence for all other pre-existing accounts 		
Due diligence for new accounts		<ul style="list-style-type: none"> ◆ Jul 1 2013 – New account opening procedures must be in place to identify US accounts (Note 3) 				
Withholding	<ul style="list-style-type: none"> ◆ Jan 1 2013 – Cut-off date for grandfathered obligations 		<ul style="list-style-type: none"> ◆ Jan 1 2014 – FATCA withholding begins on US source FDAP income 	<ul style="list-style-type: none"> ◆ Jan 1 2015 – FATCA withholding begins on gross proceeds 		<ul style="list-style-type: none"> ◆ Jan 1 2017 – FATCA withholding expected to begin for foreign passthru payments
Reporting			<ul style="list-style-type: none"> ◆ Sep 30 2014 – Begin limited reporting for US accounts and aggregate reporting for recalcitrant accounts (calendar year 2013) with respect to accounts identified as of June 30 2014 (Note 4) 	<ul style="list-style-type: none"> ◆ Mar 15 2015 – Begin Form 1042 FATCA reporting ◆ Mar 15 2015 – Begin Form 1042-S FATCA reporting (calendar year 2014) for US source FDAP income 	<ul style="list-style-type: none"> ◆ Mar 15 2016 – Form 1042-S reporting (calendar year 2015) now includes gross proceeds; as well as foreign reportable amounts paid to NPFFIs ◆ Mar 31 2016 – Reporting on U.S. accounts (calendar year 2015) required to include income associated with the U.S. account 	<ul style="list-style-type: none"> ◆ Mar 15 2017 – Form 1042-S reporting (calendar year 2016) expected to include foreign passthru payments ◆ Mar 31 2017 – Reporting for U.S. accounts (calendar year 2016) required to include proceeds paid to U.S. accounts

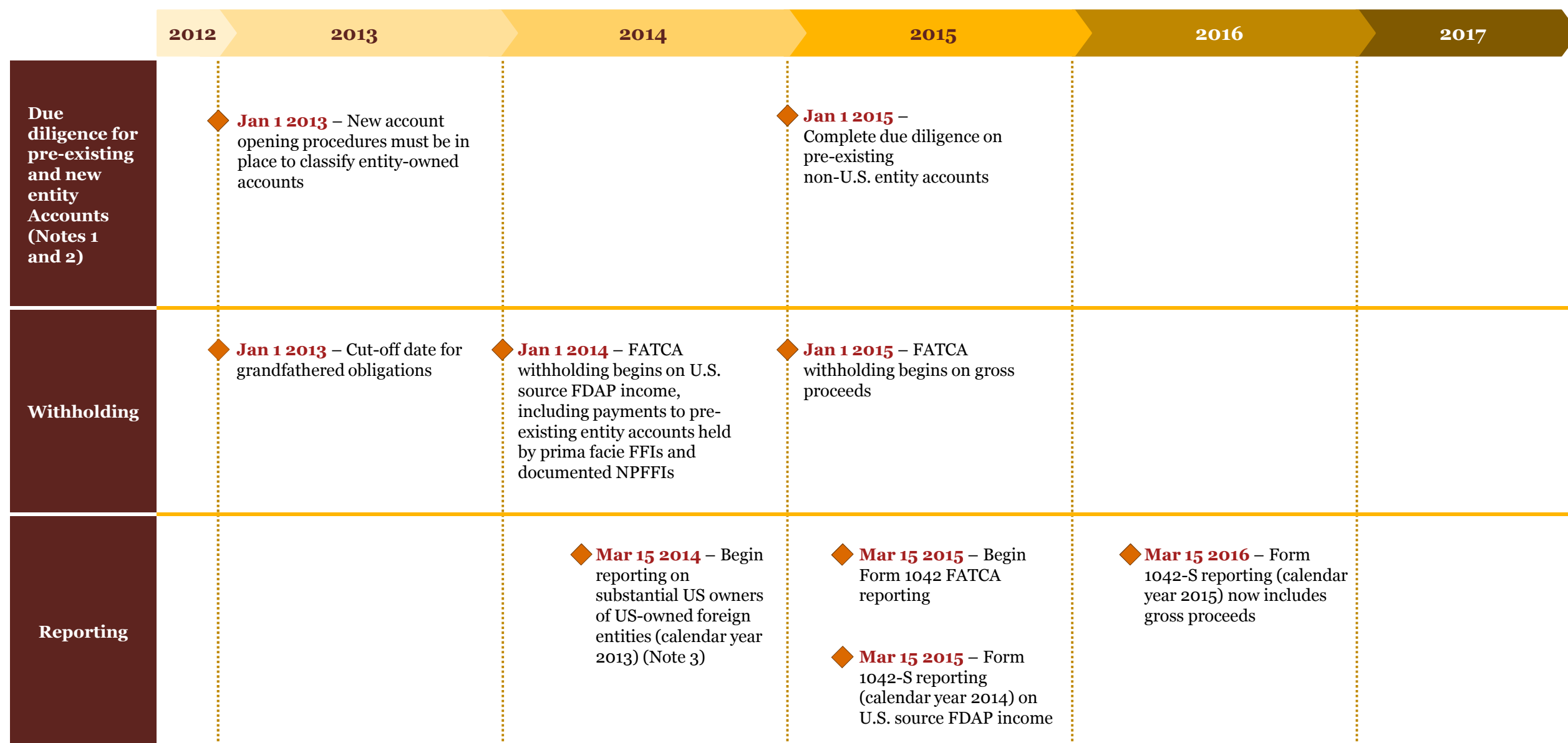
(1) IRS may make the online FFI registration system available before Jan 1 2013

(2) As part of the first certification, FFI must certify that it did not have any procedures in place from August 6, 2011 that would assist account holders in the avoidance of FATCA

(3) New accounts are generally permitted a 90-day grace period before being treated as recalcitrant

(4) Limited reporting includes name, address, TIN, account number, and account balance of each specified US person who is an account holder. For account holders that are NFFEs that are US owned foreign entities, report name, address and TIN (if any) of such entity and each substantial US owner of such entity

FATCA Timeline – For US Withholding Agents (including USFIs)



- (1) US Withholding Agents only perform due diligence on entity clients, not on individuals
- (2) The due diligence process must be completed prior to making a withholdable payment
- (3) Reporting requirements include name of the U.S. owned foreign entity; and name, address and TIN of each substantial U.S. owner