



GENEVA COMPLIANCE GROUP

OECD - COMMON REPORTING STANDARD

PRESENTATION OF THE SERVICES

GENEVA COMPLIANCE GROUP SA
Rue de Candolle 12 – 1205 Genève

INFO@GENEVACOMPLIANCE.COM | WWW.GENEVACOMPLIANCE.COM | +41 22 735 35 55



GENEVA COMPLIANCE GROUP

1. Implementation of the CRS Project

GENEVA COMPLIANCE GROUP SA

Rue de Candolle 12 – 1205 Genève

INFO@GENEVACOMPLIANCE.COM | WWW.GENEVACOMPLIANCE.COM | +41 22 735 35 55

Implementation of the CRS Project Presentation



GENEVA COMPLIANCE GROUP

The implementation of the CRS Project includes the following deliverables:

- Implementation of a step-plan and timeline
- Table of actions to be taken
- Internal training
- Mapping of the relationships subject to reporting
- Validation of the IT developments (CRS module)
- Assistance for registration with the AFC
- Drafting and preparation/review of internal documentation:
 - Internal procedure (drafted in both French and English)
 - Internal forms (drafted in both French and English)
 - Summary / Client Information Letters (general (i.e. on the effectiveness and operation of the CRS) and specific (on information for clients to be reported) (drafted in both French and English)
 - Check-list in order to validate the CRS documentation received from clients

The implementation of the CRS project also includes exchanges and discussions (telephones and sessions) relating to the deliverables listed above.

GENEVA COMPLIANCE GROUP SA

Rue de Candolle 12 – 1205 Genève



GENEVA COMPLIANCE GROUP

2. Follow-up of the CRS Project

GENEVA COMPLIANCE GROUP SA

Rue de Candolle 12 – 1205 Genève

INFO@GENEVACOMPLIANCE.COM | WWW.GENEVACOMPLIANCE.COM | +41 22 735 35 55

Follow-up of the CRS Project Presentation



GENEVA COMPLIANCE GROUP

- Follow-up of the CRS Project in 2017 and in 2018
- Personalized follow-up
- Update of the mapping
- Hotline for CRS related questions (by phone or email)
- The Follow-up of the CRS Project includes the following missions:
 - Advice and follow-up in the context of the implementation of the CRS (answer to common questions in the framework of the implementation of the CRS)
 - Review and assistance for filling in bank documentation (does not include assistance in filling in all bank documentation)

NB: the services do not include the review of accounts and relations by DBC; this can be separately agreed upon (detachment of staff). In the same way, the services are not intended to pronounce on a particular relationship (legal opinion); this can be agreed separately.

GENEVA COMPLIANCE GROUP SA

Rue de Candolle 12 – 1205 Genève



GENEVA COMPLIANCE GROUP

3. IT Implementation and Reporting

GENEVA COMPLIANCE GROUP SA

Rue de Candolle 12 – 1205 Genève

INFO@GENEVACOMPLIANCE.COM | WWW.GENEVACOMPLIANCE.COM | +41 22 735 35 55

IT Implementation and Reporting Presentation



GENEVA COMPLIANCE GROUP

In addition to the above services, we may also offer the following services in partnership with Geneva Compliance Group SA :

➤ Service 1: Outsourcing FATCA & CRS reporting

We offer your clients the opportunity to act as Services Provider for CRS reporting. In this case, we perform the reporting missions in place of your Reporting IF clients. This service is invoiced directly to the client entities. The pricing varies depending on the number of reports to be made on behalf of entities administered / managed by the managing entity. Possibility to combine CRS and FATCA reporting.

➤ Service 2: CRS Entity Registration

Depending on the requirements of each jurisdiction, Reporting IF have an obligation to register with the local tax authorities. In partnership with Geneva Compliance Group, we can make these registrations. Pricing available on request

GENEVA COMPLIANCE GROUP SA

Rue de Candolle 12 – 1205 Genève



GENEVA COMPLIANCE GROUP

4. Our deliverables ... Your tools

GENEVA COMPLIANCE GROUP SA

Rue de Candolle 12 – 1205 Genève

INFO@GENEVACOMPLIANCE.COM | WWW.GENEVACOMPLIANCE.COM | +41 22 735 35 55

CRS Project – Monitoring document



The screenshot shows an Excel spreadsheet with the following content:

Project CRS Contacts

Prénom	Nom	Société	Email	Téléphone
Guillaume	de Boccard	de Boccard Conseil SA	gdb@deboccard.ch	022 735 35 76
Romain	Blanc	de Boccard Conseil SA	rb@deboccard.ch	022 735 35 76

Links

Activated CRS Agreements	http://deboccard.ch/#crscountrymapping
SIF	https://www.sif.admin.ch/sif/fr/home/themen/internationale-steuerpolitik/automatischer-informationsaustausch.html
OCDE	http://www.oecd.org/tax/automatic-exchange/about-automatic-exchange/
AFC Registration	https://www.estv.admin.ch/estv/fr/home/estv-suisse/estv-suisse.html

Last update : 26.04.2017

Navigation tabs: Accueil, Step-plan, Requirements, Holding ENF Active, Disclaimer

Internal Directive



GENEVA COMPLIANCE GROUP

<i>Version française</i>		<i>English version</i>	
Procédure CRS			
Départements concernés (Distribution)		Entrée en vigueur	
Tous les collaborateurs de [●]		1 ^{er} janvier 2017	
		Approuvée par [●]	
<p>PROCEDURE INTERNE RELATIVE A L'ECHANGE AUTOMATIQUE DE RENSEIGNEMENTS (COMMON REPORTING STANDARD - CRS)</p>			
Internal Procedure CRS			
Relevant department (Distribution)		Entry into force	
[All the employees] of [●]		1 st January 2017	
		Approved by [●]	
<p>INTERNAL PROCEDURE COMMON REPORTING STANDARD (CRS)</p>			

Table des matières	Table of contents
Article	Article
1. Objet et droit applicable..... 3	1. Purpose and applicable law..... 3
2. Champ d'application 4	2. Scope of application 4
3. Définitions..... 4	3. Definitions 4
4. Supervision, responsabilité et formation 9	4. Supervision, Responsibilities and Training 9
5. Enregistrement auprès des autorités fiscales nationales compétentes..... 9	5. Registration with the competent national tax authorities..... 9
6. Identification des comptes et des Titulaires du comptes - Documentation 10	6. Accounts and Account Holders Identification - Documentation..... 10
7. Changement de circonstances..... 11	7. Change in Circumstances..... 11
8. Coopération avec d'autres institutions financières déclarantes 12	8. Cooperation with other reporting financial institutions 12
9. Obligations d'information vis-à-vis des Personnes devant faire l'objet d'une déclaration 12	9. Obligations to provide information to Reportable Persons 12
10. Transmission des informations aux autorités fiscales nationales compétentes 13	10. Transmission of information to the competent national tax authorities..... 13
11. Délégation..... 15	11. Delegation..... 15
12. Entraide administrative 15	12. Administrative assistance 15
13. Comportements interdits 15	13. Prohibited behaviors 15
14. Sanctions..... 16	14. Sanctions..... 16
15. Modules informatiques 16	15. IT 16
16. Entrée en vigueur..... 16	16. Entry into force 16
Annexe 1. Cahier des Charges [du Responsable CRS]..... 17	Appendix 1. Specifications of [the CRS Manager] 17
Annexe 2. Cahier des Charges de [●]..... 18	Appendix 2. Specifications of the [●] 18
Annexe 3. Cahier des Charges des Chargés de Clientèles 19	Appendix 3. Specifications of the Relationship Managers 19
Annexe 4. Procédure de revue des Nouveaux comptes de personnes physiques 20	Appendix 4. Onboarding Procedure for New Accounts of Individuals 20
Annexe 5. Procédure de revue des Nouveaux comptes entités..... 21	Appendix 5. Onboarding Procedure for New Accounts of Entities 21
Annexe 6. Procédure de revue des Comptes de personnes physiques préexistants. 24	Appendix 6. Due Diligence Procedure for Pre-Existing Accounts of Individuals 24
Annexe 7. Procédure de revue des Comptes d'Entités préexistants..... 30	Appendix 7. Due Diligence Procedure for Pre-Existing Accounts of Entities..... 30
Annexe 8. Formulaire d'Auto-Certification (Modèle Individus) 33	Appendix 8. Self-Certification Form (For Individuals)..... 33
Annexe 9. Formulaire d'Auto-Certification (Modèle Entités)..... 33	Appendix 9. Self-Certification Form (for Entities)..... 33
Annexe 10. Procédure de Validation de la Documentation CRS 33	Appendix 10. Procedure for Validation of the CRS Documentation..... 33

GENEVA COMPLIANCE GROUP SA
Rue de Candolle 12 – 1205 Genève

Forms



LOGO

Reserved to [X]

Entity name (if any):
Client number:

Date:

Received by / visa:

FATCA & CRS Tax Status Declaration (Individual)

PART 1 – Identification of Beneficial Owner or Controlling person

Last name First name

Residence address (street, house or building no. etc.) (Please do not use any P.O. box or in-care-of address)

Postal Code, Town/city, state or province Country

Date of birth (DD-MM-YYYY) Place of birth (Country)

PART 2 – FATCA: U.S. Tax Status Declaration

In accordance with the regulations applicable under United States (U.S.) Foreign Account Tax Compliant Act (FATCA) and U.S. tax law relating to withholding as well as Intergovernmental Agreements signed by the U.S. and foreign countries for Cooperation to Facilitate the Implementation of FATCA, and in order to correctly determine whether the Beneficial Owner or Controlling person is a U.S. or non-U.S. Reportable person for U.S. tax purposes, the undersigned Beneficial Owner or Controlling person hereby declares and confirms the following to [X] (hereinafter "[X]"):

Please answer the following questions and tick the appropriate boxes.

a) Are you a U.S. citizen? (If you hold multiple citizenships, tick "Yes" if one of them is U.S.) Yes No
 aa) Were you born in the U.S.? Yes No

b) Are you a resident of the U.S. for U.S. tax purposes because:
 ba) you are in possession of a U.S. Green Card (irrespective of expiry date)? Yes No
 bb) you meet the substantial presence test? Yes No
 bc) of any other reason? Please specify _____ Yes No

d) I HEREBY CERTIFY THAT:
 I AM NOT A U.S. PERSON FOR U.S. TAX PURPOSES I AM NOT
 I AM A U.S. PERSON FOR U.S. TAX PURPOSES I AM

e) If are a U.S. Person for tax purposes, please provide your U.S. tax identification number:

LOGO

Reserved to [X]

Account number:

Date:

Received by / visa:

AEIO/CRS Entity Tax Residency Self-Certification Form

The Swiss legislation implementing the OECD Common Reporting Standard (CRS), including the Swiss Federal Act on the International Automatic Exchange of Information in Tax Matters (Swiss AEIO Act), and the AEIO Agreements between Switzerland and its partner jurisdictions require [X] (hereinafter "[X]") to collect information relating to an Account Holder's residence for tax purposes. In accordance with the above mentioned regulations, the undersigned Account Holder hereby declares and confirms the below certifications to [X].

Key terms are defined in the Glossary. Neither this document nor any related written or oral explanations constitute tax advice. [X] recommends contacting a qualified tax advisor or the relevant tax authorities, if required.

PART 1 – Identification of the Account holder

Name of the Entity

Residence address (street, house or building no. etc.) (Please do not use any P.O. box or in-care-of address unless these are entered as such in the commercial register)

Postal Code, Town/city, state or province Country

PART 2 – CRS: Country/jurisdiction of Residence for Tax Purposes and TIN

a) Tax residence and TIN

Please complete the following table indicating:

- All countries/jurisdictions where the Account holder is **resident for tax purposes** (other than the U.S.), and
- The Account holder's **Tax Identification Number (TIN)** for each country/jurisdiction indicated.

Each country/jurisdiction has its own rules for defining tax residence and countries/jurisdictions provided information on how to determine whether an entity is resident for tax purposes in the jurisdiction for inclusion on the OECD AEIO Portal (<http://www.oecd.org/tax/automatic-exchange/>).

If the Account Holder is not resident for tax purposes in any country/jurisdiction (e.g., because it is fiscally transparent), please provide its place of effective management or jurisdiction in which its principal office is located. Trusts are typically resident for AEIO/CRS purposes in the residence of their trustee(s) and branches are tax resident for AEIO/CRS purposes in the country/jurisdiction of residence for tax purposes of the headquarter entity of which they are a branch.

Country/jurisdiction of tax residence	TIN	If no TIN available enter reason A, B, C, D, E or F
1.		
2.		
3.		

Analysis of the main setup



UIP

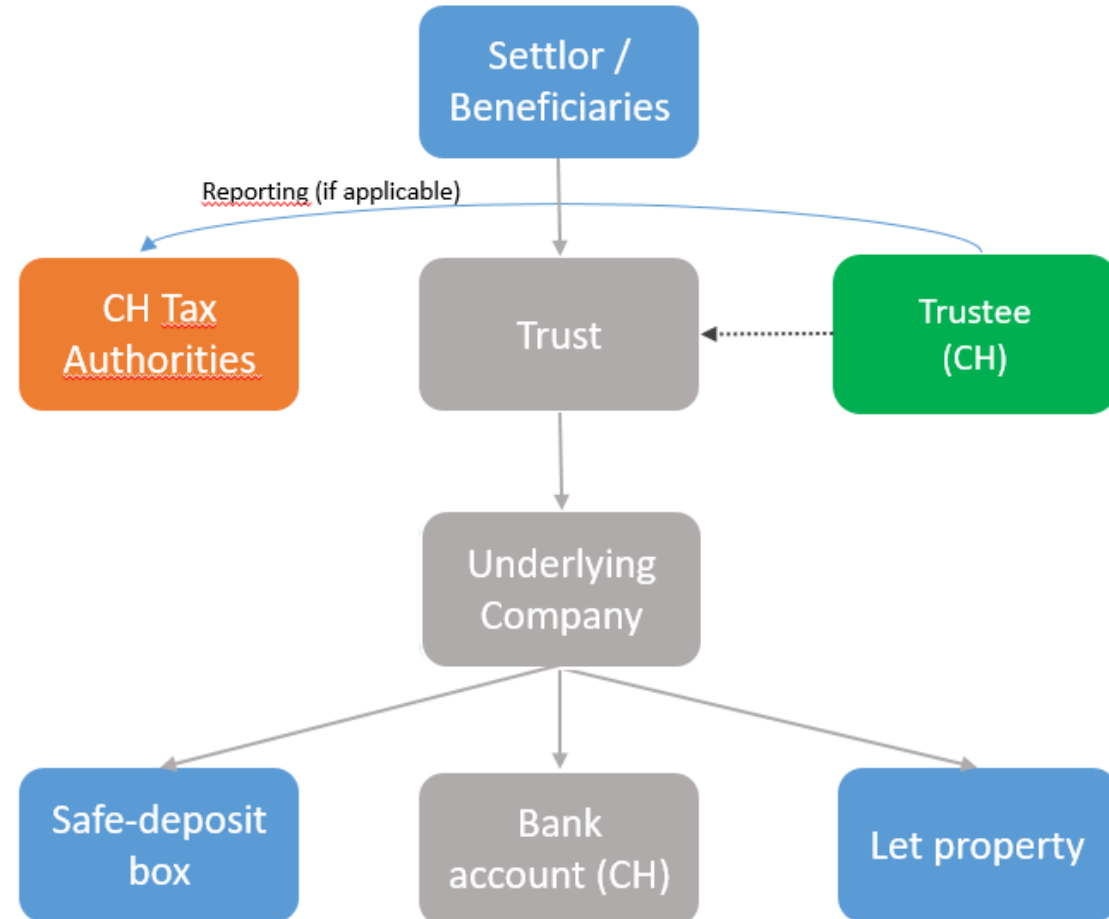
Type 1 – Financial Institution

If the income from the bank account is greater than income from the property:

- Trust with professional corporate trustee (FI)
- Trustee manages bank account of the UC
- Income mainly generated by the bank account
- From an «income test» or a «managed by test» perspective, the structure qualifies as FI
- Trustee is the Reporting FI
- Ultimate BO subject to due diligence and reporting by the Trustee with the total value of the structure (as from 2018)
- CRS agreement between Switzerland and country of residence of BO applies

Person reported:

- Settlor with the total value of the Trust
- Beneficiaries with the value of the payment/distribution



Financial Income Test - Holding ENF Active



GENEVA COMPLIANCE GROUP

HOLDING OF A NON-FINANCIAL GROUP WITH AN ACTIVE NFE STATUS PRINCIPLES			
To be qualified as holding of a non-financial group, with an Active NFE status, the two following criteria have to be met (§ 129 and seq. of the commentaries on Section VIII of the CRS):			
1/ The non-financial activities of the structure account for at least 80% of the trust's gross income; and			
2/ The entity does not belong to a financial group.			
A non-financial group is a group which is not a financial group (a contrario interpretation). A financial group is determined as follow:			
<ul style="list-style-type: none"> • The group has at least one financial institution; and • During the three-year period ending on December 31 prior to the most significant period (or during the life of the entity, whichever is less) meets at least one of the following criteria: <ul style="list-style-type: none"> o more than 25% of the Group's gross revenues are passive income; o more than 25% of the assets in NFE's possession are assets that generate or are intended to generate passive income; or o more than 5% of the group's gross income are attributable to group members who are considered FIs. 			
FINANCIAL INCOME TEST			
If Condition 1/ is equal to 0, please only complete Group's aggregate income over the past 3 years and Condition 2			
Group's aggregate income over the past 3 years :	100.00		
1/ Number of FI in the Group :	0		
		Amount <i>EUR, CHF, USD</i>	Percentage
2/ Financial income test	Group's financial income over the past 3 years	19.00	19.000%
<i>Financial income : no more than 20%</i>			
3/ Income from FI test	Group's income from FIs over the past 3 years	5.00	5.000%
<i>Income from financial entities : no more than 5%</i>			
4/ Passive income test	Group's passive income over the past 3 years	25.00	25.000%
<i>Group's passive income = no more than 25%</i>			
5/ Assets test	Percentage of assets generating passive income :		25.000%
<i>Assets generating passive income = no more than 25%</i>			
Status of Holding :			Holding ENF Active

Mapping



GENEVA COMPLIANCE GROUP

Account Holder						
B	C	D	E	F	G	H
Entity Jurisdiction*	Entity Type	Internal Contact Reference Number	Contact Type	Contact Residence Country	Reporting	Termination Date
Liechtenstein	Foundation	7272F4EA1A60321FC4F2A5FC60AA1ABD00019DB3	Account Holder	Belgium	2017	
Liechtenstein	Foundation	4C99DB1BCE3C5474683E0BE75772A7409C0C7286	Settlor	Italy	2017	
Liechtenstein	Foundation	A8D5C9B404D163A0916F19E0DC5B65716F8AC472	Settlor	Italy	2017	
British Virgin Islands	Corporation	8FA8AF53781D798B95F0FB7817C4554422E56A73	Account Holder	United Kingdom	2017	
British Virgin Islands	Corporation	EFDB6299295D82AA44A421781B7AAECB873FE14	Account Holder	United Kingdom	2017	
British Virgin Islands	Corporation	6C712B36553072A5BC9951F177B648D216B11270	Account Holder	Panama	N/A	
British Virgin Islands	Corporation	B08598E1CA0FF0FA61E47CC2878DD55371599BCA	Account Holder	Panama	N/A	
Liechtenstein	Foundation	CB6FE421D48467E9CB12052A7948A827519EE900	Account Holder	Switzerland	N/A	
British Virgin Islands	Corporation	E77FC175857CA71444A84D0FE3D4D377D9FA8554	Account Holder	Brazil	N/A	
British Virgin Islands	Corporation	C0CF911E1F7ABBEF817FAED32395C497BDBD9764	Account Holder	Brazil	N/A	
British Virgin Islands	Corporation	68ECB89B3ED417F9A93D2D34D296377847F95078	Account Holder	Brazil	N/A	
British Virgin Islands	Corporation	BFC800920BE028BB5A58DF7EC4E540D9234FA588	Account Holder	Brazil	N/A	
British Virgin Islands	Corporation	9FEFF9AC6C67FAB029788D078BA00B892A4DE15D	Account Holder	Indonesia	N/A	
British Virgin Islands	Corporation	7CE1A8D59FD43AFEE12FA9173A49CDA617C9E4B3	Account Holder	Indonesia	N/A	
British Virgin Islands	Corporation	546A62C6EC686194D93964EC5EE0853788000E5B	Account Holder	Indonesia	N/A	
British Virgin Islands	Corporation	20C096DCE86487126131BDD33E0D1009B573A032	Account Holder	Indonesia	N/A	
British Virgin Islands	Corporation	0C1F907D8C0493F007897D64650C12496C4CA2C8	Account Holder	Indonesia	N/A	
British Virgin Islands	Corporation	4C30687E9A632EF2725147EF8CE4E535CF41D5A5	Account Holder	Indonesia	N/A	
Liechtenstein	Foundation	BBF90447735BCE06B969F5184CD7C6A787B94CEC	Account Holder	Indonesia	N/A	
Liechtenstein	Foundation	0A5C3BA9D75A6FDC42B8B3D10EF151CC57B0D27A	Account Holder	Indonesia	N/A	
Liechtenstein	Foundation	7D8E29D7ED083E4B247202357594AF10594CCF5C	Settlor	Indonesia	N/A	
British Virgin Islands	Corporation	14F836023941BC7E130483BDF671212AA94C48C7	Account Holder	Brazil	N/A	
British Virgin Islands	Corporation	E21375F7A23652BFA6FA232A11D2DDE0745A6CDA	Account Holder	Brazil	N/A	
British Virgin Islands	Corporation	9ABECD1F3482EF89512897852769FD957B6801FE	Account Holder	Turks and Caicos Islands	N/A	
Liechtenstein	Foundation	1A2997CF8118531E33BFCDF53AA66EB8ABA35A30	Settlor	Monaco	N/A	
British Virgin Islands	Corporation	BA9226233079842CF04B079D84E8EEEC228A302B	Account Holder	Czech Republic	2017	
Liechtenstein	Foundation	845162415D07B517FDA3D11F2770E91BD3A14440	Settlor	Monaco	N/A	
British Virgin Islands	Corporation	435C830F527F0F499CCE62B3956998477679731E	Account Holder	Colombia	2017	
Panama	Corporation	68F392C80DD4BF9D25F0CFD41C76469D6608C73	Account Holder	Singapore	N/A	
Liechtenstein	Foundation	B70C058A904A5DC428602935B98088973871574D	Settlor	Singapore	N/A	
British Virgin Islands	Corporation	C39B31ACFF696E59D23EE3887EE3249C4F795849	Account Holder	Turkey	N/A	
Liechtenstein	Foundation	129F72D67CB81E82A97476B27A21050A5C7F7F90	Account Holder	France	2017	
Liechtenstein	Foundation	CC91B24F3AC4A86AB1CF2B187E166ACF79923284	Account Holder	Belgium	2017	
British Virgin Islands	Corporation	8F08A98576807767799D86E49FA6720AE0A475C3	Account Holder	null	N/A	
Liechtenstein	Foundation	C817CA99A90A9E3B0F989F997861D00F386DAC59	Settlor	null	N/A	
Liechtenstein	Foundation	B26CA87412B7175E3F5799250C0F72C500D8FBFF	Protector	Switzerland	N/A	

Step Plan



ANCE GROUP

Fichier Accueil Insérer Dessin Mise en page Formules Données Révision Affichage Développeur Dites-nous ce que vous voulez faire							
Step Plan							
A	B	C	D	E	F	G	H
1	CONFIDENTIAL						
2							
3	V						
4	Step Plan						
5							
6	Années CRS						
7	2017						
8	2018						
9	2019						
10	2020						
11							
12							
13							
14							
15							
16	1	Individus Pays partenaires 2017	Etablissement liste individus pays partenaires 2017	01.05.17	IT - Opérations	771	
17	1	Individus Pays partenaires 2017	Validation liste individus pays partenaires 2017	12.05.17	Compliance		
18	1	Individus Pays partenaires 2017	Envoi formulaire individus pays partenaires 2017	01.06.17	Fichier Central		
19	1	Individus Pays partenaires 2017	Relance retour formulaires individus pays partenaires 2017	30.07.17	RM		
20	1	Individus Pays partenaires 2017	Date limite retour formulaires individus pays partenaires 2017	31.08.17	N/A		
21	1	Individus Pays partenaires 2017	Etablissement liste entités et/ou CP pays partenaires 2018 sans formulaire	04.09.17	FC - Compliance		
22	1	Individus Pays partenaires 2017	Fin période revue de la plausibilité	30.09.17	Compliance		
23	1	Individus Pays partenaires 2017	Comptes individus pays partenaires 2017 sans formulaires : - Revue électronique	01.10.17	IT - Opérations		
24	1	Individus Pays partenaires 2017	Comptes individus pays partenaires 2017 sans formulaires : - Revue papier	01.10.17	RM - Compliance		
25	1	Individus Pays partenaires 2017	Comptes individus pays partenaires 2017 sans formulaires : - Envoi demande RM Inquiry au RM	01.11.17	Compliance		
26	1	Individus Pays partenaires 2017	Comptes individus pays partenaires 2017 sans formulaires : - Retour RM Inquiry au Compliance	30.11.17	RM		
27	1	Individus Pays partenaires 2017	Validation de la fin de revue des comptes individuels	15.12.17	Compliance		
28	1	Individus Pays partenaires 2017	Etablissement liste provisoire reporting individus 2017	31.12.17	IT - Opérations		
29	1	Individus Pays partenaires 2017	Validation listes reporting 2017 (incluant nouveaux comptes 2017)	12.01.18	Compliance		
30	1	Individus Pays partenaires 2017	Courrier individus reporting pays partenaires 2017	26.01.18	FC - RM		
31	1	Individus Pays partenaires 2017	Compilation données pour reporting individus pays partenaires 2017	01.05.18	IT - Opérations - RM		
32	1	Individus Pays partenaires 2017	Validation fichier et données reporting individus 2017	31.05.18	Compliance		
33	1	Individus Pays partenaires 2017	Reporting individus pays partenaires 2017	30.06.18	IT		
34							
35	2	Entités	Etablissement liste comptes entités > 250'000 au 31.12.2016	01.09.17	IT - Opérations	619	
36	2	Entités	Validation liste comptes entités > 250'000 au 31.12.2016	15.09.17	Compliance		

Our dedicated team for your CRS Project



GENEVA COMPLIANCE GROUP

UNE ÉQUIPE À VOTRE ÉCOUTE

**GUILLAUME
DE BOCCARD**

PARTNER

gdb@genevacompliance.com



**MICHEL
CHAUVET**

PARTNER

mc@genevacompliance.com

GENEVA COMPLIANCE GROUP SA

Rue de Candolle 12 – 1205 Genève