

# The Path to FATCA Compliance

FATCA  
Management  
Summary

FATCA  
solution of  
TONBELLER  
AG

FATCA-  
compliant  
for customer  
acceptance

FATCA-  
compliant  
for customer  
base check

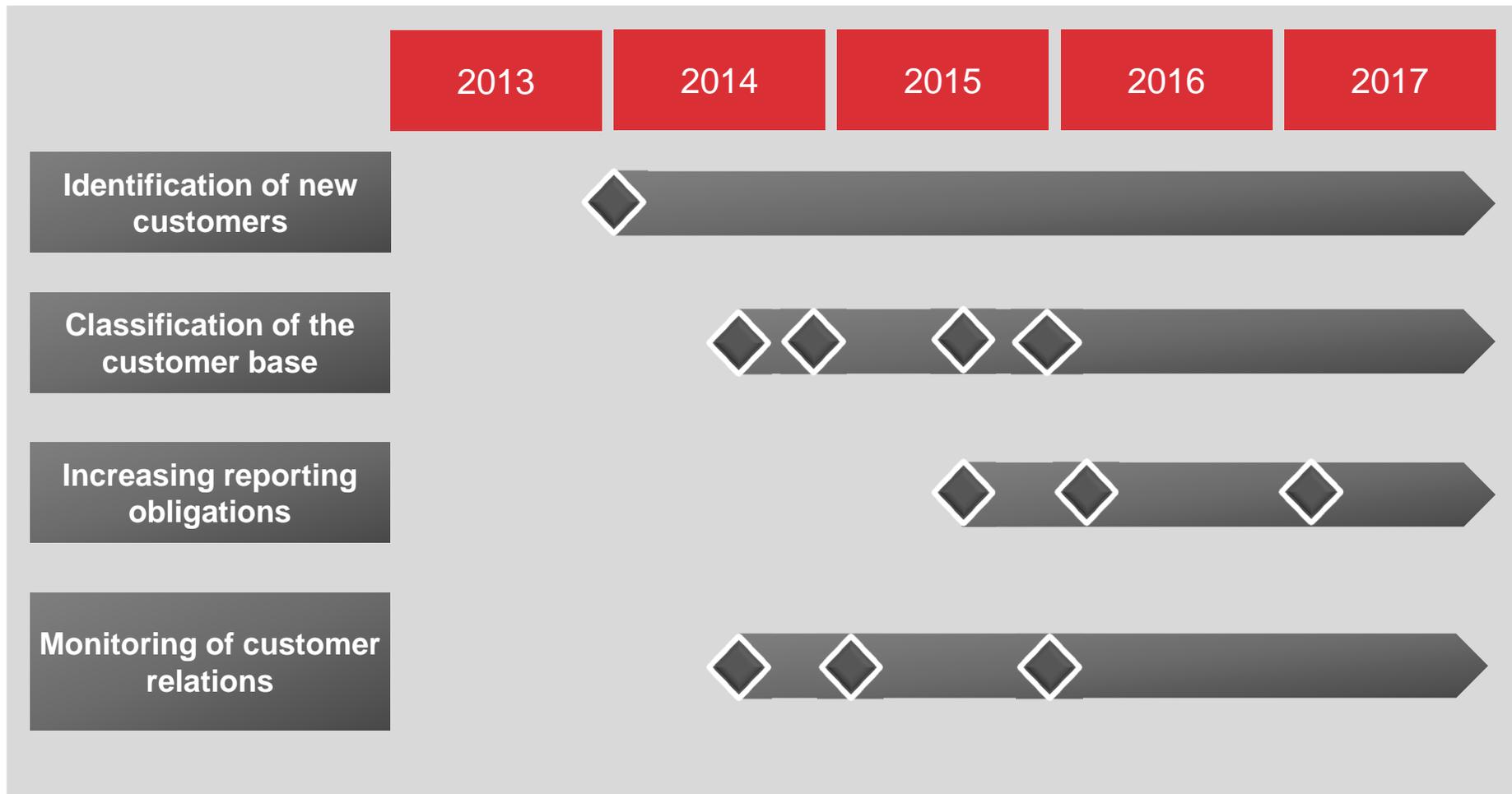
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# FATCA – Schedule

FATCA is implemented in several steps.



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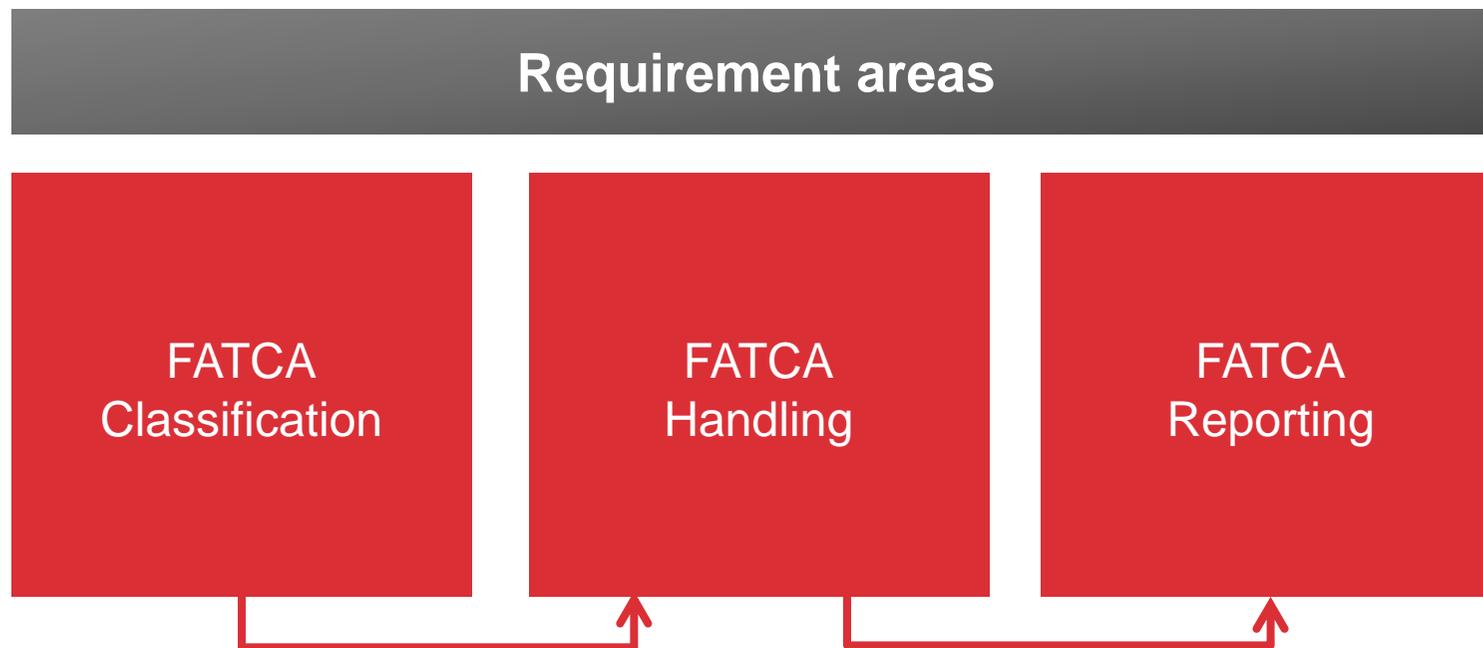
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# FATCA Requirements – Overview

Three requirement areas are involved in developing a FATCA solution scenario:



# FATCA Classification

The first requirement to comply with the statutory directives is FATCA classification.



# FATCA Handling

The second area includes the processing of transactions and how FATCA regulations are handled



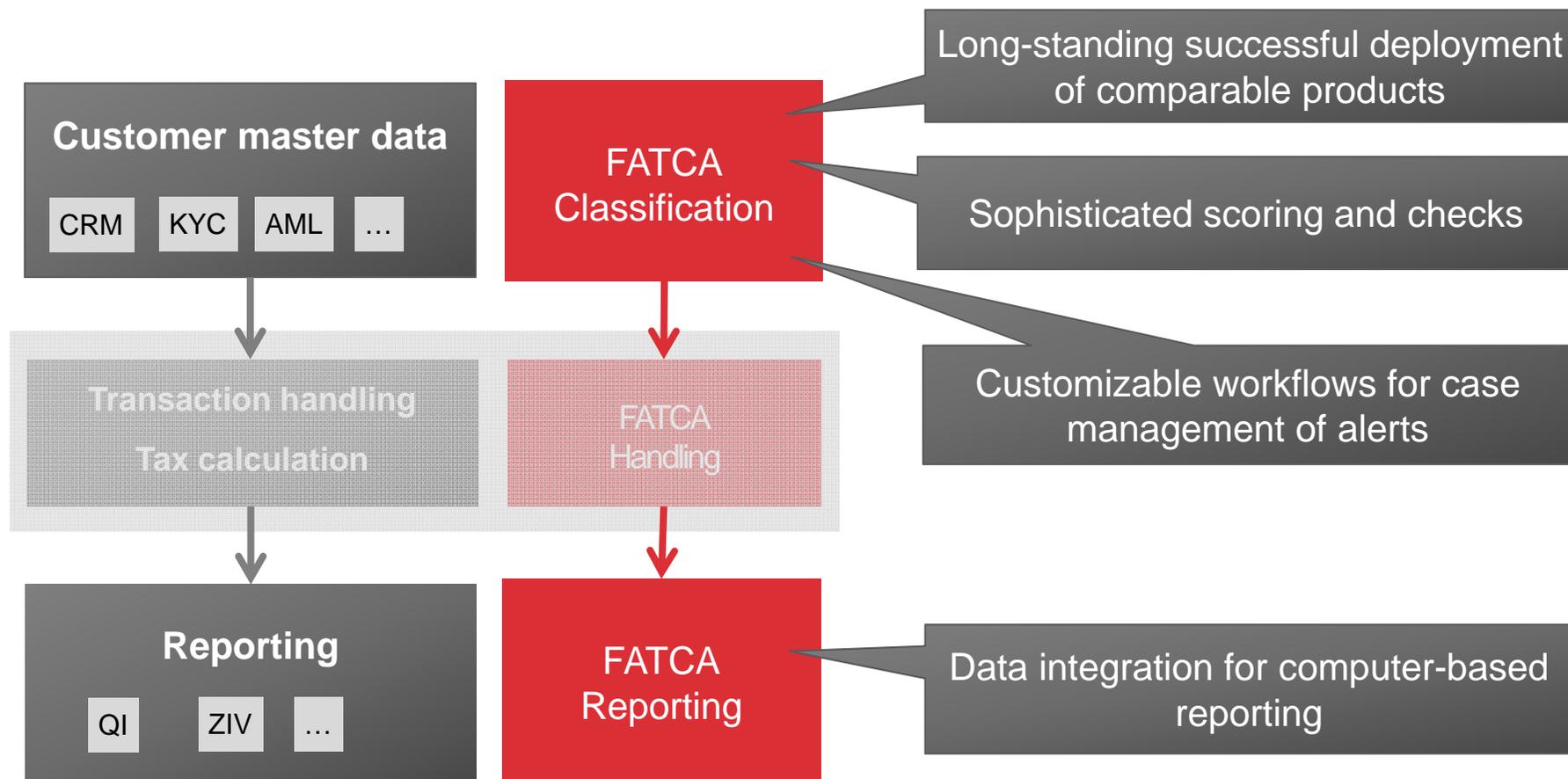
# FATCA Reporting

The third area must fulfill the requirements regarding the reporting to the IRS and national authorities.



# TONBELLER – Good Practice

Supporting two areas **FATCA classification** and **FATCA reporting**.



# Makes Sure You Are on the Right Track.

These features ensure FATCA compliance:

<b>Classification</b>	Identification and classification of relevant new and existing customers
<b>Check rules</b>	Integrated check rules for IRS scenarios
<b>Change of circumstances</b>	Detect changes in the customer's environment
<b>Workflow management</b>	Workflow management for document tracking of FATCA cases and completeness check
<b>Interfaces</b>	Data forwarding to third-party systems
<b>Reporting</b>	Reporting to IRS and national authorities

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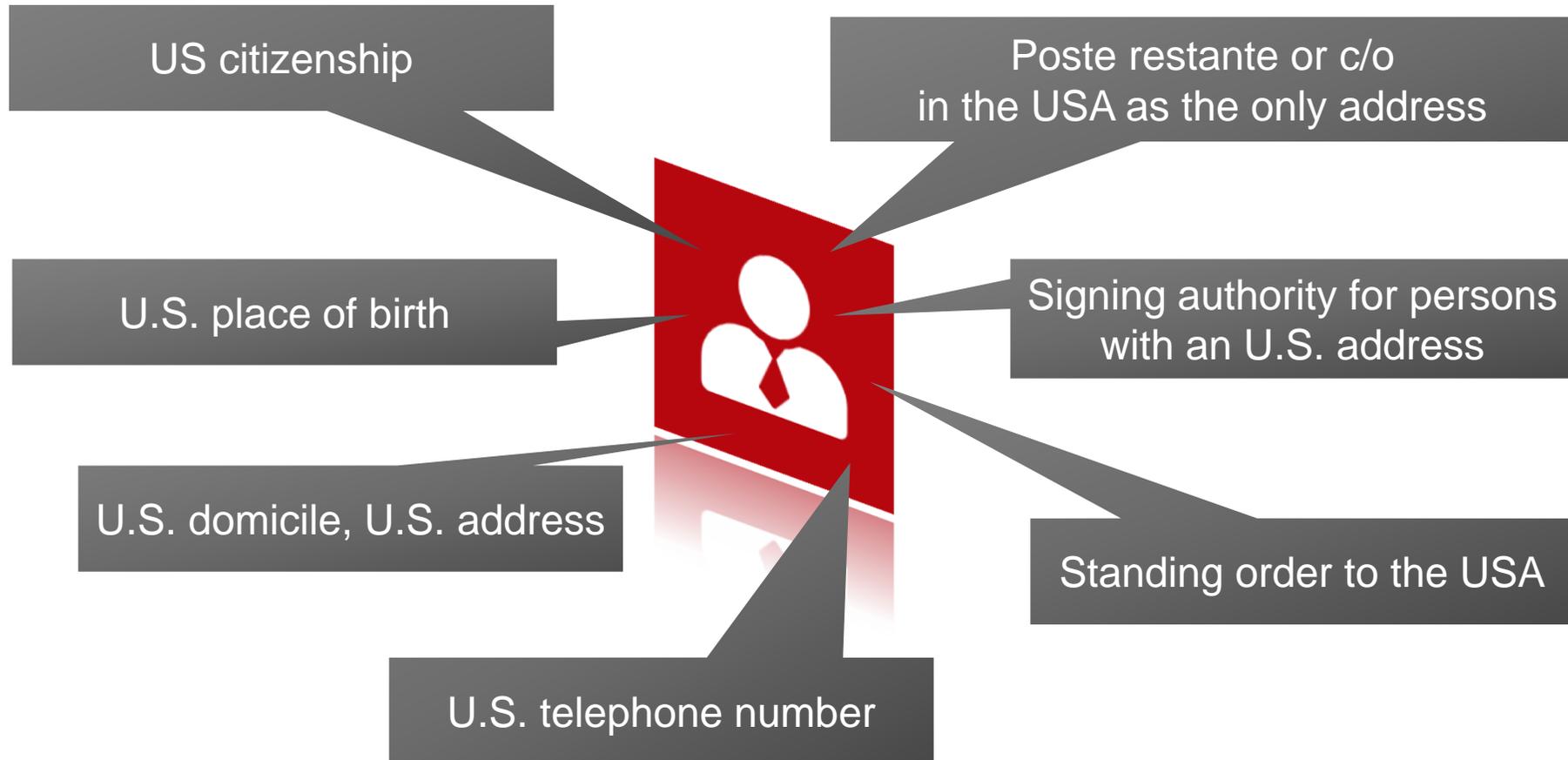
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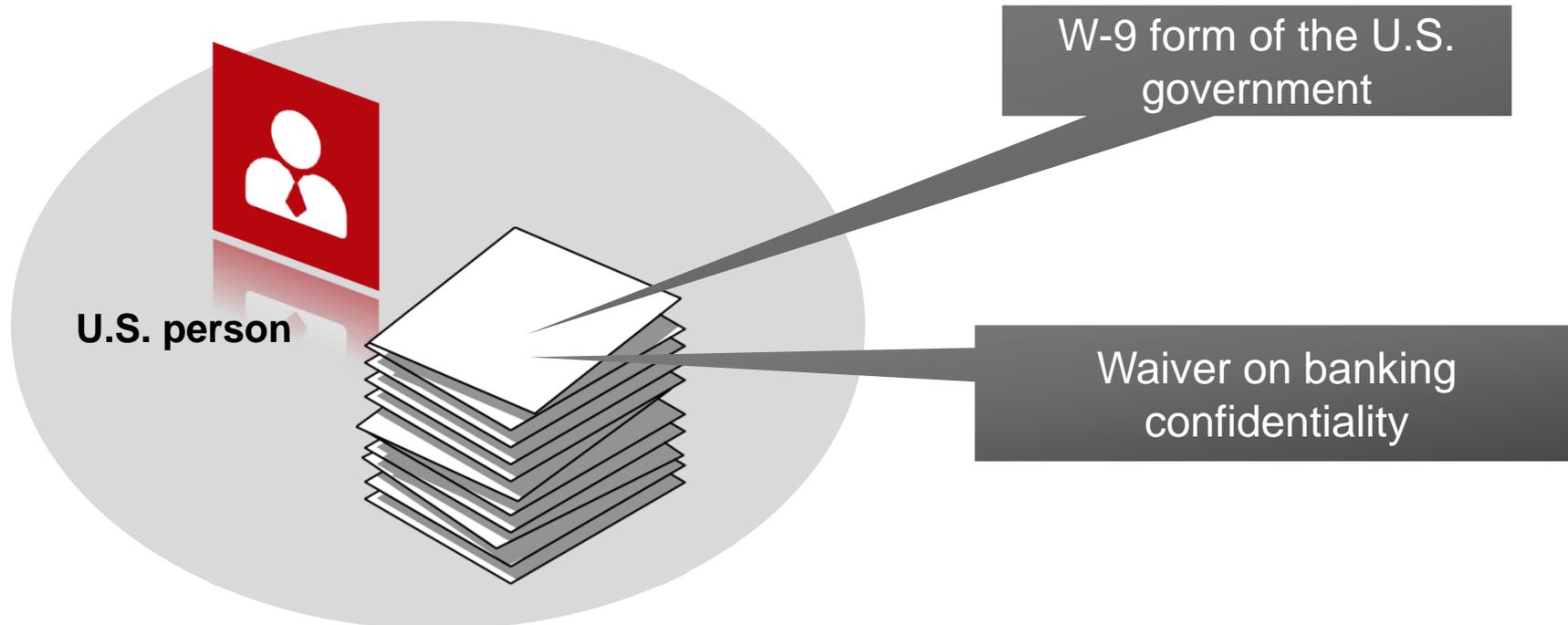
## Check new Customers for U.S. Scenarios

New customers must be categorized in accordance with the FATCA regulations and reported to the U.S. tax authority and other national authorities



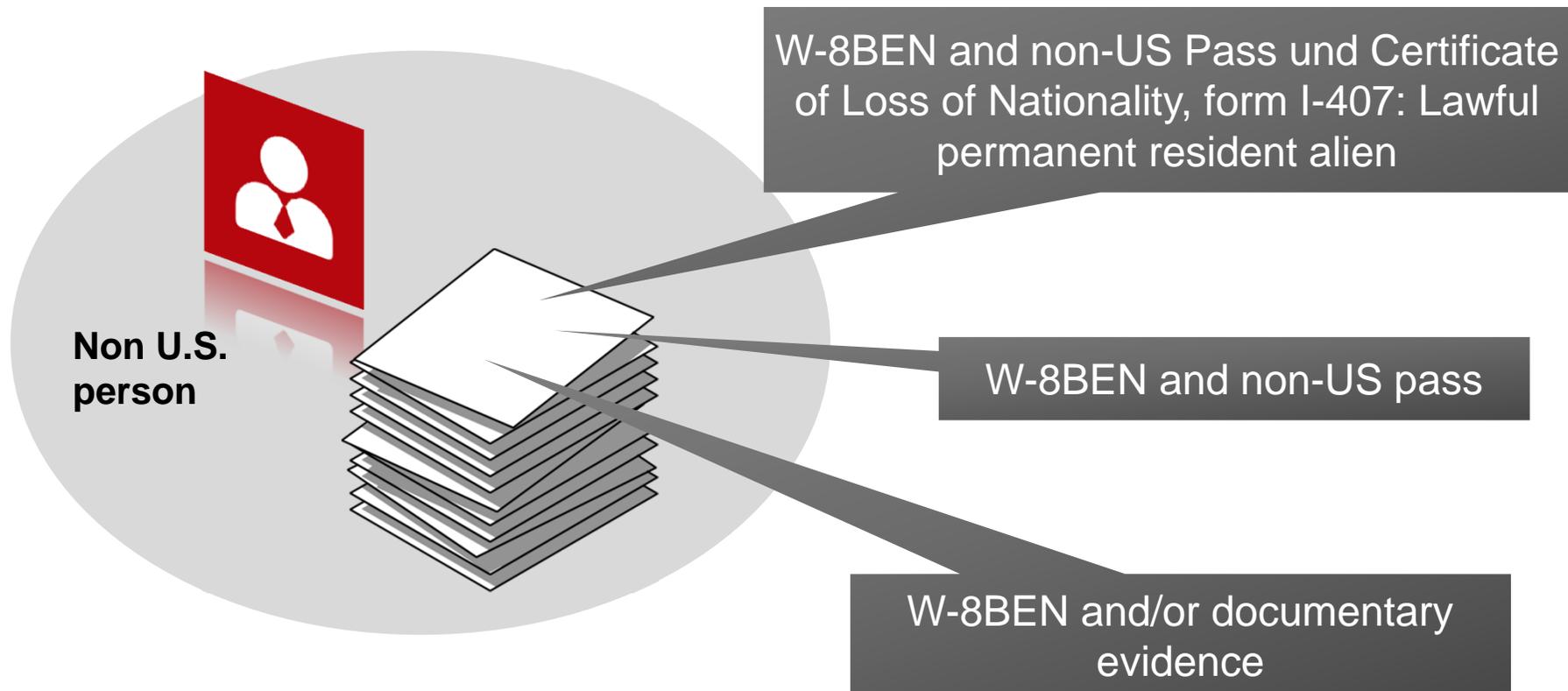
# Supply Mandatory Documentation

All new customers that the IRS check criteria apply to must provide evidence of their status as U.S. persons.



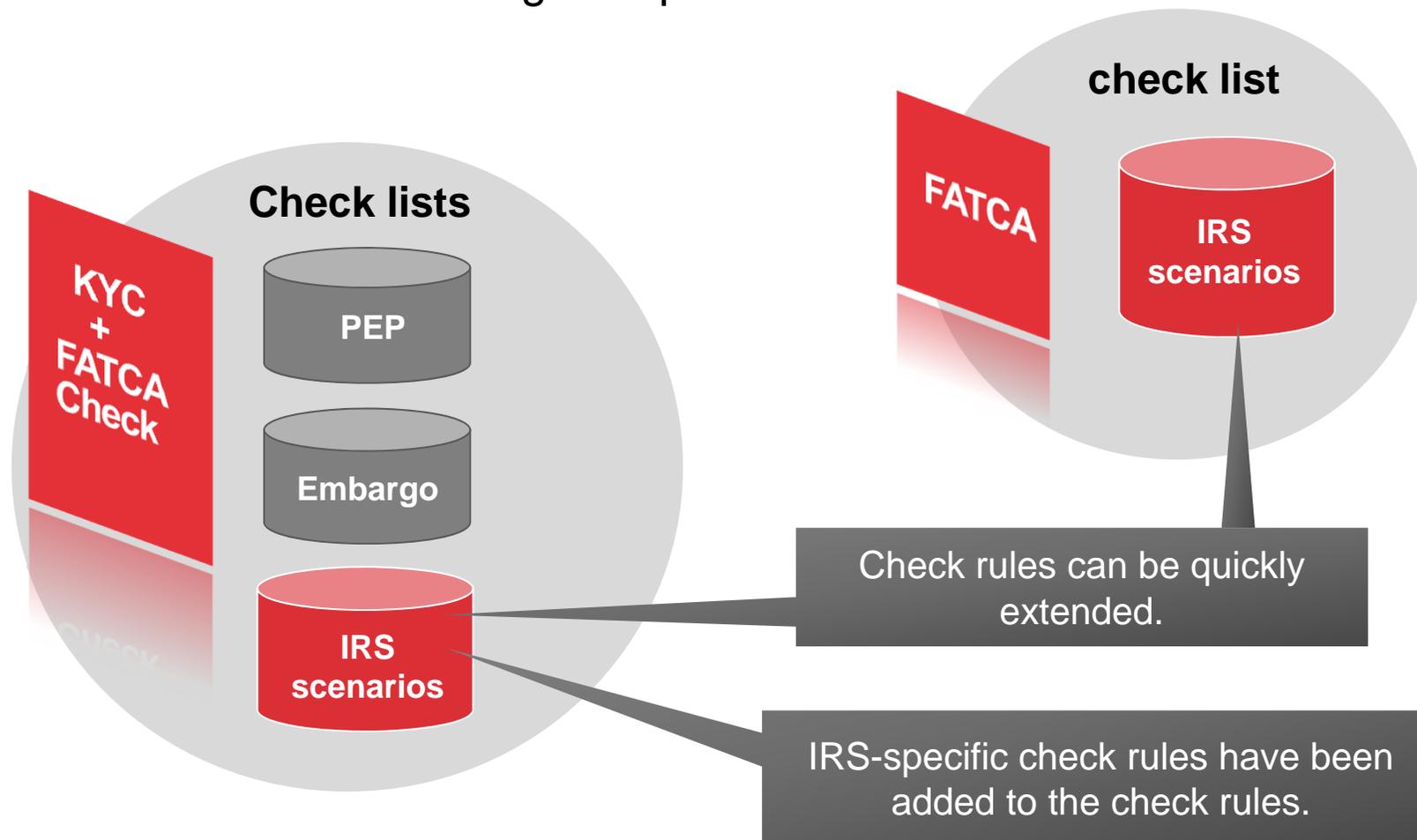
# Supply Mandatory Documentation

If there are FATCA-relevant scenario hits for persons who are no U.S. citizens other documents and forms are to be provided as evidence.



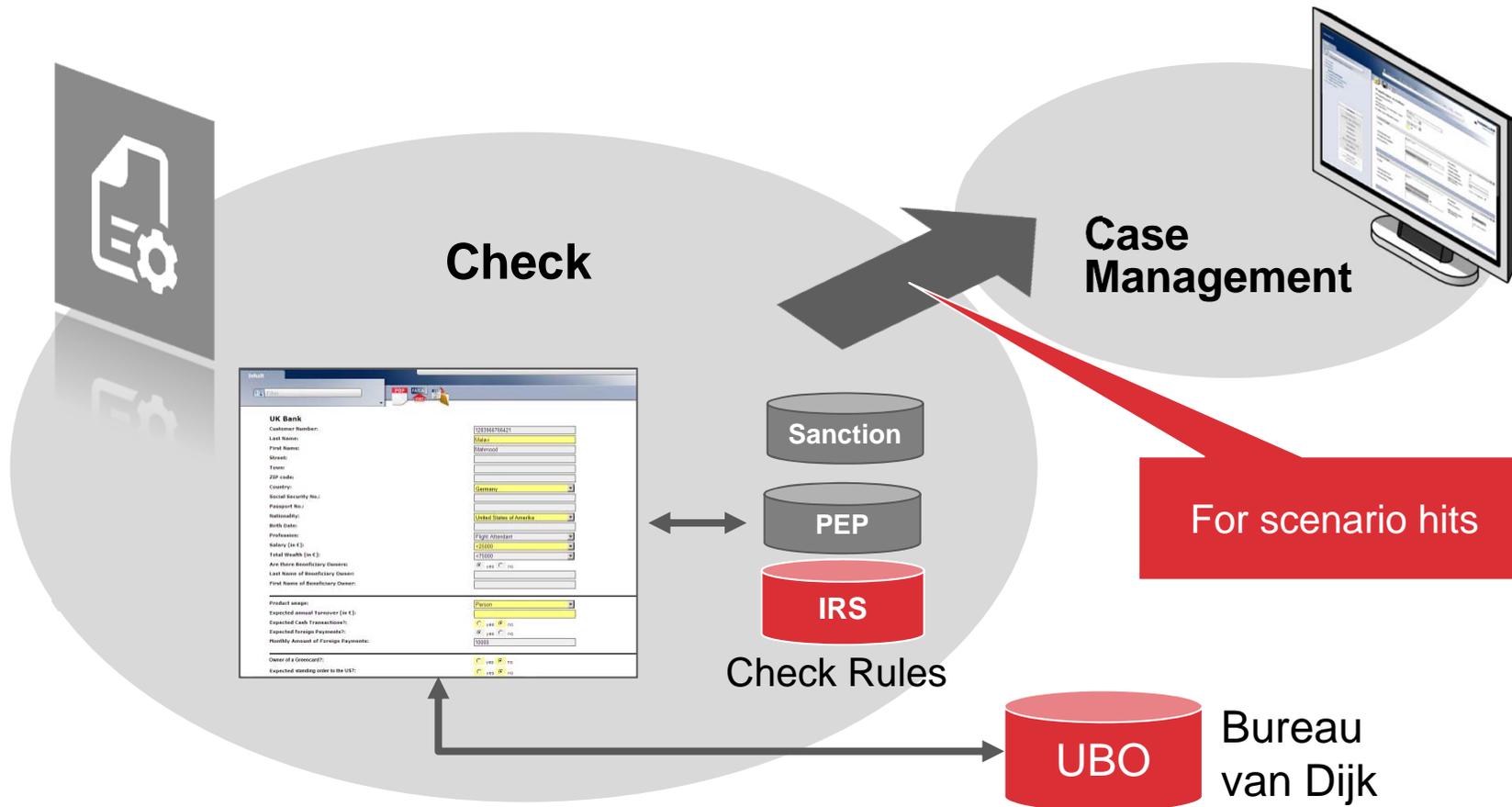
# FATCA Check Basis: IRS Check Scenarios

The IRS check criteria are part of the default rules.  
Integrated KYC functionality allows optional PEP-, Sanction- and UBO-check within one single step.



# FATCA Check Steps for Customer Acceptance

Once all information of the (new) customer has been entered it is automatically matched with the check rules.



# Input Forms

In our FATCA approach, customer acceptance is managed by computer-based input forms, so called questionnaires.

The screenshot displays the Siron@FATCA software interface. On the left, a navigation menu includes 'Contents', a search filter, and a list of actions: 'Start page', 'Customers', 'Questionnaires', 'Create', 'Edit', 'Delete', and 'Evaluations'. Below this is an 'Elements' panel with various form controls like Text, Numeric, Combo box, Option button, Check box, Date field, Country, Dividing line, File, Beneficial owners, and Collapse/expand elements. The main area shows a 'Create questionnaire' screen with a table of questions and a 'Text' editor. Overlaid on this are several FATCA KYC forms, including 'Know Your Customer (KYC) Profile Form - (Individual)' and 'Section B - Mandatory Checks'. A blue arrow points from the 'Create questionnaire' area to the forms, and a red arrow points from the 'Elements' panel to the forms. A red box at the bottom right contains the text: 'These questionnaires can be customized.'

# Consider FATCA-Relevant Questions

The questionnaire records all check-relevant data.

**UK Bank**

Customer Number: 1283966766421

Last Name: Malavi

First Name: Mahmood

Street:

Town:

ZIP code:

Country: Germany

Social Security No.:

Passport No.:

Nationality: United States of Amerika

Birth Date:

Profession: Flight Attendant

Salary [in €]: <25000

Total Wealth [in €]: <75000

Are there Beneficiary Owners:  yes  no

Last Name of Beneficiary Owner:

First Name of Beneficiary Owner:

---

Product usage: Person

Expected annual Turnover [in €]:

Expected Cash Transactions?:  yes  no

Expected foreign Payments?:  yes  no

Monthly Amount of Foreign Payments: 10000

---

Owner of a Greencard?:  yes  no

Expected standing order to the US?:  yes  no

Greencard holders

Nationality

Expected transactions, standing orders, etc.

## Result (new customer acceptance)

With FATCA, TONBELLER offers a solution that can be integrated easily with the existing account opening process.

### Resources

Maximize resource efficiency

### Cost

Minimize impact to the operating business and save expenses

### Compliance

Implement compliance requirements in a short period of time

# Requirements for the Existing Customer Base Check

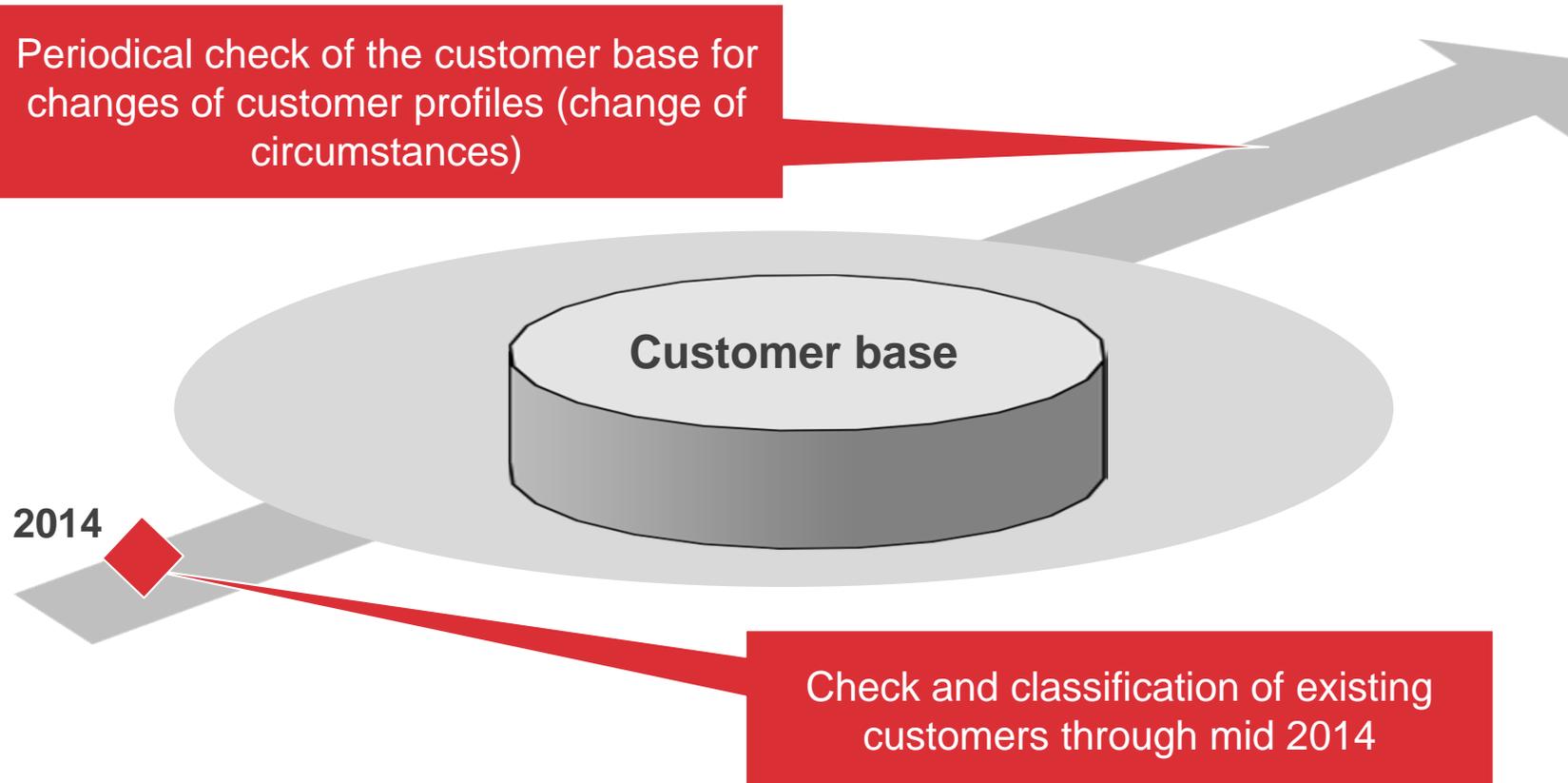
According to FATCA regulations, financial institutions are obliged to extend their current processes of identifying their existing customers.

Periodical check of the customer base for changes of customer profiles (change of circumstances)

2014

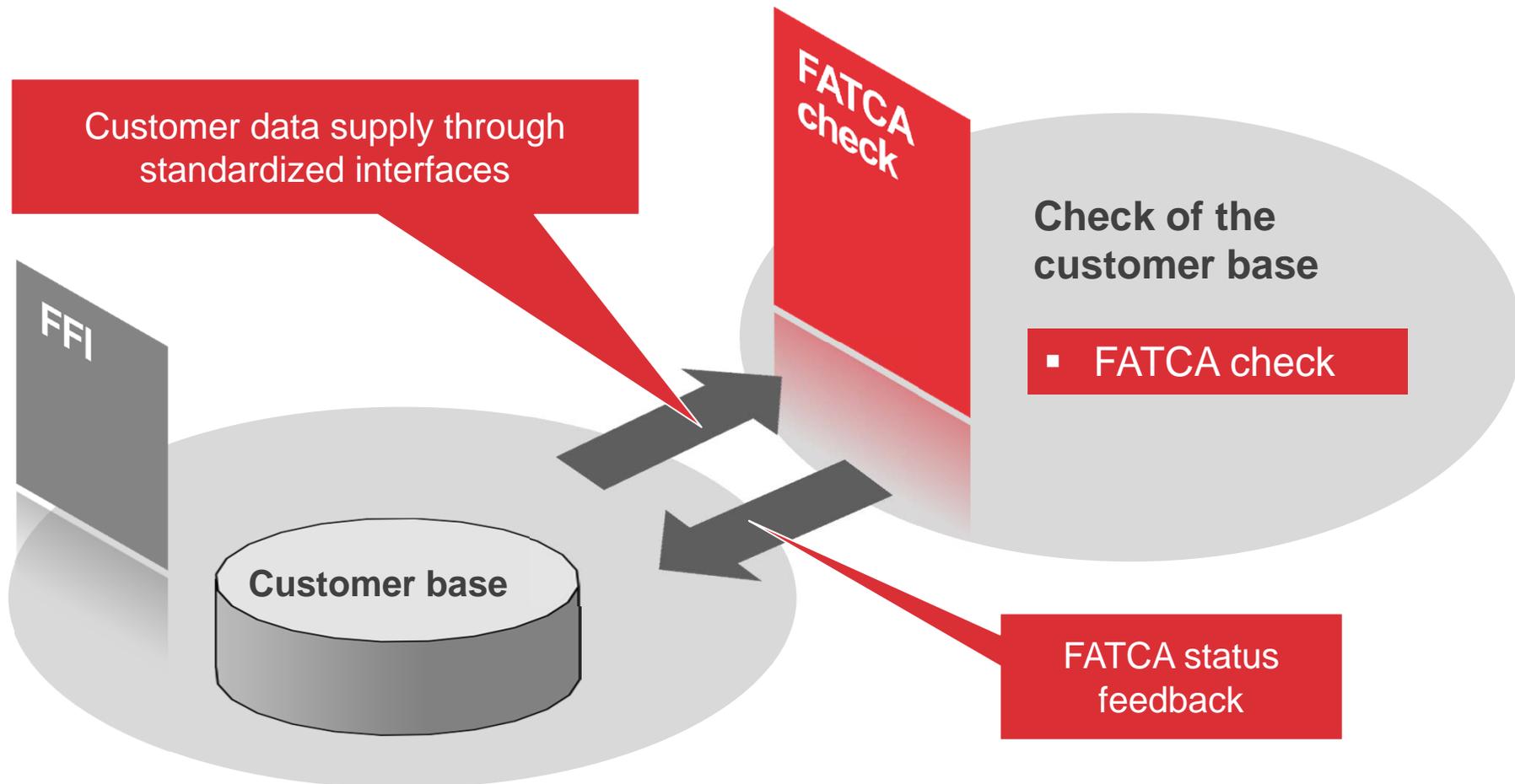
Customer base

Check and classification of existing customers through mid 2014



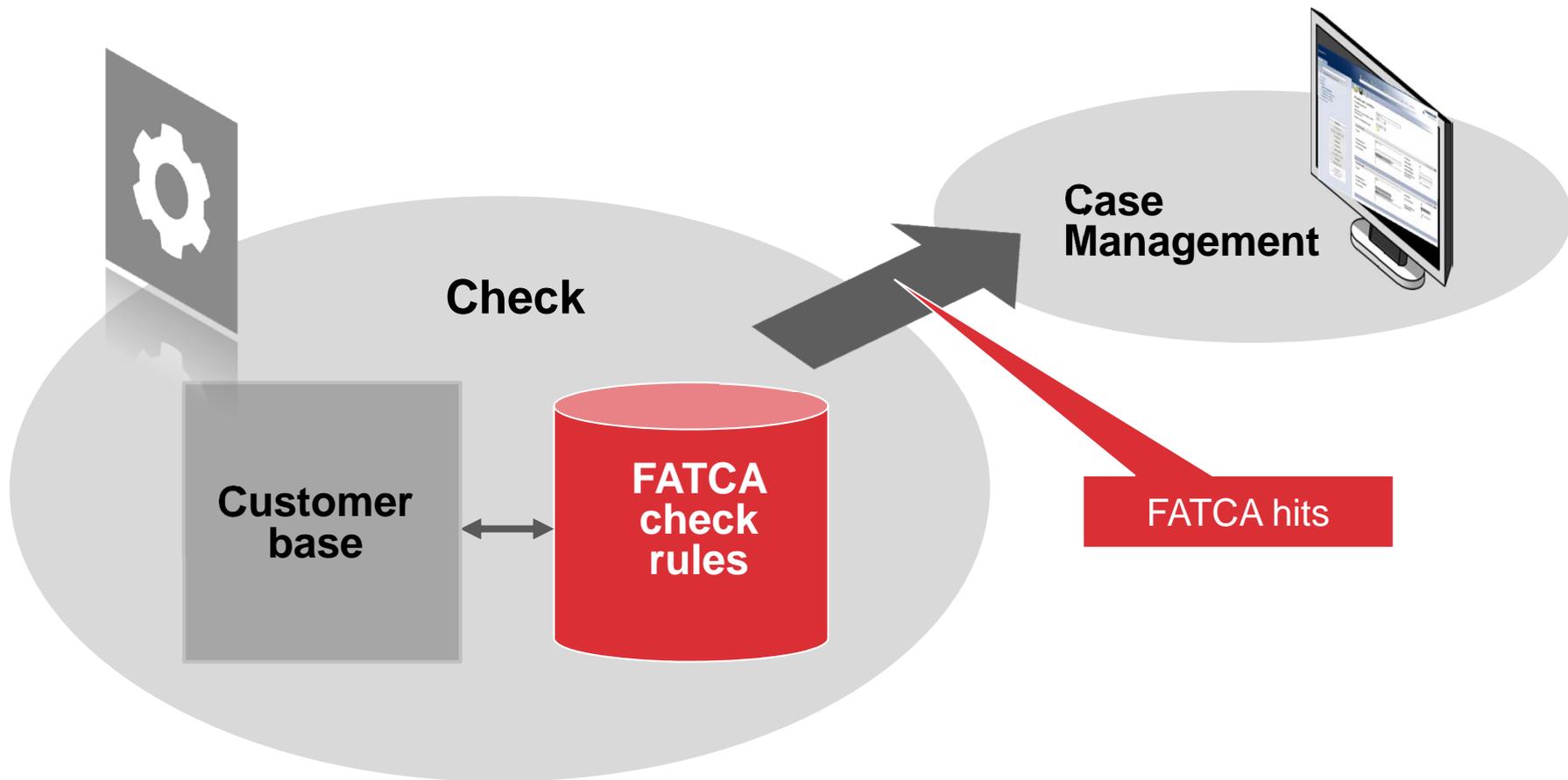
## FATCA as the Basis – Data Supply

The TONBELLER FATCA solution serves as a sound basis of the implementation for the FATCA requirements.



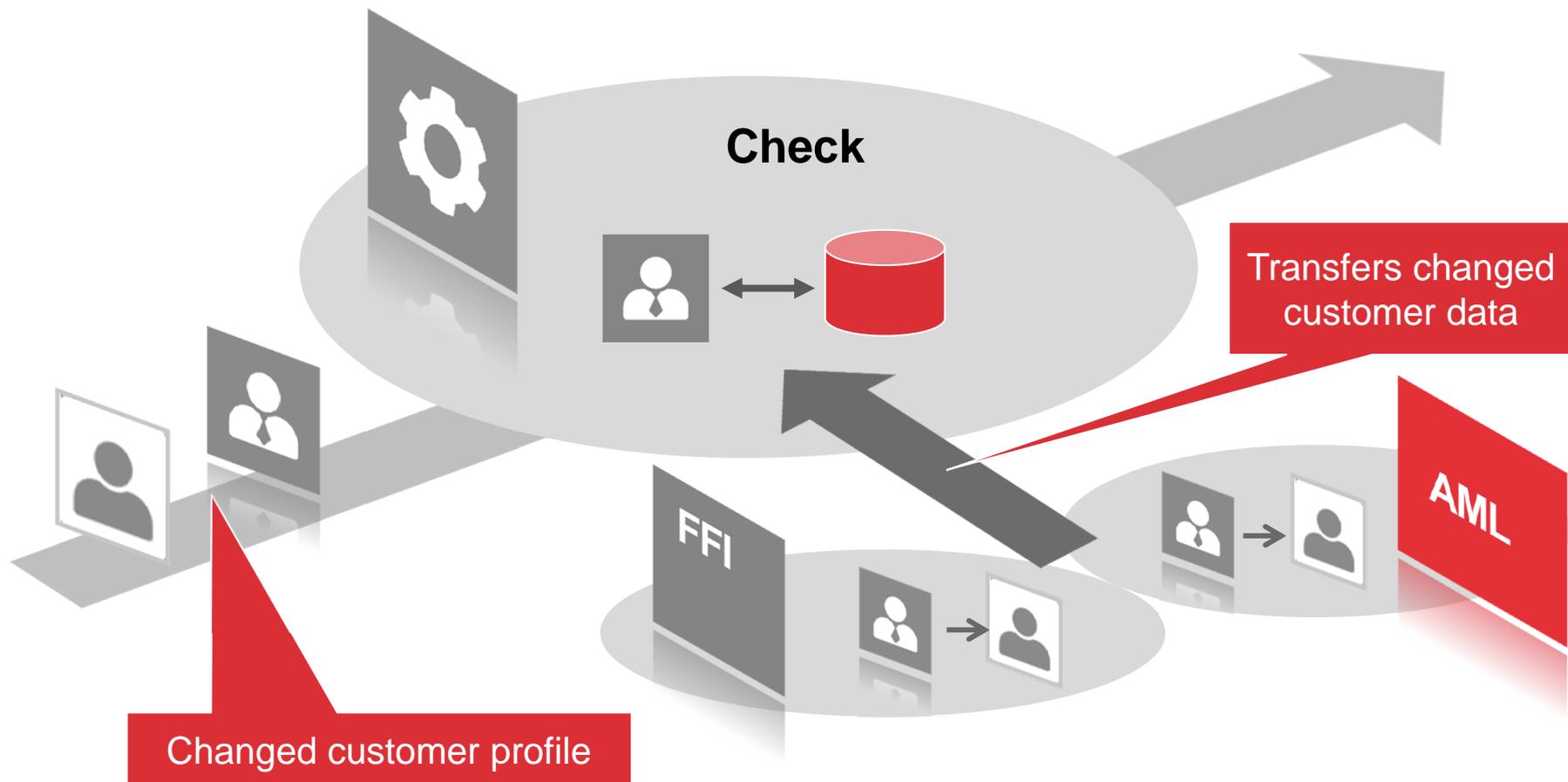
# FATCA Check of Existing Customers

The check classifies the customer data in FATCA-relevant and not FATCA-relevant customers according to the check rules.



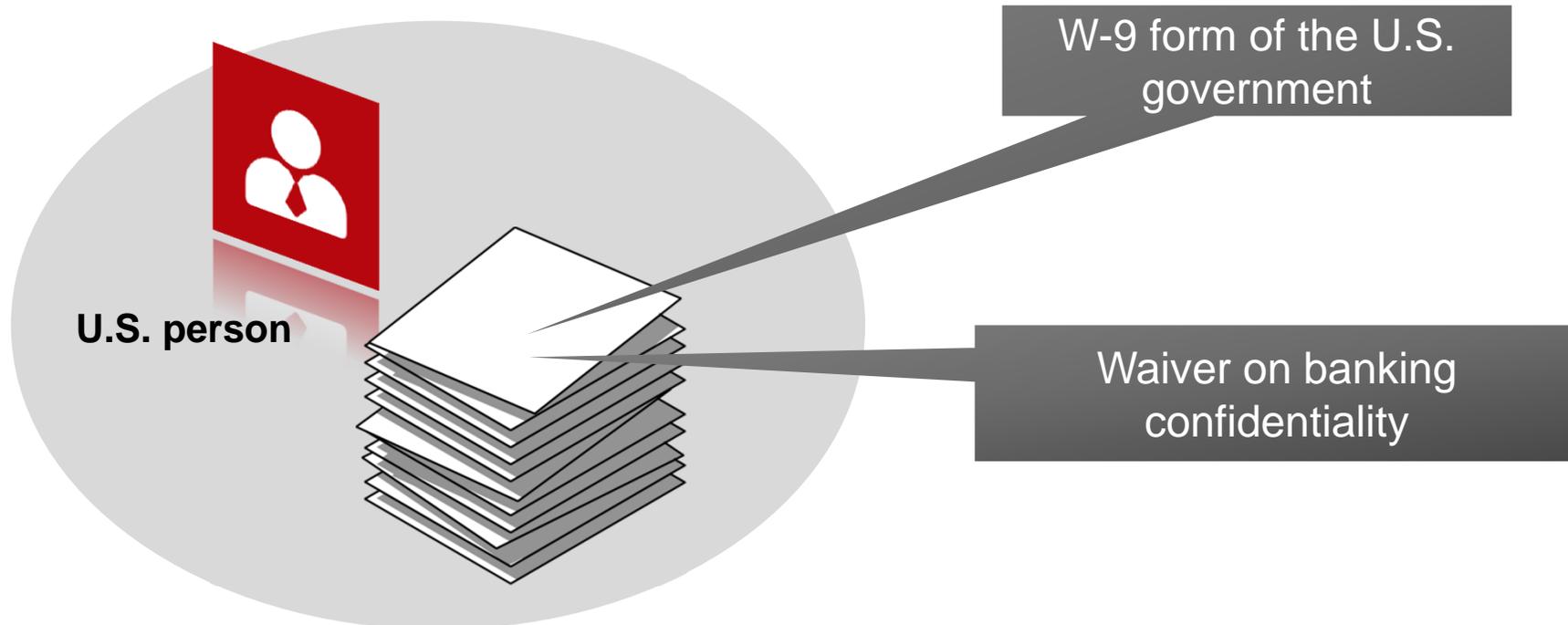
# Recognize Changes of the Customer Profile

Financial institutions must continually match natural and legal persons with FATCA criteria.



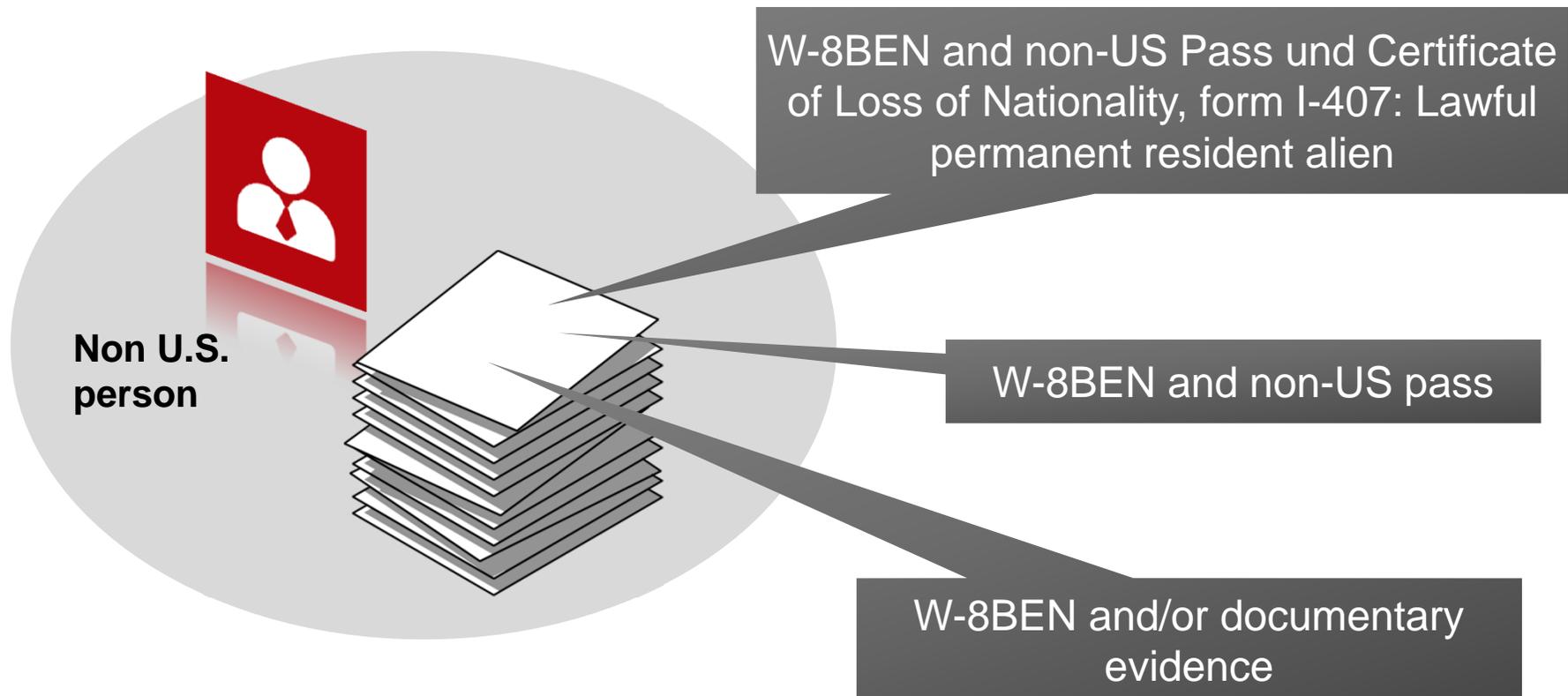
# Supply Mandatory Documentation

All new customers that the IRS check criteria apply to must provide evidence of their status as U.S. persons.



# Supply Mandatory Documentation

If there are FATCA-relevant scenario hits for persons who are no U.S. citizens other documents and forms are to be provided as evidence.



## Result (existing customer base)

Statutory FATCA requirements can be fulfilled at little cost.

<b>Expenditure</b>	Very low impact on operating business
<b>Sustainability</b>	Continual update of customer classification
<b>Integration</b>	Easy FATCA integration with existing system environments
<b>Extensibility</b>	Fast check rule adjustment

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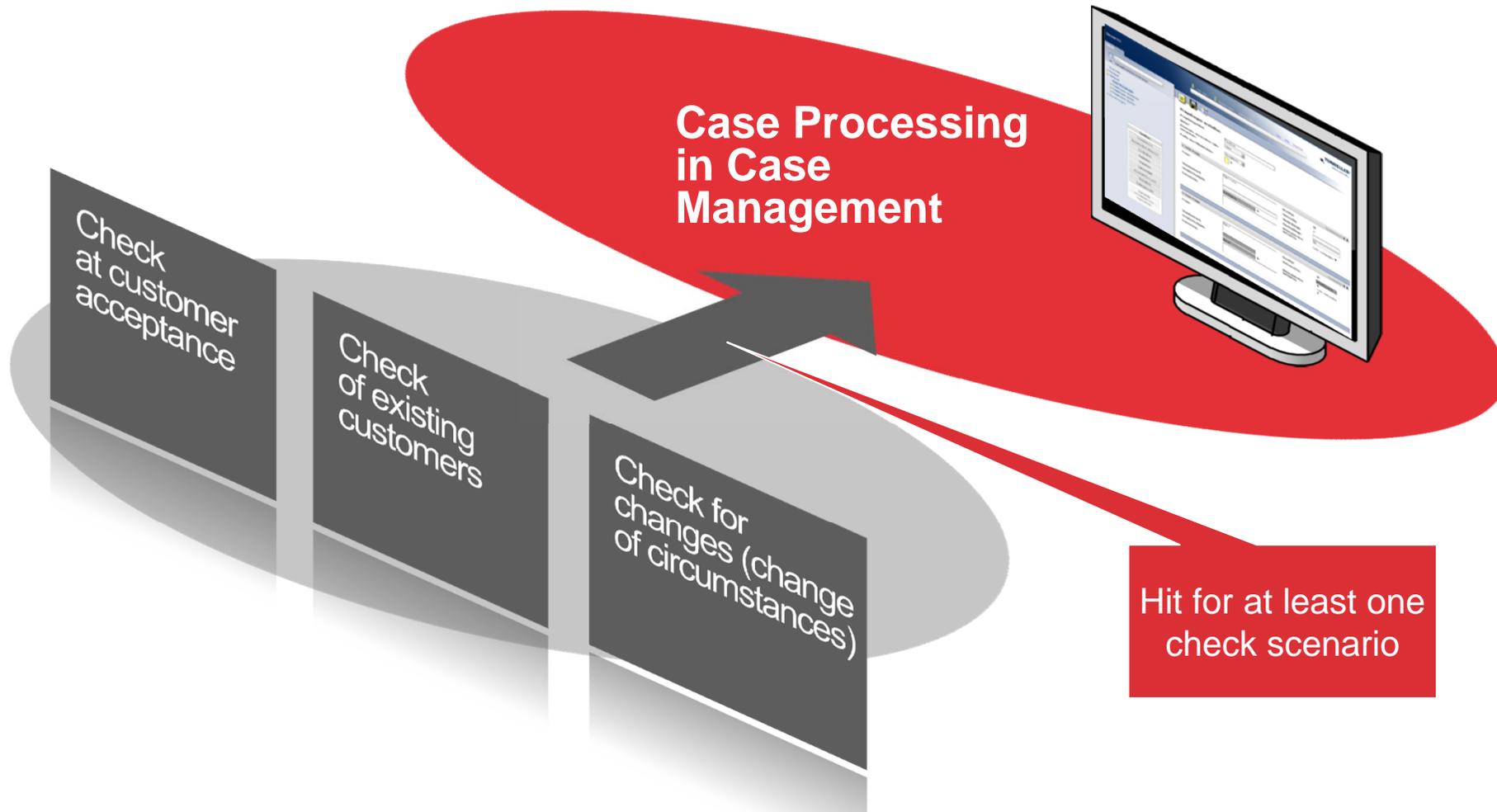
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# Case Processing in Case Management

All natural and legal persons with FATCA hits are forwarded to Case Management.



# Relevant Information at a Glance

Case Management shows all relevant information for FATCA hits.



# Security Through Integrated Document Tracking

Integrated document tracking is used to monitor the deadlines and thus enables an escalation management.

The screenshot shows the Siron@ FATCA web application interface. The top navigation bar includes 'Users: Demo', 'Client: 0001', and 'Print', 'About', 'Help', 'Log off' links. The main content area is divided into several sections:

- Kunden Daten:** Customer information for John Smith, including address (Kepler Str. 55, 55120 Mainz), phone (+49 6131 1234567), and nationality (USA).
- Quick Reports:** Summary statistics such as 'Transaktionen: 265', 'Volumen in EUR: 23.654,235', and 'Volumen (FATCA) in USD: 4.225,932'.
- Status:** Shows 'Status des Falles: In Prüfung (Fall 12352164)' and 'FATCA Status: Compliant'.
- Ergebnisse des Scoring vom 23.08.2012:** A list of alerts, including 'Aggregierter Kontosaldo > 60.000,00 €', 'Dauerauftrag an eine US-Adresse', and 'Geburtsort liegt in den Staaten'.
- Dokumenten:** A table showing document validity for 'Waiver', 'W-9', and 'Dokument 1'.
- Wiedervorlage:** A section for document resubmission with a date field set to '01.11.2012' and an 'Anlegen' button.
- Notizen:** A list of notes, including 'Waiver eingereicht', 'Kunde informiert (Kunde scheint Kooperationszwecke zu verfolgen)', and 'Kunde nicht erreichbar'.
- Kontostatistik:** A table showing account statistics for 'CA / 5003001 / 0 / EUR' and 'CA / 5004201 / 0 / USD' across months (Jul 12, Aug 12).

Four red callout boxes highlight specific features:

- Top Left:** 'The person's master data are always at hand.' (points to the 'Kunden Daten' section)
- Bottom Left:** 'The FATCA status is shown and updated depending on the deadlines.' (points to the 'Status' section)
- Right Side:** 'Resubmissions can be specified for individual documents.' (points to the 'Wiedervorlage' section)
- Bottom Right:** 'Document validity is monitored.' (points to the 'Dokumenten' table)

# Status-Type Related Workflow

FATCA solution provides a workflow management for each status type.

The screenshot displays the Siron@ FATCA web application interface. At the top, it shows the user 'Demo' and client '0001'. The main content area is divided into several sections:

- Kunden Daten:** Customer information including ID (125648), name (John Smith), address (Kepler Str., 55 55120 Mainz), and phone number (+49 6131 1234567).
- Ergebnisse des Scoring vom 23.08.2012:** A list of three scoring items: 1. Aggregierter Kontosaldo > 60.000,00 €, 3. Dauerantrag an eine US-Adresse, and 7. Geburtsort liegt in den Staaten.
- Dokumenten:** A list of documents including Waiver (Gültig), W-9 (Fehlt), and Dokument 1 (Gültig).
- Workflow:** A table showing workflow steps and their status. The steps are 'Fall anlegen', 'Rückfragen beim Kundenbetreuer', and 'Rückfragen beim Kunden', all with a status of '✓'.
- Notizen:** A list of notes including 'Waiver eingereicht', 'Kunde informiert', and 'Kunde nicht erreichbar', each with a red 'X' icon.
- Kontostatistik:** A table showing account statistics for two accounts (CA / 5003001 / 0 / EUR and CA / 5004201 / 0 / USD) across months (Jul 12 and Aug 12), with columns for Summe Umsätze EUR, Summe Umsätze (FATCA) EUR, and Summe Umsätze (FATCA) USD.

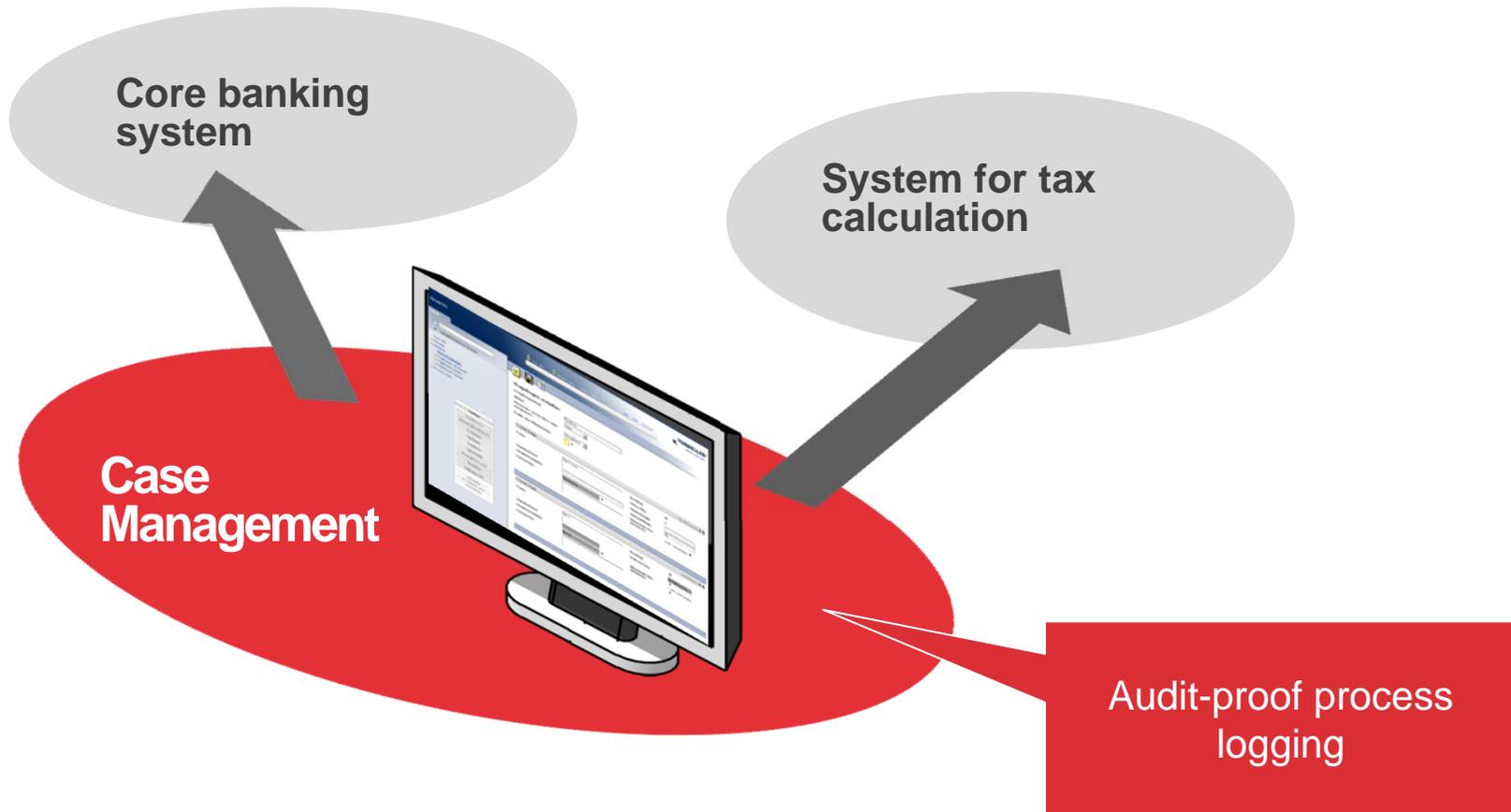
Correct case description is ensured

The documentation is checked according to the customer type

The editing status is documented

# Automatic Data Forwarding

Case processing is concluded by the specialized department's assignment of the FATCA status.



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## Company Profile

- Founded in 1971
- Privately owned by Senior Management Team
- > 1.000 customers
- > 50 countries
- > 100 employees
- Focus on Governance, Risk and Compliance

