

Translation from English  
*original Finnish/Swedish memorandum*  
*has Record Number A191/200/2016*

# **CRS and DAC2 annual information returns**

Technical instructions

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# 1 CRS AND DAC2 RETURNS – TECHNICAL INSTRUCTIONS

Separate "FATCA" return forms are in use for complying with the provisions of §17 a of Assessment Procedure Act concerning account holders in The CRS and DAC2 return filing is for giving the Tax Administration details on the existence of reportable financial accounts as required by the provisions of Sections 17 b and c of Assessment Procedure Act (1558/1995) and the Tax Administration's official decision (no A35/200/2016) regarding annual information returns. the U.S.A. and the FATCA rules. The details given on a FATCA return must not be repeated on the CRS and DAC2 filings discussed in this memorandum.

The technical instructions regarding the annual information return are based on the *Common Reporting Standard* guidance by the OECD and the *AEOI DAC2 – Technical Specifications* issued by the Commission of the European Union.

Filers must comply with the Tax Administration's guidance on how the provisions of Sections 17 b, c and d of Assessment Procedure Act must be applied on CRS and DAC2 reporting.

This memorandum supplements the existing reporting guidance. It gives Reporting Financial Institutions (= filers) further instructions for using the CRS and DAC2 filing scheme that the Tax Administration has published, discussing the application of the scheme from a technical perspective.

The CRS and DAC2 return consists of the following main structures, listed in the proper order below:

- MessageSpec, containing the annual return and the Reporting Financial Institution's (= filer's) name and contact details (identifying the financial institution concerned by the reporting requirement).
- ReportingFI, containing the reportable accounting data of the Reporting Financial Institution.
- ReportingGroup, with the AccountReport structure. The quantity of AccountReport structures may vary ( from 0 to 'n' ). Each AccountReport is expected to contain data on a reportable account and its holder.

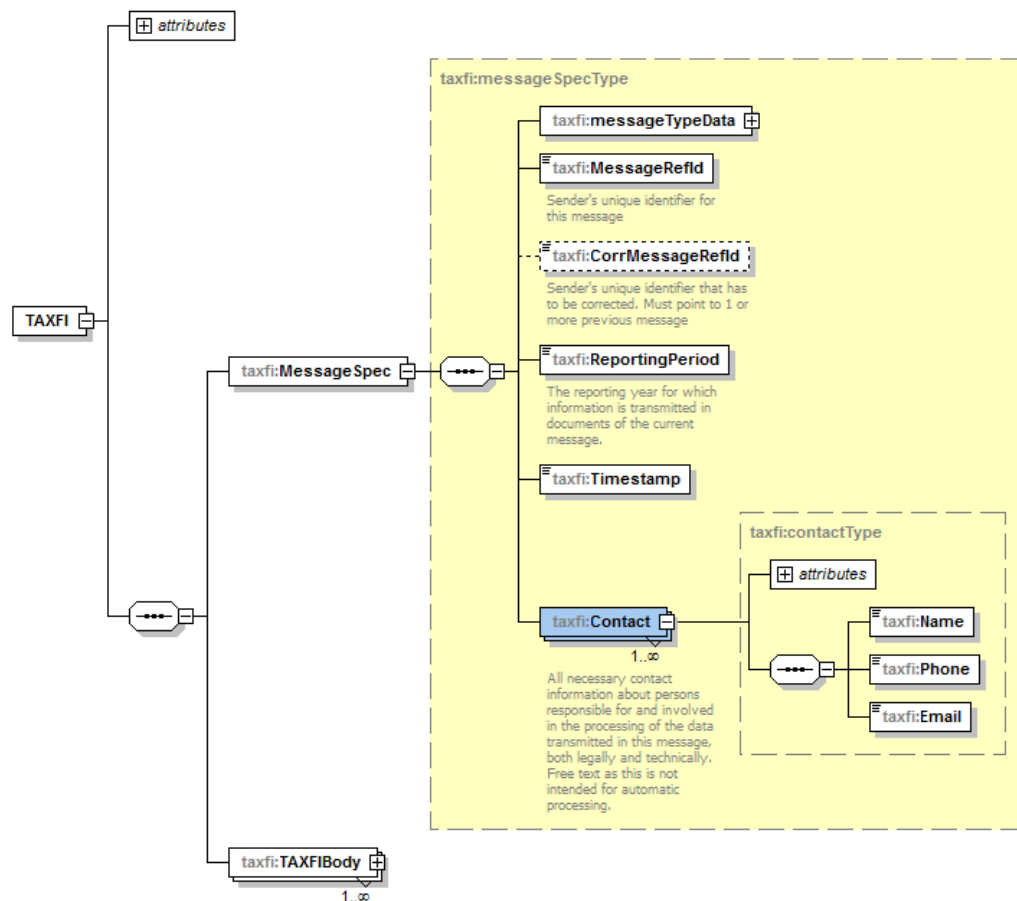
This memorandum is enclosed with XML documents serving as examples, fulfilling the mandatory requirements set out by the Tax Administration.

This memorandum is to be applied from 17 December 2018 in all CRS and DAC2 returns.

## 1.1 How to read this memorandum

The document is primarily for people who are in charge of the production of CRS and DAC2 returns. Elements have an entry in their lower right-hand corner indicating how many times the element can be repeated: if it is "0...∞", it means up to 'n' times (or not at all). If it is "1...∞", it means the element may occur once or up to 'n' times (and occurs at least once).

Elements inside a solid frame are mandatory. A dotted line indicates elements to be included on a voluntary basis. However, although the scheme treats a number of elements as voluntary, some of them are mandatory. The checking process on [www.ilmoitin.fi](http://www.ilmoitin.fi) requires that they are included because it checks their data content.



## 2 THE ILMOITIN.FI e-SERVICE

To e-file a CRS and DAC2 annual information return you must log on to [www.ilmoitin.fi](http://www.ilmoitin.fi). User interfaces are available as a browser-based version and as a Web Services interface. You may either run the Ilmoitin.fi eService in a test environment on <https://testi.ilmoitin.fi> – or log on to its live version on [www.ilmoitin.fi](http://www.ilmoitin.fi). Send e-mail to [tamo.tk@vero.fi](mailto:tamo.tk@vero.fi) to ask for the addresses of the WebServices interfaces.

To send files you must have a Katso User ID and Password. Visit the separate Katso Management Interface to set up a Katso ID for yourself (and to manage its delegations and authorizations):

- Katso live: <https://yritys.tunnistus.fi>
- Katso test website: <https://htesti.katso.tunnistus.fi>

For instructions and further guidance, visit the Katso websites listed above. For purposes of Katso testing, dummy identity codes are available (Business IDs and personal identity codes). To ask for them, send e-mail to [jl.katso.palveluntestaus@vero.fi](mailto:jl.katso.palveluntestaus@vero.fi).

Submittal of annual information returns is permitted for Katso users who hold at least one of the following Katso Roles: Master User, Parallel Master User or Annual Information Return Filer. Two variants are in use: sign-in by OTP (one-time passwords) or by PWD (user IDs and passwords). If you are a Katso user, it is enough if you have at least one of the Katso Roles listed above.

## 2.1 Technical requirements for the files to be submitted

Encoding is UTF-8. For reasons of compatibility, you must use the ISO8859-1 character set where characters are encoded as per UTF-8. This also means that characters of the Cyrillic alphabet are not allowed. No Byte Order Mark (BOM) is allowed. Ilmoitin.fi runs a check to ensure that the character set is correct.

The following special characters must be converted into the following formats:

Character	Description	Required format
&	<i>ampersand</i>	<i>must be presented as &amp;amp;</i>
<	<i>smaller than</i>	<i>must be presented as &amp;lt;</i>

Table 1. Presentation of special characters in the data.

Additional requirements are shown below.

Char.	Description	Required format
>	<i>greater than</i>	<i>recommend as &amp;gt; this is not mandatory but is good practice</i>
'	<i>apostrophe</i>	<i>&amp;apos; this is not mandatory, is good practice</i>
"	<i>quotation</i>	<i>&amp;quot; this is not mandatory, is good practice</i>
--	<i>dashx2</i>	<i>Does not exist, must not be included in xml file</i>
/*	<i>slash,asterisk</i>	<i>Does not exist, must not be included in xml file</i>
&#	<i>ampersand, hash</i>	<i>Does not exist, must not be included in xml file</i>

Table 2. Additional restrictions and requirements.

## 3 FILING A RETURN

The deadline for reporting the CRS and DAC2 information for the previous calendar year is the end of January every year. One return cannot include information for more than one Financial Institution.

All the required CRS and DAC2 details can be filed on one single return.

## 4 FILING A "NIL" RETURN

If you have no reportable CRS and DAC2 details (in reference to the provisions of 17 b or c, Assessment Procedure Act ), it is enough if you just file a nil return for that year.

Complete the annual information specifics, the Reporting Financial Institution's name and contact details in the MessageSpec structure and enter "CRS703" as the value of the MessageTypeIndic element.

Also complete the ReportingFI structure regarding the identity information of the filer.

If you are filing a nil return, the [www.ilmoitin.fi](http://www.ilmoitin.fi) runs a check making sure that no AccountReport structures are included. See an example of a nil return at the end of this memorandum, file name Nollailmoitus.xml.

## 5 CORRECTION TO PREVIOUSLY FILED RETURNS

If you file a return and notice errors and omissions in it, you can submit a replacement by a deadline date (defined by the Tax Administration) in order to put matters right. After that date, you must follow the procedure of making corrections.

The deadline for filing a replacement containing new data (DocTypeIndic=OECD1) is 31 July. Use the same MessageRefID as in the original filing. New filings (replacement filings) are treated as full replacements of the original ones. There may be new account holders included in the replacement, and there may be other account holders left out of the replacement that had been included in the original. It is the responsibility of the filer to make sure that the submitted filings make up an annual information return that fulfills the requirements in force.

Replacement may also be made by filing a nil return. If the previously submitted return cannot be replaced by a nil return, and you want to remove the previous return completely before the first acceptance date 31 August of corrections, please send mail to [fatca@vero.fi](mailto:fatca@vero.fi) at the Tax Administration.

Replacement filings are no longer accepted when the deadline has passed. Instead, you must follow the procedure of corrections described below, and corrections will be accepted starting 1 September.

The principle of making corrections is to send us corrected information separately for the specific structural parts. Each "independent" structure (ReportingFI, AccountReport) has its own DocRefId and DocTypeIndic; they also have specific CorrDocRefId and CorrMessageRefId that allow corrections to be entered. When you submit corrections, they must be related to just one previous filing. This means that the CorrMessageRefId must be the same for all the structures you submit.

Rules on DocTypeIndic values when submitting corrections:

- OECD0: Only for ReportingFI structures in situations where the filer's identity details are not changed.
- OECD1: To be used whenever new data is being reported, i.e. data that have previously not been reported or that had previously been deleted
- OECD2: To be used whenever previously submitted data is being corrected
- OECD3: To be used whenever previously submitted data is being deleted

It is not allowed to submit corrections containing both new data (DocTypeIndic=OECD1) and corrections (OECD2) and deletions (OECD3). When you make a filing for purposes of corrections, you are only allowed to include elements that have the same DocTypeIndic value.

If you want to file a replacement after 31 August to remove a previous return completely, as it had been unnecessary, you must delete all the structures by setting "OECD3" as the DocTypeIndic value. This will remove the information from the recipient countries (for more information, see [7 Further information and links](#)).

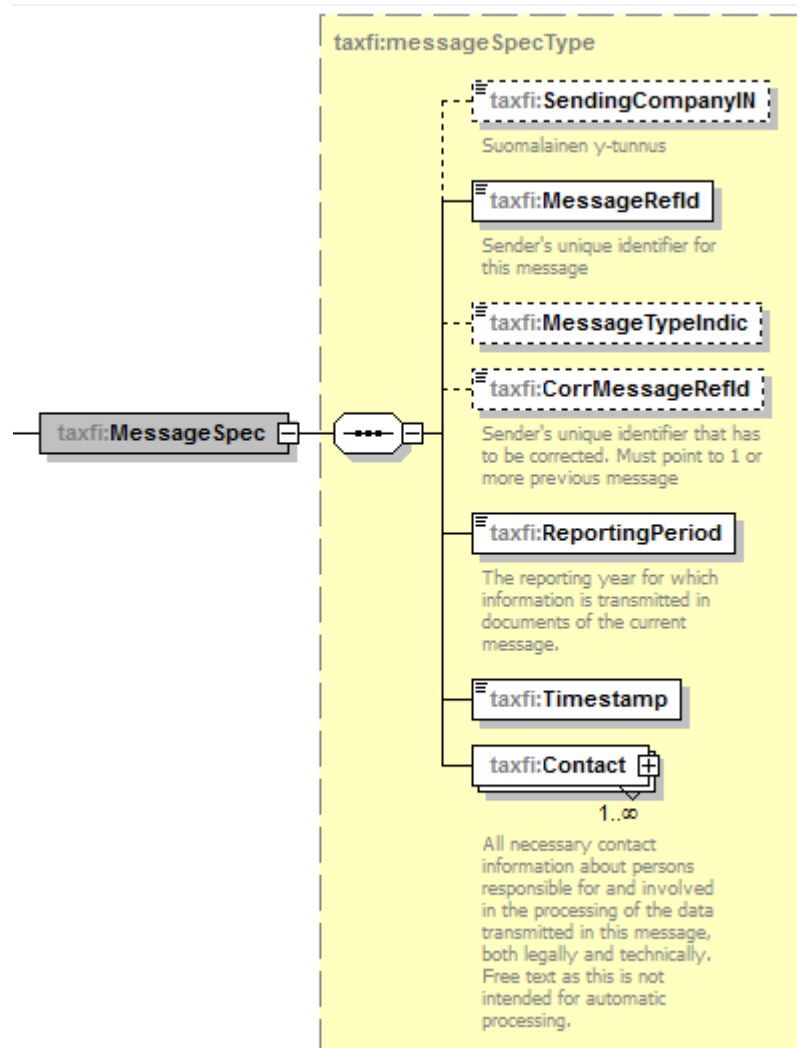
## 6 STRUCTURE OF THE XML SCHEME

This section describes the elements of scheme, presenting them specifically and also discussing the check runs by Ilmoitin.fi that are external to the xml scheme.

The namespace of the scheme is "taxfi". This is not for presenting the namespace globally; instead, it is intended to be used together with element names.

## 6.1 MessageSpec

MessageSpec contains information identifying the annual return and the filer, including filer's name and contact details (identifying the financial institution concerned by the reporting requirement) in matters having to do with CRS and DAC2.



Element	Attribute	Size	Input Type	Requirement	Validated
SendingCompanyIN			xsd:string	Mandatory	Yes

- Filer's Finnish Business ID
  - o Filer means ReportingFI
- Format of Business ID is automatically checked by [www.ilmoitin.fi](http://www.ilmoitin.fi)
- If the filer has no Finnish Business ID, you must contact the Tax Administration

Element	Attribute	Size	Input Type	Requirement	Validated
MessageRefID			xsd:string	Mandatory	Yes

- The unique Identifying Number created by the filer It is the filer's responsibility to make sure that no returns are filed under the same MessageRefID as a previously filed CRS/DAC2 or FATCA return
  - o However, if a replacement return is submitted, it is expected to have the same MessageRefID as the original
- Required information: The Finnish Business ID of the filer, the reporting year, and a sequential number (Note: cannot be the same as the number on the FATCA return), as in:
  - o Originally filed return: 6606611-7-2018-1
  - o Replacement: 6606611-7-2016-1
  - o Return filed later with corrections: 6606611-7-2018-2

- The check process of the ilmoitin.fi eService looks into the format of the Finnish Business ID, the year, and the sequential number.

Element	Attribute	Size	Input Type	Requirement	Validated
MessageTypeIndic		6 chars	xsd:boolean	Mandatory	

- Indicates the type of the return being filed:
  - o CRS701: Contains new information. This value is also used when filing a replacement.
  - o CRS702: Contains corrections for previously sent information.
  - o CRS703: Nil return, advising that there's no data to report. Use when reporting the information that there a no accounts subject to reporting (no CRS and DAC2 details to report). If you are filing a nil return, the [www. ilmoitin.fi](http://www.ilmoitin.fi) runs a check making sure that no AccountReport structures are included.

Element	Attribute	Size	Input Type	Requirement	Validated
CorrMessageRefID			xsd:string	Optional	Yes

- This is the MessageRefId of the return being corrected.
- Use the CorrMessageRefId element with correction filings only.
- Example: 6606611-7-2016-1
- The check process of the ilmoitin.fi eService looks into the format of the Finnish Business ID, the year, and the sequential number.
- The correction filing must make reference to just one previous filing (to just one MessageRefId)

Element	Attribute	Size	Input Type	Requirement	Validated
ReportingPeriod		10 chars.	xsd:date	Mandatory	Yes

- The calendar year of reporting
- Format YYYY-12-31 denoting the last date of the calendar year: for 2018 the element should be: 2018-12-31
- It is the responsibility of the filer to make sure that the return is filed under the right scheme for the right year
- Corrections continue to be accepted during a period of 1+5 years.

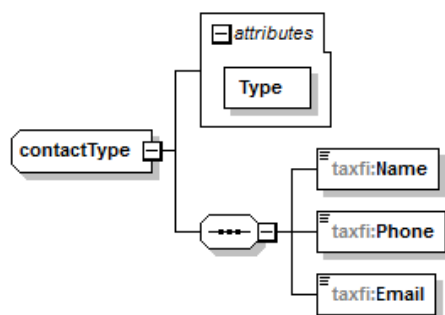
Element	Attribute	Size	Input Type	Requirement	Validated
Timestamp		20 chars.	xsd:dateTime	Mandatory	Yes

- Time stamp for saving the return file. Example: 2019-02-17T09:30:45Z
- The sender must add this element
- Note: When filing a replacement, its time stamp must indicate a later date/time than that of the original.

Element	Attribute	Size	Input Type	Requirement	Validated
Contact			xsd:string	Mandatory	

- Learn more on the contents of the Contact structure in section 6.1.1 Contact

### 6.1.1 Contact



Element	Attribute	Size	Input Type	Requirement	Validated
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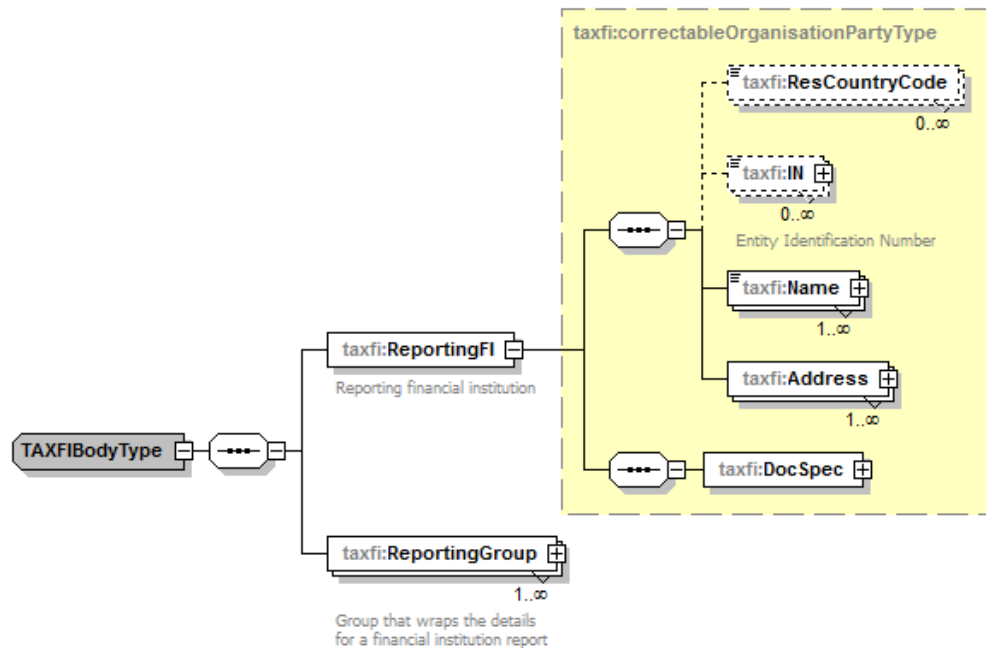


	Type		xsd:string	Mandatory	
Name		Minimum 1 char.	xsd:string	Mandatory	
Phone		Minimum 6 chars.	xsd:string	Mandatory	
Email		Max 254 chars.	xsd:string	Mandatory	

- The last name and first name of the person to contact, plus their international phone number and e-mail. This information is not disclosed outside the Tax Administration.
- You must provide at least one contact.
- The Type attribute indicates the contact person's type. Values may be:
  - o technical = person to contact in technical matters such as the structure of the message, problems in establishing contact
  - o administrative = person to contact in matters relating to the subject matter

## 6.2 ReportingFI

This element contains the reportable accounting data of the reporting financial institution concerned.



Element	Attribute	Size	Input Type	Requirement	Validated
ResCountryCode		2 chars.	iso:CountryCode_Type	Mandatory	

- Filer's country of domicile. For financial institutions in Finland, the value is "FI".
- The 2-letter code denoting the country (Country Code) (ISO-3166 Alpha 2)

Element	Attribute	Size	Input Type	Requirement	Validated
IN		Minimum 1 char.	taxfi:IN_Type	Mandatory	
	issuedBy	2 chars.	iso:CountryCode_Type	Optional	
	INType		xsd:string	Optional	

The IN of the filer:

- This is a mandatory element also for nil-return filings
- The selection is the GIIN if the filer has one. If there is no GIIN, give the Finnish Business ID. If the filer has no GIIN and no Finnish Business ID, you must contact the Tax Administration.

Attribute issuedBy:

- Country of issue of the IN, either "US" or "FI"
- Country code, 2 letters

Attribute INType:

- The type of the IN indicates its type. Permissible values:
  - US GIIN
  - TIN (when a Business ID is being used)

Element	Attribute	Size	Input Type	Requirement	Validated
Name			xsd:string	Mandatory	Yes

- Filer's registered business name.

Element	Attribute	Size	Input Type	Requirement	Validated
Address			taxfi:Address_Type		

- For more information on Address structures, see 6.4.2 Address structures

Element	Attribute	Size	Input Type	Requirement	Validated
DocSpec			taxfi:DocSpec_Type		

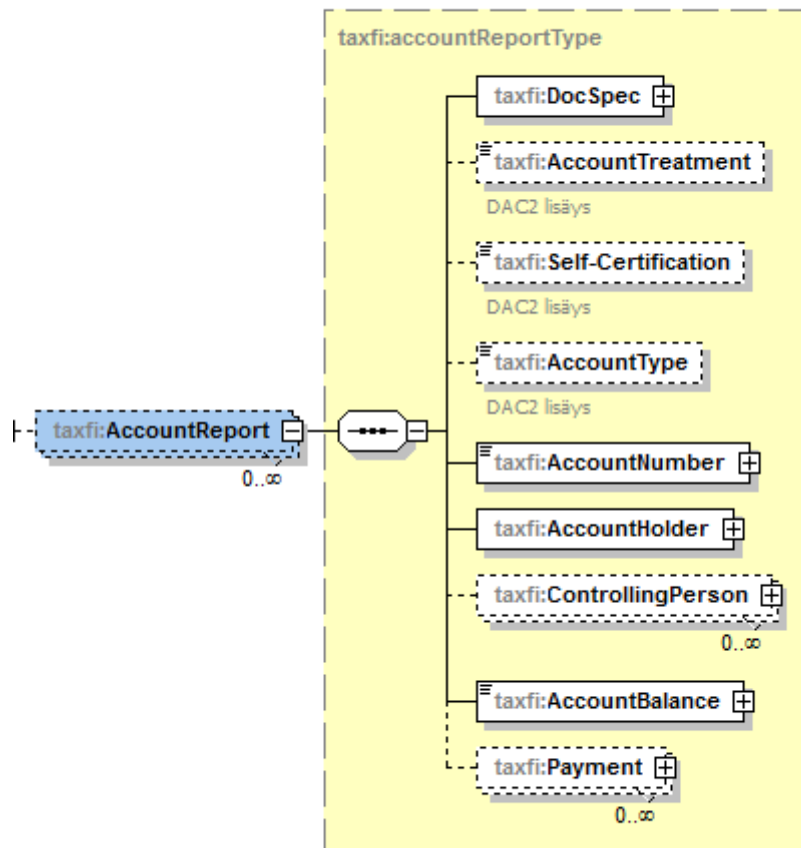
- For more information on DocSpec structures, see 6.4.3. DocSpec structures

### 6.3 ReportingGroup

The accounting data, subject to reporting, of the financial institution concerned.



### 6.3.1 AccountReport



This structure is for account holder, account, and balance.

Element	Attribute	Size	Input Type	Requirement	Validated
DocSpec			taxfi:docSpec_Type		

- For more information on DocSpec structures, see 6.4.3. DocSpec structures

Element	Attribute	Size	Input Type	Requirement	Validated
AccountTreatment			Listed values	Optional	

- This indicates whether the reportable account is New or Pre-existing.
- A mandatory element if the Financial Institution's data system contains the information.
- Permissible values:
  - o CRS981: Pre-existing Account
  - o CRS982: New Account

Element	Attribute	Size	Input Type	Requirement	Validated
Self-Certification			Listed values	Optional	

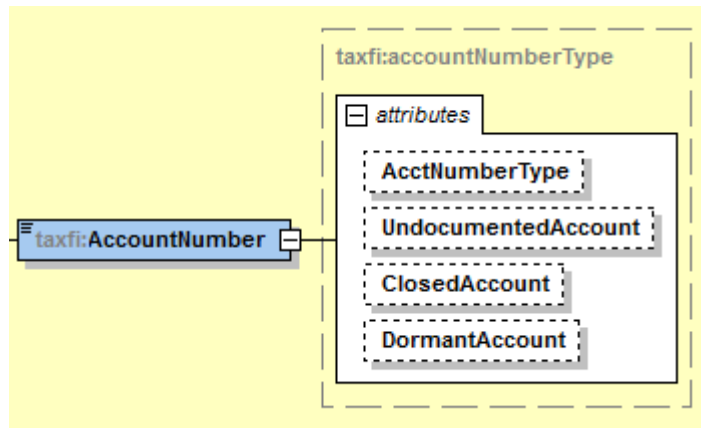
- This indicates whether the filer has received "self-certification" from the account holder regarding Country (countries) of tax residence.
  - o CRS971: No self-certification received from account holder
  - o CRS972: The account holder has provided a self-certification.
- A mandatory element if the Financial Institution's data system contains the information.

Element	Attribute	Size	Input Type	Requirement	Validated
AccountType			Listed values	Optional	

- This element indicates the type of the reportable account
  - o CRS991: Depository Account

- CRS992: Custodial Account
- CRS993: Debt or Equity in Investment Entity
- CRS994: Cash Value Insurance or Annuity Contract
- A mandatory element if the Financial Institution's data system contains the information.

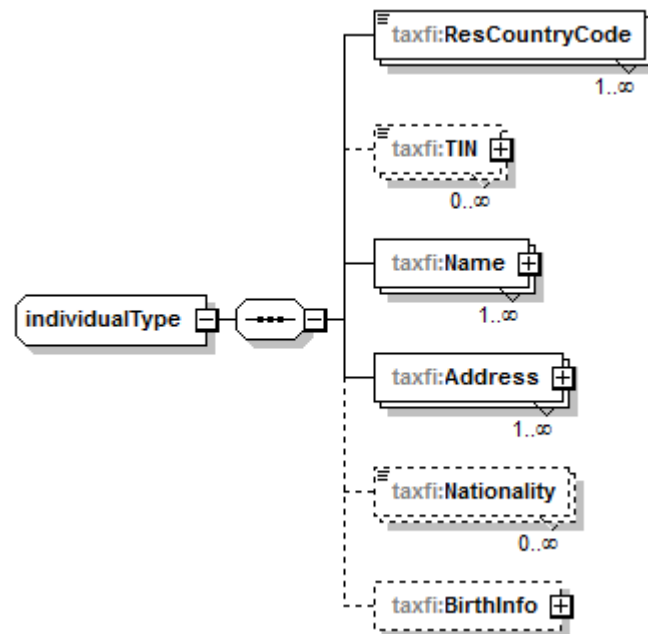
#### 6.3.1.1 AccountNumber



Element	Attribute	Size	Input Type	Requirement	Validated
AccountNumber			xsd:string	Mandatory	Yes
	AcctNumberType			Optional	
	UndocumentedAccount			Optional	
	ClosedAccount			Optional	
	DormantAccount			Optional	

- Account holder's account number
  - Ilmoitin runs a check for formal correctness when the type of the bank account number is IBAN (OECD601) or ISIN (OECD603).
  - Ilmoitin also validates the IBAN (OECD601) check digits.
- If no conventional account number is available, you must give the Customer Code that the filer uses for business purposes in order to specify the account holder's assets
  - Examples: insurance contract no, agreement no, accounts payable no, verbal description of the account or any similar identifier
- The following specific attributes are used:
  - Type (AccountNumberType)
    - OECD601 IBAN International Bank Account Number
    - OECD602 OBAN Other Bank Account Number
    - OECD603 ISIN International Securities Information Number
    - OECD604 OSIN Other Securities Information Number
    - OECD605 Other account number type e.g. an identifier of an insurance contract
  - Undocumented account (UndocumentedAccount)
    - it should be indicated whether the reportable account is undocumented (True) or not (False)
    - a mandatory element if there's no documentation on the account
  - Closed account (ClosedAccount)
    - it should be indicated whether the reportable account is closed or transferred away (True) or not (False) during the calendar year
    - in case it is closed, Ilmoitin runs a check to make sure its balance is 0.00 (zero) (AccountBalance)
  - Dormant account (DormantAccount)
    - it should be indicated whether the reportable account is dormant (True) or not (False)
    - a mandatory element in cases where the Residence Address Test has identified the account holder as a Reportable party, and identification was based on the dormant-account method.

## 6.3.1.2 AccountHolder structures/Individual



Element	Attribute	Size	Input Type	Requirement	Validated
ResCountryCode		2 chars.	iso:CountryCode_Type	Mandatory	Yes

- This element is mandatory
  - o The 2-letter code denoting the country (Country Code) (ISO-3166 Alpha 2)
- Country of tax residence of a reportable individual (Account holder / Controlling person)
- In the case of Pre-Existing Account, if the country of tax residence of the account holder is not known, enter the ResCountryCode of that country for which an indicium is identified
- If the individual is a resident of more than one country, you must list all of them
- If the account is Undocumented, and due to this, their country of residence is not known, or if the account holder is identified as (a tax nomad) one who does not have a country of tax residence, enter "FI"
- If the account holder's Country issuing the TIN is not on the List of Country Codes, please contact the Tax Administration to agree on how this account holder's information should be reported.

Element	Attribute	Size	Input Type	Requirement	Validated
TIN		Minimum 1 char.	TINType	Mandatory	

- Account holder's / Controlling person's TIN in their country of residence
  - o This element is always mandatory for new accounts
  - o For older accounts, this element is mandatory if the filer is aware of the TIN of the account holder or controlling person
- If the individual is a resident of more than one country, you must give the TINs for each one of them
- If the TIN issued by the country of residence is not known to the filer, use their Finnish personal identity code
- If no TIN or Finnish personal identity code is available, use their other identity code (TIN) issued by a foreign country for tax purposes
- If Reporting Financial Institution does not have any TIN available for the account holder or controlling person, enter nine zeroes "000000000".
- Ilmoitin.fi runs a check on the format of the TIN when it comes from an EU country.
- Ilmoitin.fi runs a check on the entry: this data element is mandatory. If it is missing, the return cannot be submitted.

Element	Attribute	Size	Input Type	Requirement	Validated
TIN	issuedBy	2 chars.	iso:CountryCode_Type	Optional	Yes

- Country (countries) of issue of the TIN (or TINs)

- This is a mandatory data element if a TIN is included
  - o If the TIN element is padded with 9 zeroes, you must leave this attribute blank
- The 2-letter code denoting the country (Country Code) (ISO-3166 Alpha 2)
- If the account holder's Country issuing the TIN is not on the List of Country Codes, please contact the Tax Administration to agree on how this account holder's information should be reported.

Element	Attribute	Size	Input Type	Requirement	Validated
Name			namePersonType		

- For more information on Name structures, see 6.4.1 Name structures

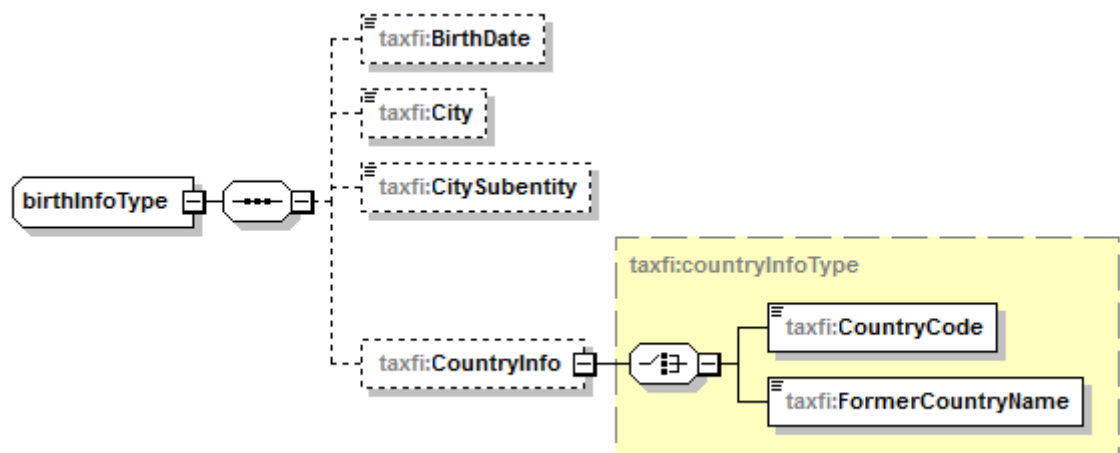
Element	Attribute	Size	Input Type	Requirement	Validated
Address			sfa:Address_Type		

- For more information on Address structures, see 6.4.2 Address structures

Element	Attribute	Size	Input Type	Requirement	Validated
Nationality		2 chars.	iso:CountryCode_Type	Optional	Yes

- Not used

#### 6.3.1.2.1 BirthInfo



The BirthInfo structure and its content details must always be included.

Element	Attribute	Size	Input Type	Requirement	Validated
BirthDate		10 chars.	xsd:date	Optional	

- Account holder's date of birth
- This element is mandatory if the date is known to the filer
- Required format for the date is YYYY-MM-DD. Example: 1975-01-21

Element	Attribute	Size	Input Type	Requirement	Validated
City			xsd:string	Optional	

- Account holder's place of birth
- This element is mandatory if the place is known to the filer

Element	Attribute	Size	Input Type	Requirement	Validated
CitySubentity			xsd:string	Optional	

- Account holder's district of birth, such as a sub-entity of a city
- This element is mandatory if the place is known to the filer

Element	Attribute	Size	Input Type	Requirement	Validated
CountryCode				Optional	

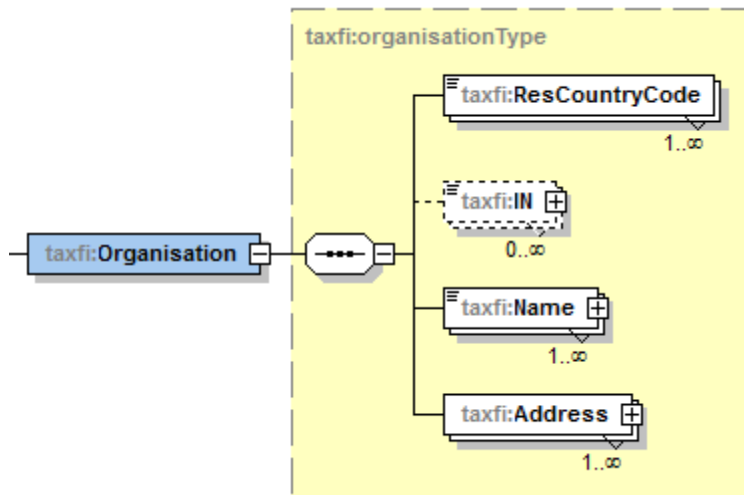
- Country of birth

- This element is mandatory if the country is known to the filer

Element	Attribute	Size	Input Type	Requirement	Validated
FormerCountryName				Optional	

- The former name of the country of birth
- This element is mandatory if the former country name is known to the filer

### 6.3.1.3 AccountHolder structures/Organisation



Element	Attribute	Size	Input Type	Requirement	Validated
ResCountryCode		2 chars.	iso:CountryCode_Type	Mandatory	Yes

- The entity's country of tax residence
- The 2-letter code denoting the country (Country Code) (ISO-3166 Alpha 2)
- This element is mandatory
- If the filer is in doubt, and the information is controversial on the entity's country of residence, you must list all the countries involved.
  - o Example: An entity is registered as a limited company in country 'X'. However, its addresses and contacts are always in country 'Y', and no reliable information on the country of tax residence has been received
- If the account holder's Country issuing the TIN is not on the List of Country Codes, please contact the Tax Administration to agree on how this account holder's information should be reported.

Element	Attribute	Size	Input Type	Requirement	Validated
IN		Minimum 1 char.	taxfi:IN_Type	Mandatory	

- Account holder's tax identification number (s) (IN) in the country (countries) of residence
  - o This element is always mandatory for new accounts
  - o For older accounts, this element is mandatory if the filer is aware of the TIN of the account holder
- If the account holder is resident in more than one countries, you must list all the tax identification numbers for all the countries involved
- If Reporting Financial Institution does not have any TIN available for the account holder or controlling person, enter nine zeroes "000000000".
- Ilmoitin.fi runs a check on the IN entry: this data element is mandatory. If it is missing, the return cannot be submitted.

Element	Attribute	Size	Input Type	Requirement	Validated
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IN	issuedBy	2 chars.	iso:CountryCode_Type	Optional	Yes
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- Country (or countries) issuing the identification number (the IN)
- This is a mandatory data element if an IN is included
- If the IN element is padded with 9 zeroes, you must leave this attribute blank
- The 2-letter code denoting the country (Country Code) (ISO-3166 Alpha 2).
  - o If the account holder's Country issuing the TIN is not on the List of Country Codes, please contact the Tax Administration to agree on how this account holder's information should be reported.

Element	Attribute	Size	Input Type	Requirement	Validated
IN	INType			Optional	

- The INType attribute indicates the type of the tax identification number. Commonly used types include:
  - o TIN
  - o US GIIN
  - o EIN
  - o LEI
- This is a mandatory data element if the type of the IN is known to the filer.

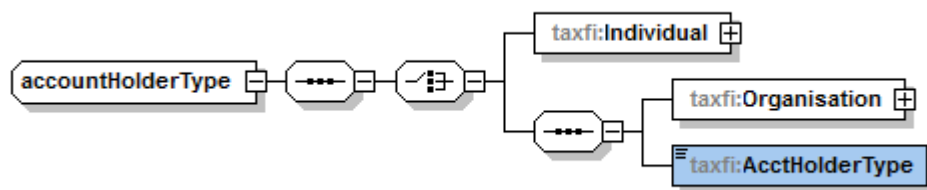
Element	Attribute	Size	Input Type	Requirement	Validated
Name			taxfi:NameOrganisationType	Mandatory	Yes

- Account holder's registered business name

Element	Attribute	Size	Input Type	Requirement	Validated
Address			taxfi:AddressType	Mandatory	Yes

- For more information on Address structures, see 6.4.2 Address structures

#### 6.3.1.4 AccountHolder structures/AcctHolderType



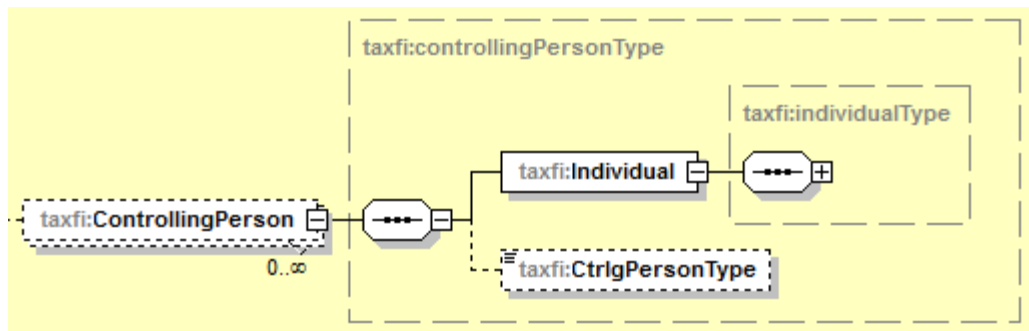
Element	Attribute	Size	Input Type	Requirement	Validated
AcctHolderType			taxfi:acctHolderType_EnumType	Mandatory	

- The account holder's type
  - o CRS101 Passive Non-Financial Entity with one or more controlling person that is a Reportable Person) (regardless of whether the entity itself is a Reportable Person)
  - o CRS102 Reportable Person
  - o CRS103 Passive Non-Financial Entity that is a Reportable Person
- This is a mandatory data element if the account holder is not an individual (the account is an entity account)
- If the account holder has a controlling person that is a Reportable Person, you must invariably use CRS101
  - o Ilmoitin runs a check to make sure that the account holder has at least one controlling person (ControllingPerson structure)
- If the account holder is an active Non-Financial Entity, you must use CRS102
  - o Ilmoitin runs a check to make sure the account holder has not reported a controlling person (ControllingPerson structure)



- Always use CRS103 if the account holder is a passive Non-Financial Entity residing in a reportable country (not Finland) regardless of whether they have Reportable Controlling Persons or not,
  - o If a passive Non-Financial Entity residing in a reportable country has one or more people who are Reportable Controlling Persons, you also have to submit CRS101, the type of account holder, in addition to CRS103.
  - o This means that in this case, you must report the account both as CRS101 and also as CRS103.
  - o If the account holder is a Finnish-resident passive Non-Financial Entity and it has Reportable Controlling Persons, you must use CRS101 only.

### 6.3.1.5 ControllingPerson



- The data elements are the same as those of AccountHolder/Individual. For information on this structure, see 6.3.1.2 AccountHolder structures/Individual
- These elements are mandatory if the values are known to the filer
- In case AcctHolderType is CRS102 or CRS103, Ilmoitin runs a check to make sure that no ControllingPerson structure has been reported
  - o If there are any Reportable Controlling Persons to be reported for the account, use the CRS101 code. This means that you must use both CRS101 and CRS103 for reporting the same account.
- You must give the details of all the Controlling Persons
  - o Gross asset balances and gross turnover of transactions must be included for all
- Additionally, the CRS and DAC2 return filings contain a CtrlgPersonType element
  - o You must use the following categorizations to indicate the Controlling Person's position in relation to the entity.

Element	Attribute	Size	Input Type	Requirement Yes/No	Validated
CtrlgPersonType			Listed values	Optional	

- This element is mandatory if a Controlling Person is being reported
- This indicates the status of the Controlling Person
- CRS801 = CP of legal person – ownership
- CRS802 = CP of legal person – other means
- CRS803 = CP of legal person – senior managing official
- CRS804 = CP of legal arrangement – trust – settlor
- CRS805 = CP of legal arrangement – trust – trustee
- CRS806 = CP of legal arrangement – trust – protector
- CRS807 = CP of legal arrangement – trust – beneficiary
- CRS808 = CP of legal arrangement – trust – other
- CRS809 = CP of legal arrangement – other – settlor-equivalent
- CRS810 = CP of legal arrangement – other – trustee-equivalent
- CRS811 = CP of legal arrangement – other – protector-equivalent
- CRS812 = CP of legal arrangement – other – beneficiary-equivalent
- CRS813 = CP of legal arrangement – other – other-equivalent
- CRS819 = CP of legal person, trust or legal arrangement – unknown

### 6.3.1.6 AccountBalance

Element	Attribute	Size	Input Type	Requirement	Validated
AccountBalance			taxfi:twoDigFractType	Mandatory	Yes
	currCode	3 chars.	iso:currCode_Type	Mandatory	Yes

- Balance of the account
  - o In the case of a closed account (AccountNumber/ClosedAccount="True"), Ilmoitin runs a check to make sure its balance is 0.00 (zero)
- Give the balance at end of calendar year

- Use the currency actually used
- If balance is 0 or negative, enter 0.00.
- Ilmoitin.fi blocks negative values
- Always enter the amount with two decimals, separator is the "." character.  
Example: enter 1000.00 for one thousand euros
- The currCode attribute is for indicating the currency being used

### 6.3.1.7 Payment

Element	Attribute	Size	Input Type	Requirement	Validated
Type			Listed values	Mandatory	Yes

- Category of the income
  - o CRS501 = Dividends
  - o CRS502 = Interest
  - o CRS503 = Gross proceeds/redemptions
  - o CRS504 = Other
- When reporting payments with respect to an Equity Interest or a Debt Interest, a Cash Value Insurance Contract or an Annuity Contract, either give a lump sum (CRS504) or specify all income types involved (CRS501-CRS503)

Element	Attribute	Size	Input Type	Requirement	Validated
PaymentAmnt			taxfi:twoDigFractType	Mandatory	Yes
	currCode	3-digit	iso:currCode_Type	Mandatory	Yes

- Amount paid to the account
- Always enter the amount with two decimals, separator is the "." character.  
Example: enter 1000.00 for one thousand euros
- The currCode attribute is for indicating the currency

## 6.4 Shared structures

This section discusses the structures that are shared by the different parts of the scheme. Reference to them is made wherever shared structures are used.

### 6.4.1 Name structures

Element	Attribute	Size	Input Type	Requirement	Validated
PrecedingTitle			xsd:string	Optional	

- Not used

Element	Attribute	Size	Input Type	Requirement	Validated
Title			xsd:string	Optional	

- Not used

Element	Attribute	Size	Input Type	Requirement	Validated
FirstName			xsd:string	Mandatory	

- Account holder's / Controlling person's first name
- If the first name is not available, enter "NFN" (No First Name)
- Just one value is permitted

Element	Attribute	Size	Input Type	Requirement	Validated
MiddleName			xsd:string	Optional	

- Account holder's / Controlling person's middle name or names

Element	Attribute	Size	Input Type	Requirement	Validated
NamePrefix			xsd:string	Optional	

- Account holder's / Controlling person's last name may have a "prefix" such as van, von, de, von de, etc.
- Alternatively, include the prefix in the LastName element

Element	Attribute	Size	Input Type	Requirement	Validated
LastName			xsd:string	Mandatory	

- Account holder's / Controlling person's last name
- Include all the last names of a natural person in this field
- If the filer's database has no record of the first name so as to enter it in the FirstName element, enter NFN (No First Name) there, and enter both the first and the last name in the LastName element

Element	Attribute	Size	Input Type	Requirement	Validated
GenerationIdentifier			xsd:string	Optional	

- Not used

Element	Attribute	Size	Input Type	Requirement	Validated
Suffix			xsd:string	Optional	

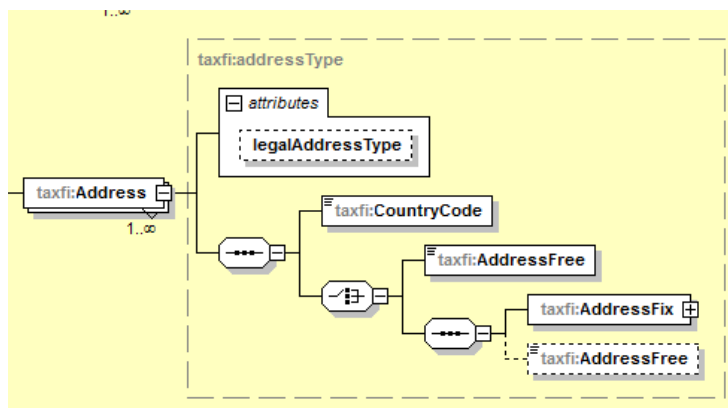
- Not used

Element	Attribute	Size	Input Type	Requirement	Validated
GeneralSuffix			xsd:string	Optional	

- Not used

## 6.4.2 Address structures

Because the Address is a mandatory element, either the AddressFix structure or the AddressFree structure must contain it. You must utilize the AddressFix fields when creating your filing if the input information is available to you.



Element	Attribute	Size	Input Type	Requirement	Validated
AddressType	legalAddressType		Listed values	Optional	

- Type of address:
  - o OECD301= residential or business
  - o OECD302= residential
  - o OECD303= business
  - o OECD304= registered office
  - o OECD305= unspecified

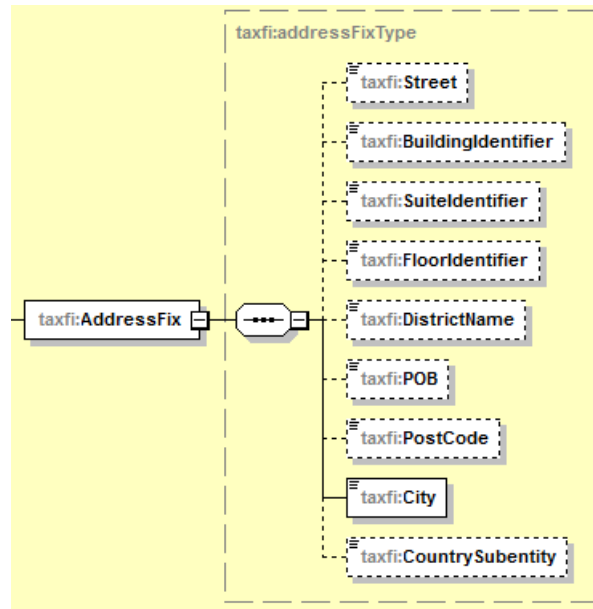
Element	Attribute	Size	Input Type	Requirement	Validated
CountryCode		2 chars.	iso:CountryCode_Type	Mandatory	

- Country of location relating to the address
- The 2-letter code denoting the country (Country Code) (ISO-3166 Alpha 2)

### 6.4.2.1 AddressFix

If you are using AddressFix to facilitate address reporting, you must enter the full street address in this structure with at least the following details included

- City, Town or Municipality
- Postal code



Element	Attribute	Size	Input Type	Requirement	Validated
Street			xsd:string	Optional	

- Street name
- This element is mandatory if the street is known to the filer

Element	Attribute	Size	Input Type	Requirement	Validated
BuildingIdentifier			xsd:string	Optional	

- House number or building number
- This element is mandatory if the value is known to the filer

Element	Attribute	Size	Input Type	Requirement	Validated
SuiteIdentifier			xsd:string	Optional	

- Number denoting the Unit/Apartment/Suite
- This element is mandatory if the value is known to the filer

Element	Attribute	Size	Input Type	Requirement	Validated
FloorIdentifier			xsd:string	Optional	

- Floor where the dwelling or office is located
- This element is mandatory if the value is known to the filer

Element	Attribute	Size	Input Type	Requirement	Validated
DistrictName			xsd:string	Optional	

- Section, neighbourhood or district of the city
- This element is mandatory if the value is known to the filer

Element	Attribute	Size	Input Type	Requirement	Validated
POB			xsd:string	Optional	

- Post office box number
- This is a mandatory data element for all addresses that have a P.O. Box.

Element	Attribute	Size	Input Type	Requirement	Validated
PostCode			xsd:string	Optional	

- Postal code
- This element is mandatory if the value is known to the filer

Element	Attribute	Size	Input Type	Requirement	Validated
City			xsd:string	Mandatory	Yes

- City, Town or Municipality
- This element is mandatory

Element	Attribute	Size	Input Type	Requirement	Validated
CountrySubentity			xsd:string	Optional	

- State, Province, or other sub-entity relating to the Country
- This element is mandatory if the value is known to the filer

#### 6.4.2.2 AddressFree

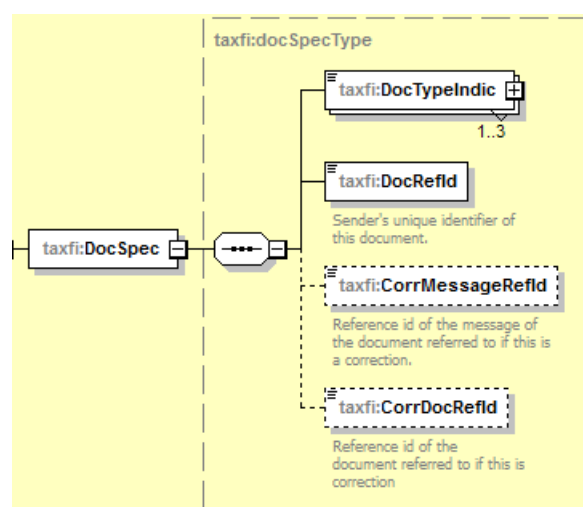
This structure must be used if the address cannot be entered in the AddressFix structure. It is permissible to give the entire street address in this structure and use the AddressFix structure for City, Postal Code and Country Sub-Entity in situations where the filer's database does not specify the street address as expected by the AddressFix structure. If the address is reported by using both the AddressFix and the AddressFree structures, both structures are reported in one Address structure, not in two separate structures.

Element	Attribute	Size	Input Type	Requirement	Validated
AddressFree			xsd:string	Optional*	

- This is a free-text field for entering an address.
- Recommended format is street, city, postal code
- This structure is secondary in relation to AddressFix
  - If your AddressFix structure contains all the necessary addresses, you should leave out AddressFree
- However, this is a mandatory element if no address has been given in the AddressFix structure
- The address is mandatory and it must always be reported if the Financial Institution has the address information
  - If the Financial Institution does not have any current address or previously valid address on file, it can be reported as "Not known" in the AddressFree element.
    - o This means that the Financial Institution has declared and affirmed that it does not know the address, and that applicable law does not require that it should know the address.

#### 6.4.3 DocSpec structures

The DocSpec contains information on the type of the report being filed (DocTypeIndic), ID information (DocRefId) and the IDs of the filing (CorrMessageRefId) and the reports (CorrDocRefId) to be corrected.



Element	Attribute	Size	Input Type	Requirement	Validated
DocTypeIndic			Listed values	Mandatory	Yes

- This element specifies the type of data being submitted.

- Allowable entries are:
  - o OECD0 = Resend CRS or DAC2 Data
  - o OECD1 = New CRS or DAC2 Data
  - o OECD2 = Corrected CRS or DAC2 Data
  - o OECD3 = Deletion of CRS or DAC2 Data

Element	Attribute	Size	Input Type	Requirement	Validated
DocRefID		Minimum 1 char.	xsd:string	Mandatory	Yes

- The ID code for the filing
- Reporting Financial Institutions must make sure they do not use the same DocRefId on annual information returns and on previously submitted CRS/DAC2 returns and FATCA returns.
- An identity code is compiled of the following parts
  - o Filer's GIIN is issued. Example: S519K4.99999.SL.246
  - o A period (.)
  - o Filer's Finnish Business ID if issued. If the filer has no Business ID, use some other identity code.
  - o A hyphen (-)
  - o A unique string consisting e.g. of the tax year and an ordinal number: 2018-001-002
  - o maximum length is 200 characters
- An example of a DocRefId in its entirety: S519K4.99999.SL.246.6606611-7-2018-001-002

Element	Attribute	Size	Input Type	Requirement	Validated
CorrMessageRefID		Minimum 1 char.	xsd:string	Optional	

- Use this when making a correction and DocTypeIndic <> OECD1
- For more information on the MessageRefId of the return being corrected, see 6.1 MessageSpec.
- This can only be used when correcting a previously filed return.
- Ilmoitin makes a check on this entry when DocTypeIndic = OECD2 or OECD3

Element	Attribute	Size	Input Type	Requirement	Validated
CorrDocRefID		Minimum 1 char.	xsd:string	Optional	

- Use this when making a correction and DocTypeIndic <> OECD1
- The DocRefId of the return being corrected.
- This can only be used when correcting a previously filed return.
- Ilmoitin makes a check on this entry when DocTypeIndic = OECD2 or OECD3.

## 7 FURTHER INFORMATION AND LINKS

The annual information return for CRS and DAC2 must be filed as instructed in the technical requirements herein. See below for further guidance and useful links.

Common Reporting Standard (CRS) User Guide and Schema

<http://www.oecd.org/tax/automatic-exchange/common-reporting-standard/schema-and-user-guide/>

Xml validation files for the schema; XML documents fulfilling the mandatory requirements set out by the Tax Administration:

