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# FATCA

Technical guidance

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## VERSION HISTORY

Version	Release date	Information on content updates
3.5	3 February 2026	<p>Updates made to:</p> <p>8 List of messages from Ilmoitin Removed “An invalid US TIN '000000000' is found in the 'Individual/TIN' element” Removed “An invalid US TIN 'AAAAAAAAA' is found in the 'Individual/TIN' element”.</p>
3.4	15 September 2025	<p>Updates made to:</p> <p>5.1 Correction information An update relating to how DocTypeIndic should be used when deleting</p> <p>6.3.3.1 AccountHolder structures/Individual Updates relating to IRS Notice 2024-78 were made</p> <p>6.4.2.1 AddressFix Updates relating to IRS Notice 2024-78 were made</p> <p>6.4.3 The DocRefId element An updated format requirement for DocRefId: Business ID and tax year will now be required</p> <p>7 List of automated checks made by Ilmoitin AccountHolder/Individual/TIN ja SubstantialOwner/Individual/TIN – the automated check will only concern US TINs.</p> <p>AccountHolder/Organisation/TIN – removed the 'AAAAAAAAA' value, which was previously a permissible value</p> <p>AccountHolder/Individual/TIN/IssuedBy, /SubstantialOwner/Individual/TIN/IssuedBy, – starting the 2025 reporting year, this is no longer used</p> <p>8 List of messages from Ilmoitin The following messages will only appear if the TIN is issued by the United States: AccountHolder/Individual/TIN /Individual/TIN .../Individual/TIN and .../Individual/BirthInfo/BirthDate</p>
3.3	21 March 2025	<p>Updates made to:</p> <p>2 The Ilmoitin.fi e-service Removed all references to the secure sign-in system called Katso.</p> <p>4 Filing a “nil” return</p>

		<p>Location of the example file was corrected</p> <p>6.3.3.1.1 BirthInfo</p> <p>The BirthInfo structure is used when the Reporting Financial Institution does not have the U.S. TIN of the account holder or controlling person.</p> <p>7 List of automated checks made by Ilmoitin</p> <p>A new check process was added for verifying that the return should only contain elements that have the same DocTypeIndic value.</p>
3.2	19 March 2024	<p>Updates made to:</p> <p>6.4.3 DocSpec structures</p> <p>Data to be reported in the DocRefId element was specified. No changes to ilmoitin.fi check routines</p> <p>7 Check routines run by the Ilmoitin.fi service</p> <p>Text has been added about a situation where the file cannot be checked. The check routine was already included in Ilmoitin.fi, but now is has been added to the technical guidance</p> <p>Text has been added about a situation where the format of DocRefId has not been accepted. The check routine was already included in Ilmoitin.fi, but now is has been added to the technical guidance</p>
3.1	28 August 2023	<p>Updates made to:</p> <p>1.1 Example files in the XML format, and 5.2 Correction examples</p> <p>Instructions for opening linked files were added; several XML example files were added</p> <p>6.3.3.2 AccountHolder structures/Organisation</p> <p>Instructions for the TIN IssuedBy attribute were updated</p>
3.0	28 March 2023	<p>Updates made to:</p> <p>6.3.3.1 AccountHolder structures/Individual TIN</p> <p>6.3.3.2 AccountHolder structures/Organisation TIN</p> <p>7 List of automated checks made by ilmoitin</p>
2.9	8 September 2022	<p>Updates made to:</p> <p>5 Making corrections</p>
2.8	30 March 2022	<p>Updates made to:</p> <p>7 List of automated checks made by ilmoitin</p>

		Fixed MessageRefld element name in text. Previously MessageRefld was used in some sections
2.7	2 December 2021	<p>Updates made to:</p> <p>6.3.3 AccountReport - AccountClosed</p> <p>In the text boolean values earlier started with a capital letter. Values changed to true or false</p> <p>7 List of automated checks made by Ilmoitin - AccountHolder/Organisation/TIN</p>
2.6	4 November 2021	<p>Updates made to:</p> <p>6.3.3.1 AccountHolder structures/Individual TIN</p> <p>6.3.3.2 AccountHolder structures/Organisation TIN</p> <p>5 Making corrections - text has been clarified</p> <p>8 List of messages from ilmoitin</p>
2.5	8 June 2021	<p>We have updated the following chapters and sections:</p> <p>6.3.3.1 AccountHolder structures/Individual</p> <p>- Update to TIN field regarding individual account holders whose US TIN is unknown to the financial institution at the time of reporting. Code 77777777 added.</p> <p>6.3.3.2 AccountHolder structures/Organisation</p> <p>- Update to TIN field regarding US tax liable entity account holders whose US TIN is unknown to the financial institution at the time of reporting. Code 77777777 added.</p> <p>6.4.2.1 AddressFix - Update to the instruction text</p> <p>7 List of automated checks made by ilmoitin</p>
2.4	9 April 2021	Update to 2 The Ilmoitin.fi e-Service
2.3	30 March 2021	<p>We have updated the following chapters and sections:</p> <p>6.3.3.1 AccountHolder structures/Individual</p> <p>- Update to TIN field regarding individual account holders whose US TIN is unknown to the financial institution at the time of reporting</p> <p>6.3.3.2 AccountHolder structures/Organisation</p> <p>- Update to TIN field regarding US tax liable entity account holders whose US TIN is unknown to the financial institution at the time of reporting</p>

		7 List of automated checks made by ilmoitin
2.2	4 December 2020	Update to 2 The Ilmoitin.fi e-Service
2.1	24 November 2020	<p>We have updated the following chapters and sections:</p> <p>6.3.3.1 AccountHolder structures/Individual (TIN)</p> <p>7. Automated check processes run by Ilmoitin - An update was made to the BirthDate check: now the submittal is not rejected because of a missing Date of birth</p> <p>8. The Ilmoitin.fi messages Ilmoitin.fi now contains a new message:  - The system displays a message if the TIN is padded with AAAAAAAAAA or 000000000 and no BirthDate is given.</p> <p>9. Further information/links</p> <p>The example files were transferred to section 1.1</p>
2.0	19 October 2020	<p>Update to 6.3.3.1.1 BirthInfo</p> <p>Added information regarding non-disclosure for personal safety reasons:</p> <p>6.4.2 Address structures</p> <p>6.4.2.2 AddressFree</p> <p>Added automatic checks and messages to sections</p> <p>7 List of automated checks made by ilmoitin</p> <p>8 List of messages from ilmoitin</p>
1.9	20 August 2020	<p>6.3.3.1.1 BirthInfo ("The BirthInfo structure was in use 2014-2016" changed to "The BirthInfo structure was in use 2014-2019")</p> <p>6.4.3 DocSpec structures. CorrMessageRefId element text changed from "The MessageRefId for the file containing corrections" to "The MessageRefId of the file being corrected"</p>
1.8	9 June 2020	<p>The following passages and sections have had updates:</p> <p>6.1 MessageSpec Timestamp (The current year must be timestamped.)</p> <p>6.2 FATCA/ReportingFI (The ResCountryCode element's value must be "FI".)</p> <p>6.3.3.1.1 BirthInfo (The value must be 1900-01-01 or a date after that.)</p> <p>6.3.3.2 The guidance regarding the TIN is updated, specifically for the AcctHolderType FATCA102 situation.</p>

		7. Automated check processes run by Ilmoitin 8. List of messages from Ilmoitin
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# 1 ANNUAL INFORMATION REPORTING AS REQUIRED BY FATCA, TECHNICAL GUIDE

Under § 17a of the act on assessment procedure (Laki verotusmenettelystä (1558/1995)), and under the Tax Administration's official decision of 3 March 2015, the FATCA annual information returns must be submitted, using the format designed for FATCA (the U.S. legal act called the Foreign Account Tax Compliance Act).

Regarding the technical characteristics of the Finnish annual information return, the Intergovernmental FATCA XML Schema v 2.0 and the Intergovernmental FATCA Schema Version 2.0 User Guide have been followed. They are released by the U.S. Internal Revenue Service, and available on

<https://www.irs.gov/businesses/corporations/fatca-xml-schemas-and-business-rules-for-form-8966>. In addition, the format is based on the Tax Administration guideline for implementing the agreement on FATCA, signed between Finland and the United States of America. This technical guide supplements the existing materials. It gives reporting financial institutions further instructions on the procedure that filers in Finland must follow. The guide contains a description of the Tax Administration's technical requirements and information on how files can be sent via Ilmoitin.fi.

The consistent parts of the annual information return are a number of main level Structures. The first one is MessageSpec, containing the unique identity information both for the annual information return and the reporting financial institution.

ReportingFI is the next structure, where more details are given on the reporting entity (either a financial institution or a sponsored entity). After that, the next structure is ReportingGroup. ReportingGroup is comprised of the Sponsor, Intermediary, NilReport and AccountReport structures.

The quantity of AccountReport structures is 0-n. Each AccountReport has information on the reportable account and its account holder. If corrections need to be made, each of the structures can be treated as an independent unit when making corrections.

## 1.1 Example files in the XML format

The links below point to a selection of XML files. They fulfil the Tax Administration's requirements of mandatory input. If any linked XML files fail to open, please first save this PDF file in your computer, and then use (Adobe Acrobat or another) PDF reader software to open the saved PDF. Now you can open the linked files in it.



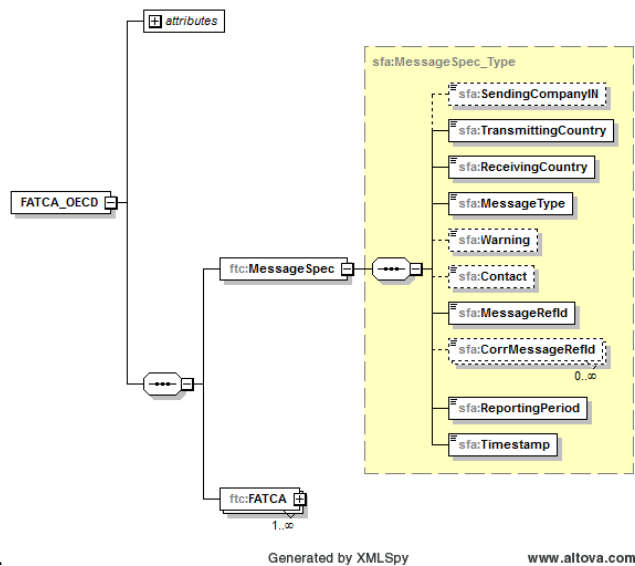
## 1.2 How to read this memorandum

The technical guidance is primarily for people in charge of the production of FATCA information 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.

If a solid frame surrounds an element, it means that the element is "Required", so it must be included in all submitted returns. Correspondingly, if a dotted line surrounds

an element, it is an optional element, included on a voluntary basis. However, some of the data elements that the Schema denotes as optional are required; the check process of [www.ilmoitin.fi](http://www.ilmoitin.fi) verifies that they are included and that they have the appropriate contents.



## 2 THE ILMOITIN.FI E-SERVICE

To e-file a FATCA 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.

You must log in securely to send the return. The options for login are the Suomi.fi authentication and Suomi.fi authorisations. For more information on Suomi.fi authentication and authorisations, click the links below.

- Suomi.fi authorisations: <https://www.suomi.fi/e-authorizations>
- How to grant a Suomi.fi authorisation for tax matters: <http://www.vero.fi/en/About-us/contact-us/efil/authorisations/>

Check the required method of sign-in and the required role [here](#).

At the moment filing a FATCA annual return doesn't require additional Suomi.fi roles or rights. Suomi.fi e-identification is sufficient for submitting reports.

### 2.1 Technical requirements for the files to be submitted

Maximum file size is 100MB. If you create a file larger than 100MB in size, you must divide it into several smaller files that stay below the 100MB-limit. If you deliver such a file, consisting of several parts, each one of them must have a unique MessageRefId.

Encoding is UTF-8. In the interests of compatibility, we require the ISO8859-1 character set, with UTF-8 encoding. This means that characters of the Cyrillic alphabet are not recommended. No Byte Order Mark (BOM) is allowed.

When submitting the annual information content, the following special characters must be converted into the following formats:

Character	Description	Required format
&	ampersand	&amp; conversion is mandatory
<	smaller than	&lt; conversion is mandatory
>	greater than	&gt; conversion is mandatory
'	apostrophe	&apos; conversion is mandatory
"	quotation marks	&quot; conversion is mandatory

Table 1. Presentation of special characters in the data

Additional requirements are shown below.

Character	Description	Required format
--	Dash×2	This character must not appear in an XML file
/*	slash, asterisk	This character must not appear in an XML file
&#	ampersand, hash	This character must not appear in an XML file

Table 2. Additional “IRS” restrictions and requirements

### 3 FILING A RETURN

The deadline for the FATCA information for the previous calendar year is the end of January every year, as per the Tax Administration’s official decision on the information-reporting requirement. You can only submit the annual information for one reporting financial institution on one FATCA annual information return.

### 4 FILING A “NIL” RETURN

If you have no reportable information, it is enough if you just file a nil return for that year. To file a nil return, fill out the MessageSpec structure with unique identifiers for the annual information return and the reporting financial institution. Then enter “Yes” as the value of the ReportingGroup/NilReport NoAccountToReport element. Complete the ReportingFI structure with more details to identify the reporting financial institution. If the nil return is for a sponsored entity, you must complete the ReportingGroup/Sponsor structure with the Sponsor’s unique identification. An example of a “nil” return is provided in this memorandum’s section [1.1. Example files in the XML format](#) in file Nollailmoitus\_2020.xml.

If you are filing a nil return, Ilmoitin.fi will run a check to make sure no AccountReport structures are included.

## 5 MAKING CORRECTIONS

### 5.1 Correcting information

Up to 31 July, you can still make corrections to an annual information return by filing a replacement, which is treated as a full replacement of the original one. Replacement returns must have ‘FATCA1’ as the value of the DocTypeIndic element. The MessageRefId must be exactly the same as that of the original annual information return. If the only correction is that the filer adds some more reportable financial accounts, another option besides replacement is to submit a separate new return. Such a new return must have a different MessageRefId, and as a result, it

does not replace the original. Instead, the new return is a complement to the year's reporting. The filer bears responsibility for making sure that all the reportable financial accounts are included in the year's reporting.

It is possible for the replacement return to be a 'nil' return. It may be that an original return cannot be replaced by a nil return – for example, after several original returns have been submitted. If this is the case, and you want to remove your previous return because it was unnecessary to submit it, and it is not yet possible to make corrections on a correction return, please send e-mail to [fatca@vero.fi](mailto:fatca@vero.fi) at the Tax Administration.

After the deadline has passed, replacements are no longer accepted. Instead, you must follow the procedure of corrections described in the DocTypeIndic chapter of the IRS FATCA schema user guide. Corrections to the previous year's annual information return will be accepted starting 1 September.

When you make corrections in accordance with the FATCA procedure, specific structures are corrected one-by-one. Each one of the 'independent' structures (ReportingFI, Sponsor, Intermediary, NilReport, AccountReport) has its DocRefId element and DocTypeIndic element, and additionally for corrections, its own CorrDocRefId and CorrMessageRefId elements. 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. Correction reports cannot contain new data (DocTypeIndic=FATCA1) along with corrections (FATCA2, FATCA3 or FATCA4).

The process of making corrections varies depending on what data elements are involved, or whether the Tax Administration requested the errors to be put right or whether the filer detected the errors independently, for example. If the Tax Administration asks you to make corrections because the IRS has notified it of problems in your report, set the value of DocTypeIndic to FATCA2 (corrected data), unless it is necessary to remove data. The FATCA2 value of DocTypeIndic may not be used in any other situation. In other situations where corrections are made, other values should be set for DocTypeIndic as described below.

If it is necessary for the filer to remove some of the accounts that were reported previously, you must have 'FATCA3' (void data) as the value of the DocTypeIndic element. In such cases, FATCA3 is also used in the ReportingFI structure even if only individual accounts are removed. The FATCA3 value is also used when corrections are made to the following errors based on a notification (after deleting the previous entry, giving a corrected entry (FATCA1) as a new entry:

- No TIN of Account Holder or Substantial US Owner
- Incorrect TIN of Account Holder or Substantial US Owner
- Incorrect Name of Account Holder or Substantial US Owner
- Incorrect Name and Address for Account Holder or Substantial US Owner

If you are making other corrections, DocTypeIndic should be FATCA4 (Amended Data).

If it is necessary to indicate some new reportable financial accounts that were not included in the previous return, set FATCA1 as the value of the DocTypeIndic element; and do not use the CorrMessageRefId element and the CorrDocRefId element. When you add new reportable financial accounts, please contact the Tax Administration to set a suitable date for sending the return, because Ilmoitin.fi does not automatically accept filings with the FATCA1 value for previous years after 31 July.

If you are submitting corrections to a return that has already been corrected, i.e. you are correcting the original return for a second time (with a second correction filing), the CorrMessageRefId and CorrDocRefId elements should still contain a reference to the MessageRefId and DocRefId elements of the original return, unless the correction specifically relates to the AccountReport structure submitted in the previous correction filing.

If you need to correct the ReportingFI and/or Sponsor structure, the correction return should also contain all the AccountReport structures.

If the Sponsor structure was used in the return to be corrected, it should also be used in the correction return. In that case, CorrMessageRefId and CorrDocRefId of the Sponsor structure refer to the original return, unless the AccountReport structure to be corrected has been corrected previously. If it has been corrected previously, CorrMessageRefId and CorrDocRefId of the Sponsor structure must refer to the MessageRefId and DocRefId elements submitted in the previous correction report.

A return may contain only elements that have the same DocTypeIndic value.

When you run tests with the testi.ilmoitin.fi website, enter the FATCA1-FATCA4 values instead of the test data values FATCA11-FATCA14.

## 5.2 Correction examples

If the examples include linked files that fail to open when you click them, please save this PDF file in your computer, and then use (Adobe Acrobat or another) PDF reader software to open the PDF. Now you can open the linked files.

**Example 1.** Correction return – Filer removes an account that has been submitted by mistake (DocTypeIndic FATCA3). In this example, the removal concerns an account that has been corrected with a previous correction return.

**More than one correction (no Sponsor)** The diagrams show DocSpec, by way of example, only under ReportingFI, but it also has to be used in the AccountReport structure.

1. The filer submits the first return in January
2. The Tax Administration contacts the filer in October because of an error notification it received from the IRS and asks them to make corrections to account A using the DocTypeIndic value FATCA2 [in some cases, the filer may be asked to remove the account (FATCA3) and resubmit it with corrected data (FATCA1)]
3. The filer submits the 1st correction return in October, correcting account A data
4. The filer notices that the original return contains an error in accounts B and C, and submits the 2nd correction return in November
5. The filer then notices that account C should not have been reported at all, and submits a deletion report for account C in December

The account A data corrected on the first correction return was submitted in the first filing, and the CorrMessageRefId and CorrDocRefId values therefore refer to the first filing. The account B and C data corrected on the second correction return was also submitted in the first filing, and the CorrMessageRefId and CorrDocRefId values therefore refer to the first filing.

Account C, to be corrected on the third correction report, was already corrected on the second correction return, so the CorrMessageRefId and CorrDocRefId values refer to the second correction return.

Attached is a diagram of Example 1.



**Example 2.** Correction return – Filer removes an account that has been submitted by mistake (DocTypeIndic FATCA3). In this example, the removal concerns an account that has been corrected with a previous correction return.

**More than one correction (with Sponsor).** Unlike is Example 1, the Sponsor structure is included in this example. The diagrams show DocSpec, by way of example, only under ReportingFI, but it also has to be used in the AccountReport and Sponsor structures.

1. The filer submits the first return in January
2. The Tax Administration contacts the filer in October because of an error notification it received from the IRS and asks them to make corrections to account A using the DocTypeIndic value FATCA2 [in some cases, the filer may be asked to remove the account (FATCA3) and resubmit it with corrected data (FATCA1)]
3. The filer submits the 1st correction return in October, correcting account A data
4. The filer notices that the original return contains an error in accounts B and C, and submits the 2nd correction return in November
5. The filer then notices that account C should not have been reported at all, and submits a deletion report for account C in December

The account A data corrected on the first correction return was submitted in the first filing, and the CorrMessageRefId and CorrDocRefId values therefore refer to the first filing. The account B and C data corrected on the second correction return was also submitted in the first filing, and the CorrMessageRefId and CorrDocRefId values therefore refer to the first filing.

Account C, to be corrected on the third correction report, was already corrected on the second correction return, so the CorrMessageRefId and CorrDocRefId values refer to the second correction return.

Attached is a diagram of Example 2.



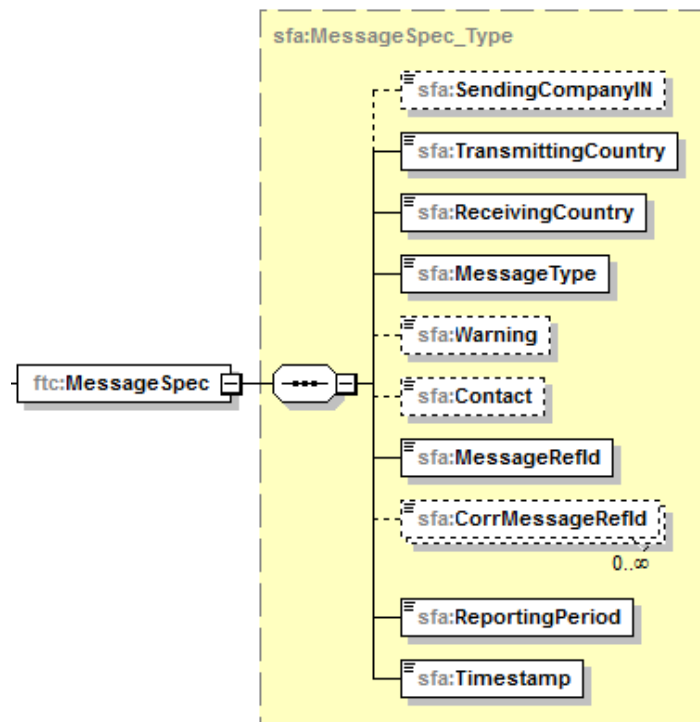
## 6 STRUCTURE OF THE XML SCHEMA

This section describes the User Guide’s additional instructions for the IRS’s FATCA schema, with a discussion of the check runs by Ilmoitin.fi that are external to the xml schema.

For the full description, visit <https://www.irs.gov/businesses/corporations/fatca-xml-schemas-and-business-rules-for-form-8966>.

### 6.1 MessageSpec

This structure contains the unique identification of the annual information return and the financial institution, and its contact information in matters concerning FATCA.



Element	Attribute	Size	Input Type	Requirement
SendingCompanyIN		Unlimited	xsd:string	Mandatory

- The reporting financial institution’s Business ID
  - o Note: The “reporting financial institution” term refers to the entity relevant for the annual information return (ReportingFI)
  - o The sponsored entity’s Business ID if sponsoring
  - o This data element is required
- The Ilmoitin.fi checks the integrity of the Business ID. If the reporting financial institution has not been issued a Finnish Business ID, you must contact the Tax Administration.

Element	Attribute	Size	Input Type	Requirement
TransmittingCountry		2 digits	iso:CountryCode_Type	Validation

- The country of location for the reportable account
- This data element is required
  - o The 2-character Country Code (ISO-3166 Alpha 2)
- In general, for the FATCA returns, this would be “FI” (Finland)

Element	Attribute	Size	Input Type	Requirement
ReceivingCountry		2 digits	iso:CountryCode_Type	Validation

- Name of the country that receives the report
- This data element is required
  - o The 2-character Country Code (ISO-3166 Alpha 2)
- For FATCA returns, the United States, "US"

Element	Attribute	Size	Input Type	Requirement
MessageType			sfa:MessageType_EnumType	Validation

- Category of the annual information return
- This is a required data element
- For FATCA returns, enter "FATCA"

Element	Attribute	Size	Input Type	Requirement
Warning			xsd:string	Optional

- Not used
- Note: If you are submitting a nil return, complete the NilReport elements of the FATCA/ReportingGroup structure.

Element	Attribute	Size	Input Type	Requirement
Contact			xsd:string	Mandatory

- How to contact a person who can give further information. The contact person's information is not sent on to the Internal Revenue Service (in the USA).
- **This data element is required**
- Contact person's last name, first name, and phone number including its area code; contact person's e-mail address. The separator character between the name, phone number and e-mail address is the comma (,).  
example: Elmo the Filer, +358912345678, ilmo.ilmoittaja@financeslaitos.fi.

Element	Attribute	Size	Input Type	Requirement
MessageRefId			xsd:string	Validation

- The unique identifier, generated by the reporting financial institution
- This data element is required
- You, the filer representing the reporting financial institution must make sure no FATCA annual information returns are submitted with a MessageRefId that has already been used in a previous annual information return, either FATCA or CRS/DAC2.
  - o Note: however, if you are sending a correction as a replacement, use the MessageRefId you had used for the original.
- The following components make up the MessageRefId: The reporting financial institution's Business ID, the year of submittal, a sequential running digit (please note that the identifier cannot be similar to the ones entered in the annual information returns required by CRS/DAC2). Examples of MessageRefIds:
  - o Original annual information return: 6606611-7-2018-1
  - o Replacement: 6606611-7-2018-1
  - o Correction to a previously filed return: 6606611-7-2018-2
- Ilmoitin.fi runs a check on the format of the Business ID – year – sequential running digit.

Element	Attribute	Size	Input Type	Requirement
CorrMessageRefId			xsd:string	Optional

- The MessageRefId for the report containing corrections
- CorrMessageRefId must not have a value unless you are sending a correction
  - o Example: 6606611-7-2018-1
- Ilmoitin.fi runs a check on the format of the Business ID – year – sequential running digit.
- A correction can only refer to one previous return (to one MessageRefId).

Element	Attribute	Size	Input Type	Requirement
ReportingPeriod			xsd:date	Validation

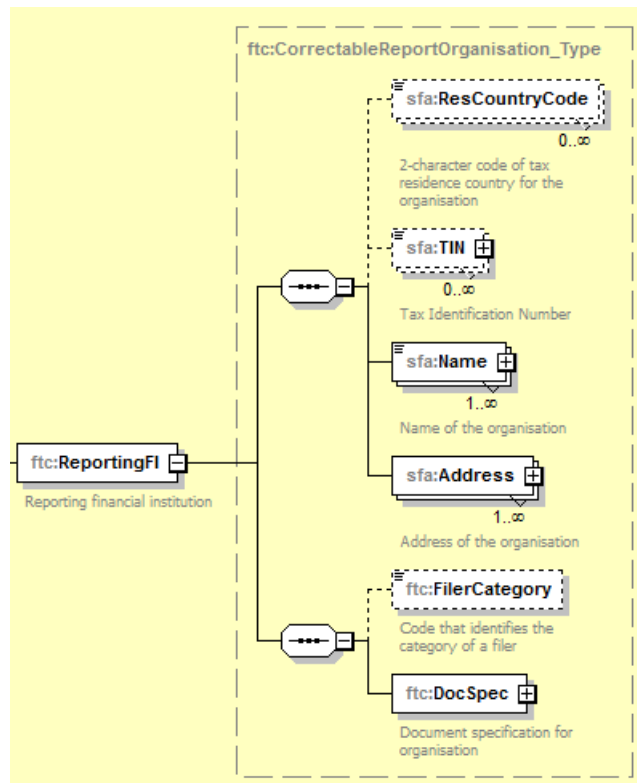
- The calendar year concerned by the annual information return
- This element is required
- Use the YYYY-12-31 format for the year's end date, in other words, enter 2018-12-31 for December 31, 2018
- You, the filer representing the reporting financial institution, have responsibility for indicating the correct year and using the Schema for that year
- The period when you can still make corrections is 1 + 5 years.

Element	Attribute	Size	Input Type	Requirement
Timestamp			xsd:dateTime	Validation

- The date and time when the annual information return is filed. Example: 2019-01-17T09:30:45Z
- This timestamp must be added by the filer of the return
- If you are filing a replacement, its timestamp must indicate a later date/time than that of the original
- The timestamped year must be the current year

## 6.2 FATCA/ReportingFI

This structure is for the information of the reporting entity (of the reporting financial institution, or of the sponsored entity).



Element	Attribute	Size	Input Type	Requirement
ResCountryCode		2-digit	iso:CountryCode_Type	Mandatory

- Country of location (of the reporting financial institution, or of the sponsored entity). The location for Finnish files is "FI", for Finland.
- The location country's 2-character Country Code (ISO-3166 Alpha 2)

Element	Attribute	Size	Input Type	Requirement
TIN		Min 1 char	sfa:TIN_Type	Mandatory
	issuedBy	2-digit	iso:CountryCode_Type	Optional

The TIN of a reporting financial institution (including sponsored entities):

- This element is required, also for nil returns
- The reporting financial institution's GIIN must **in all circumstances** be entered
  - o this field is not for the Finnish Business ID or a TIN issued by a foreign country. Instead, you must enter the GIIN here.
  - o you must use the financial institute's GIIN that matches the role the FI is having when submitting the annual information return
    - this way, when submitting the annual information return for themselves, financial institutions that are sponsors cannot use their "sponsor" GIIN (ending in .SP) – these FIs must use the GIIN that they are registered with (.SL, .LE, .ME)
  - o if the reportable entity is a sponsored entity, the annual information return must be complete with information on the sponsor in the structure designed for the purpose (for more guidance, see 6.3.1)

In the rare cases where the reporting financial institution has no GIIN, it is necessary to contact the Tax Administration to fulfil the information-reporting requirement.

The issuedBy attribute:

- The country of issue of the TIN
- The country that issues GIINs is the United States of America
- Enter the 2-character country code "US", or leave blank
  - If this attribute is blank, it will be assumed to indicate the issuing country is the United States

Element	Attribute	Size	Input Type	Requirement
Name			sfa:NameOrganisation_Type	Validation

- Registered company name or business name (of the reporting financial institution, or of the sponsored entity)
- This element is required

Element	Attribute	Size	Input Type	Requirement
Address			sfa:Address_Type	

- [For Address structures, go to 6.4.2 Address structures](#)

Element	Attribute	Size	Input Type	Requirement
FilerCategory			ftc:FatcaFilerCategory_EnumType	

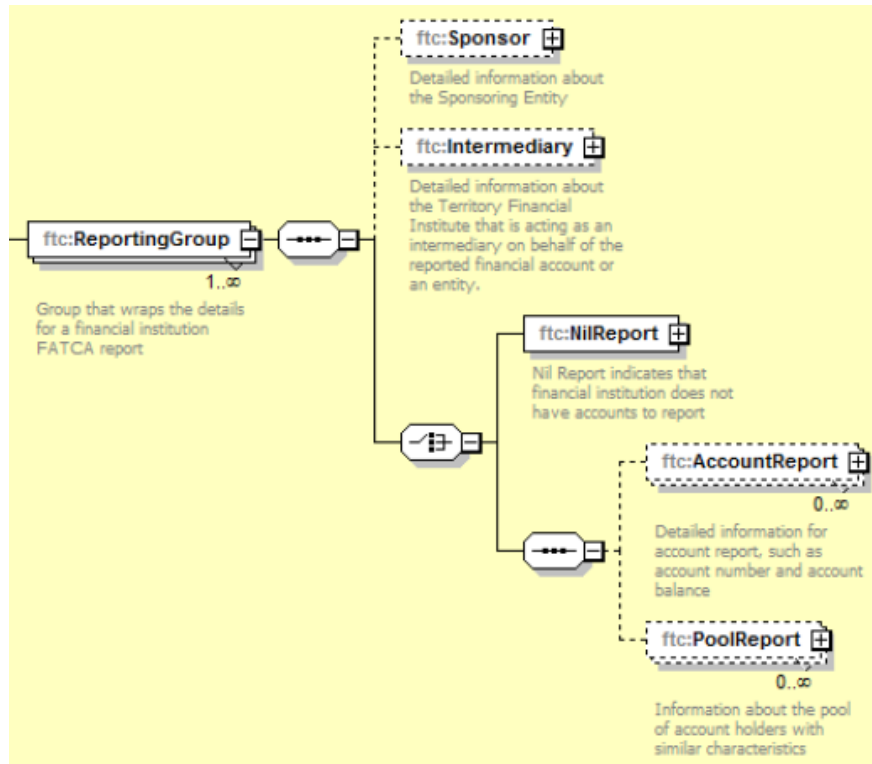
- This element is required
- Permissible codes for Finnish filers are FATCA 601 and FATCA607
- FATCA601: this code must always be entered with the ReportingFI element unless a sponsored entity is in question
- FATCA607: this code must be entered in sponsored-entity reporting when submitting the Sponsor element
- Enter just one or the other, depending on the circumstances

Element	Attribute	Size	Input Type	Requirement
DocSpec			ftc:DocSpec_Type	

- [For contents of the DocSpec structure, go to 6.4.3. DocSpec structures](#)

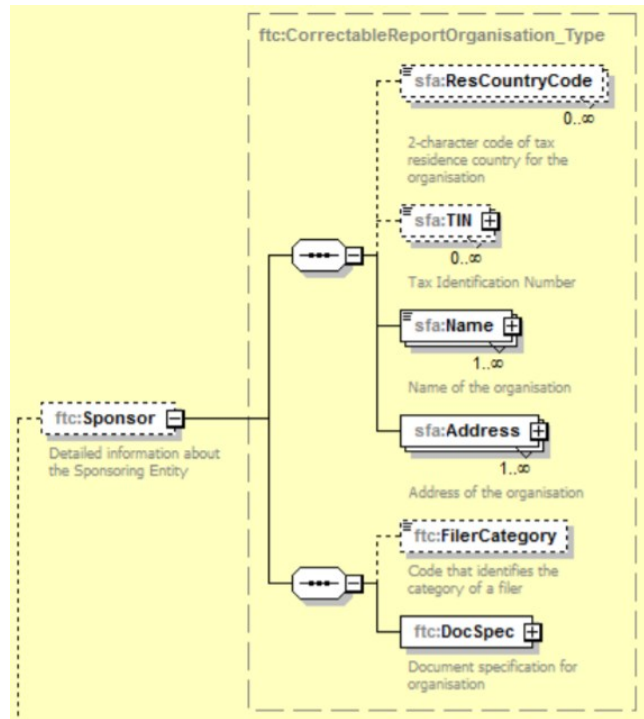
## 6.3 FATCA/ReportingGroup

This structure contains the account information of the reporting financial institution. This structure additionally contains the nil report information when appropriate (NilReport). In addition, the unique identification of the Sponsor and Intermediary are given in this structure.



### 6.3.1 Sponsor

- Sponsor information is required when the reportable entity that submits the annual information return is a sponsored entity (the reporting FI's GIIN ends in .SF, .SS or .SB)
- Always enter the sponsor's GIIN that ends in .SP
- The sponsored entity is both in the role of "ReportingFI" and "SendingCompany" in the annual information return
  - o Example: a Finnish investment fund can be a sponsored entity. In this case, the fund company that manages it can be the sponsor
    - o The fund company is accountable for the review and identification of the account holders (shareholders in the funds), and also for the submittal of the FATCA annual information returns for the funds
    - o The fund company must identify itself as the sponsor in this structure
    - o The sponsored entity – the Finnish investment fund – must, in this structure, be both the "ReportingFI:nä" and "SendingCompany"
  - o The details on account holders are given according to the normal procedure



Element	Attribute	Size	Input Type	Requirement
ResCountryCode		2-digit	iso:CountryCode_Type	Optional

Element	Attribute	Size	Input Type	Requirement
TIN		Min 1 char	sfa:TIN_Type	Optional

Element	Attribute	Size	Input Type	Requirement
Name			sfa:NameOrganisation_Type	Validation

- [6.4.1 Name structures](#)

Element	Attribute	Size	Input Type	Requirement
Address			sfa:Address_Type	Validation

- [For Address structures, go to 6.4.2 Address structures](#)

### 6.3.2 Intermediary

- [Go to 6.3.1 Sponsor to see the related structures](#)
- The Intermediary is a required data element if the financial institution is paying to a territory organized financial institute (TOFI) located in a U.S. territory listed in the Agreement (such as Puerto Rico).
- Where a territory organized financial institution (TOFI) is involved, its name, address and other identifying information must be provided in the same way as for the legal person being the reportable entity,
- The TIN of an Intermediary is its U.S. EIN, if it has been issued one and the reporting financial institution is aware of the EIN.
- If the TOFI does not have a U.S.EIN then TIN is the EIN used by the relevant U.S. territory tax administration to identify the TOFI.

### 6.3.3 AccountReport

This structure is for giving details on the account holder, accounts and balance amounts

Element	Attribute	Size	Input Type	Requirement
DocSpec			ftc:DocSpec_Type	

- [For more information on DocSpec structures, see 6.4.3 DocSpec structures](#)

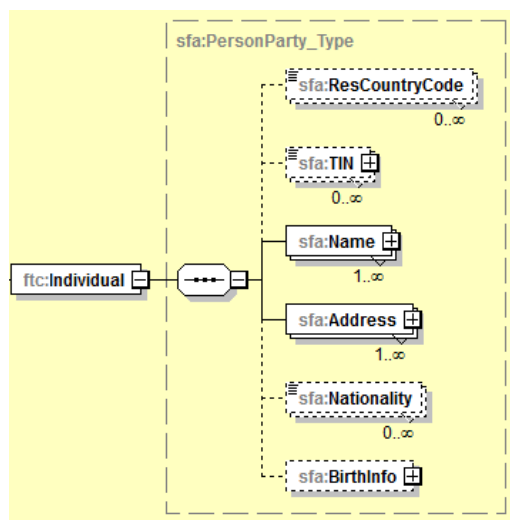
Element	Attribute	Size	Input Type	Requirement
AccountNumber			ftc:FIAccountNumber_Type	Validation

- Account holder's account number
- If there is no customary account number, use the code the reporting financial institution uses in its usual business transactions to refer to the account holder's assets
  - o This may be an insurance policy number, a code number for the contract, an accounts payable number, the account's name in words, etc.

Element	Attribute	Size	Input Type	Requirement
AccountClosed			xsd:boolean	

- A closed account
  - o you should indicate whether (true) or (false)
    - This is a required element if the account is closed (or transferred)

### 6.3.3.1 AccountHolder structures/Individual



Element	Attribute	Size	Input Type	Requirement
ResCountryCode		2-digit	iso:CountryCode_Type	Optional

- The reportable natural person's country of tax residence
- The country of tax residence of the account holder or controlling person
- If the reporting financial institution is aware of the country, this is a required element
  - o The 2-character Country Code (ISO-3166 Alpha 2)
- Indicate all the countries if the natural person has multiple countries of tax residence

Element	Attribute	Size	Input Type	Requirement
TIN		Min 1 char	sfa:TIN_Type	Mandatory

- The U.S. TIN of the account holder or controlling person
- TIN, the U.S. Taxpayer Identification Number, is required
  - o Ilmoitin makes a check of whether or not the TIN is entered
  - o In the event that the U.S. TIN is known, there is no need to provide any other countries' TIN information concerning the account holder or controlling person.
  - o There are 9 digits in a U.S. TIN. See the following guidance of the Internal Revenue Service regarding the U.S. TIN's proper format:

- “A value for a TIN data element must be either in a GIIN format or in one of the following formats for a US TIN:
    - Nine consecutive digits without hyphens or other separators (e.g. 123456789)
    - Nine digits with two hyphens (e.g. 123-45-6789)
    - Nine digits with a hyphen entered after the second digit (e.g. 12-3456789)”
- If the U.S. TIN of the account holder or controlling person is not known to the financial institution, an appropriate 9-character code selected from the codes listed below should be entered in the TIN element. If the codes cannot be used for technical reasons, for example, and the TIN is not known, enter nine zeros (000000000) in the TIN element.
- The Tax Administration’s detailed FATCA guidance (sections National options allowed by the agreement and 5.7 Tax identification number (TIN)) describes the conditions under which a U.S. TIN is not mandatory reportable data in Finland on a FATCA annual information return, provided that the reporting financial institution still makes every reasonable effort to obtain the missing U.S. TIN from the account holder. In situations where all the conditions described in the guidance are met and the U.S. TIN is missing, it is recommended that you should enter nine letters A (AAAAAAAAA) in the TIN element. With this code, the reporting party confirms that the case is within the scope of the exception described in the above-mentioned detailed FATCA guidance. Nine letters A should not be used in the TIN element in any other situation.
- IRS has published new instructions in May 2021 and in January 2023 related to reporting missing US TINs ([see FAQ6 in IRS's website](#)). According to IRS, regarding individual account holders whose US TIN is unknown to the financial institution at the time of reporting, the following codes should be used in TIN element in order to provide information related to the circumstances of each case:
  - 222222222 – Preexisting individual account with only U.S. indicia being a U.S. place of birth, other than an account reported under code 000222111. This code takes precedence if any other code (other than 000222111) could also be applicable.
  - 000222111 – Preexisting depository individual account with only U.S. indicia being a U.S. place of birth. Additionally, FFI must determine that the account holder is a resident of the jurisdiction where the account is maintained for AML and tax purposes. For reference, “depository account” has the meaning defined in the applicable Model 1 Intergovernmental Agreement (Model 1 IGA). This code takes precedence if any other code could also be applicable.
  - 333333333 – New individual account that (1) has indicia of a U.S. place of birth, and (2) either:
    - a) has a change in circumstances causing the self-certification originally obtained at account opening to be incorrect or unreliable, and a new self-certification has not been obtained, or
    - b) was below the threshold for documenting and reporting the account at the time of account opening (if opened in 2014 or 2015) and subsequently exceeded the threshold, and a self-certification has not been obtained.
  - 444444444 – Preexisting individual account that (1) has U.S. indicia other than a U.S. place of birth, and (2) either:
    - a) has a change in circumstances that either results in one or more U.S. indicia being associated with the account or causes a self-certification or other documentation originally obtained to be incorrect or unreliable, and a valid self-certification or other documentation has not been obtained subsequent to the change in circumstances, or
    - b) was below the threshold for documenting and reporting the account in 2014 and 2015 and subsequently exceeded the threshold, and a self-certification or other documentation has not been obtained.
  - 555555555 – New individual account that has a U.S. indicia other than a U.S. place of birth, and (2) either:

- a) has a change in circumstances causing the self-certification or other documentation originally obtained to be incorrect or unreliable, and a new self-certification or other documentation has not been obtained, or
  - b) was below the threshold for documenting and reporting the account at the time of account opening (in 2014 or 2015) and subsequently exceeded the threshold, and a self-certification or other documentation has not been obtained.
- 777777777 – Pre-existing individual account which has been dormant or inactive (for reference see Tax Administration's binding guidance on FATCA, section "4.15 Käyttämättömät tilit"). If an account could be classified into multiple TIN codes, the other code takes precedence.
- 999999999 – Any account for which the FFI cannot obtain a TIN and none of the other TIN codes would be applicable. The use of this code indicates that an FFI has completed its review of accounts without U.S. TINs and has in good faith applied TIN codes to records when applicable.
- The IRS released Notice 2024-78 that lays down new requirements regarding situations, in which a Tax identification number issued by the United States is missing (US TIN) from FATCA reporting for the 2025, 2026 and 2027 reporting years. These requirements are as follows:
  - Foreign-issued tax identification numbers to be reported. If the financial institution searches its electronic archive and locates a foreign-issued TIN for the account holder (also including a Finnish personal identity code), this identifier has to be reported on the FATCA annual information return when reporting the financial account for which there is no U.S. TIN.
  - City and country of residence to be reported using the AddressFix structure. For all financial accounts with a missing required U.S. TIN, the following has to be reported under AddressFix:
    - City
    - Country of residence
- If the U.S. TIN has not been indicated in the annual information return, the IRS will send an error message to the Finnish Tax Administration. The reporting financial institution must be prepared to correct the error or give an explanation within 120 days in cases where correction or explanation is requested by the Finnish Tax Administration.

Element	Attribute	Size	Input Type	Requirement
TIN	issuedBy	2-digit	iso:CountryCode_Type	Optional

- The country of issue of the TIN
- Enter the 2-character country code (ISO-3166 Alpha 2) "US", or up to the 2024 reporting year, leave blank. Starting the 2025 reporting year, it is permissible for the value of the IssuedBy to be the country code of the country that issued the Tax identification number.
- If this attribute is blank, it will be assumed to indicate the issuing country is the United States
- If the account holder is a passive non-financial entity not having a U.S. TIN, leave the element blank

Element	Attribute	Size	Input Type	Requirement
Name			sfa:NamePerson_Type	

- [For more information on Name structures, go to 6.4.1 Name structures](#)

Element	Attribute	Size	Input Type	Requirement
Address			sfa:Address_Type	

- [For Address structures, go to 6.4.2 Address structures](#)

Element	Attribute	Size	Input Type	Requirement
Nationality			iso:CountryCode_Type	Null

- This element is not in use for purposes of FATCA reporting.

#### 6.3.3.1.1 BirthInfo

The BirthInfo structure is used when the Reporting Financial Institution does not have the U.S. TIN of the account holder or controlling person.

Element	Attribute	Size	Input Type	Requirement
BirthDate			xsd:date	Optional

- Account holder's date of birth
- Enter the date in the YYYY-MM-DD format, as in 1975-01-21
- The earliest permissible date of birth is 1900-01-01

Element	Attribute	Size	Input Type	Requirement
City			xsd:string	Null

- Not used on the FATCA information return, must be blank

Element	Attribute	Size	Input Type	Requirement
CitySubentity			xsd:string	Null

- Not used on the FATCA information return, must be blank

Element	Attribute	Size	Input Type	Requirement
CountryInfo			xsd:string	Null

- Not used on the FATCA information return, must be blank

#### 6.3.3.2 AccountHolder structures/Organisation

Element	Attribute	Size	Input Type	Requirement
ResCountryCode		2-digit	iso:CountryCode_Type	Optional

- The entity's country of tax residence
- The 2-character Country Code (ISO-3166 Alpha 2)
- If the reporting financial institution is aware of the country, this is a required element
- In case the reporting financial institution has inconclusive information on the entity's country of residence, enter all the countries that are involved
  - o Example: an entity may be a Limited Company in the "X" country. However, all addresses and other contact information refer to the "Y" country, and the reporting financial institution has not been able to clear up the entity's real country of tax residence.

Element	Attribute	Size	Input Type	Requirement
TIN		Min 1 char	sfa:TIN_Type	Mandatory

For the account holder:

- The U.S. Taxpayer Identification Number, TIN is required
  - o There are 9 digits in a U.S. TIN. See the following guidance of the Internal Revenue Service regarding the U.S. TIN's proper format:
    - "A value for a TIN data element must be either in a GIIN format or in one of the following formats for a US TIN:

- *Nine consecutive digits without hyphens or other separators (e.g. 123456789)*
  - *Nine digits with two hyphens (e.g. 123-45-6789)*
  - *Nine digits with a hyphen entered after the second digit (e.g. 12-3456789)”*
- It is allowed to include a foreign TIN in the TIN element for a non-US Entity Account Holder that has US Substantial Owners (AcctHolderType FATCA101 or FATCA102). In this case, the TIN Issued by element should be populated with the issuing country code. If there is no foreign TIN available for the foreign entity, the characters “NA” (to indicate “Not Available”) can be included in the TIN element, and in that case “FI” should be included in the TIN Issued by element.
  - For example, if the account holder is Finnish Passive Non-Financial Entity with substantial US owner, the Finnish TIN is populated in the Account Holder's TIN element and “FI” in the TIN Issued by element.
  - IRS has published new instructions in May 2021 and in January 2023 related to reporting missing US TINs ([see FAQ6 in IRS's website](#)). According to IRS, regarding US tax liable entity account holders whose US TIN is unknown to the financial institution at the time of reporting, the following codes should be used in TIN element in order to provide information related to the circumstances of each case:
    - 444444444 – Preexisting entity account that (1) has U.S indicia, and (2) either:
      - a) has a change in circumstances that either results in one or more U.S. indicia being associated with the account or causes a self-certification or other documentation originally obtained to be incorrect or unreliable, and a valid self-certification or other documentation has not been obtained subsequent to the change in circumstances, or
      - b) was originally below the threshold for documenting and reporting the account, and subsequently exceeded the threshold, and a self-certification or other documentation has not been obtained.
    - 555555555 – New entity account that has a U.S. indicia, and (2) either:
      - a) has a change in circumstances causing the self-certification or other documentation originally obtained to be incorrect or unreliable, and a new self-certification or other documentation has not been obtained, or
      - b) was below the threshold for documenting and reporting the account at the time of account opening and subsequently exceeded the threshold, and a self-certification or other documentation has not been obtained.
    - 666666666 – Preexisting entity account held by a passive NFFE with one or more controlling persons with respect to which self-certifications have not been obtained, and no U.S. indicia have been identified in relation to any controlling persons.
    - 777777777 – Pre-existing entity account which has been dormant or inactive (for reference see Tax Administration's binding guidance on FATCA, section "4.15 Käyttämättömät tilit"). If an account could be classified into multiple TIN codes, the other code takes precedence.
    - 999999999 – Any account for which the FFI cannot obtain a TIN and none of the other TIN codes would be applicable. The use of this code indicates that an FFI has completed its review of accounts without U.S. TINs and has in good faith applied TIN codes to records when applicable.

Element	Attribute	Size	Input Type	Requirement
TIN	issuedBy	2-digit	iso:CountryCode_Type	Optional

- The country of issue of the TIN
- Enter the 2-character Country Code (ISO-3166 Alpha 2) "US", or leave blank
- If this attribute is blank, it will be assumed to indicate the issuing country is the United States.
- If the account holder is a passive non-financial entity with US Persons among the entity's substantial owners, and the entity is not a US tax liable entity, enter the country code in the TIN IssuedBy element of the country of which the TIN is reported, following the instructions above. If no tax identification number for any country is known for the account holder, it is permissible to enter "NA" in the TIN element; in this case, you need to enter "FI" in the TIN Issued by element

Element	Attribute	Size	Input Type	Requirement
Name			sfa:NameOrganisation_Type	Validation

- Legal registered name of the account holder
- This element is required

Element	Attribute	Size	Input Type	Requirement
Address			sfa:Address_Type	Validation

- [For Address structures, go to 6.4.2 Address structures](#)

#### 6.3.3.3 AccountHolder-rakenteet/AcctHolderType

Element	Attribute	Size	Input Type	Requirement
AcctHolderType			Ftc:FatcaAcctHolderType_EnumType	Mandatory

- Types of account holders
  - o FATCA101 = Owner-Documented FI with specified US owner(s).
  - o FATCA102 = Passive Non-Financial Entity with substantial US owner(s).
  - o FATCA103 = Non-Participating FFI
  - o FATCA104 = Specified US Person
  - o FATCA105 = Direct Reporting NFFE
- If an account is held by an entity, not a natural person, this element is required.
- If this data element's value is FATCA101 or FATCA102, you also have to fill out the SubstantialOwner information. Note: otherwise no SubstantialOwner is to be filled out
- The account-holder type "Non-Participating FFI (FATCA103)" is a financial institution that does not fulfil the requirements under the FATCA Agreement, and to which the reporting financial institution has paid money.
- Starting 2017, the FATCA annual information return no longer has to include amounts paid to non-participating financial institutions and the accounts they hold

#### 6.3.3.4 SubstantialOwner

- To see the structure, go to [6.3.3.1 AccountHolder structures/Individual](#)
- Personal details of the controlling person
- This data element is required only if it is known to the financial institution that there are Controlling Persons who are Reportable as regards the account (in other words, controlling persons with the United States as the country of residence, as evidenced either by self-certification or by indicia).
- Information must be included in the SubstantialOwner structure only when an account holder is being reported, having an AcctHolderType = FATCA101 or FATCA102 i.e. "owner documentedFI" or "passive NFFE with US owner(s)".
- If the account-holder entity has no Controlling Persons with the United States as country of residence, do not use codes FATCA101 and FATCA102 to give details on this account holder, and consequently, do not indicate any controlling persons.

- For every account being reported, you must include all the individuals whom you have identified as Reportable Controlling Persons;
  - o give complete details on gross assets and all transactions for each.

#### 6.3.3.5 AccountBalance

Element	Attribute	Size	Input Type	Requirement
AccountBalance			sfa:MonAmnt_Type	Mandatory
	currCode		sfa:MonAmnt_Type	Mandatory

- Account balance
- This element is required
- Indicate the end-of-calendar-year balance, or the balance just before closure of the account, with 2 decimals, for example enter 1000.00 for one thousand euros
- The currency for this data element is the euro or the foreign currency the account uses
- You can convert a foreign-currency balance into euros, but this is not required
- If account balance is 0 or negative, enter 0.00
- The currCode attribute indicates the name of the foreign currency of account balance

#### 6.3.3.6 Payment

Element	Attribute	Size	Input Type	Requirement
Type			ftc:FatcaPaymentType_EnumType	Validation

- Classification of the reportable income
  - o FATCA501 = dividends
  - o FATCA502 = interest
  - o FATCA503 = selling price or redemption price of an asset
  - o FATCA504 = Other income
- If you are reporting transfers of money that are payments for corporate shares, for parts of a loan, or relating to an insurance contract, you can classify it as a single item with no specification (FATCA504) or you can specify it (FATCA501-FATCA503)

Element	Attribute	Size	Input Type	Requirement
PaymentAmnt			sfa:MonAmnt_Type	Validation
	currCode	3 digit	iso:currCode_Type	Validation

- Amount of money, transferred to the account
- Enter the amount with two decimal places
- The currency for this attribute is the euro; or the foreign currency the account uses
- You can convert a foreign-currency balance into euros, but this is not required
- The currCode attribute is for the name of the foreign currency used when receiving money into the account

#### 6.3.3.7 CARRef

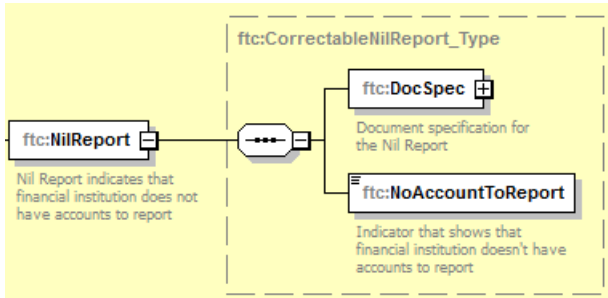
Not used.

#### 6.3.3.8 AdditionalData

Not used.

### 6.3.4 NilReport

This structure is for indicating that a nil return is being filed. When your annual information return is a nil return, refer to section 4 for guidance on how nil returns are submitted.



Element	Attribute	Size	Input Type	Requirement
NoAccountToReport			xsd:string	

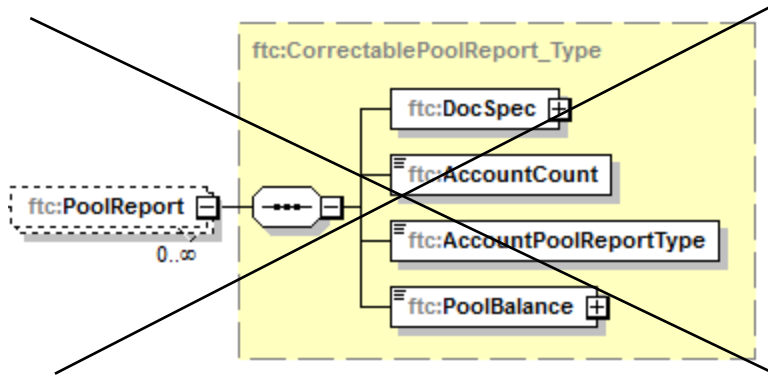
- This element is required ("Yes") when you submit a Nil return.
- Not one AccountReport structure can be included in a Nil return.

Element	Attribute	Size	Input Type	Requirement
DocSpec			ftc:DocSpec_Type	

- [For more information on DocSpec structures, see 6.4.3 DocSpec structures](#)

### PoolReport

The structure with the pooled reporting option is not available because Finland provides the information pursuant to a Model 1 IGA.



## 6.4 Shared structures

This section discusses the structures within the Schema that are shared. Reference is made to the shared structures where appropriate and where they are in use.

### 6.4.1 Name structures

Element	Attribute	Size	Input Type	Requirement
PrecedingTitle			stf:OECDNameType_EnumType	Null

- This data element is not used for FATCA reporting

Element	Attribute	Size	Input Type	Requirement
Title			xsd:string	Null

- This data element is not used for FATCA reporting

Element	Attribute	Size	Input Type	Requirement
FirstName			xsd:string	Mandatory

- Account holder's / Controlling person's first names
- This data element is required
  - o If there is no value available, fill in "NFN" (No First Name)
- The complete first and middle names of a natural person are reported in this field

Element	Attribute	Size	Input Type	Requirement
MiddleName			xsd:string	Optional

- This data element is not used for FATCA reporting

Element	Attribute	Size	Input Type	Requirement
NamePrefix			xsd:string	Optional

- This data element is not used for FATCA reporting

Element	Attribute	Size	Input Type	Requirement
LastName			xsd:string	Mandatory

- Account holder's / Controlling person's last name
- This data element is required
- All the family names of a natural person are reported in this field
- If the IT system of the reporting financial institution cannot transmit the person's first names to the FirstName element, both first and last names must go to the LastName element and you must enter NFN (No First Name) in the FirstName element.

Element	Attribute	Size	Input Type	Requirement
GenerationIdentifier			xsd:string	Null

- This data element is not used for FATCA reporting

Element	Attribute	Size	Input Type	Requirement
Suffix			xsd:string	Null

- This data element is not used for FATCA reporting

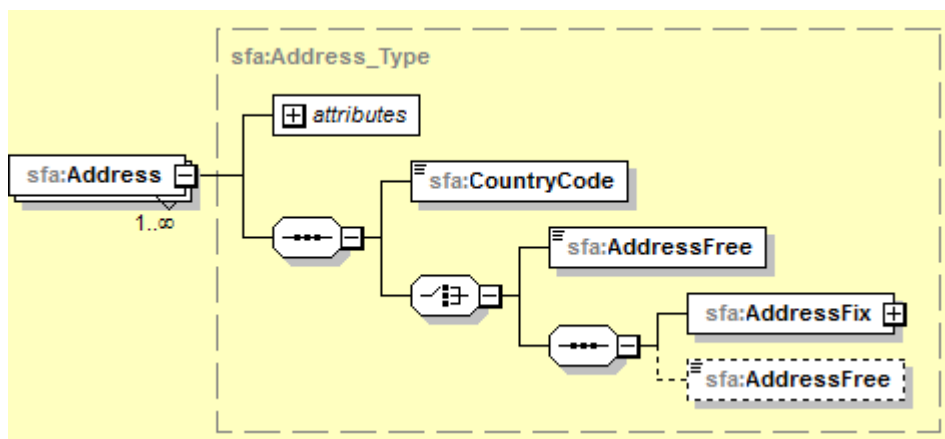
Element	Attribute	Size	Input Type	Requirement
GeneralSuffix			xsd:string	Null

- This data element is not used for FATCA reporting

## 6.4.2 Address structures

Because the address information is required, you must enter it in either AddressFix or AddressFree structure. If the reporting financial institution is aware of the complete address information, AddressFix must be used for the FATCA annual information return.

In case an individual Account Holder or a Substantial Owner of a Passive Non-Financial Entity has been recorded a non-disclosure for personal safety reasons in the Population Information System, either in Finland or in some other jurisdiction, address information that is under such non-disclosure should not be reported; instead some other address, which is public and safe for the customer in question, should be reported. In Finland such safe address is a public contact address recorded in the Population Information System. Contact address can be for example a PO Box address either in the municipality of residence of the customer or in some other municipality. You can find further guidance in section 6.4.2.2.



Element	Attribute	Size	Input Type	Requirement
CountryCode		2 digits	iso:CountryCode_Type	Mandatory

- Country of location of the address
- This element is required
- The 2-character Country Code (ISO-3166 Alpha 2)

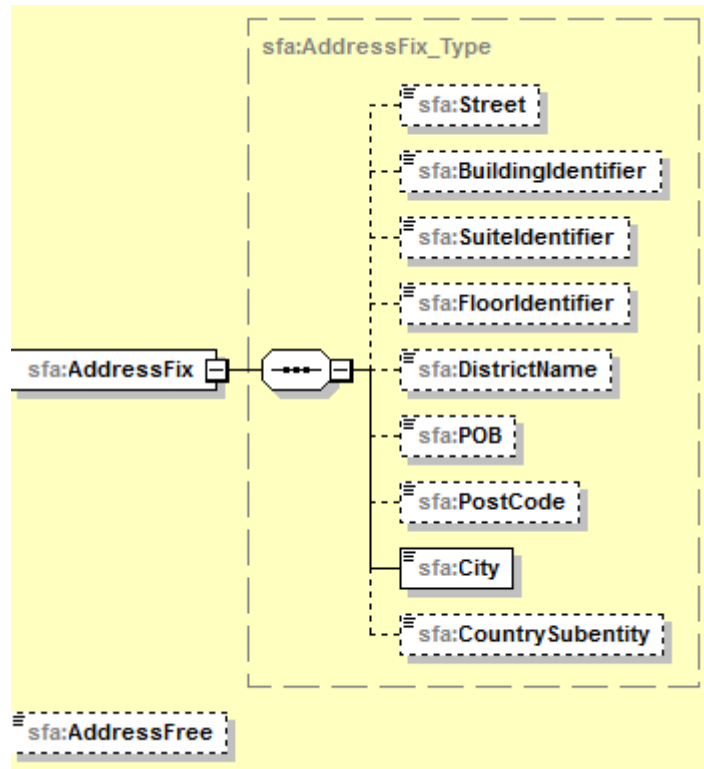
### 6.4.2.1 AddressFix

If you are using AddressFix to facilitate address reporting, you must enter at least the following details in this structure, if they are available:

- City
- Postal code
- State or other Country Subentity

In addition, the full street address must be reported in the relevant elements, but it is also allowed to enter the street address in AddressFree structure, while above listed details are entered in AddressFix structure. Please see more details in 6.4.2.2 AddressFree.

**Note:** Starting the 2025 reporting year, it is required for all reportable financial accounts with a missing required US TIN to use the AddressFix structure to provide the city (the City element) and the country of residence (CountrySubentity). For detailed instructions, see section 6.3.3.1 AccountHolder structures/Individual.



Element	Attribute	Size	Input Type	Requirement
Street			xsd:string	Optional

- Street Name
- If the reporting financial institution is aware of the correct value, this is a required element

Element	Attribute	Size	Input Type	Requirement
BuildingIdentifier			xsd:string	Optional

- House no./Building no.
- If the reporting financial institution is aware of the correct value, this is a required element

Element	Attribute	Size	Input Type	Requirement
SuitIdentifier			xsd:string	Optional

- Apartment number, etc.
- If the reporting financial institution is aware of the correct value, this is a required element

Element	Attribute	Size	Input Type	Requirement
FloorIdentifier			xsd:string	Optional

- The floor or storey in the building
- If the reporting financial institution is aware of the correct value, this is a required element

Element	Attribute	Size	Input Type	Requirement
DistrictName			xsd:string	Optional

- Name of the neighbourhood, district, section of the town
- If the reporting financial institution is aware of the correct value, this is a required element

Element	Attribute	Size	Input Type	Requirement
POB			xsd:string	Optional

- P.O. Box
- If the address is a P.O. box, this is a required data element

Element	Attribute	Size	Input Type	Requirement
PostCode			xsd:string	Optional

- Postal (zip) code
- If the reporting financial institution is aware of the correct value, this is a required element

Element	Attribute	Size	Input Type	Requirement
City			xsd:string	Validation

- City/Municipal entity
- This element is required

Element	Attribute	Size	Input Type	Requirement
CountrySubentity			xsd:string	Optional

- State or other sub-entity
- If the reporting financial institution is aware of the correct value, this is a required element

#### 6.4.2.2 AddressFree

You can choose the AddressFree structure if it is not feasible to give the address information in AddressFix.

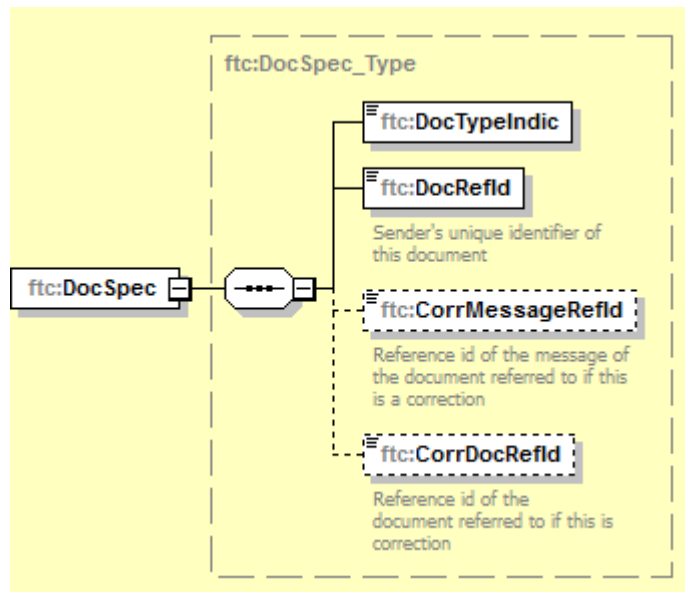
If the IT system available to the reporting FI does not specify the street address as required in AddressFix, you can enter the entire address here. In this case, enter city or town, postal code (zip code) and state, if available, in the AddressFix structure. If you are indicating the account holder's address with both AddressFix and AddressFree, you must include both structures in one Address structure, do not enter them in two separate Address structures.

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

- This element is a free-text field for address information
- Use the following order of sequence: street, name of town/city, state, and postal code
- This element is secondary while AddressFix is the primary element
  - o If complete address information has been given successfully in the AddressFix structure, you must leave out the AddressFree element
- In case an individual Account Holder or a Substantial Owner of a Passive Non-Financial Entity has been recorded a non-disclosure for personal safety reasons in the Population Information System, and the reporting financial institution has no information of a public contact address or other safe address for the customer, the AddressFree element should include the following text: "Non-disclosure for personal safety reasons based on domestic legislation".

#### 6.4.3 DocSpec structures

DocSpec structure is comprised of the following elements: DocTypeIndic for the type of report, DocRefId – the unique identifier of the specific report, CorrMessageRefId for message to be corrected, and CorrDocRefId for reports to be corrected.



Element	Attribute	Size	Input Type	Requirement
DocTypeIndic			ftc:FatcaDocTypeIndic_EnumType	Validation

- Type of report
- Permissible values are:
  - o FATCA1 = New Data (live production)
    - under the FATCA1 code, you can continue to submit annual returns for the previous calendar year up to the end of July (July 31). After July 31, the following code values must be used.
  - o FATCA2 = Corrected Data (live production)
  - o FATCA3 = Void Data (live production)
  - o FATCA4 = Amended Data (live production)
- The following codes are not used in Finland's reporting:
  - o FATCA11 = New Test Data (tests)
  - o FATCA12 = Corrected Test Data (tests)
  - o FATCA13 = Void Test Data (tests)
  - o FATCA14 = Amended Test Data (tests)

Element	Attribute	Size	Input Type	Requirement
DocRefId		Minimum 1 character	xsd:string	Validation (ilmoitin.fi)

- The **unique identifier** of the report, different in each one of the elements
- The reporting financial institution must make sure that there is no identical DocRefId in the annual information, in the previous FATCA returns, and in the previous CRDS/DAC2 returns
- The data element is comprised of the following parts:
  - The financial institution's GIIN, for example, CAWYDV.00001.SF.246
  - Period (.)
  - The Business ID, the tax year, a digit that runs in sequence; example: 6606611-7-2018-001-002-003
  - The Business ID and tax year are mandatory
  - No blank characters are allowed (no blankspaces), including no leading or trailing blank spaces
  - Max 200 characters.
- Example of an entire string for DocRefId:  
CAWYDV.00001.SF.246.6606611-7-2018-001-002-003

Element	Attribute	Size	Input Type	Requirement
CorrMessageRefId		Minimum 1 character	xsd:string	Optional

- This is used when you are filing a correction, and DocTypeIndic <> FATCA1
- The MessageRefId of the file being corrected
- The consistent parts are Business ID-year-seq.digit, example: 6606611-7-2016-1

<b>Element</b>	<b>Attribute</b>	<b>Size</b>	<b>Input Type</b>	<b>Requirement</b>
CorrDocRefId		Minimum 1 character	xsd:string	Optional

- This is used when you are filing a correction, and DocTypeIndic <> FATCA1
- The DocRefId of the report being corrected
- This element is only for purposes of making corrections to an earlier file

## 7 LIST OF AUTOMATED CHECKS MADE BY ILMOITIN

These checks prevent the return from being sent if an error or omission is detected in the data.

Date when added (mm/yyyy is shown if the check was added 1 January 2019 or later)	Related data element	Description of the automated check process
3/2024	All data elements	<p>The file is not identified as a FATCA report. Check that XML complies with the schema.</p> <p>#File [] does not contain acceptable data. The check routine cannot be run. Attachments to income tax returns are submitted through the Attachment files page.</p>
	All data elements	#The submitted filing contains unacceptable characters, or unacceptable combinations of characters (--,&#,' or /*)
6/2020	Encoding	<p>The required encoding for XML files is UTF-8. This must be indicated at the start of the XML file: &lt;?xml version="1.0" encoding="UTF-8"?&gt;</p>
	Contact	<p>A check process is in place to check that this data element has a value.</p> <p>#Elementti 'Contact' on pakollinen #Elementin 'Contact' nimen, puhelinnumeron ja sähköpostiosoitteen välissä on oltava pilkut</p>
06/2020	Timestamp	<p>A check is made to make sure that the value of the MessageSpec/Timestamp element is the current year.</p> <p>#Timestamp elementin vuosi tulee olla sama kuin kuluva vuosi</p>
Updated 06/2020	AccountReport	<p>The submittal must either contain AccountReport structure(s) or a NilReport structure. Submittals that do not contain one or the other are not accepted.</p> <p>#Joko 'ftc:NilReport' tai ainakin yksi 'ftc:AccountReport' rakenne on ilmoitettava.</p>
6/2020	ReportingGroup	<p>If you are filing a nil return containing a Sponsor structure, then the Sponsor structure and NilReport structure must be inside one ReportingGroup structure. Accordingly, there can be no more than one ReportingGroup structure only.</p> <p>#Nollailmoituksella Sponsor ja NilReport rakenteet pitää olla samassa ReportingGroup rakenteessa</p>
	SendingCompanyIN MessageRefId	<p>Ilmoitin.fi checks the format of the Business ID</p> <p>#Virheellinen ytunnus [] elementissä []</p>
	MessageRefId	<p>The business ID found in MessageRefId must be the same as that in the SendingCompanyIN element.</p> <p>#Elementin 'MessageRefId' y-tunnus ei vastaa elementin 'SendingCompanyIN' y-tunnusta</p>
	CorrMessageRefId	<p>This information is only allowed on a correction (DocTypeIndic = "Fatca2, 3 or 4")</p> <p>#Elementin sfa:CorrMessageRefId saa ilmoittaa vain korjaussanomilla</p>

	CorrMessageRefId	The CorrMessageRefId that you submitted is not found among the records submitted previously: <i>[CorrMessageRefId]</i>  #Annettua CorrMessageRefId:tä ei löydy aiemmin lähetetyistä aineistoista: <i>[CorrMessageRefId]</i>
3/2022	MessageSpec/CorrMessageRefId	If DocSpec/DocTypeIndic value is FATCA2, FATCA3 or FATCA4 then MessageSpec/CorrMessageRefId is mandatory  #MessageSpec rakenteesta puuttuu CorrMessageRefId elementti. Korjaus/poistotilanteissa kyseinen elementti on pakollinen.
	DocRefId	A check is made in order to prevent re-use of a DocRefId for “new” or “replacement” report types (DocTypeIndic = 'FATCA1') and the MessageRefId is found in Ilmoitin.fi because it has been reported previously.  #Olet lähettämässä ilmoitusta jo aiemmin käytetyllä DocRefId:llä: <i>[DocRefId]</i>
3/2024	DocRefId	Check that the DocRefId element is in the format specified under 6.4.3 DocSpec structures  #Element 'ReportingGroup/AccountReport/DocSpec/DocRefId' in invalid format ([])
	CorrDocRefId	The CorrDocRefId that you submitted is not found among the records submitted previously: <i>[CorrDocRefId]</i>  #Annettua CorrDocRefId:tä ei löydy aiemmin lähetetyistä aineistoista: <i>[CorrDocRefId]</i>
6/2020	CorrDocRefId	If the value of DocTypeIndic is FATCA2, FATCA3 or FATCA4, then the structure must contain a CorrDocRefId element that has not been left blank.  #Jos DocTypeIndic on FATCA2, FATCA3 tai FATCA4 on samassa rakenteessa löydyttävä CorrDocRefId elementti, eikä se saa olla tyhjä.
Updated 9/2025	AccountHolder/Individual/TIN  SubstantialOwner/Individual/TIN	TIN element cannot have 9 times the same character (as in 111111111, 111-11-1111 or 11-1111111), and the entry cannot consist of blank spaces only.  Exceptions are TIN values 000000000, AAAAAAAAAA, 222222222, 333333333, 444444444, 555555555, 777777777 and 999999999 that are allowed.  The above will apply, if no IssuedBy attribute is reported or if the value of IssuedBy is US.  #Virheellinen US TIN elementissä 'Individual/TIN'
Updated 9/2025	AccountHolder/Organisation/TIN	TIN element cannot have 9 times the same character (as in 111111111, 111-11-1111 or 11-1111111), and the entry cannot consist of blank spaces only.  Exceptions are TIN values 000000000, 444444444, 555555555, 666666666, 777777777 and 999999999 that are allowed.  #Virheellinen US TIN '111111111' elementissä 'Organisation/TIN'
Updated 3/2021	.../Individual/BirthInfo/BirthDate	If the BirthDate element is filled in, its value must fall between [1900 – end date of the reporting year]  #BirthDate elementin arvo on muu kuin välillä 1900 ja ReportingPeriod elementin arvo eli ReportingPeriod viimeinen päivä
3/2025	DocTypeIndic	A return may contain only elements that have the same DocTypeIndic value.

		To include more than one DocTypeIndic value in one return is not allowed.  #Usean eri DocTypeIndic arvon käyttäminen samalla ilmoituksella ei ole sallittu.
6/2020	DocTypeIndic	DocTypeIndic only has the following permissible values: FATCA1, FATCA2, FATCA3 or FATCA4  #DocTypeIndic sallitut arvot ovat FATCA1, FATCA2, FATCA3 ja FATCA4
	DocTypeIndic	The first possible date to submit a correction (DocTypeIndic = "FATCA2, 3 or 4") is 1 September yyyy.  #FATCA2, 3, 4 muotoista dataa otetaan vastaan ilmoituksen vuodelta 31.8.201V jälkeen
	DocTypeIndic CorrMessageRefId	The CorrMessageRefId element cannot be included unless you are submitting a correction report (DocTypeIndic = "Fatca2, 3 or 4")  #Elementin sfa:CorrMessageRefId saa ilmoittaa vain korjaussanomilla
6/2019	SendingCompanyIN MessageRefId	No identity codes found in the example files are permitted in senders' real reports.  #Esimerkkisanomilla olevaa y-tunnusta [] ei saa käyttää varsinaisilla sanomilla.
Updated 3/2021	Account/Individual/TIN  SubstantialOwner/Individual/TIN	The TIN is required if DocTypeIndic value is not FATCA3.  #Pakollinen elementti puuttuu './Individual/TIN'
	AccountHolder/Individual/Address SubstantialOwner/Individual/Address ReportingFI/Address	If the AddressFree structure is reported, it cannot be left blank  #Jos ../AddressFree-elementti löytyy ilmoitukselta, se ei saa olla tyhjä
Updated 6/2020	../AccountHolder/Individual/Name/FirstName  ../SubstantialOwner/Individual/Name/FirstName	The element cannot be blank or consist of blankspaces only  #Elementti ../AccountHolder/Individual/Name/FirstName arvo ei voi olla tyhjä tai sisältää vain välilyöntejä #Elementti ../SubstantialOwner/Individual/Name/FirstName arvo ei voi olla tyhjä tai sisältää vain välilyöntejä
6/2020	ReportingFI/ResCountryCode	The value of ReportingFI/ResCountryCode must be 'FI' in all circumstances. To leave it blank or to not include this element is not allowed.  #ReportingFI/ResCountryCode tiedon on aina oltava 'FI' tai elementti puuttuu ilmoitukselta
6/2020	ReportingFI/TIN	A check is made to make sure that the ReportingFI/TIN element is included, not blank, and not consisting of blankspaces only  #ReportingFI/TIN elementti puuttuu tai se on tyhjä #ReportingFI/TIN tunnuksia voi olla vain yksi #Elementti 'ReportingFI/TIN' on väärän muotoinen tai elementti puuttuu
	ReportingFI/TIN	Checking ReportingFI/TIN's correct format  #Elementti 'ReportingFI/TIN' on väärän muotoinen
11/2020	ReportingFI/TIN	Example GIIN used in the XML examples can't be used.  #GIIN ei saa olla teknisten soveltamisohjeiden XML-mallipohjissa oleva malli-GIIN, eli ei saa olla: CAWYDV.00001.SF.246,

		S519K4.00000.SL.246, G1TFL0.00039.SL.246, S2RFL0.0001.SL.246, eikä G1TFL0.00038.SF.246
	ReportingFI/TIN and the Sponsor structure	If the TIN element contains a US-GIIN that ends in other than SS, SF or SB, your file cannot contain a Sponsor structure
	ReportingFI/TIN and the Sponsor structure	If the TIN element contains a US-GIIN that ends SP, your file must have a Sponsor structure
Updated 3/2021	../Address/AddressFix/City	If ../Address/AddressFix/ structure has been filed then ../AddressFix/City element is mandatory and element cannot be blank or consist of blankspaces only.  #../Address/AddressFix/City-elementti ei saa olla tyhjä tai sisältää pelkkiä välilyöntejä
Updated 6/2020	Sponsor/TIN	Always enter the sponsor's GIIN that ends in .SP. Sponsor/TIN element cannot be blank or consist of blankspaces only.  #Virheellinen US GIIN "xxx" elementissä Sponsor/TIN. Sponsor rakenteessa on annettava Sponsorin GIIN tunnus. #Jos ../Sponsor/TIN-elementti löytyy ilmoitukselta, se ei saa olla tyhjä
6/2020	Sponsor/TIN	If you have entered a Sponsor structure, you must give a GIIN ending in .SP in the Sponsor/TIN element. Sponsor/TIN element cannot be blank or missing.  #Sponsor/TIN elementti puuttuu. Sponsor tilanteessa tulee ilmoittaa .SP-päätteinen GIIN
6/2020	Sponsor/Name	If a Sponsor is included, the Sponsor/Name element must have the Sponsor's name. The Sponsor/Name element cannot be left blank, only consist of blankspaces, or be missing.  # Jos ../Sponsor/Name-elementti löytyy ilmoitukselta, se ei saa olla tyhjä tai sisältää pelkästään välilyöntejä
	ReportingFI Sponsor	You must give the Sponsor information when the ReportingFI is a sponsored entity  #Sponsorin tiedot on ilmoitettava kun ReportingFI on sponsoroitava
Updated 6/2020	ReportingFI/FilerCategory	This is a required element; you must enter a code recognized by the Schema; the entry can occur only once in one report; if the value is FATCA601, it must be in the ReportingFI structure, if it is FATCA607, it must be in the Sponsor structure, otherwise it is an error  Related error messages that vary by the type of the error: If there is a Sponsor structure, /FilerCategory must be entered for the Sponsor structure, not the ReportingFI structure #Jos on Sponsor-rakenne /FilerCategory tulee ilmoittaa sponsor rakenteessa, eikä ReportingFI-rakenteessa  FilerCategory FATCA607 is permitted only for the Sponsor/FilerCategory element #FilerCategory arvo FATCA607 voidaan antaa vain Sponsor/FilerCategory elementissä  FilerCategory FATCA601 is permitted only for the ReportingFI/FilerCategory element #FilerCategory arvo FATCA601 voidaan antaa vain ReportingFI/FilerCategory elementissä  FilerCategory element is missing, or has been entered for ReportingFI/FilerCategory element and Sponsor/FilerCategory element at the same time

		#FilerCategory elementti puuttuu kokonaan tai se on annettu sekä ReportingFI/FilerCategory että Sponsor/FilerCategory elementeissä
	AccountReport/Substantial Owner	If the AcctHolderType is FATCA101 or FATCA102, you must enter the SubstantialOwner information  #Jos AccountHolderType on FATCA101 tai FATCA102, pitää antaa SubstantialOwner tiedot
	AccountReport/Substantial Owner	If the AcctHolderType is FATCA103, FATCA104, or FATCA105, no SubstantialOwner information must be given
6/2020	SubstantialOwner	The natural person (in the Individual structure) cannot have a SubstantialOwner structure  #Henkilöllä (Individual rakenne) ei saa olla SubstantialOwner rakennetta
	AccountReport/CARRef	No entry is permitted  #Elementtiä 'ftc:AccountReport/ftc:CARRef' ei saa ilmoittaa
	AccountReport/AdditionalData	No entry is permitted  #Elementtiä 'ftc:AccountReport/ftc:AdditionalData' ei saa ilmoittaa
3/2019	AccountHolder/Individual/TIN	This element is required. The element cannot be missing, or left blank  #Pakollinen elementti puuttuu './Individual/TIN' #Pakollinen tieto puuttuu elementistä
9/2020	/Individual/Name/LastName	The LastName element cannot be left blank or consist of blankspaces only  #Elementti ../AccountHolder/Individual/Name/LastName ei saa olla tyhjä tai sisältää pelkkiä välilyöntejä #Elementti ../SubstantialOwner/Individual/Name/LastName ei saa olla tyhjä tai sisältää pelkkiä välilyöntejä
Updated 11/2021	AccountHolder/Organisation/TIN	This element is required. The element cannot be missing, or left blank  #Pakollinen elementti puuttuu './Organisation/TIN' #Pakollinen tieto puuttuu elementistä 'Organisation/TIN'
Updated 9/2025	AccountHolder/Individual/TIN/IssuedBy  SubstantialOwner/Individual/TIN/IssuedBy	If issuedBy information has been given it must be 'US'. Not in force starting from the reporting year 2025.  #Elementissä 'Individual/TIN' ilmoitetaan vain US verotunniste
Updated 6/2021	AccountHolder/Organisation/TIN/IssuedBy	If issuedBy information has been given it must be 'US'. For account holders that are organisations TIN format check is conducted if TIN IssuedBy is US or if there is no TIN IssuedBy attribute.  Exeption: When AcctHolderType is FATCA101 or FATCA102 TIN IssuedBy attribute value can be any country code. When TIN IssuedBy country code is other than US there is no TIN format check.  #Attribuutin ../AccountHolder/Organisation/TIN/@issuedBy arvo saa olla vain 'US' #Elementissä 'Organisation/TIN' ilmoitetaan vain US verotunniste
6/2020	AccountReport/Accountnumber	The AccountReport/AccountNumber element cannot be blank or consist of blankspaces only  #AccountReport/AccountNumber-elementti ei saa olla tyhjä tai sisältää pelkkiä välilyöntejä
	AccountBalance	The value cannot be negative, and you must give two decimals  #Elementin 'ftc:AccountReport/ftc:AccountBalance' arvo ei saa olla negatiivinen

		#Elementin 'ftc:AccountReport/ftc:AccountBalance' arvo on ilmoitettava kahdella desimaalilla
	Payment	The value cannot be negative, and you must give two decimals #Elementin 'ftc:Payment/ftc:PaymentAmnt' arvo ei saa olla negatiivinen #Elementin 'ftc:AccountReport/ftc:Payment/ftc:PaymentAmnt' arvo on ilmoitettava kahdella desimaalilla

## 8 LIST OF MESSAGES FROM ILMOITIN

The messages below do not prevent the return from being sent. The messages call the filer's attention to specific issues that are worth checking before the filer sends the return.

Date when added (mm/yyyy is shown for msg added 1 January 2019 or later)	Related data element	Description of the automated check process; the message
6/2019	SendingCompanyIN	<p>Ilmoitin displays the following message if the Business ID, found in the SendingCompanyIN element, has already been in the original report for the same year; and the value of ReportingFI TIN/IN is different from the previously filed report (GIIN/Business ID is different). (This message is active for report submittals after 11 June 2019.)</p> <p>#Y-tunnuksella on jo annettu vuodelle [vuosi] ilmoitus, jossa ReportingFI -osiossa eri tunnus</p>
	MessageRefId	<p>The following message appears if a report submitted earlier had the same MessageRefId</p> <p>You are about to send a report with a MessageRefId that has been used previously; if you do that, it will overwrite all the previous reports and filings that have this MessageRefId</p> <p>#Olet lähettämässä ilmoitusta jo aiemmin käytetyllä MessageRefId:llä, nyt lähetetty sanoma pyyhkii yli kaikki aiemmat samalla MessageRefId:llä lähetetyt ilmoitukset</p>
9/2025	.../Individual/TIN .../Individual/BirthInfo/BirthDate	<p>The following message appears if the TIN is padded with AAAAAAAAAA, 00000000, 22222222, 33333333, 44444444, 55555555 or 77777777 AND IF no BirthDate is given. The check is made, if no IssuedBy attribute is reported or the IssuedBy value is US.</p> <p>#BirthDate saa puuttua vain, jos US TIN ilmoitetaan</p>
6/2020	AccountHolder/Organisation/TIN	<p>The following message appears if the value has 9 zeroes one after another: 00000000</p> <p>An invalid US TIN '00000000' is found in the 'Organisation/TIN' element</p> <p>#Virheellinen US TIN '00000000' elementissä 'Organisation/TIN'</p>
	AccountReport/AccountHolder/AccountHolderType (Organisation)	<p>The following message appears if the value of AcctHolderType is different from FATCA102, FATCA103 or FATCA104</p> <p>Please make sure that the AcctHolderType value is correct.</p> <p>#Varmista, että AcctHolderType-arvo on oikein.</p>

## 9 FURTHER INFORMATION AND LINKS

<https://www.irs.gov/pub/irs-pdf/p5124.pdf>

The Intergovernmental FATCA XML Schema v 2.0,  
<http://www.irs.gov/Businesses/Corporations/International-Data-Exchange-Service>

For information on the XML Schema validations and on XML files that fulfil the Tax Administration's requirements of mandatory input, go [1.1 Example files in the XML format](#).