

FOR INFORMATIONAL PURPOSES ONLY

Periodic Certification – Participating FFIs

Identifying Information

1. The periodic certification can only be completed by the Responsible Officer (RO). Confirm the RO information and make updates as needed. Any updates made will be saved to your registration account.¹
2. Identify the type of financial institution of the participating FFI:²
 - Custodial institution
 - Depository institution
 - Holding company or treasury center
 - Investment entity
 - Specified insurance company
3. Describe the financial institution's business (or each line of business):³
4. Did the participating FFI acquire accounts in a merger or bulk acquisition during the certification period?⁴

Select the applicable option for the periodic certification for the period of <start date> to <end date>:

- I am completing the periodic certification of compliance.⁵
- I am unable to complete a periodic certification at this time.⁶
- I am not required to complete a periodic certification for this certification period.⁷

Periodic Certification – Certification Type – Certification of Compliance Initial Questions:

1. Were there any material failures that occurred during the certification period?⁸
 - a. Were there any material failures that have not been remediated by the date of this certification?⁹

¹ The RO information to be confirmed includes the name of the RO, address and other contact information. This section will be pre-populated with all the registration data for the RO fields (question 10). Any changes made to the RO information will be saved in the registration account.

² Field type: Drop down, list values.

³ Field type: Text box (1-1,000 characters).

⁴ Field type: Radio button (values: Yes, No).

⁵ If this statement is selected, continue with initial questions.

⁶ If this statement is selected, the filer will need to provide a reason/explanation as to why you are unable to certify at this time. Field type: Text box (1-2,500 characters).

⁷ If this statement is selected, the filer will need to provide a reason/explanation as to why you are not required to certify. Field type: Text box (1-2,500 characters).

⁸ Field type: Radio button (values: Yes, No). If Yes is selected, the system will display question a. If No is selected, the system will display question 2.

⁹ Field type: Radio button values: Yes, No. If Yes is selected, the system will display the question set for a Qualified Certification. If No is selected, the system will display question 2.

FOR INFORMATIONAL PURPOSES ONLY

Periodic Certification – Participating FFIs

2. Were there any events of default during the certification period?¹⁰

PERIODIC CERTIFICATION – PARTICIPATING FFI - CERTIFICATION OF EFFECTIVE INTERNAL CONTROLS¹¹

I, the responsible officer of the participating FFI, certify that:

1. I (or my designee) have established a compliance program for the participating FFI that is in effect as of the date of this certification.
2. I have conducted a periodic review of the sufficiency of the program and the participating FFI's compliance with the requirements of the FFI agreement during the certification period.
3. The participating FFI has deliberately or systematically failed to report accounts that it was required to treat as U.S. accounts.¹²
 - a. Describe the material failure and provide the approximate date(s) when the failure occurred.
 - b. With respect to the material failure, appropriate actions were taken to remediate the failure and to prevent the failure from reoccurring.¹³
 - c. Provide a short description and the approximate date(s) of the actions taken to remediate the material failure and prevent the failure from reoccurring.
4. The participating FFI has deliberately or systematically failed to withhold on pass thru payments to the extent required.¹⁴
 - a. Describe the material failure and provide the approximate date(s) when the failure occurred.
 - b. With respect to the material failure, appropriate actions were taken to remediate the failure and to prevent the failure from reoccurring.¹⁵
 - c. Provide a short description and the approximate date(s) of the actions taken to remediate the material failure and prevent the failure from reoccurring.
5. The participating FFI has deliberately or systematically failed to deposit taxes withheld.¹⁶

¹⁰ Field type: Radio button (values: Yes, No). If Yes is selected, the system will display the question set for a Qualified Certification. If No is selected, the system will display the question set for Certification of Effective Internal Controls.

¹¹ Questions 1 - 9: Field Type: Radio button (values: Yes, No). Question a: Field type: Text box (1-15,000 characters). Question b: Field Type: Radio button (values: Yes, No). Question c: Field type: Text box (1-15,000 characters). Question 10: Field Type: Radio button (values: Yes, No, Not Applicable).

¹² If Yes is selected, the system will display questions a and b. If No is selected, display question 4.

¹³ If Yes is selected, display question c. If No is selected, display question 4.

¹⁴ If Yes is selected, the system will display questions a and b. If No is selected, display question 5.

¹⁵ If Yes is selected, display question c. If No is selected, display question 5.

¹⁶ If Yes is selected, the system will display questions a and b. If No is selected, display question 6.

FOR INFORMATIONAL PURPOSES ONLY

Periodic Certification – Participating FFIs

- a. Describe the material failure and provide the approximate date(s) when the failure occurred.
 - b. With respect to the material failure, appropriate actions were taken to remediate the failure and to prevent the failure from reoccurring.¹⁷
 - c. Provide a short description and the approximate date(s) of the actions taken to remediate the material failure and prevent the failure from reoccurring.
6. The participating FFI has deliberately or systematically failed to accurately report recalcitrant account holders (or non-consenting U.S. accounts under an applicable Model 2 IGA) or nonparticipating FFIs as required.¹⁸
- a. Describe the material failure and provide the approximate date(s) when the failure occurred.
 - b. With respect to the material failure, appropriate actions were taken to remediate the failure and to prevent the failure from reoccurring.¹⁹
 - c. Provide a short description and the approximate date(s) of the actions taken to remediate the material failure and prevent the failure from reoccurring.
7. A criminal or civil penalty or sanction has been imposed on the participating FFI (or any branch or office thereof) by a regulator or other governmental authority or agency with oversight over the participating FFI's compliance with the Anti-Money Laundering (AML) due diligence procedures to which it (or any branch or office thereof) is subject and that is imposed based on a failure to properly identify account holders under the requirements of those procedures.²⁰
- a. Describe the material failure and provide the approximate date(s) when the failure occurred.
 - b. With respect to the material failure, appropriate actions were taken to remediate the failure and to prevent the failure from reoccurring.²¹
 - c. Provide a short description and the approximate date(s) of the actions taken to remediate the material failure and prevent the failure from reoccurring.
8. The participating FFI has established, for financial statement purposes, a tax reserve or provision for a potential future tax liability related to the participating FFI's compliance (or lack thereof) with the FFI agreement.²²
- a. Describe the material failure and provide the approximate date(s) when the failure occurred.

¹⁷ If Yes is selected, display question c. If No is selected, display question 6.

¹⁸ If Yes is selected, the system will display questions a and b. If No is selected, display question 7.

¹⁹ If Yes is selected, display question c. If No is selected, display question 7.

²⁰ If Yes is selected, the system will display questions a and b. If No is selected, display question 8.

²¹ If Yes is selected, display question c. If No is selected, display question 8.

²² If Yes is selected, the system will display questions a and b. If No is selected, display question 9.

FOR INFORMATIONAL PURPOSES ONLY

Periodic Certification – Participating FFIs

- b. With respect to the material failure, appropriate actions were taken to remediate the failure and to prevent the failure from reoccurring.²³
 - c. Provide a short description and the approximate date(s) of the actions taken to remediate the material failure and prevent the failure from reoccurring.
9. There were other material failure(s) that occurred during the certification period.²⁴
 - a. Describe the material failure and provide the approximate date(s) when the failure occurred.
 - b. With respect to the material failure, appropriate actions were taken to remediate the failure and to prevent the failure from reoccurring.²⁵
 - c. Provide a short description and the approximate date(s) of the actions taken to remediate the material failure and prevent the failure from reoccurring.
10. With respect to any failure to withhold, deposit, or report to the extent required under the FFI agreement, the participating FFI has corrected such failure by paying any taxes due (including interest and penalties) and filing the appropriate return (or amended return).

PERIODIC CERTIFICATION – PARTICIPATING FFI - QUALIFIED CERTIFICATION²⁶

I, the responsible officer of the participating FFI, certify that:

1. I (or my designee) have established a compliance program for the participating FFI that is in effect as of the date of this certification.
2. I have conducted a periodic review of the sufficiency of the program and the participating FFI's compliance with the requirements of the FFI agreement during the certification period.
3. The participating FFI has deliberately or systematically failed to report accounts that it was required to treat as U.S. accounts.²⁷
 - a. Describe the material failure and provide the approximate date(s) when the failure occurred.
 - b. With respect to the material failure, appropriate actions have been taken or will be taken to remediate the failure and to prevent the failure from reoccurring.²⁸

²³ If Yes is selected, display question c. If No is selected, display question 9.

²⁴ If Yes is selected, the system will display questions a and b. If No is selected, display question 10.

²⁵ If Yes is selected, display question c. If No is selected, display question 10.

²⁶ Questions 1 - 22 & 24: Field Type: Radio button (values: Yes, No). Question a: Field type: Text box (1-15,000 characters). Question b: Field Type: Radio button (values: Yes, No). Question c: Field type: Text box (1-15,000 characters). Question 23: Field Type: Radio button (values: Yes, No, Not Applicable).

²⁷ If Yes is selected, the system will display questions a and b. If No is selected, display question 4.

²⁸ If Yes is selected, display question c. If No is selected, display question 4.

FOR INFORMATIONAL PURPOSES ONLY

Periodic Certification – Participating FFIs

- c. Provide a short description of the action plan that has been taken or will be taken to remediate the material failure and prevent the failure from reoccurring, including the estimated implementation date of such plan.
4. The participating FFI has deliberately or systematically failed to withhold on passthru payments to the extent required.²⁹
 - a. Describe the material failure and provide the approximate date(s) when the failure occurred.
 - b. With respect to the material failure, appropriate actions have been taken or will be taken to remediate the failure and to prevent the failure from reoccurring.³⁰
 - c. Provide a short description of the action plan that has been taken or will be taken to remediate the material failure and prevent the failure from reoccurring, including the estimated implementation date of such plan.
5. The participating FFI has deliberately or systematically failed to deposit taxes withheld.³¹
 - a. Describe the material failure and provide the approximate date(s) when the failure occurred.
 - b. With respect to the material failure, appropriate actions have been taken or will be taken to remediate the failure and to prevent the failure from reoccurring.³²
 - c. Provide a short description of the action plan that has been taken or will be taken to remediate the material failure and prevent the failure from reoccurring, including the estimated implementation date of such plan.
6. The participating FFI has deliberately or systematically failed to accurately report recalcitrant account holders (or non-consenting U.S. accounts under an applicable Model 2 IGA) or nonparticipating FFIs as required.³³
 - a. Describe the material failure and provide the approximate date(s) when the failure occurred.
 - b. With respect to the material failure, appropriate actions have been taken or will be taken to remediate the failure and to prevent the failure from reoccurring.³⁴
 - c. Provide a short description of the action plan that has been taken or will be taken to remediate the material failure and prevent the failure from reoccurring, including the estimated implementation date of such plan.
7. A criminal or civil penalty or sanction has been imposed on the participating FFI (or any branch or office thereof) by a regulator or other governmental authority or agency with oversight over

²⁹ If Yes is selected, the system will display questions a and b. If No is selected, display question 5.

³⁰ If Yes is selected, display question c. If No is selected, display question 5.

³¹ If Yes is selected, the system will display questions a and b. If No is selected, display question 6.

³² If Yes is selected, display question c. If No is selected, display question 6.

³³ If Yes is selected, the system will display questions a and b. If No is selected, display question 7.

³⁴ If Yes is selected, display question c. If No is selected, display question 7.

FOR INFORMATIONAL PURPOSES ONLY

Periodic Certification – Participating FFIs

the participating FFI's compliance with the AML due diligence procedures to which it (or any branch or office thereof) is subject and that is imposed based on a failure to properly identify account holders under the requirements of those procedures.³⁵

- a. Describe the material failure and provide the approximate date(s) when the failure occurred.
 - b. With respect to the material failure, appropriate actions have been taken or will be taken to remediate the failure and to prevent the failure from reoccurring.³⁶
 - c. Provide a short description of the action plan that has been taken or will be taken to remediate the material failure and prevent the failure from reoccurring, including the estimated implementation date of such plan.
8. The participating FFI has established, for financial statement purposes, a tax reserve or provision for a potential future tax liability related to the participating FFI's compliance (or lack thereof) with the FFI agreement.³⁷
- a. Describe the material failure and provide the approximate date(s) when the failure occurred.
 - b. With respect to the material failure, appropriate actions have been taken or will be taken to remediate the failure and to prevent the failure from reoccurring.³⁸
 - c. Provide a short description of the action plan that has been taken or will be taken to remediate the material failure and prevent the failure from reoccurring, including the estimated implementation date of such plan.
9. There were other material failure(s) that occurred during the certification period.³⁹
- a. Describe the material failure and provide the approximate date(s) when the failure occurred.
 - b. With respect to the material failure, appropriate actions have been taken or will be taken to remediate the failure and to prevent the failure from reoccurring.⁴⁰
 - c. Provide a short description of the action plan that has been taken or will be taken to remediate the material failure and prevent the failure from reoccurring, including the estimated implementation date of such plan.
10. The participating FFI has failed to perform material obligations required with respect to the due diligence, verification, withholding, or reporting requirements of the FFI agreement.⁴¹

³⁵ If Yes is selected, the system will display questions a and b. If No is selected, display question 8.

³⁶ If Yes is selected, display question c. If No is selected, display question 8.

³⁷ If Yes is selected, the system will display questions a and b. If No is selected, display question 9.

³⁸ If Yes is selected, display question c. If No is selected, display question 9.

³⁹ If Yes is selected, the system will display questions a and b. If No is selected, display question 10.

⁴⁰ If Yes is selected, display question c. If No is selected, display question 10.

⁴¹ If Yes is selected, the system will display questions a and b. If No is selected, display question 11.

FOR INFORMATIONAL PURPOSES ONLY

Periodic Certification – Participating FFIs

- a. Describe the event of default and provide approximate date(s) when the event of default occurred.
 - b. With respect to the event of default, appropriate actions will be taken to remediate the event of default and to prevent the event from reoccurring.⁴²
 - c. Provide a short description and the approximate date(s) of the proposed plan to remediate the event of default and prevent the event from reoccurring.
11. The participating FFI has failed to obtain, in any case in which foreign law would (but for a waiver) prevent the reporting of U.S. accounts as required, valid and effective waivers from holders of U.S. accounts or failure to otherwise close or transfer such U.S. accounts.⁴³
- a. Describe the event of default and provide approximate date(s) when the event of default occurred.
 - b. With respect to the event of default, appropriate actions will be taken to remediate the event of default and to prevent the event from reoccurring.⁴⁴
 - c. Provide a short description and the approximate date(s) of the proposed plan to remediate the event of default and prevent the event from reoccurring.
12. The participating FFI has failed to significantly reduce, over a period of time, the number of account holders or payees that the participating FFI is required to treat as recalcitrant account holders or nonparticipating FFIs, as a result of the participating FFI failing to comply with the due diligence procedures for the identification and documentation of account holders and payees.⁴⁵
- a. Describe the event of default and provide approximate date(s) when the event of default occurred.
 - b. With respect to the event of default, appropriate actions will be taken to remediate the event of default and to prevent the event from reoccurring.⁴⁶
 - c. Provide a short description and the approximate date(s) of the proposed plan to remediate the event of default and prevent the event from reoccurring.
13. In any case in which foreign law prevents or otherwise limits withholding to the extent required, the participating FFI has failed to obtain an authorization from each account holder or payee to withhold, close the account or terminate the obligation, or sell the assets in the account that produce (or could produce) withholdable payments; or, if such authorization is not obtained within a reasonable period of time, to transfer or block such account or obligation.⁴⁷

⁴² If Yes is selected, display question c. If No is selected, display question 11.

⁴³ If Yes is selected, the system will display questions a and b. If No is selected, display question 12.

⁴⁴ If Yes is selected, display question c. If No is selected, display question 12.

⁴⁵ If Yes is selected, the system will display questions a and b. If No is selected, display question 13.

⁴⁶ If Yes is selected, display question c. If No is selected, display question 13.

⁴⁷ If Yes is selected, the system will display questions a and b. If No is selected, display question 14.

FOR INFORMATIONAL PURPOSES ONLY

Periodic Certification – Participating FFIs

- a. Describe the event of default and provide approximate date(s) when the event of default occurred.
 - b. With respect to the event of default, appropriate actions will be taken to remediate the event of default and to prevent the event from reoccurring.⁴⁸
 - c. Provide a short description and the approximate date(s) of the proposed plan to remediate the event of default and prevent the event from reoccurring.
14. The participating FFI has made incorrect claims for refund under the collective refund procedures.⁴⁹
- a. Describe the event of default and provide approximate date(s) when the event of default occurred.
 - b. With respect to the event of default, appropriate actions will be taken to remediate the event of default and to prevent the event from reoccurring.⁵⁰
 - c. Provide a short description and the approximate date(s) of the proposed plan to remediate the event of default and prevent the event from reoccurring.
15. The participating FFI has entered into or participated in any transaction relating to sponsorship, promotion, or noncustodial distribution for or on behalf of any local FFI that is an investment entity.⁵¹
- a. Describe the event of default and provide approximate date(s) when the event of default occurred.
 - b. With respect to the event of default, appropriate actions will be taken to remediate the event of default and to prevent the event from reoccurring.⁵²
 - c. Provide a short description and the approximate date(s) of the proposed plan to remediate the event of default and prevent the event from reoccurring.
16. The participating FFI has failed to take timely corrective actions to remedy a material failure after making a qualified certification for any prior certification period.⁵³
- a. Describe the event of default and provide approximate date(s) when the event of default occurred.

⁴⁸ If Yes is selected, display question c. If No is selected, display question 14.

⁴⁹ If Yes is selected, the system will display questions a and b. If No is selected, display question 15.

⁵⁰ If Yes is selected, display question c. If No is selected, display question 15.

⁵¹ If Yes is selected, the system will display questions a and b. If No is selected, display question 16.

⁵² If Yes is selected, display question c. If No is selected, display question 16.

⁵³ If Yes is selected, the system will display questions a and b. If No is selected, display question 17.

FOR INFORMATIONAL PURPOSES ONLY

Periodic Certification – Participating FFIs

- b. With respect to the event of default, appropriate actions will be taken to remediate the event of default and to prevent the event from reoccurring.⁵⁴
 - c. Provide a short description and the approximate date(s) of the proposed plan to remediate the event of default and prevent the event from reoccurring.
17. The participating FFI has failed to inform the IRS within 90 days of an acquisition of all, or substantially all, of the participating FFI's assets in any transaction in which the participating FFI is not the surviving legal entity.⁵⁵
- a. Describe the event of default and provide approximate date(s) when the event of default occurred.
 - b. With respect to the event of default, appropriate actions will be taken to remediate the event of default and to prevent the event from reoccurring.⁵⁶
 - c. Provide a short description and the approximate date(s) of the proposed plan to remediate the event of default and prevent the event from reoccurring.
18. The participating FFI has failed to inform the IRS within 90 days that the participating FFI (other than a reporting Model 2 FFI) maintains a limited branch that cannot fulfill the requirements for participating FFI or deemed-compliant FFI status after the expiration of the transitional rule for limited branches or the participating FFI (other than a reporting Model 2 FFI) is a member of an expanded affiliated group that includes a limited FFI after the expiration of the transitional rule for limited FFIs.⁵⁷
- a. Describe the event of default and provide approximate date(s) when the event of default occurred.
 - b. With respect to the event of default, appropriate actions will be taken to remediate the event of default and to prevent the event from reoccurring.⁵⁸
 - c. Provide a short description and the approximate date(s) of the proposed plan to remediate the event of default and prevent the event from reoccurring.
19. The participating FFI has failed to inform the IRS within 90 days of a change in U.S. federal law or policy, or applicable foreign law or policy, that materially affects the participating FFI's ability to perform its obligations under the FFI agreement.⁵⁹
- a. Describe the event of default and provide approximate date(s) when the event of default occurred.

⁵⁴ If Yes is selected, display question c. If No is selected, display question 17.

⁵⁵ If Yes is selected, the system will display questions a and b. If No is selected, display question 18.

⁵⁶ If Yes is selected, display question c. If No is selected, display question 18.

⁵⁷ If Yes is selected, the system will display questions a and b. If No is selected, display question 19.

⁵⁸ If Yes is selected, display question c. If No is selected, display question 19.

⁵⁹ If Yes is selected, the system will display questions a and b. If No is selected, display question 20.

FOR INFORMATIONAL PURPOSES ONLY

Periodic Certification – Participating FFIs

- b. With respect to the event of default, appropriate actions will be taken to remediate the event of default and to prevent the event from reoccurring.⁶⁰
 - c. Provide a short description and the approximate date(s) of the proposed plan to remediate the event of default and prevent the event from reoccurring.
20. The participating FFI has failed to inform the IRS within 90 days of a significant change in the participating FFI's business practices that materially affects the FFI's ability to meet its obligations under the FFI agreement.⁶¹
- a. Describe the event of default and provide approximate date(s) when the event of default occurred.
 - b. With respect to the event of default, appropriate actions will be taken to remediate the event of default and to prevent the event from reoccurring.⁶²
 - c. Provide a short description and the approximate date(s) of the proposed plan to remediate the event of default and prevent the event from reoccurring.
21. If the participating FFI is a lead FI, the FFI has failed, without reasonable cause, to inform the IRS within 90 days of an acquisition, sale, or change affecting the chapter 4 status of an FFI in the FFI group for which it is acting as lead FI, including that such FFI ceases to comply with (or does not otherwise comply with) the requirements to maintain its status as a participating or registered deemed-compliant FFI.⁶³
- a. Describe the event of default and provide approximate date(s) when the event of default occurred.
 - b. With respect to the event of default, appropriate actions will be taken to remediate the event of default and to prevent the event from reoccurring.⁶⁴
 - c. Provide a short description and the approximate date(s) of the proposed plan to remediate the event of default and prevent the event from reoccurring.
22. There were other event(s) of default that occurred during the certification period.⁶⁵
- a. Describe the event of default and provide approximate date(s) when the event of default occurred.
 - b. With respect to the event of default, appropriate actions will be taken to remediate the event of default and to prevent the event from reoccurring.⁶⁶

⁶⁰ If Yes is selected, display question c. If No is selected, display question 20.

⁶¹ If Yes is selected, the system will display questions a and b. If No is selected, display question 21.

⁶² If Yes is selected, display question c. If No is selected, display question 21.

⁶³ If Yes is selected, the system will display questions a and b. If No is selected, display question 22.

⁶⁴ If Yes is selected, display question c. If No is selected, display question 22.

⁶⁵ If Yes is selected, the system will display questions a and b. If No is selected, display question 23.

⁶⁶ If Yes is selected, display question c. If No is selected, display question 23.

FOR INFORMATIONAL PURPOSES ONLY

Periodic Certification – Participating FFIs

- c. Provide a short description and the approximate date(s) of the proposed plan to remediate the event of default and prevent the event from reoccurring.

- 23. With respect to any failure to withhold, deposit, or report to the extent required under the FFI agreement, the participating FFI will correct such failure by paying any taxes due (including interest and penalties) and filing the appropriate return (or amended return).

- 24. I, or my designee, will respond to any notice of default, if applicable, or will provide to the IRS, to the extent requested, a description of each material failure and a written plan to remediate each such failure.