INLAND REVENUE AUTHORITY OF SINGAPORE

IRAS User Guide

Foreign Account Tax Compliance Act ("FATCA")
IRAS Supplementary XML Schema User Guide for Preparing the FATCA Reporting Data File
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Part A Introduction

1. With effect from 1 April 2020, Reporting Singaporean Financial Institutions ("Reporting SGFIs") must submit all FATCA returns, including nil returns (if applicable), electronically to IRAS via the "Submit CRS or FATCA Return" Digital Service at IRAS' myTax Portal. The FATCA returns should set out all the information in relation to every Reportable Account that the Reporting SGFI maintains in accordance with the United States Inland Revenue Service ("U.S. IRS") FATCA XML Schema Version 2.0 ("FATCA XML Schema"). Correspondingly, IRAS will no longer accept FATCA returns submitted via the International Data Exchange System ("IDES"). The requirement is applicable to all submissions of new, nil, amended, corrected or void FATCA returns, including returns relating to Reporting Years 2018 and earlier.

2. With effect from 1 January 2027, Reporting SGFIs submitting FATCA returns in XML format must prepare and submit the required data in accordance with the U.S. IRS FATCA XML Schema Version 2.0.1.

3. This Supplementary Guide provides additional guidance on how the information for certain data elements (e.g. MessageRefId and DocRefId) must be presented for the purpose of FATCA reporting to IRAS via myTax Portal.

4. This Supplementary Guide should be read in conjunction with the FATCA Regulations, FATCA guidance materials and the FATCA XML Schema V2.0 User Guide (U.S. IRS' Publication 5124). These are available on the IRAS FATCA webpage.

Part B XML File Preparation and Submission

1. All FATCA returns, including nil returns, must be submitted electronically to IRAS via the "Submit CRS or FATCA Return" Digital Service at IRAS' myTax Portal. No paper return will be accepted.

2. Reporting SGFIs will prepare their FATCA returns[1] in XML format and submit them to IRAS through IRAS' myTax Portal. The XML file does **not** need to be digitally signed, encrypted or compressed. The maximum file size for each XML file is 5MB (uncompressed). **With effect from 1 January 2027, the maximum file size for each XML file will be increased to 50MB (uncompressed).** If an XML file size exceeds the applicable maximum file size, it should be split into 2 or more smaller files (or messages) and submitted individually. While there is no naming convention for the XML file, Reporting SGFIs are **strongly encouraged** to use the MessageRefId of the FATCA return to name the file.

3. A FATCA Return that is submitted to correct, amend or void information that was previously sent to IRAS should only be submitted one day after the initial return (which contains the error) is submitted.

4. If a Reporting SGFI does not maintain any financial account that is a U.S. Reportable Account for a Reporting Year, the institution does not need to prepare and submit a nil return in XML format. Instead, it can indicate that it is submitting 'a return with no data' when it uses the AEOI Digital Services at myTax Portal to file a nil return with IRAS.

[1] *Reporting SGFIs that do not wish to acquire a reporting tool to generate the FATCA Return in XML format can submit their FATCA Return using fillable PDF forms that is available on the IRAS FATCA webpage.*

Part C Schema Information

1. Part C of this Supplementary Guide provides additional guidance on how the information for certain XML data elements must be presented for the purpose of FATCA reporting to IRAS. The requirement is applicable to all submissions of new, nil, amended, corrected or void FATCA returns, including returns relating to Reporting Years 2018 and early. The requirement is not applicable for amended, corrected or void FATCA return submissions pertaining to Reporting Year 2018 and earlier that were submitted via the International Data Exchange System ("IDES") before 1 April 2020.

2. This section must be read in conjunction with the FATCA XML Schema V2.0 User Guide (U.S. IRS' Publication 5124).

Section 1 - MessageSpec

1. XML element - 'TransmittingCountry'

1.1 For reporting to IRAS, Reporting SGFIs must use the code "SG".

2. XML element - 'ReceivingCountry'

2.1 For reporting to IRAS, Reporting SGFIs must use the code "SG".

3. XML element - 'Warning'

3.1 For reporting to IRAS, Reporting SGFIs should leave this field blank as the processing of the FATCA returns submitted to IRAS is fully automated.

4. XML element - 'Contact'

4.1 For reporting to IRAS, Reporting SGFIs should leave this field blank as the processing of the FATCA returns submitted to IRAS is fully automated. Reporting SGFIs are required to appoint a Point of Contact ("POC") when providing FATCA information to IRAS. IRAS will liaise with the appointed POC on reporting matters.

5. XML element - 'MessageRefId'

5.1 Reporting SGFIs are strongly encouraged to structure the MessageRefId in the following format:

<GIIN><Date and time of file creation><2-digit incremental number>

Where:

- <GIIN> refers to the Global Intermediary Identification Number ("GIIN") assigned to the Reporting SGFI by the U.S. IRS. If a Sponsoring Entity or Trustee is filing a report for a Sponsored Closely Held Investment Vehicle or a Trustee-Documented Trust, the GIIN of the Sponsoring Entity/Trustee can be used.

- <Date and time of file creation> has to be represented in YYYYMMDDHHMMSS format.

- The <2-digit incremental number> would start at '00' and increase to '99' when a file is produced on the same day.

Example A Reporting SGFI, with GIIN 123456.00000.SL.702, prepares a FATCA Return for Reporting Year 2019 on 21 May 2020 at 7:20:22pm. The MessageRefID for the FATCA Return that it generates for the day is "123456.00000.SL.702020052119202200".

Section 2 – FATCA Report Complex Types

6. XML element - 'DocRefId'

6.1 The DocRefId data element must be structured in the following format and contain a minimum of 21 characters:

<GIIN><period character(.)><Unique Value across all time for the Reporting SGFI>

Where:

- <GIIN> refers to the Global Intermediary Identification Number ("GIIN") assigned to the Reporting SGFI by the U.S. IRS. If a Sponsoring Entity or Trustee is filing a report for a Sponsored Closely Held Investment Vehicle or a Trustee-Documented Trust, the GIIN of the Sponsoring Entity/Trustee can be used.

- The second part is a period character (.).

- The <Unique Value> refers to a value for the referenced record assigned by the Reporting SGFI that is unique within the Reporting SGFI for all time. It is recommended for Reporting SGFIs to use the globally unique identifier ("GUID"). The DocRefId must not include any non-alphanumeric characters, excluding periods and dashes. Prohibited non-alphanumeric characters include, but are not limited to, _, @, +, &, ! and *.

> Example
>
> A Reporting SGFI, with GIIN of S519K4.99999.SL.702, prepares a FATCA Return for Reporting Year 2019. The unique reference for the account report is 12291cc2-37cb-42a9-ad74-06bb5746b60b. The DocRefId for the account report will be formatted as "S519K4.99999.SL.392.12291cc2-37cb-42a9-ad74-06bb5746b60b".

6.2 The 'DocRefId' data element should contain at least 21 characters, and the maximum length allowed is 200 characters.

7. XML element - 'TIN'

7.1 The TIN data element must be in one of the following formats to be considered valid:

- Nine consecutive numerical digits without hyphens or other separators (e.g., "123456789")

- Nine numerical digits with two hyphens, one hyphen entered after the third numeric digit and a second hyphen entered after the fifth numeric digit (e.g., "123-45-6789")

- Nine numerical digits with a hyphen entered after the second digit (e.g., "12-3456789")

7.2 For Reporting Years 2017, 2018 and 2019, where a Reporting SGFI maintains preexisting accounts that are U.S. Reportable Accounts without the required U.S. TIN of the U.S. Account Holder or Controlling Person, and the Reporting SGFI fulfils the 3 conditions stated in Section III(B) of Notice 2017-46, the Reporting SGFI should insert a string of nine consecutive "A"s (i.e. "AAAAAAAAA") in the 'TIN' data element and provide the date of birth in the 'BirthDate' data element for each U.S. Account Holder or Controlling

Person whose required U.S. TIN is not available when the Reporting SGFI reports such accounts to IRAS.

7.3 Please note that the above does not apply to an Entity Account Holder. For Entity Account Holder that is a U.S. Person, Reporting SGFI must report its U.S. TIN in the specified U.S. TIN format. Where the Entity Account Holder is not a U.S. Person (e.g. in the case of Passive NFFE), the ORG_TIN data element may be populated with a space or omit the ORG_TIN data element. However, the Reporting SGFI will receive a "TIN not populated" record-level error from the U.S. IRS.

To avoid receiving a record-level error from the U.S. IRS where the Entity Account Holder is not a U.S. Person, SGFI should populate the ORG_TIN data element with the foreign TIN (with the "TIN Issued by" element populated with the issuing country code) for the foreign Entity Account Holder. If there is no foreign TIN available for the foreign Entity Account Holder, Reporting SGFI may include your country code in the "TIN Issued by" element and the characters "NA" (to indicated "Not Available") in the ORG_TIN data element (e.g. <sfa:TIN issuedBy="SG">NA</sfa:TIN>).

The above will apply for Account Holder Type FATCA101 (Owner-Documented FFI with specific U.S. Owner) or FATCA102 (Passive NFFE with U.S. Controlling Persons).

7.4 The relief stated in paragraph 7.2 of Part C, will not be applicable for Reporting Year 2020 onwards. In instances where the SGFI is still unable to obtain and report the U.S. TIN of the Account Holders and/or Controlling Persons of the preexisting accounts beginning 1 January 2020, the Reporting SGFI may continue to report a U.S. Reportable Account without the required U.S. TIN of U.S. Persons by inserting the following in the TIN field for each relevant Account Holder and/or Controlling Person whose U.S. TIN is not available.

Preexisting individual account (and controlling persons of passive NFFEs) with only U.S. indicia being a U.S. place of birth.	222222222

Preexisting individual account (and controlling persons of passive NFFEs) and entity account that (1) has 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 and subsequently exceeded the threshold, and a self-certification or other documentation has not been obtained.	444444444
Preexisting accounts which are "dormant accounts" with account balance above the reporting threshold (refer to paragraph 9.3 and paragraph 9.13 of the FATCA e-Tax Guide issued by IRAS for preexisting individual accounts and preexisting entity accounts respectively). For reference, "dormant account" is defined in paragraph 8.16 of the FATCA e-Tax Guide issued by IRAS.	777777777
All other scenarios under Notice 2017-46	AAAAAAAAA

7.5 For instances where a Reporting SGFI has U.S Reportable Accounts that are outside the scope of Notice 2017-46 issued by the U.S. IRS, and the Reporting SGFI is still unable to obtain the U.S. TINs, the Reporting SGFI may continue to report a U.S. Reportable Account without the required U.S. TIN of U.S. Persons by inserting the following in the TIN field for each relevant Account Holder and/or Controlling Person whose U.S. TIN is not available:

Instances where the SGFI is still unable to obtain the U.S. TIN	**TIN input where U.S. TIN has not been obtained**

New individual account (and controlling persons of passive NFFEs) 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 and subsequently exceeded the threshold, and a self-certification has not been obtained.	333333333
New individual account (and controlling persons of passive NFFEs) and entity 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 and subsequently exceeded the threshold, and a self-certification or other documentation has not been obtained.	555555555
Preexisting entity account with account balance exceeding $1,000,000 held by a passive NFFE with respect to which self-certifications have not been obtained, and no U.S. indicia have been identified in relation to its controlling persons.	666666666

7.6 For Reporting Years 2022, 2023 and 2024, where Reporting SGFIs maintain preexisting accounts that are U.S. Reportable Accounts without the required US TIN of the U.S. Persons, and the Reporting SGFIs fulfil the

4 conditions stated in Section 3.03 of Notice 2023-11, they should insert the relevant TIN codes for each U.S. Account Holder or Controlling Person whose required U.S. TIN is not available when they report such accounts to IRAS for the 3 reporting years to qualify for relief.

7.7 Reporting Year 2022 (due by 31 May 2023) is considered to be a transition year, and to be eligible for relief, Reporting SGFIs must either use the TIN codes issued in paragraphs 7.4 and 7.5 or the below updated TIN codes. For Reporting Years 2023 (due by 31 May 2024) and 2024 (due by 31 May 2025), Reporting SGFIs must use the below updated codes that identify features of these accounts that may explain why the Reporting SGFI cannot report a U.S. TIN.

Instances where the SGFI is still unable to obtain the U.S. TIN	**TIN input where U.S. TIN has not been obtained**
Preexisting individual account (and controlling persons of passive NFFEs) 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.	222222222
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.	000222111
New individual account (and controlling persons of passive NFFEs) 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) as below the threshold for documenting and reporting the account at the time of account opening and subsequently exceeded the threshold, and a self-certification has not been obtained.	333333333

Preexisting individual account (and controlling persons of passive NFFEs) and entity 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 on the determination date provided in the applicable Model 1 IGA and subsequently exceeded the threshold, and a self-certification or other documentation has not been obtained.	444444444
New individual account (and controlling persons of passive NFFEs) and entity 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 and subsequently exceeded the threshold, and a self-certification or other documentation has not been obtained.	555555555
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.	666666666
Preexisting accounts which are “dormant accounts” with account balance above the reporting threshold (refer to paragraph 9.3 and paragraph 9.13 of the FATCA e-Tax Guide issued by IRAS for preexisting individual accounts and preexisting entity accounts	777777777

respectively). If an account could be classified into multiple TIN codes, the other code takes precedence. For reference, "dormant account" is defined in paragraph 8.16 of the FATCA e-Tax Guide issued by IRAS.	
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.	999999999

7.8 For Reporting Years 2025 (due by 31 May 2026), 2026 (due by 31 May 2027) and 2027 (due by 31 May 2028), Reporting SGFIs who have been unable to obtain U.S. TINs for their preexisting accounts that are U.S. reportable accounts, can continue to rely on the TIN codes in paragraph 7.7, provided the criteria in sections 3.02 and 3.03 of the US IRS Notice 2024-78 are met.

8. XML element - 'FilerCategory'

8.1 For reporting to IRAS, only the following values are applicable:

If the financial institution reporting the account is a:	**FilerCategory for element**	**FilerCategory Value**
RDC FFI (including a Reporting Model 1 FFI)	Reporting FI	FATCA602
Sponsoring Entity of a Sponsored FFI	Sponsor	FATCA607
Trustee of a Trustee-Documented Trust	Sponsor	FATCA609

8.2 Inserting any other values in the data element will result in a record-level error.

Section 3 – ReportingFI

9. TIN value for ReportingFI

9.1 The list below summarises the applicable categories and TIN values for a Reporting SGFI:

Reporting FI	Description
Registered Deemed-Compliant FFI (RDC FFI)	Enter the Reporting SGFI's GIIN.
Sponsored FFI (other than a sponsored, closely held investment vehicle)	Enter the Reporting SGFI's GIIN.
Sponsored FFI that is a sponsored, closely held investment vehicle	Enter the GIIN of the sponsoring entity.
Sponsored Subsidiary Branch	Enter the Reporting SGFI's GIIN.
Trustee-Documented Trust	Enter the TDT Reference ID issued by IRAS in the following format: <Entity ID Type><Space><TDT Reference Number>, e.g. "TDT 1234567890"

9.2 Please ensure that the GIIN of the Reporting SGFI and/or Sponsoring Entity has been updated via the "View/ Update FI AEOI Profile" Digital Service before filing the FATCA Return. Please note that if the TIN values provided in the TIN field does not match the GIIN information which was provided to IRAS during registration, the FATCA Return will be rejected with a record-level error.

Section 4 – Reporting Group

10. XML element - 'AcctHolderType'

10.1 For reporting to IRAS, only the following values are applicable:

Value	Description
FATCA101	Owner-Documented FFI with specified U.S. owners
FATCA102	Passive NFFE with U.S. controlling persons
FATCA104	Specified U.S. person

10.2 Inserting any other values in the data element will result in a record-level error.

11. XML element - 'PoolReport'

11.1 Pooled Reporting is not applicable to Reporting SGFIs. Reporting SGFIs are required to report an account that would otherwise be treated as held by recalcitrant account holders under the U.S. FATCA statute and regulations, as a U.S. Reportable Account.

Part D Updates and amendments

	Date of Amendment	Amendments made
1	21 September 2020	(i) Amended paragraph 7.3 of Part C to further clarify the ORG_TIN data element requirement for Passive NFFE entities (ii) Amended paragraph 9.1 of Part C to further clarify the TIN value for TDTs (iii) Amended paragraph 10.1 of Part C to include Owner-Documented FFI with specified U.S. owners (FATCA101) as an acceptable AcctHolderType
2	1 April 2021	(i) Amended paragraph 7.3 to further clarify the ORG_TIN data element requirement for Passive NFFE entities (ii) Added paragraph 7.4 to provide clarification for instances where a RSGFI is unable to obtain and report the U.S. TIN of the Account Holders and/or Controlling Persons of the preexisting accounts (iii) Added paragraph 7.5 to provide clarification for instances where a RSGFI is unable to obtain and report the U.S. TIN of the Account Holders and/or Controlling Persons of the new accounts
3	13 April 2021	(i) Amended paragraph 7.4 to provide clarification for preexisting accounts where there is no TIN available and the account has been dormant or inactive
4	23 February 2022	(i) Amended paragraph 7.3 to provide clarification on populating foreign TIN for Entity Account Holder that is not a U.S. Person.

5	13 March 2023	(i) Added paragraphs 7.6 and 7.7 to provide clarification for the reporting relief to RSGFIs who have been unable to obtain U.S. TINs for their preexisting accounts that are U.S. reportable accounts
6	19 December 2024	(i) Added paragraph 7.8 to provide clarification on the reporting relief for RY2025 to RY2027 to RSGFIs who have been unable to obtain U.S. TINs for their preexisting accounts that are U.S. reportable accounts.
7	18 November 2026	(i) Added paragraph 2 of Part A to include the change in FATCA XML Schema Version 2.0.1 with effect from 1 January 2027 onwards. (ii) Amended paragraph 2 of Part B to include the change in maximum file size with effect from 1 January 2027 onwards.

Contact Information

For enquiries on this Supplementary Guide, please contact us at https://www.iras.gov.sg/contact-us/international-tax