

CITT Portal

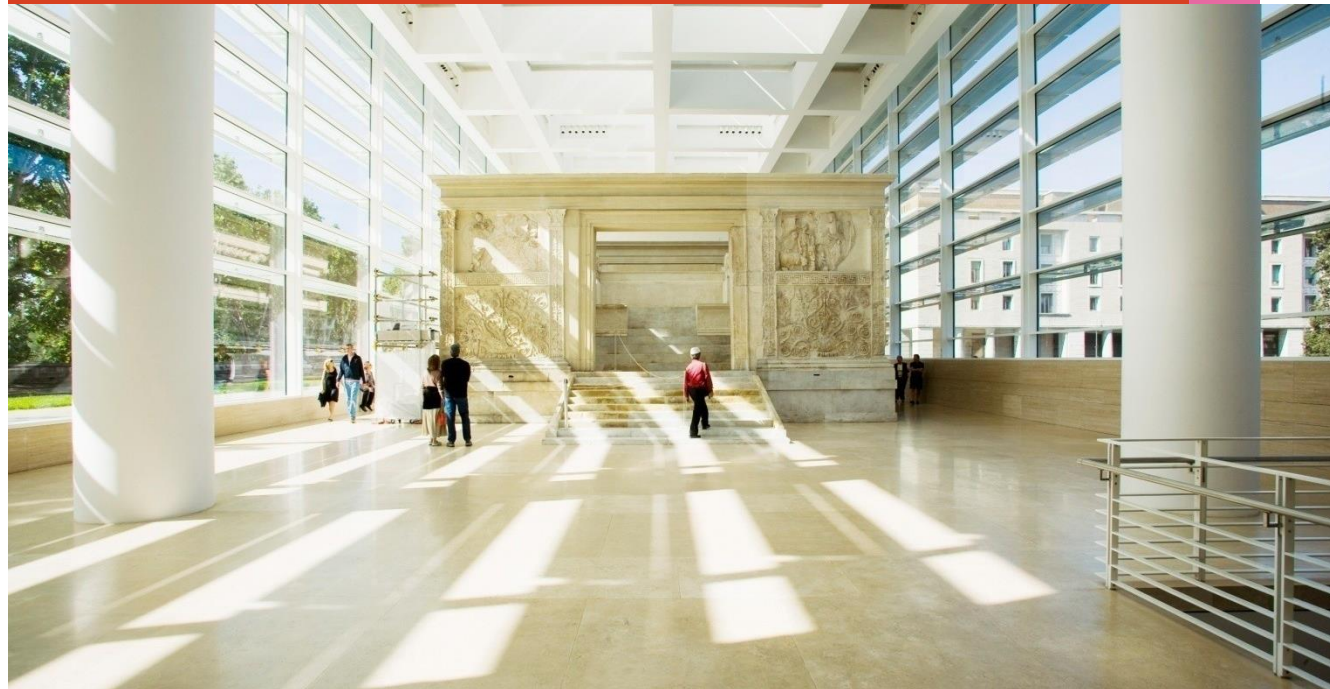
Response to RfI Common Reporting Standard (CRS)

*Supporting you
on your way
to CRS
compliance*

*Strictly
Confidential*

*Vienna,
January 19, 2015*

Version 3.0



PwC has developed tools to address a number of areas critical to FATCA / CRS compliance

pwc Customer & Investor Tax Transparency
The PwC CITT Gateway

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Overview

This section provides an overview of selected services offered by PwC. These services align with the operational areas of Scope & Governance, Customer Due Diligence, Reporting and Withholding. Additional services are listed under the category of Related Services.

For more information click on the relevant area below. It is also possible to navigate from one subsection to another using the contents list available on the left hand side of each page.

CITT Gateway

The diagram illustrates the CITT Gateway structure, centered around five key areas:

- Assessment & Controls**
 - Compare
 - Compass – LEA
 - Process & Gap Assessment
 - Risk & Controls framework
- Documentation**
 - Electronic U.S. Tax Forms
 - Pre-existing Account Due Diligence
 - Stand alone / external back office
 - Service Center Approach
- Reporting**
 - Reporting engine
 - FATCA Account Reporting
 - CRS Account Reporting
 - 1099/1042 Reporting
- Communication**
 - Training & education tools
 - Internal communication templates
 - Market communication templates
 - Holistic platform for AEOI activities
- CITT Backoffice**
 - Flexible back office support
 - Collecting customer gap information
 - Validating tax forms
 - Annual compliance
 - AEOI Help Desk

Contacts

- PwC West Cluster – Americas**
Contact a specialist
[Link to global contacts](#)
- PwC Central Cluster – EMEA**
Contact a specialist
[Link to global contacts](#)
- PwC East Cluster – Asia/Asia Pacific**
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Tools will enable clients to to review their regulatory environments in which they are operating

Assessment & Controls

Compare Tool

- Highlighted areas of:
 - Governance & Compliance
 - Due Diligence
 - Reporting
 - Withholding
- Alert capabilities
- Nearly 200 criteria



A variety of reports can be generated from the CITT Compare Tool in differing formats. The user will be able to select pre-determined reports highlighting the areas of **Governance & Compliance, Due Diligence, Report and Withholding**, containing the relevant criteria for each section.

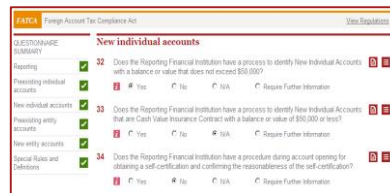
The user will be asked to select a **“base country”** when using the tool. This is the country against which differences should be compared. By doing so, all other reports will be presented in comparison to the selected “base country” and differences should be clearly highlighted.

PwC will provide **alerts to users in a 2-step process**: First, the user will be notified of any regulatory changes in any jurisdiction, i.e. the passage of local legislation. Next, the user will be notified after the tool has been updated to reflect these changes.

The user is free to select from **nearly 200 criteria** to create individualized reports based on the user’s own preferences / needs.

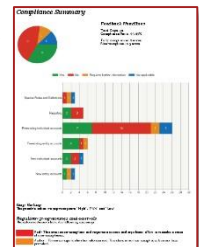
Compass – LEA

- Entity Review and Classification
- Dashboard tracking



The Compass tool was developed by PwC to assist clients with the legal entity analysis. It is based on a questionnaire approach designed to result in a reliable classification of each entity. A **Compliance Summary** will highlight the high

level feedback based on the responses collected from the business units. This will act as an initial heatmap for the gaps.



Tools supporting development of target processes and increase performance

Documentation

Electronic U.S. Tax Forms

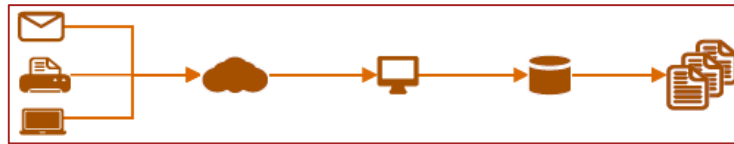
- Review of withholding certificates
- Design of relevant policies and procedures

Pre-existing Account Due Diligence (PADD)

- Highly customizable
- Centralized storage
- “Electronic binder” of documentation

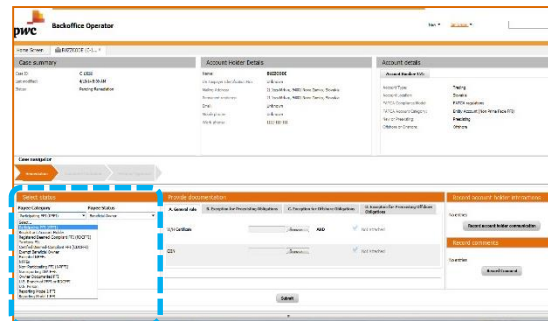
End-to-end: data aggregation, indicia search, case management

- A standard application supports consistency
- Automatic presentation of cure requirements improves quality
- Audit trail



An analysis of a withholding certificate requires line by line review of the information

presented on the form to determine whether the form is complete and consistent with other information provided by the payee. Companies need **policies and procedures, trained personnel and processes** in place to solicit and analyze withholding certificates. **Software systems** can be used to address some issues but may not solve all problems.



PwC has developed a pre-existing account due diligence tool which can support [CLIENT] in its **due diligence for FATCA and CRS**. The PADD workflow consists of up to five step:

1. Electronic Search
2. RM Inquiry
3. Remediation
4. Document Validation
5. Review / Approval

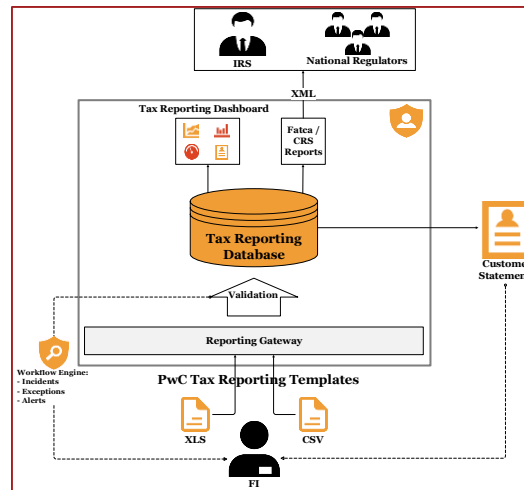
- A case consists of one or more related accounts (if aggregation is enabled)
- The system maintains case, customer, and account level details
- Each account is displayed with relevant information
- Configurable base screens, process flow and supporting functional to specific requirements
- Ability to capture data extracts from other databases or data sources
- Allows an administrator to control who has access to every function in the solution
- Ability to be deployed in more than one site (if data privacy restrictions apply), providing consistency

Reporting is the objective of the Customer & Investor Tax Transparency initiatives, and PwC has the tools to support

Reporting

Reporting Engine

- FATCA Account Reporting
- CRS Account Reporting
- 1099/1042 Reporting



Tax Reporting Dashboard

- Number of persons/accounts
- Aggregation by EAG
- Account balances
- Access to granular data, incl. Tax No.
- By country / time period / tax authority

Audit Trail

- Revision history for all submissions
- Advanced audit reports

PwC has developed an account reporting engine to support clients in their multiple reporting obligations. The engine has multiple functionalities, broken out as follows:

Tax Reporting Gateway

- Generic templates for multi-framework submissions
- Sophisticated data validation & workflow engine

Tax Reporting Database

- Consolidated data model
- Export into all regulatory formats (FATCA, CRS, National standards)

Customer Statements

- Generate PDF statements for customer communication

Report Submission

- Interfaces to tax authorities
- XML-based (FATCA, CRS etc.)
- Form-based
- Approval reports for each submission

Reporting Process Support

- Incident / Exception Handling
- Alerts / Deadline surveillance
- Workflows / Q & A system

Throughout implementation and future operations, training will continue to be required to maintain compliance

Communication

Training & Education tools

- Knowledge sharing within the institution
- Education planning
- Compliance training



PwC has developed full range of trainings in a number of languages intended to raise awareness of the regulatory changes which will impact bank employees as well as to support the internal control and oversight functions.

Basic FATCA / CRS training

- Onboarding of project team members
- Training for new front-office staff

Compliance Training (RM)

- Makes RMs aware of their responsibilities under FATCA / CRS
- Sign-off required from RM to confirm understanding
- Component of internal control function

Language

- Currently, trainings are available in:
 - English
 - French
 - German

Note that not all trainings are yet available in all languages



www.pwc.at/crs

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