MDES | Multi Data Exchange Solution

FATCA CRS user guide – reporting entity

MDES v3.3
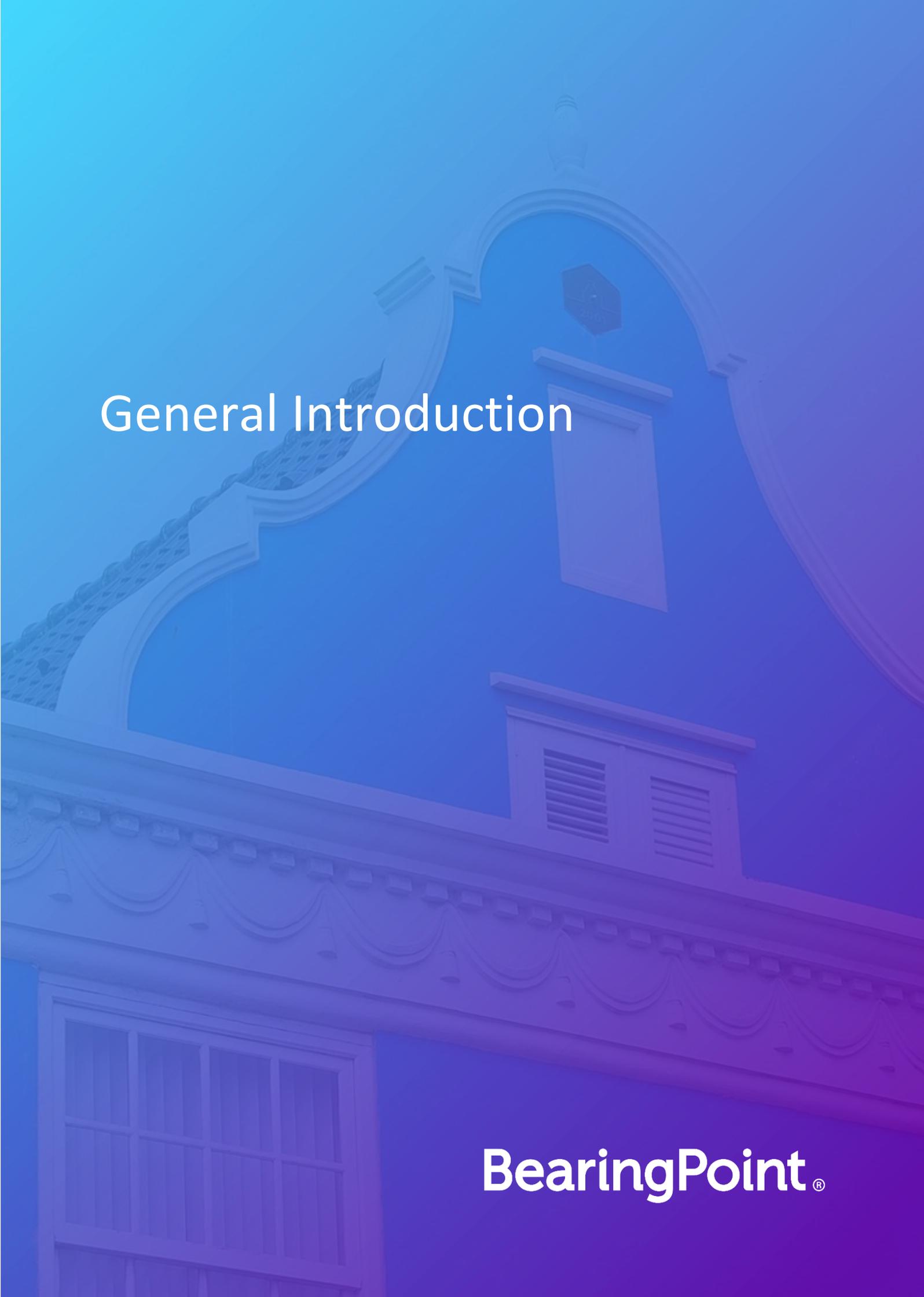
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Table of Contents

General Introduction

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1 Introduction to the user guide

> **NOTE:** From MDES version 3.2 on it will be possible to upload a CRS XML file which is based on the CRS XML schema as published by the OECD.
>
> In MDES it will be possible to upload data by using the FATCA CRS (FC) XML format or the CRS XML format.

1.1 Contents of this user guide

The MDES portal application facilitates the automatic exchange of information (AEOI) commitments and obligations between reporting entities, competent authorities, and partner jurisdictions.

This document is the specific user guide for the Foreign Account Tax Compliance Act (FATCA) / Common Reporting Standard (CRS) reporting module of the MDES portal. Its purpose is to provide guidance on the FATCA/CRS specific functionalities of the MDES portal.

For privacy/copyright reasons some (parts of) images have been blurred.

NOTE: depending on the application roles of the actual users, some tasks, screens, or functionalities may not be shown to a user once logged in.

1.2 Document structure and general layout

The MDES portal has two main user groups: the reporting entities (RE) and the competent authority (CA).

This document is applicable to the reporting entities.

As mentioned in the introduction, this is the FATCA – CRS module user guide for the MDES portal.

There are separate user guides for the other modules of the MDES portal:

- Country-by-Country Reporting (CbC)
- Exchange of Information on Request (EOIR)
- Memorandum of Understanding (MoU)
- the General user guide

1.3 Application tasks

Tasks have been made visible by adding [Task] before each task. The tasks described within this document are listed in below table.

Task	Group	Paragraph (link)
Validate XML file	Reporting entity	3.1
New FC report	Reporting entity	3.2
Add Account report	Reporting entity	3.2.1
Edit / delete Reporting FIs	Reporting entity	3.2.2
Submit (Report)	Reporting entity	3.2.3
Delete report	Reporting entity	3.2.4
Revise (Report)	Reporting entity	3.2.5
NIL-report (Manual entry)	Reporting entity	3.3
New report (upload)	Reporting entity	3.4
Register NO delivery report	Reporting entity	3.5
Withdraw No delivery	Reporting entity	3.6

1.4 Abbreviations

CA	Competent Authority
CbC	Country by Country
CRS	Common Reporting Standard
CSV	Comma-Separated Values
CTS	Common Transmission System (Portal from OECD)
FATCA	Foreign Account Tax Compliance Act
FI	Financial Institution
FC	FATCA/CRS
IDES	International Data Exchange System
MDES	Multi Data Exchange Solution (Portal from BearingPoint Caribbean)
MNE	Multinational Enterprise
OECD	Organization for Economic Co-operation and Development
RE	Reporting entity
XML	Extensible Markup Language

1.5 Disclaimer

Information in this user guide may contain technical inaccuracies or typographical errors. The MDES portal is continually being improved and functionality might change without notice. Please contact BearingPoint Caribbean if any changes need to be made to this document.

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2 Important process flows

This chapter contains a few important process flows of the MDES portal and include a step-by-step description of process.

2.1 Submitting a FATCA/CRS report using manual data entry
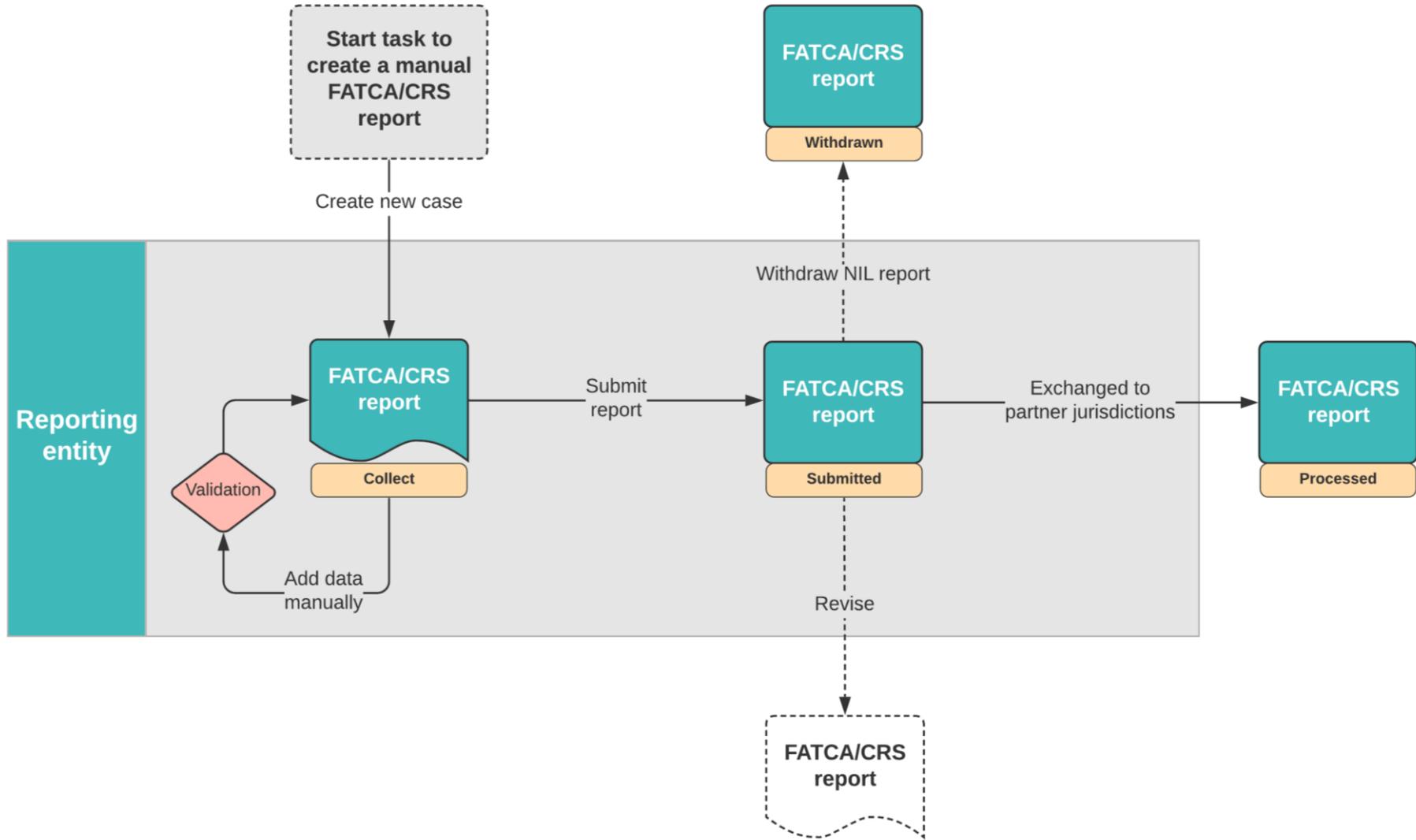
2.1.1 Description

A reporting entity (RE) can upload FATCA/CRS information by either entering the financial information manually, or by uploading an FC XML file or the CRS XML file for CRS-only data.

Below is the process description for manual data entry.

Process:

1. The reporting entity (RE) user starts the task to manually create a new FATCA/CRS report.

2. A few details of the report must be entered by the RE user and a new report case is created by MDES.

3. The RE user can now add accounts and account information one by one. During this process, the system validates the data against the FATCA/CRS schema.

4. When finished, the RE user can submit the report to the competent authority.

5. When the competent authority exchanges the data to partner jurisdictions, the report will be in status "Processed".

6. A submitted report can also be revised. In the latter case, a (new) correction report will be created automatically by the system.

7. Note that a submitted NIL-report, can be withdrawn.

2.1.2   Process flow: Submitting a FATCA and/or CRS report using manual data entry

2.2 Submitting a FATCA/CRS report using a FC XML file or CRS XML file

> **NOTE:** From MDES version 3.2 on it will be possible to upload a CRS XML file which is based on the CRS XML schema as published by the OECD.
>
> In MDES it will be possible to upload data by using the FATCA CRS (FC) XML format <u>or</u> the CRS XML format.

2.2.1 Description

A reporting entity (RE) can upload FATCA and/or CRS information by either entering the financial information manually, or by uploading a FC XML file or a CRS XML file for CRS-only data.

Below is the process description for uploading data using an XML file.

NOTE: separate FC XML and CRS XML user guides are available to reporting entities, which provide guidance on successfully creating an XML file for the MDES portal

Process:

1. The reporting entity (RE) user starts the task to upload a new XML file.

2. The XML file will go through a two-step validation process:

   a. The header data will be validated first. Elements such as the version, declaration type, SendingCompanyIn etc. will be validated. If the initial check fails, the document will not be uploaded, no other validations will be done, and the file is denied.

   b. If the initial validation is ok, the file records will be validated as well. If ok, the file will be registered in the system. If the validation fails, the file will be in status "Denied", and the report case will be accessible to the RE user until a correct version is uploaded.

3. Once the uploaded XML file has passed all validations, the user can submit the file, or choose to submit at a later stage:

   a. If the RE user submits the file to the competent authority, the reporting process is finished.

   b. The RE user can also opt to submit later. In that case, the report case remains in the status Approved until it is submitted.

4. When the competent authority exchanges the data to partner jurisdictions, the report will be "Processed".

5. Note that a submitted NIL-report, can be withdrawn. A submitted report can also be revised. In the latter case, a (new) correction report will be created.

2.2.2   Process flow: Submitting a FATCA and/or CRS report using a XML file
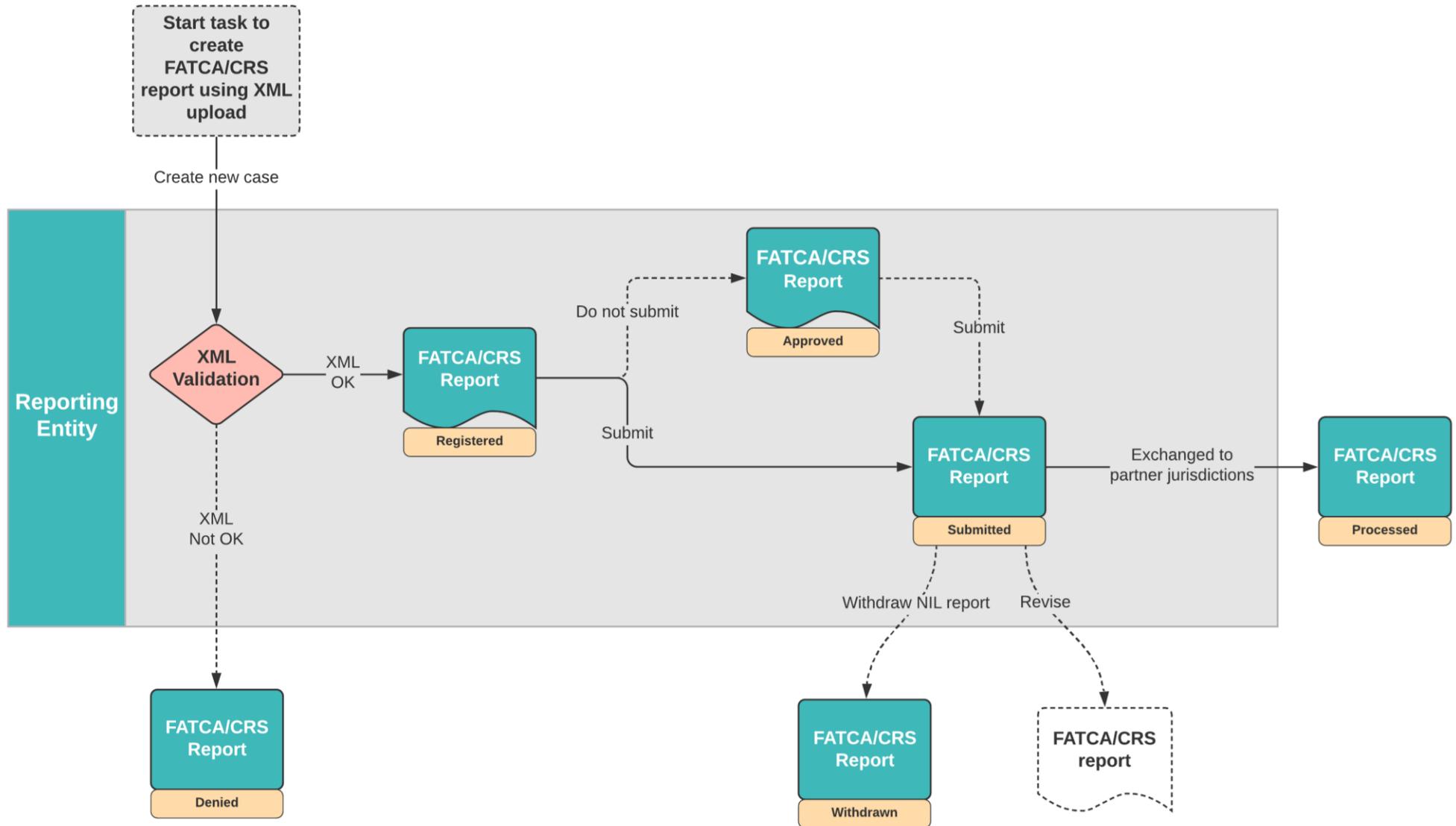
Section I
Reporting entities

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Section I: Reporting entities

This section describes all the screens, functionalities, and tasks for the **reporting entity users** of the MDES portal relating to the FATCA/CRS reporting functionality.

The section is divided into the below chapters, each chapter describing the main tab of the application and the FATCA/CRS related functionalities:

3 **Menu tab: Reports**

4 **Menu tab: Reporting Entity**

3   Menu tab: Reports

Summary

The "Reports" tab (1) relates to all FC related data that are uploaded into the MDES portal by the reporting entity.
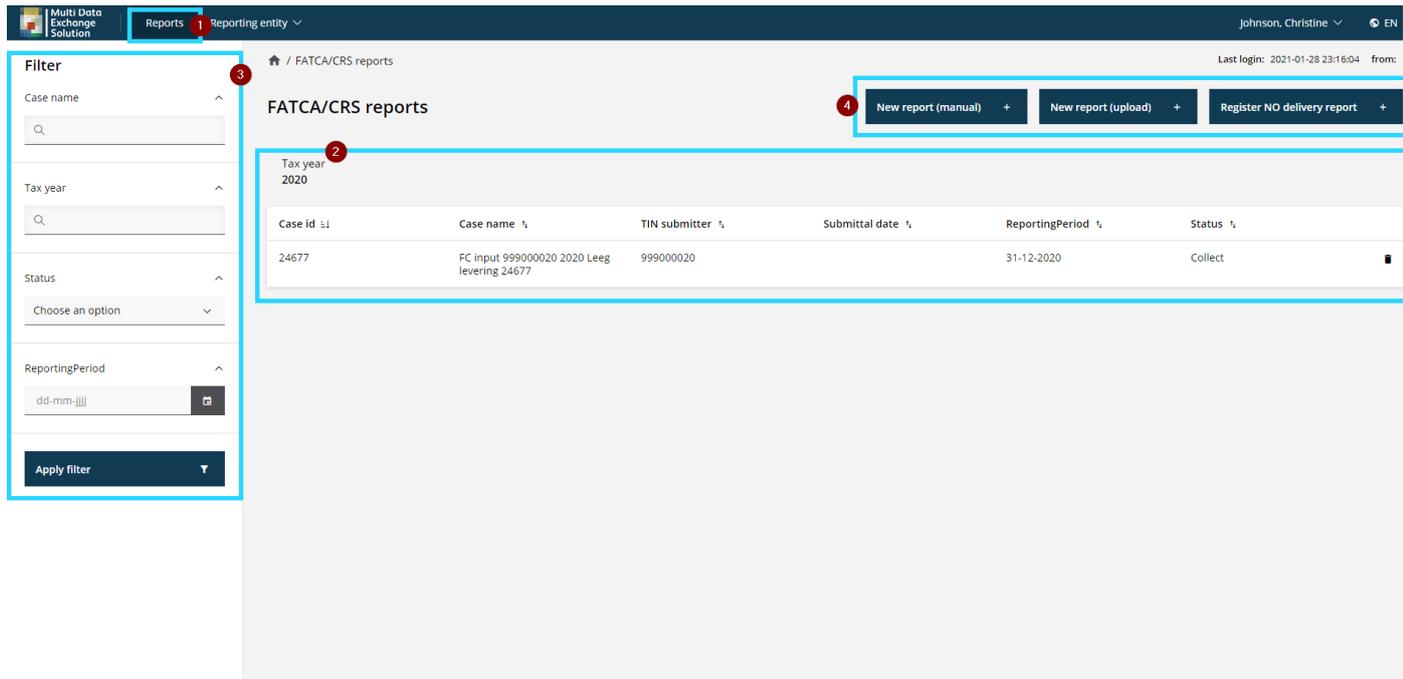

Figure 3-1 FC reports upload overview

The following information is available (2):
- Case ID
- Case name
- TIN submitter
- Submittal date
- Reporting period
- Status

Table 3 Status FC reports

Status	Description
Registered	The FC report was uploaded as XML file. *Immediately after the upload, the XML gets validated, resulting in either Approved or Denied status.*
Collect	The reporting entity has chosen for a manual FC report entry and the report is still in status "Collect". The report has not been submitted yet.

Denied	The FC report upload was denied by the system due to validation errors in the FC report.
Cancelled	The FC report was uploaded successfully but was cancelled by the reporting entity. *In an unlikely case, the FC report can be cancelled by the system due to import or validation failure.*
Processed	The FC upload has been submitted and the registration of delivery has also taken place by the CA for all partner countries.
Withdrawn	After correcting a NO-delivery report by withdrawing the report.
Submitted	The FC report was uploaded successfully by the reporting entity and the report was formally submitted.
Approved	The FC report was uploaded successfully by the reporting entity.

The user can search for a specific report by using the search box and/or applying a search filter on the left side of the page (3).

The task section at the right of the screen (4) displays the tasks available for the user. The following tasks are available:
- Validate XML file.
- New report (manual)
- New report (upload)Register NO delivery report.

3.1 [Task] Validate XML file

MDES provides an XML testing functionality for financial institutions to test the report of financial data against the XML message schema. The test functionality for data reporting for previous years is continuously available if the portal is in the status: "Released for relations management and test".

In MDES 3.0 you can quickly see the status of the portal, thanks to the vertical red line at the left of the portal and the text box at the right bottom in a similar color. As you can see in the screenshot below, the MDES portal is now open for XML file validation and the management of EOI relations.

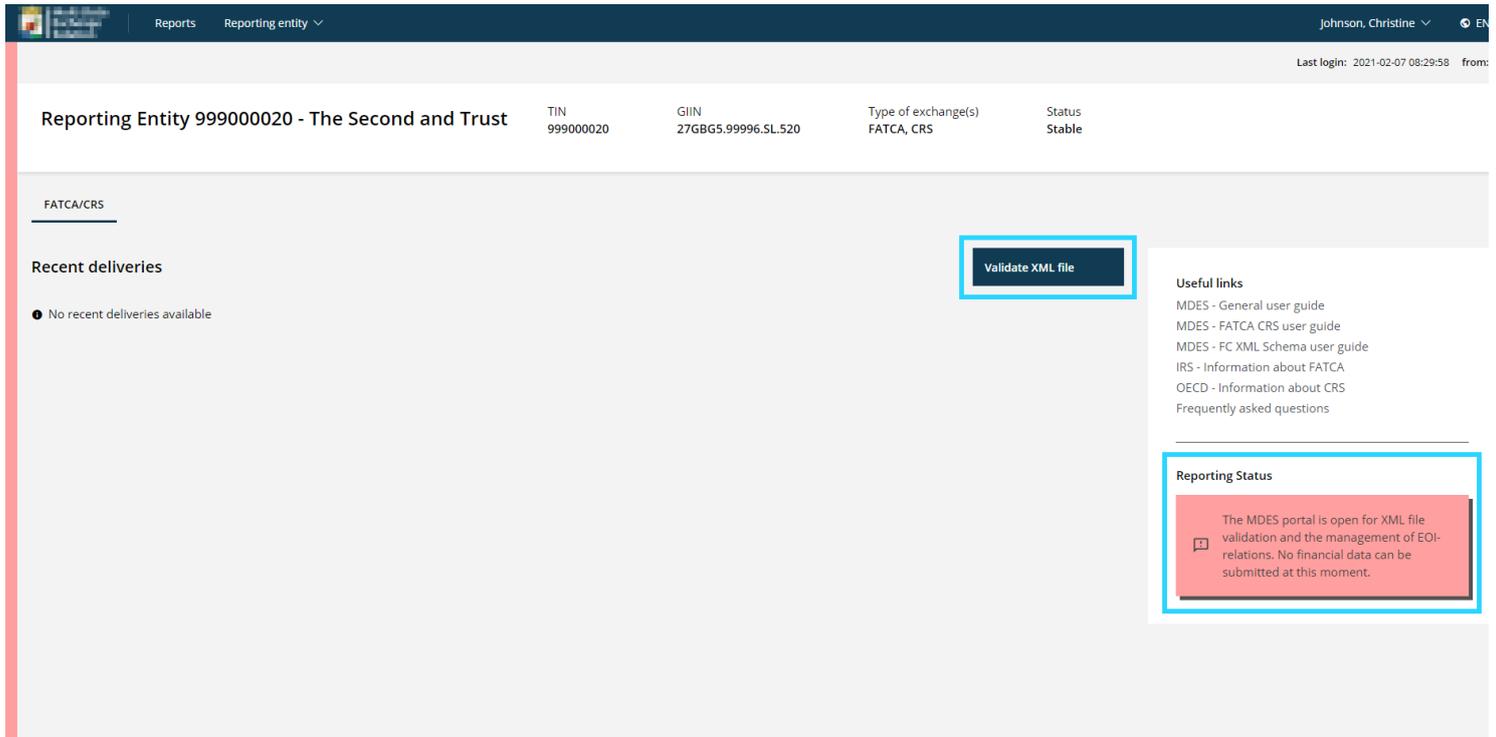The "Validate XML file" button will appear.

Figure 3-2 Portal closed for reporting. Validate XML task available

The following screen appears after clicking "Validate XML file".
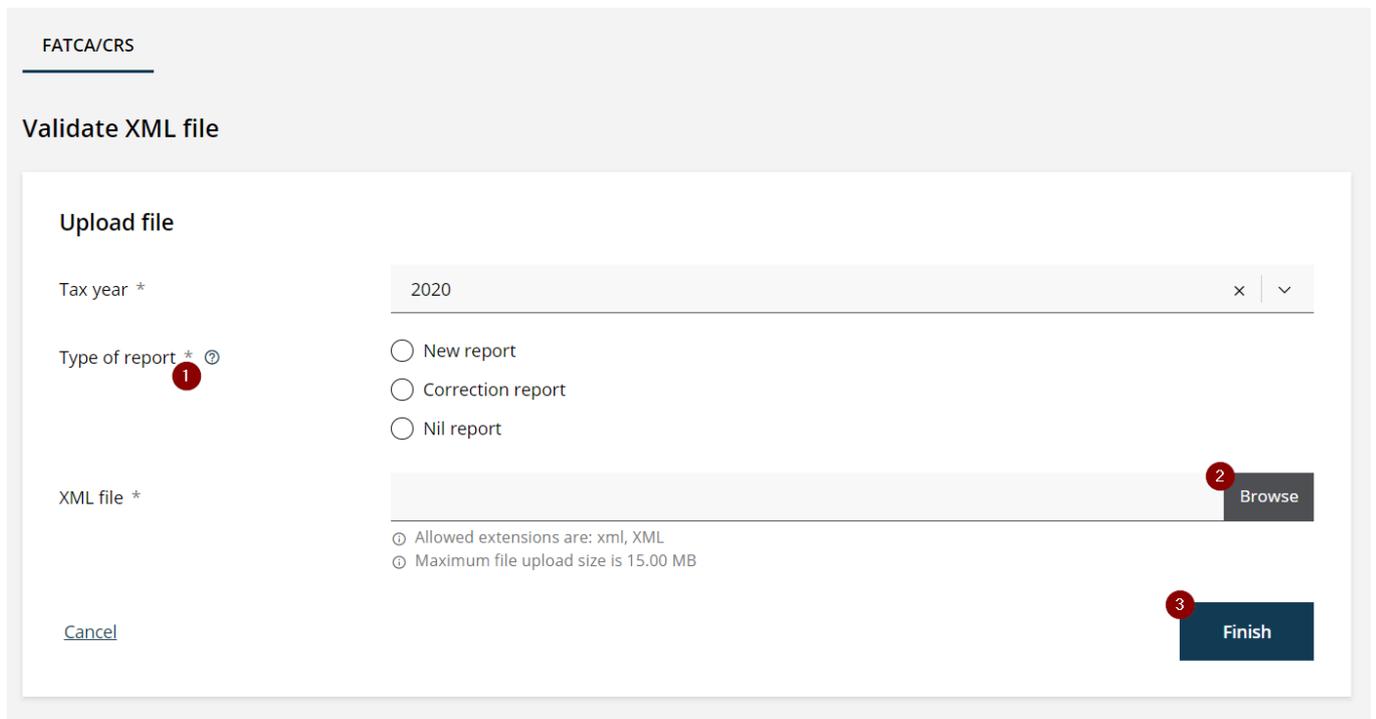

Figure 3-3 Validate XML file screen

You are requested to select the tax year you would like to file reports for, and the type of report you would like to validate (1). There are three type of reports possible:

1. New report: The initial data can be reported; this is a New Report (CRS701)
2. Correction report: A correction for previously sent information can be uploaded (CRS702)
3. NIL report: File NIL reports to declare that there are no accounts to report for the calendar year (CRS703)

By clicking the "**Browse**" button (2), the XML file can be selected (with a maximum file upload size of 15 MB). After the XML file is selected, click "**Finish**" and the file will be checked (3).
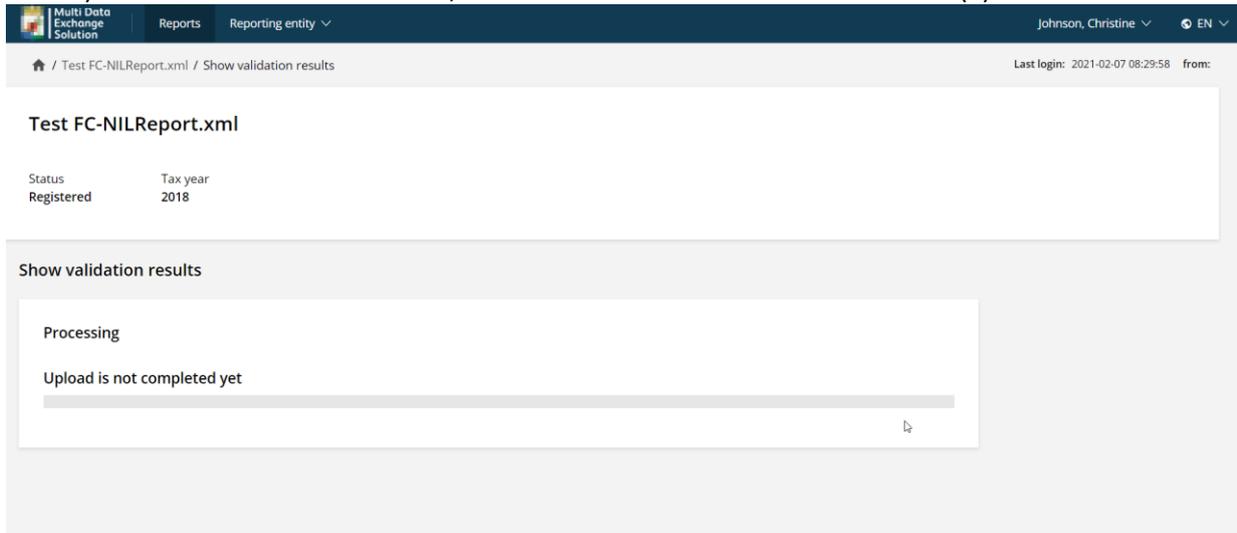

Figure 3-4 Validation result screen

Validation of the file takes place in two ways. First, a check is made whether the file is in the correct format. If this is not the case, an error message appears at the bottom of the screen and the user is prompted to amend the XML and upload another file.

In addition, there is also a validation on the records. If the content of the XML file is incorrect, a screen will appear showing the error message.
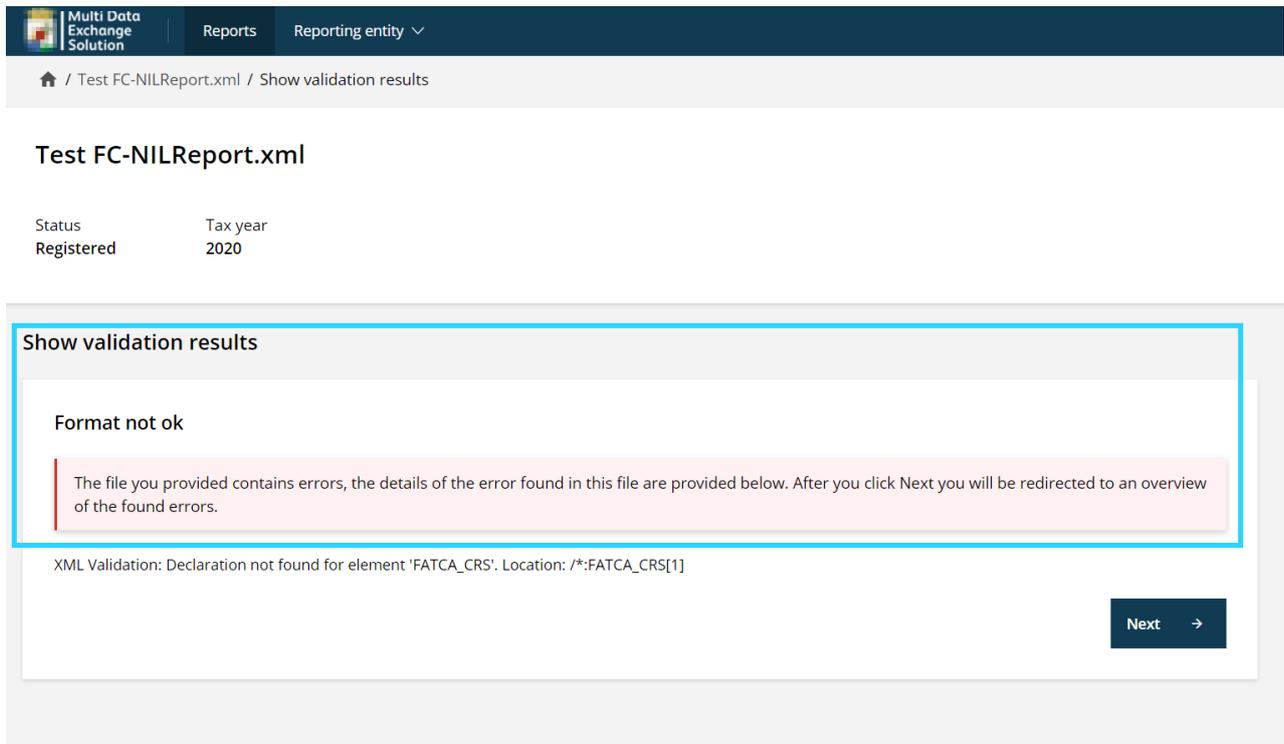
Figure 3-5 Error message

In case the file is approved but contains a warning, the warning will be displayed along with a message that the file can be read.

If the file is approved without warning, a message will appear that the file has been received in the correct order user will be re-directed to the reports overview screen.

3.2 [Task] New report (manual)

If the reporting status of the portal is set to "open", you will see a green vertical line on the left of the screen. The **"Validate XML file"** button disappears and instead, you have the option to submit new reports, either manually or via upload:

1. **Manual Entry:** Data can be entered manually.
2. **Upload File:** An XML file in the FATCA CRS (FC) XML or CRS XML format can be uploaded to read all data at once.
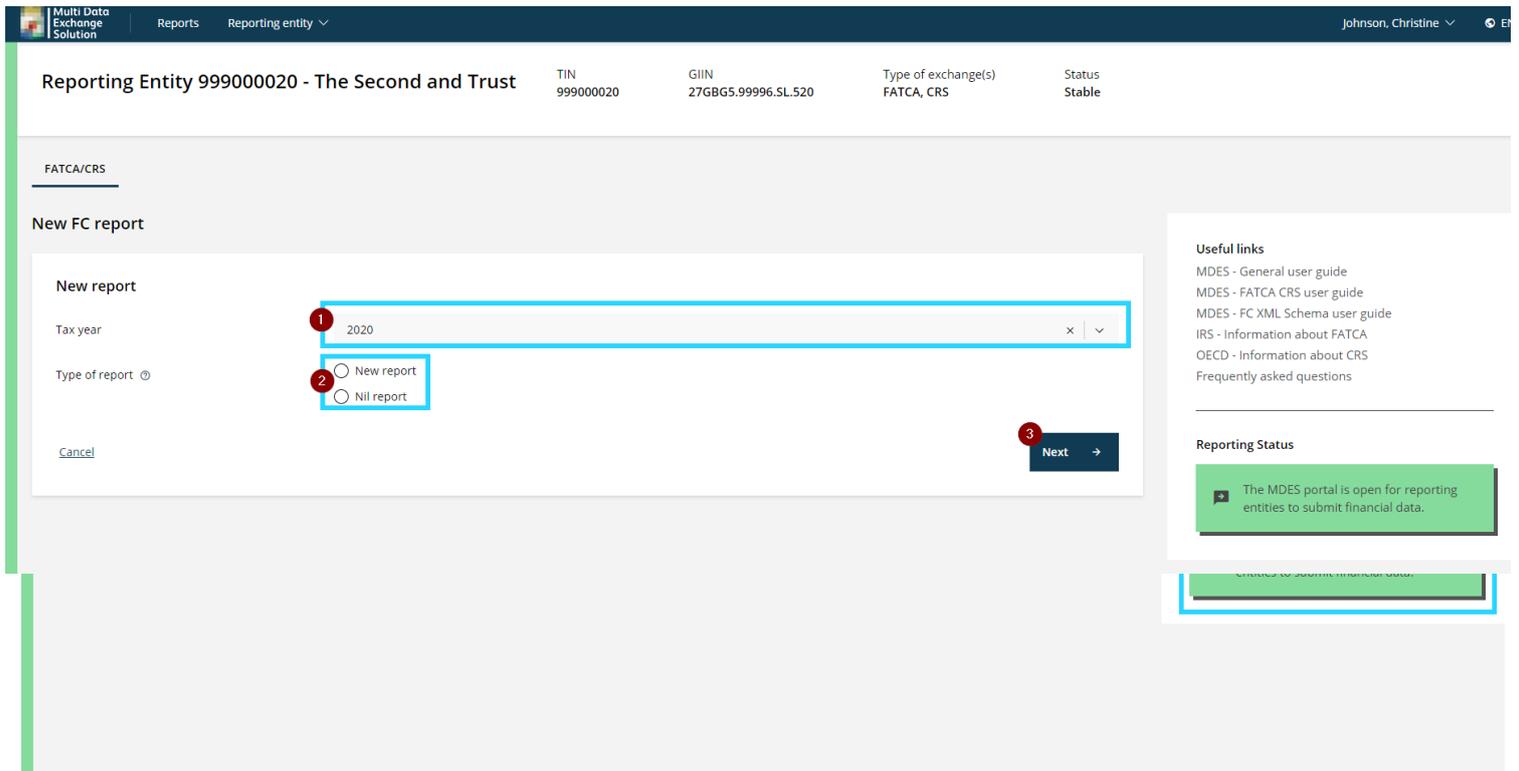
Figure 3-6 New FC report selection (Manual)

By clicking on the **"New report (manual)"** task, a screen opens where the type of report can be specified.

First the user needs to select the tax year for which the FC report will be created (1).

The user then needs to select the type of report (2). This field indicates the message type of the report. It should match the MessageTypeIndic in the MessageHeader when uploading a file.

Possible values are:
- New (CRS701): report contains only new data;
- Correction (CRS702): report contains only corrections of previously sent data;
- NIL (CRS703): report contains reporting entities without data.

By clicking the "**Next**" button (3), the process to enter data manually starts.

The new report case will be opened.

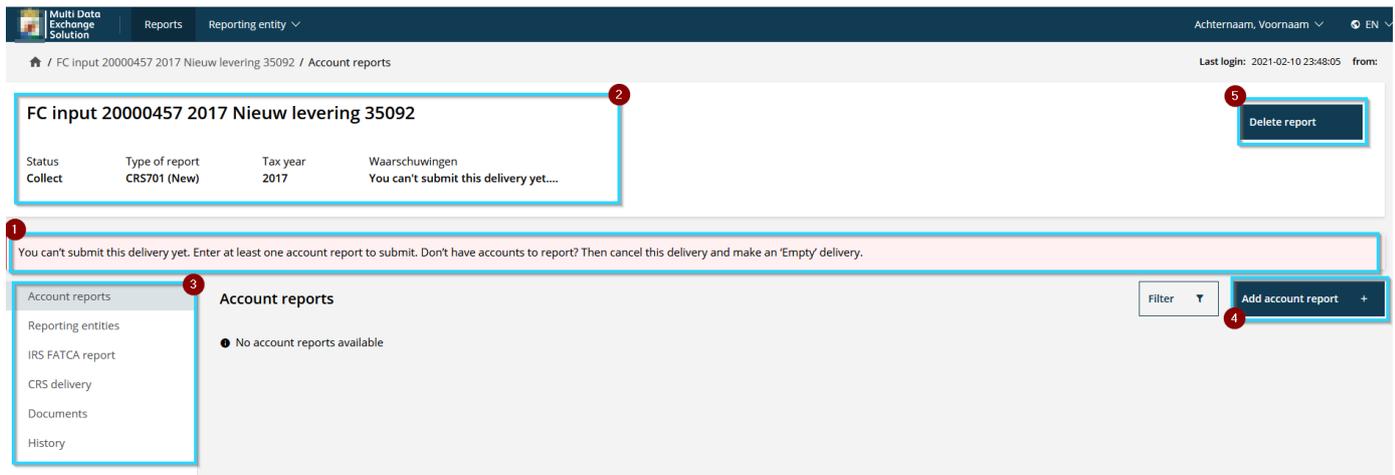Figure 3-7 New FC report selection

Figure 3-8 FC report case

The header section (2) displays the case information. The information available in the case header are:

- Case name
- Status
- Type of report
- Tax year
- Submittal date (will be empty if the report is not submitted yet)
- Error message

The detail section (3) displays addition information about the FC report. The following information is available:

- Account reports
- Reporting entities
- IRS FATCA report
- CRS delivery
- Documents
- History

The task section at the right of the screen (5) displays the tasks available for the user. The following tasks are available depending on the status if the FC report:

- Submit
- Delete report
- Revise

When you open this page, the Account Reports Panel will be displayed immediately.

The report case is created without an Account Report thus the report cannot be submitted yet (1).

The user must add at least one account report manually (4). This is possible by clicking on the task **"Add account report"** (4). This task will be explained in the following paragraph.

3.2.1 [Task] Add Account report

An account report is mandatory under CRS (except when the reporting entity does not have any accounts to report. In this case the reporting entity needs to cancel this report and create a NIL report).

The task **"Add account report"** is used by the reporting entities to add an account report. After clicking on the task, the first screen that appears is the account details screen. In this screen the user needs to fill in the account details.

Figure 3-9 Add account report - Account details

By clicking **"Next"** the user can proceed with filling in the account holder information.

Add account report

Account Holder

Account holder type *	◉ Individual
	○ Organisation

Name

Title	
First name	
First name type	
Middle name	
Middle name type	
Name prefix	
Name prefix type	
Last name	
Last name type	
More name fields	○ Yes
	◉ No
Name type	Choose an option ⌄

Tax data

TIN

The OECD aims to increase the overall quality of financial data that is exchanged between jurisdictions. Therefore, the Competent Authority will review reports that have missing data. If the information in the TIN field(s) remains empty, this report will be subject to review by the Competent Authority.

TIN	
issued by	Anguilla

Personal data

The OECD aims to increase the overall quality of financial data that is exchanged between jurisdictions. Therefore, the Competent Authority will review reports that have missing data. If the information in the Birth date field remains empty, this report will be subject to review by the Competent Authority.

Birth date	dd-mm-yyyy 📅
Birth city	
Birth city subentity	
Birth country	Choose an option ⌄

Address

Note that according to CRS XML Schema, 'AddressFix' should be used for all CRS reporting, unless the reporting FI cannot define the various parts of the account holder's address.

The 'AddressFree' option should only be used if the data cannot be presented in the 'AddressFix' format.

If the information in the 'AddressFix' field(s) remain(s) empty, this report will be subject to review by the Competent Authority.

Address type	Choose an option ⌄
Country *	Choose an option ⌄
Street	
BuildingIdentifier	
PostCode	
City	
AddressFree	
More address fields	○ Yes
	◉ No

Cancel ← Previous | Next →

Figure 3-10 Add account report - Account holder

When the user does not complete the TIN, Date of birth (in case of individual) and address information, the system will display a warning of such fact.

To proceed to the next screen, the user needs to click on **"Next".**

Figure 3-11 Add account report - Payment and/or additional data

In this screen the reporting entity can specify payments.

By clicking on **"Finish"** the Account report is saved. The report screen will be displayed again.

In certain scenario's, the controlling persons information can be added after creating the account report. The user can always add more controlling persons by clicking on the icon on the right of the account.

Figure 3-12Edit an account report

The user proceeds to add information on the controlling person.

Add a controlling person

Controlling person

> The account report has been successfully saved.
> This account report requires a controlling person. Please input this below.

Name

Preceding title	
Title	
First name *	
First name type	
Middle name	
Middle name type	
Name prefix	
Name prefix type	
Last name *	
Last name type	
Generation identifier	
Suffix	
General suffix	
Name type	Choose an option ∨

Tax data

Tax residence	Choose an option ∨

Personal data

> The OECD aims to increase the overall quality of financial data that is exchanged between jurisdictions.
> Therefore, the Competent Authority will review reports that have missing data. If the information in the
> Birth date field remains empty, this report will be subject to review by the Competent Authority.

Birth date	dd-mm-yyyy 📅
Birth city	
Birth city subentity	
Birth country	Choose an option ∨

Address

> Note that according to CRS XML Schema, 'AddressFix' should be used for all CRS reporting, unless the
> reporting FI cannot define the various parts of the account holder's address.
>
> The 'AddressFree' option should only be used if the data cannot be presented in the 'AddressFix' format.
>
> If the information in the 'AddressFix' field(s) remain(s) empty, this report will be subject to review by the
> Competent Authority.

Address type	Choose an option ∨
Country *	Choose an option ∨
Street	
BuildingIdentifier	
SuiteIdentifier	
FloorIdentifier	
DistrictName	
Mail box	
PostCode	
City	
CountrySubentity	
AddressFree	
Controlling person type	Choose an option ∨

Cancel — Next →

Figure 3-13 FC report case – Add controlling person

Multi Data Exchange Solution - FATCA CRS User Guide | Final version 1.2   25

![BearingPoint logo]

After clicking on **"Next"**, The TIN needs to be entered.

Figure 3-14 FC report case – Add TIN

By clicking on **"Finish"** the Account report is saved. The report screen will be displayed again.

Figure 3-15 FC report case - Account report

The **Account Report** can be found on the Account Reports panel (1). If data is still missing, the report cannot be submitted.

The Account Report can be edited or more data can be added to the account report by clicking on the dots (2).

The available tasks are not always the same; It depends on the Account Holder Type, Account Holder, Country, and data that were already added to the Account Report. The option to delete the account report is also available.

3.2.2   Edit / delete ReportingFIs

Reporting entities can correct the address data of a ReportingFI of a report before submitting the report. The ReportingFI data can be found on the Reporting entities (1).
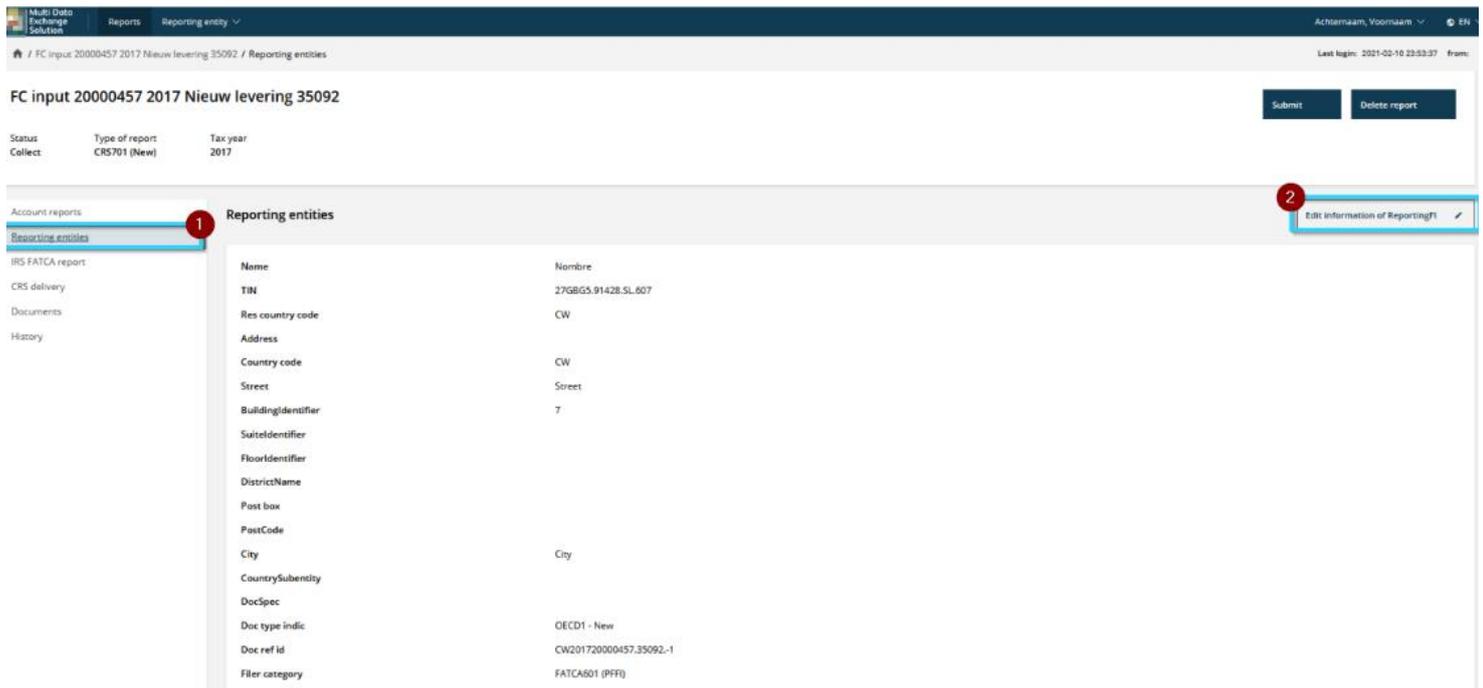
Figure 3-16 FC report case – ReportingFIs

By clicking on the task **"Edit information of ReportingFI"** (2), the address or filer category* of a Reporting entity in the current report can be edited.
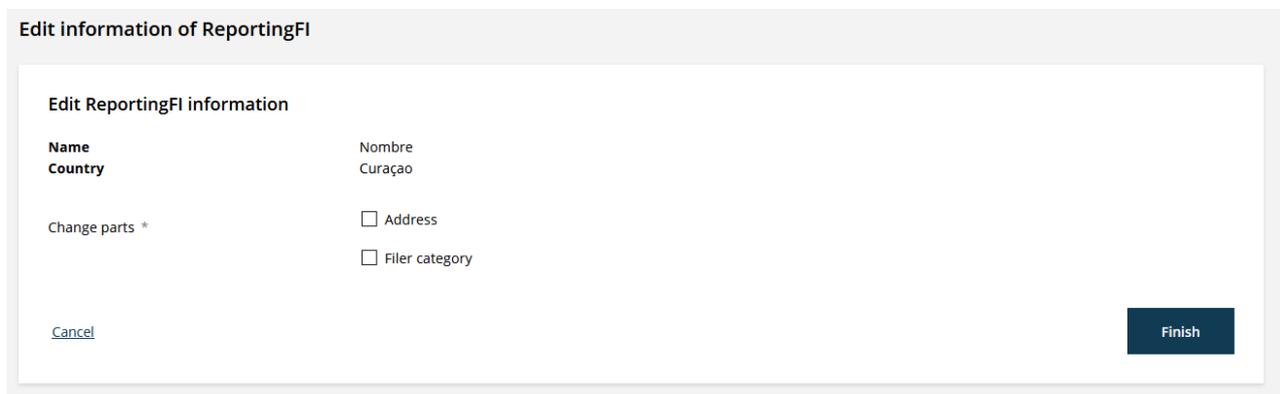

Figure 3-17 FC report case – Edit ReportingFI information

By clicking on **"Finish"** the update is saved.

Filer category details are only required for reports that contain FATCA related information.

3.2.3 [Task] Submit

The report can be submitted by using the "**Submit**" task in the menu list on the right side of the screen.
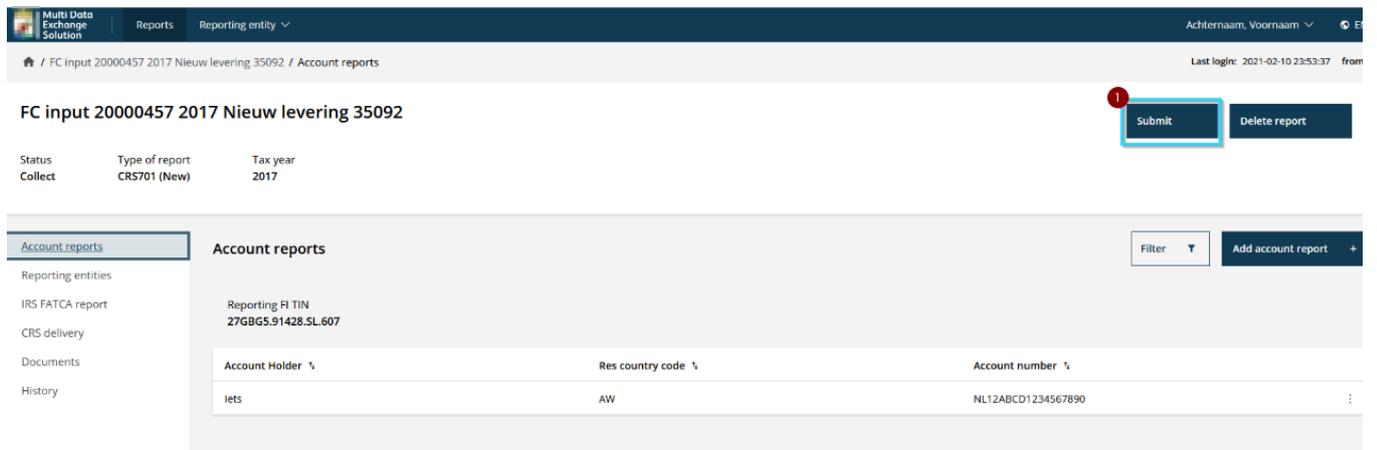
Figure 3-18 FC report case - Submit

By clicking on the "**Submit**" task, a new screen will appear with data about submitting the report.

Submit

Submit

Tax year	2021
Type of report	CRS701 (New)
Type of exchange(s)	CRS

> Submitted information will be delivered to the concerning jurisdictions by the competent authority. The information cannot be withdrawn. However, the portal allows you to revise the supplied information. You will receive a confirmation of the submittal of this report to the Tax Authorities.
> You will also receive a separate confirmation e-mail after the information has been forwarded by the Tax Authorities.
> Cancel this task if you do not want to submit this report to the competent authority yet.

Type	Reporting FI	Account holder (Organisation)	Account Holder (Individual)	Controlling Person
Address	✔	✗	✗	✗
DateOfBirth	✗	✗	✗	✗
TIN	✔	✗	✗	✔

> The OECD aims to increase the overall quality of financial data that is exchanged between jurisdictions. Therefore, the Competent Authority will review reports that have missing data.
>
> One (or more) TIN field(s) and/or BirthDate field(s) contain(s) no information. If the field(s) remain(s) empty, this report will be subject to review by the Competent Authority.

> Note that according to CRS XML Schema, 'AddressFix' should be used for all CRS reporting, unless the reporting FI cannot define the various parts of the account holder's address.
>
> The 'AddressFree' option should only be used if the data cannot be presented in the 'AddressFix' format.
>
> If the information in the 'AddressFix' field(s) remain(s) empty, this report will be subject to review by the Competent Authority.

Cancel   Finish →

Figure 3-19 Submit confirmation screen

The system will alert the user in case the TIN, Date of birth (in case of individual) and address information, is not completed in the report. The user will be able to continue submitting the report but is informed that the report will be subjected to review by the CA.

By clicking "**Finish"**, the report will be submitted.

3.2.4 [Task] Delete report

In case the report has not been submitted yet it is possible to cancel the report.

The report can be cancelled by using the "**Delete report**" task in the menu list on the right side of the screen.
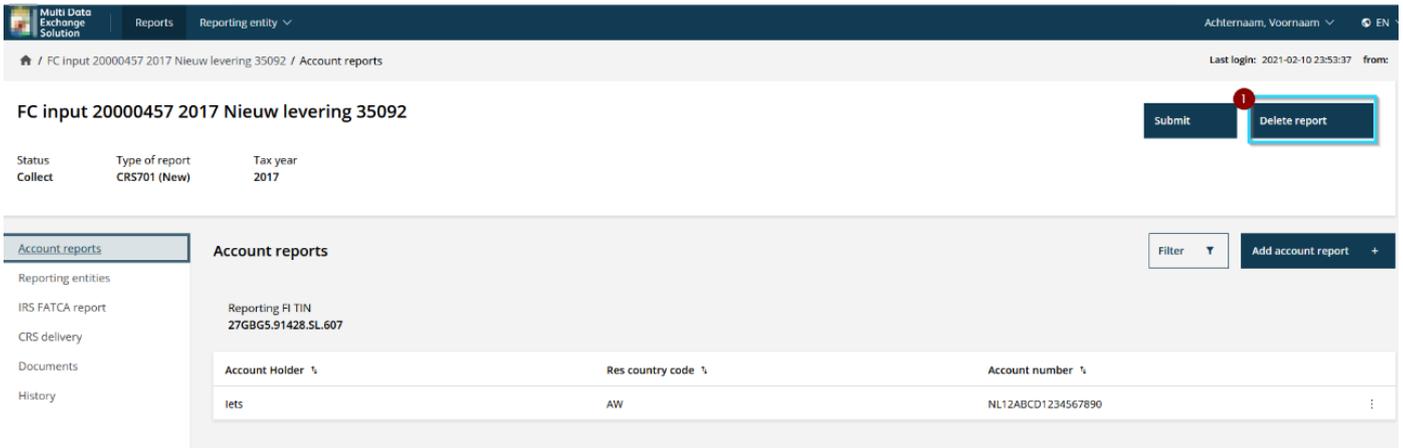

Figure 3-20 FC report case – Delete report

By clicking on the "**Delete report**" task, a new screen will appear to confirm the deletion.
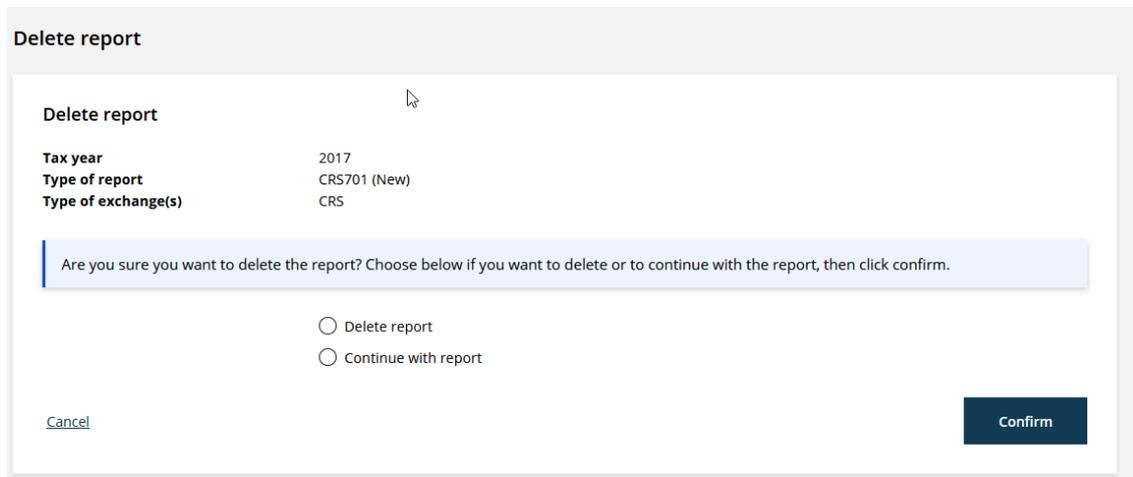

Figure 3-21 Delete confirmation screen

The user needs to select the option "**Delete report**" before clicking on the button "**Confirm**" to delete the report.

3.2.5 [Task] Revise

After a report has been submitted to the competent authority, it can only be "Revised". This is done by starting the "**Revise**" task in the submitted report case, on the right side of the screen.
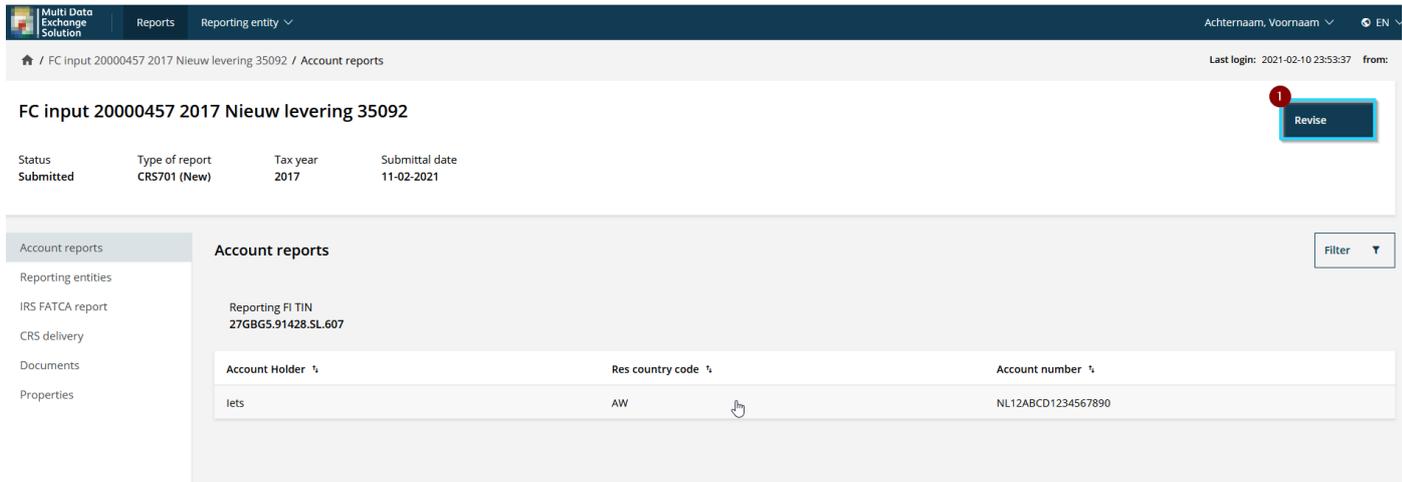
Figure 3-22 FC report case – Revise

The "**Revise**" task allows you to manually enter data or upload a file. The previous data entry method (manual entry or XML file upload) does not matter.
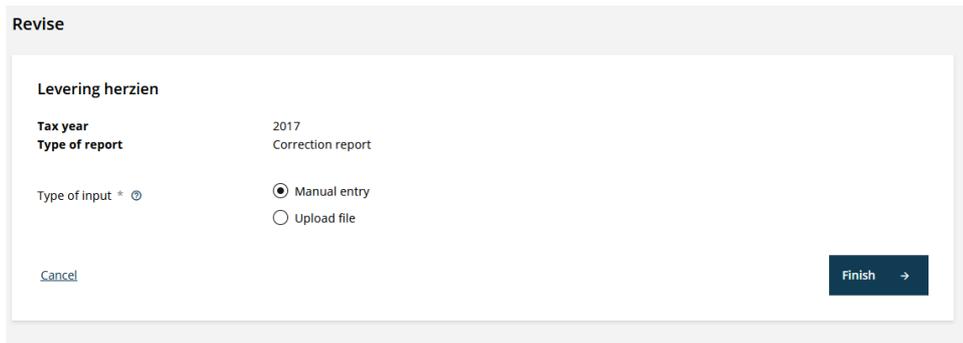

Figure 3-23 Revise confirmation screen

By clicking on **"Finish"** the correction report is created.

3.3   NIL-Report – Manual Entry

If there is no financial data for the relevant tax year, a NIL report can be submitted. This can be done by selecting the task **"New report (manual)"** and in the selection screen choose NIL as the Type of report.
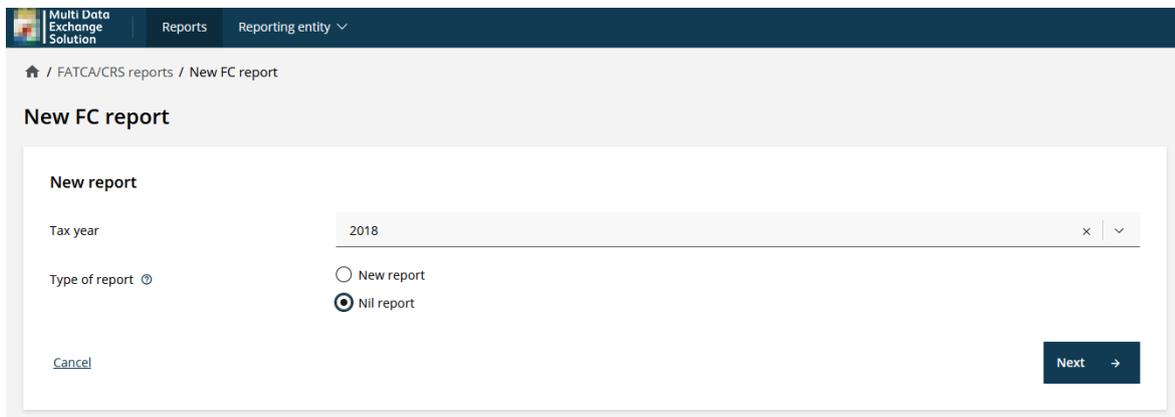
Figure 3-24 New FC report NIL report selection

By clicking the **"Next"** button, the process to enter data manually will start.

New FC report

Nil report

Nil report has to be filed if the reporting financial institution has no financial account to report to any country or, in case of the FATCA treaty, only has US-accounts with an account balance beneath the threshold and the FI does not have any accounts of EU residents.

ReportingFI's initial Nil report

	GIIN	CRIB Number	Formal/Legal name
	27GBG5.91428.SL.607	20000457	Nombre

Cancel

← Previous   Next →

Figure 3-25 New FC report - NIL report

By clicking "**Finish**", the NIL report is submitted manually.

3.4 [Task] New report (upload)

Reporting can also be done by uploading an FC XML or CRS XML file. The abbreviation FC stands for FATCA CRS. The CRS XML file is based on the XML schema published by the OECD and can be used for reports containing CRS only data.

NOTE: There is a separate FC XML manual available to explain the structure of the XML accepted by MDES.

Figure 3-26 New FC report selection (Manual)

By clicking on the **"New report (upload)"** task, a screen opens where the type of report can be specified.
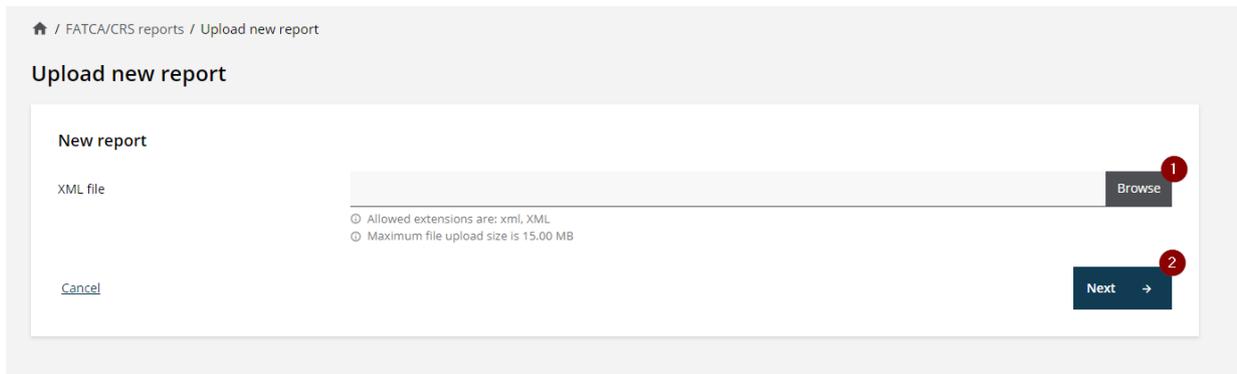
Figure 3-27 Upload new report screen

The relevant XML file must be entered using the "**Browse**" button (1).

By clicking the **"Next"** button, you will receive a notification that the file was read correctly or incorrectly.

A rejected file returns to the case list. An approved file will display the Show Validation Results screen. The report can be submitted right away or later.

Also note the process description of uploading a FC XML file here: *2.2 Submitting a FATCA/CRS report using a FC XML file or CRS XML file.*

3.5 [Task] Register NO delivery report

This task is only available in case the information exchange commitment is FATCA and the reporting entity has no data to deliver.

If there is no financial data for the relevant tax year, a no delivery report will be created. This can be done by selecting the task **"Register NO delivery report"** (1).
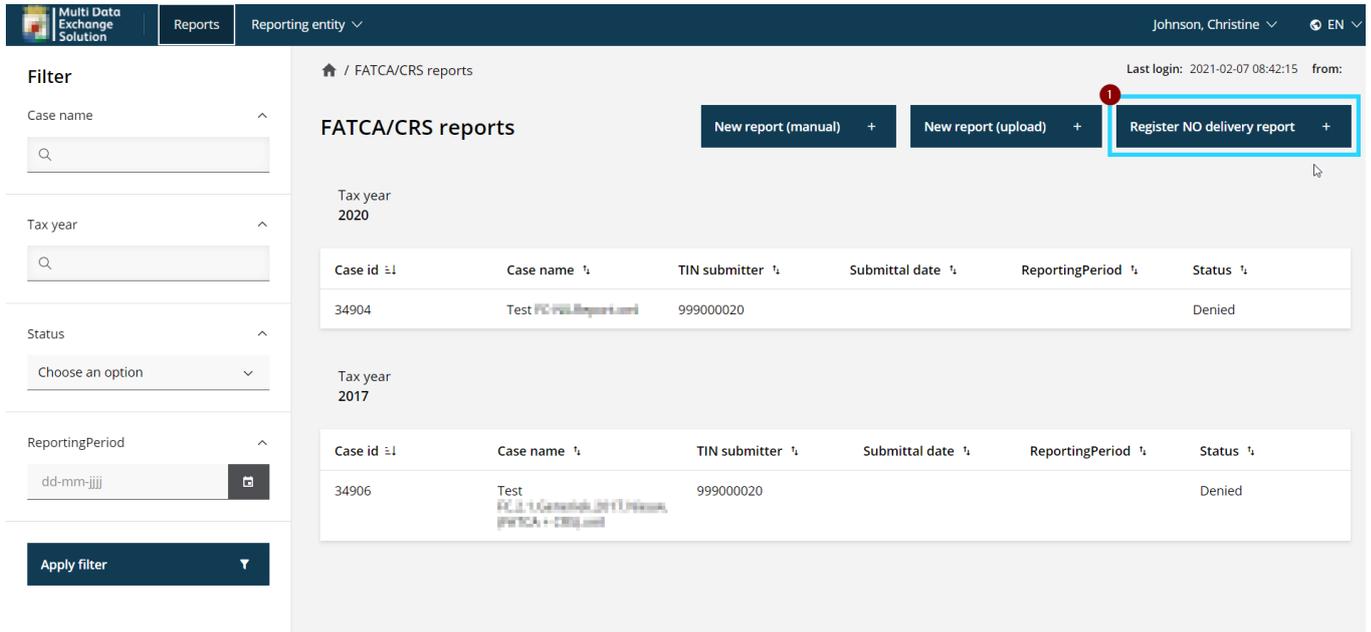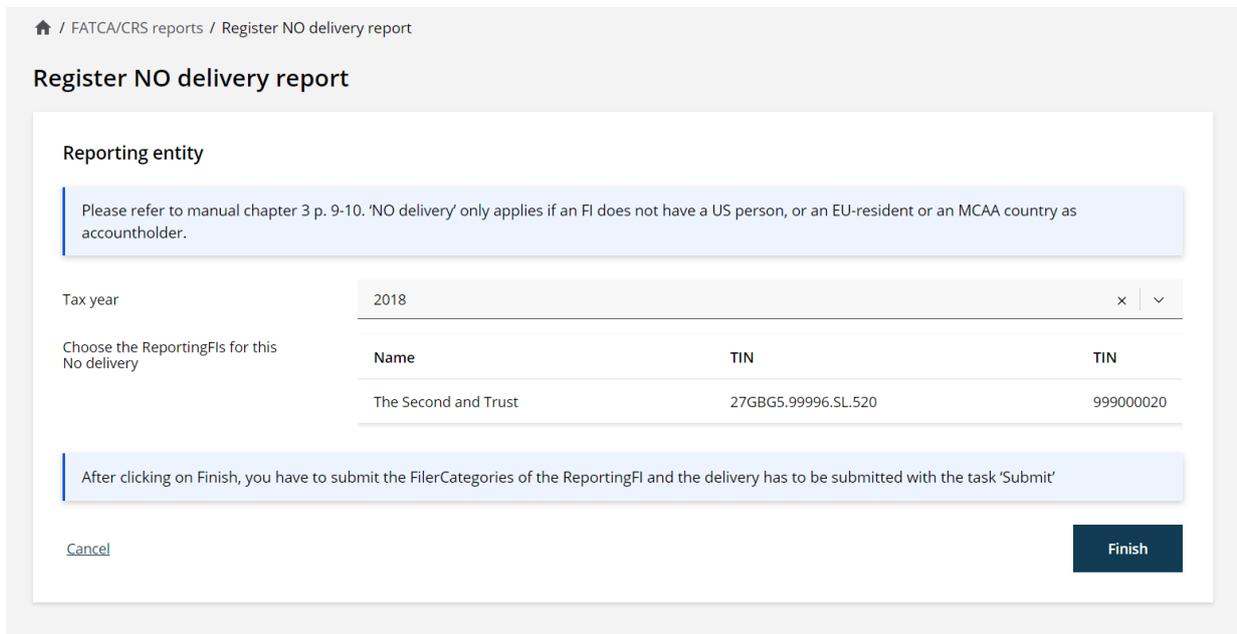
Figure 3-28 FC reports upload overview

A confirmation screen appears. In this screen the user needs to select the tax year and reporting entity for which this is applicable.

By clicking on **"Finish"**, the NO-delivery is registered. Before submitting the report, the user must add a filer category to the ReportingFI panel.

This can be done by clicking on the task **"Edit information of ReportingFI"**. If all information is filled in, the report can be submitted.
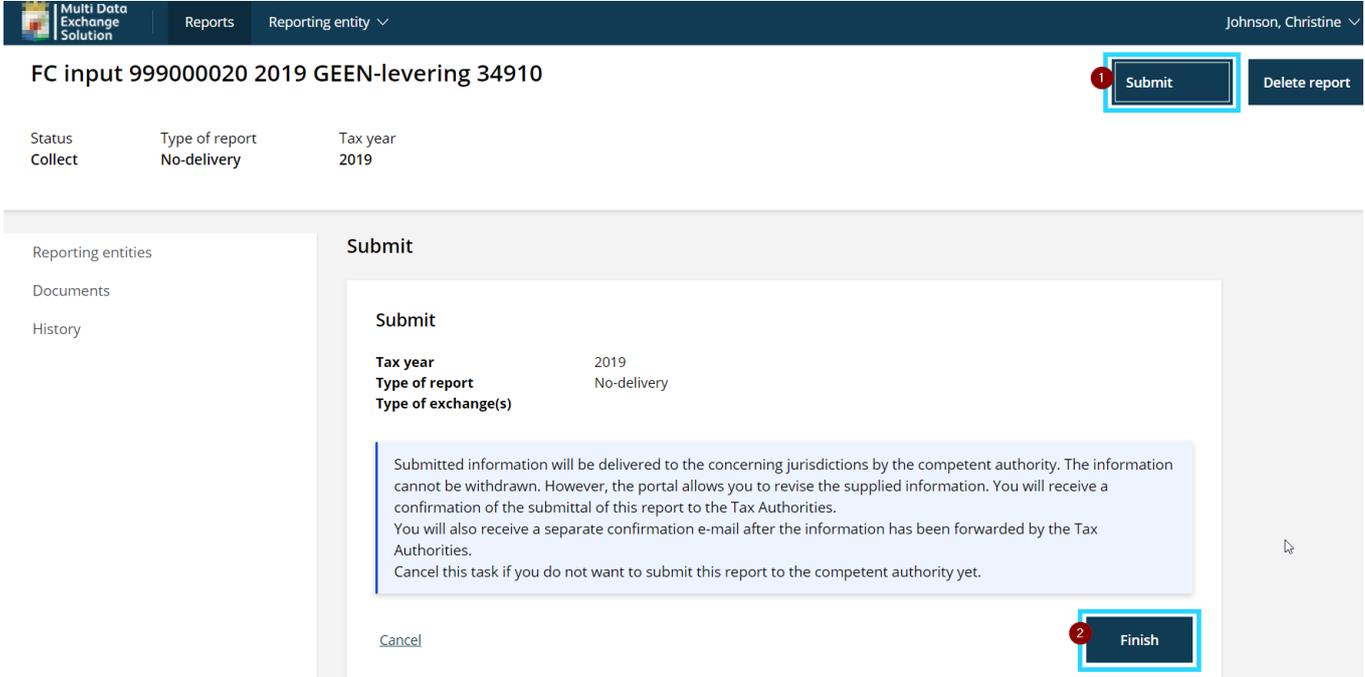

Figure 3-29 Submitting a No Delivery

3.6 [Task] Withdraw No-Delivery

After registering the No-Delivery, no data can be submitted for the relevant institution(s). To correct errors, the No-Delivery must be withdrawn. The case can be withdrawn using the task "Withdraw No delivery".

Note: 'NO delivery' only applies if a reporting entity does not have a US person, or an EU-resident or an MCAA country as accountholder.
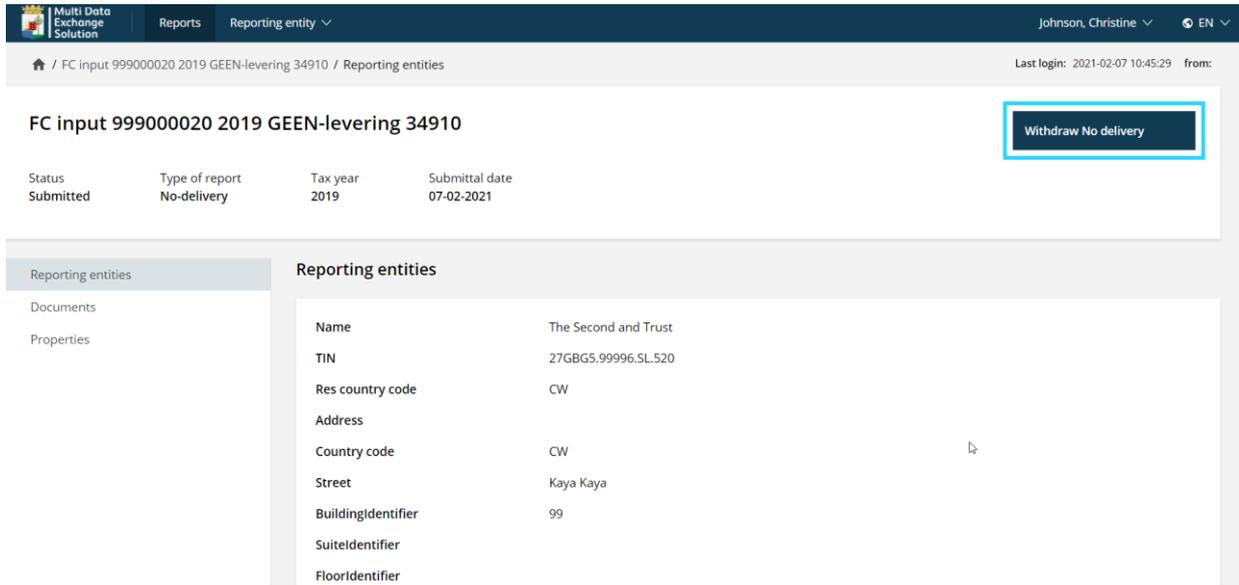
Figure 3-30 FC report case – Withdraw no delivery

By carrying out the "**Withdraw No-delivery"** task, the reporting entity is then obliged to make a report on the Reporting FIs included in the No-Delivery. After clicking on the task **"Withdraw No delivery"** a confirmation screens appears. The user needs to confirm the deactivation.
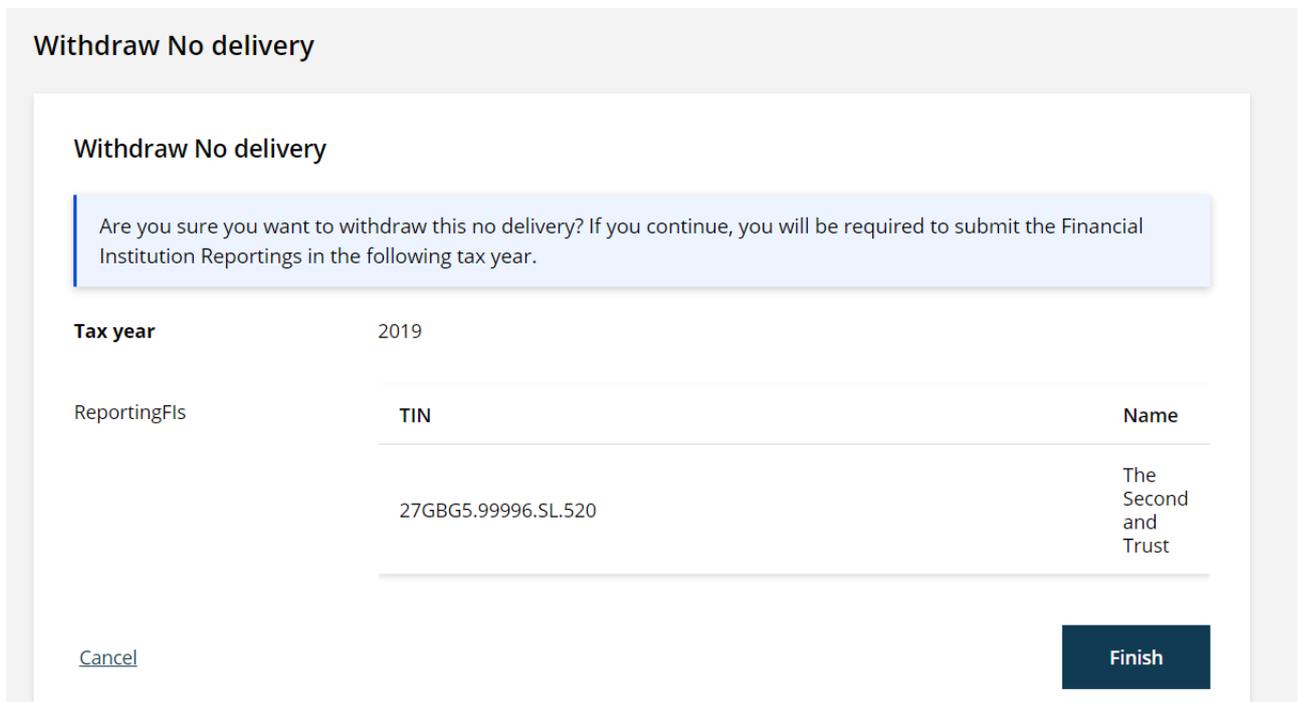

Figure 3-31 Withdraw no delivery confirmation screen

If a report has been withdrawn, the report will also appear on the summary page with the status Withdrawn.

4 Menu tab: Reporting Entity

The second main tab for a RE user is the "Reporting entity" tab.

Below screenshot shows the dashboard for a RE user after logging in.
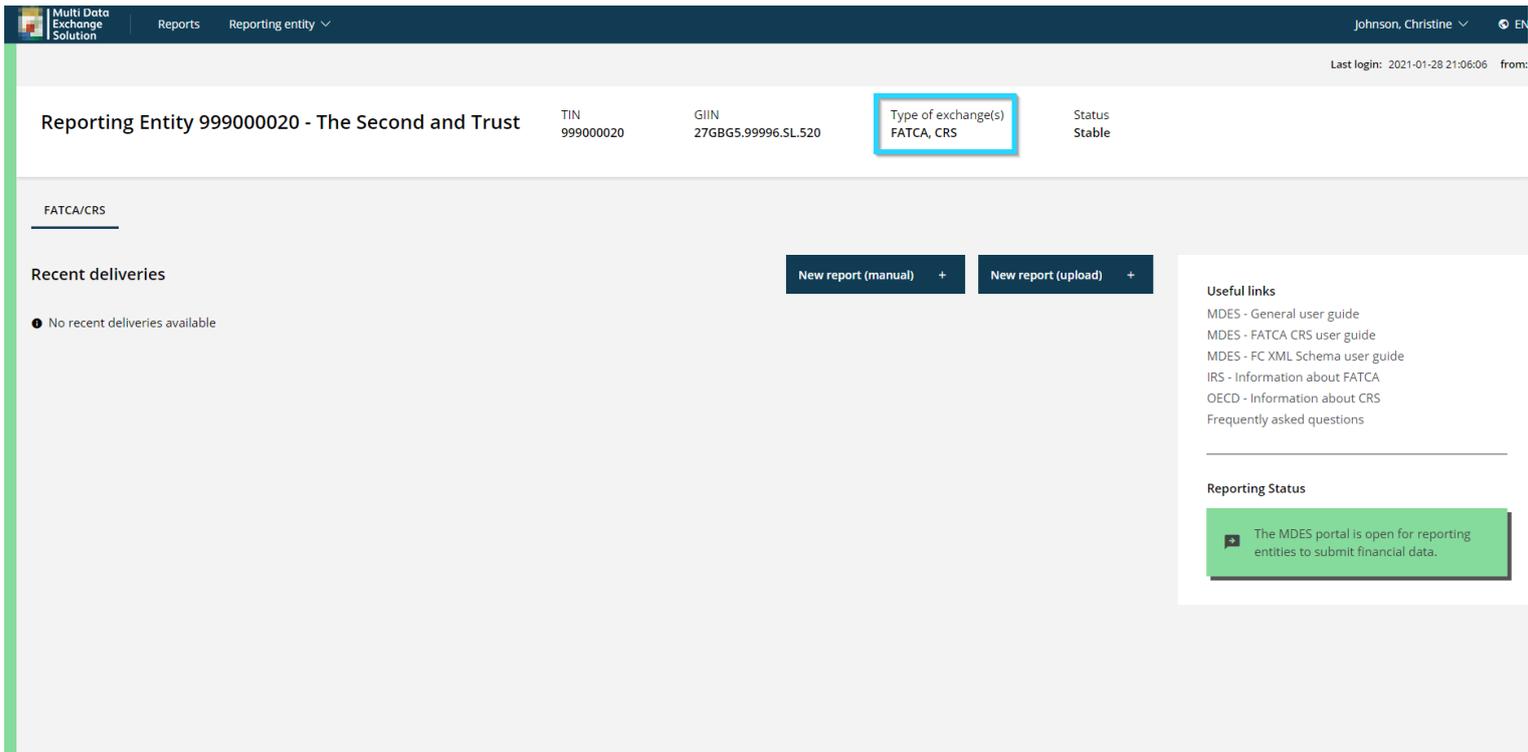

Figure 4-1 Landing page RE

In below example, the user has been authorized to use the functionalities of the FATCA/CRS reporting module in MDES.

If the user clicks on the Reporting entity tab, the information of this RE will be shown in several panels.
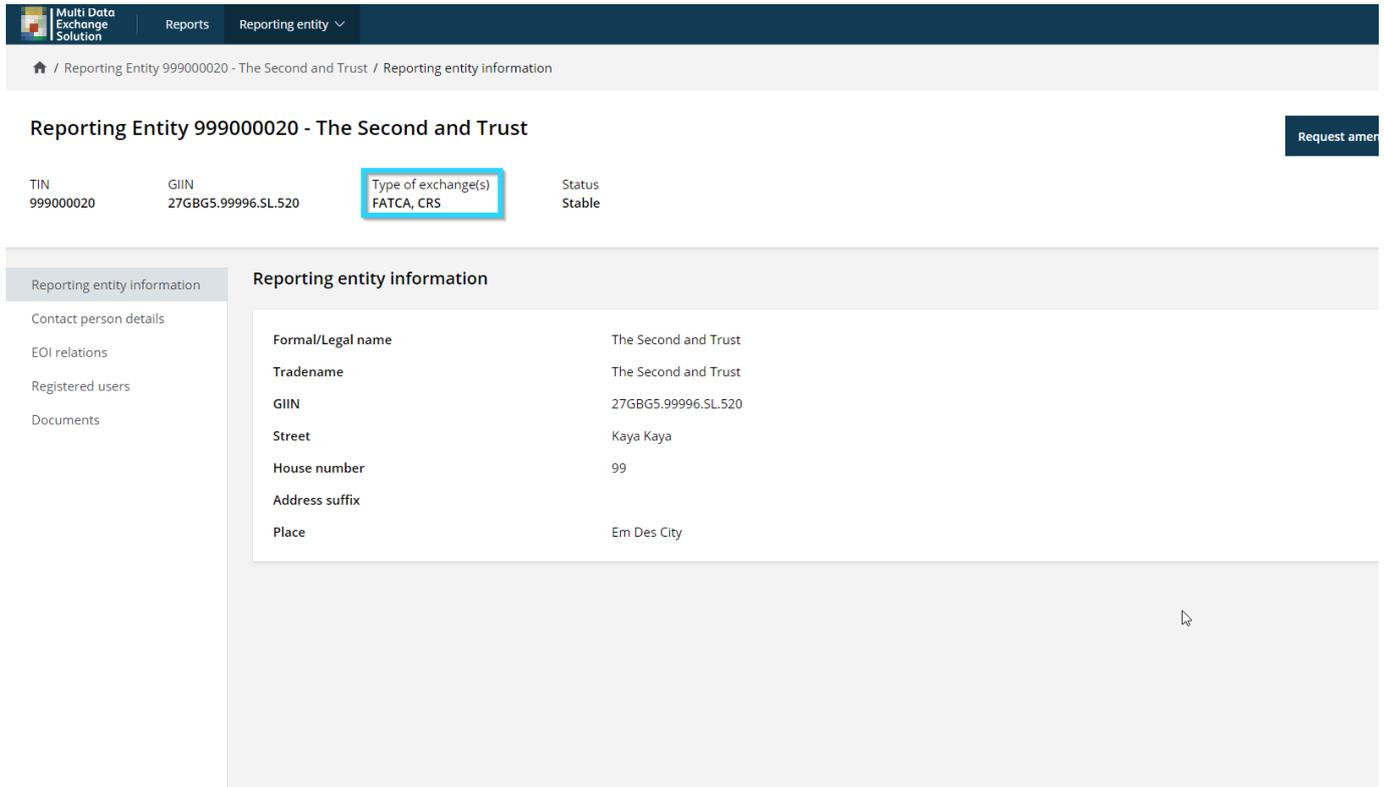
Figure 4-2 FATCA/CRS reporting is active for reporting entity user.

4.1 [Task] Add/Delete EOI Relations

In MDES, the EOI relation is the "Exchange of Information" relationship between a user account in the MDES portal and a financial institution that is registered with the competent authority as a reporting entity.

The user account in the MDES portal can only report data for financial institutions registered as an EOI relation in MDES. The minimum amount of EOI relations is 1, there is no maximum amount of EOI relations.

EOI relations can be managed by either the reporting entity or by the competent authority.

<u>This depends on the status of the portal.</u>

Below table shows when either the reporting entity or the competent authority can add a new EOI relation(s).

Table 1 EOI relation management and portal status

Status of portal	Available to
Release for relations management and testing	Reporting entity
Release for reporting	Competent authority

Below figure shows the Reporting Entity tab. The status of the portal is set to release for relations management and testing, hence is why the EOI relation management is open for the reporting entity. The EOI relations for financial institutions are shown under the panel "EOI relations" (1).

To add a new relation, the reporting entity user can click on the task **"New relation"** (2). A relation can be deleted by clicking on the waste bin (3).
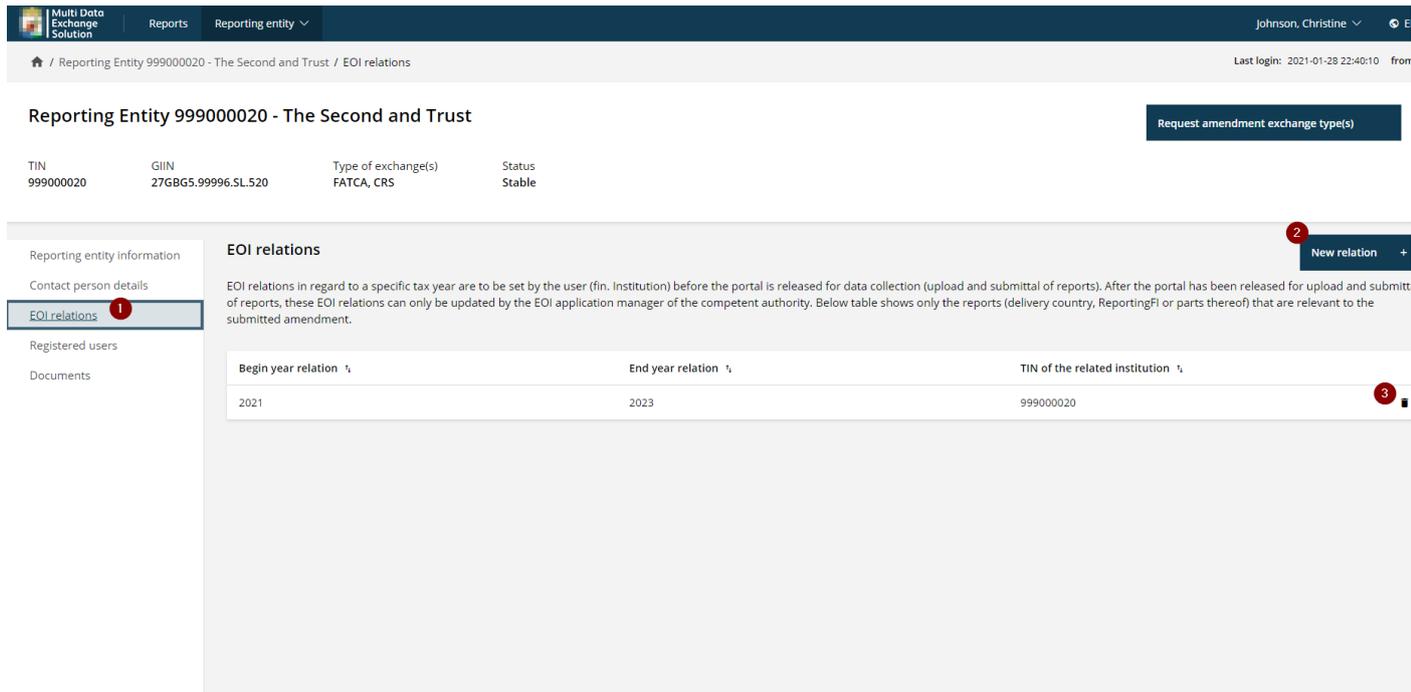

Figure 4-3 EOI relations can be managed under the reporting entity tab

After clicking on **"New relation"** below screen is shown. The reporting entity user can enter the relevant TIN or GIIN of the EOI relation.
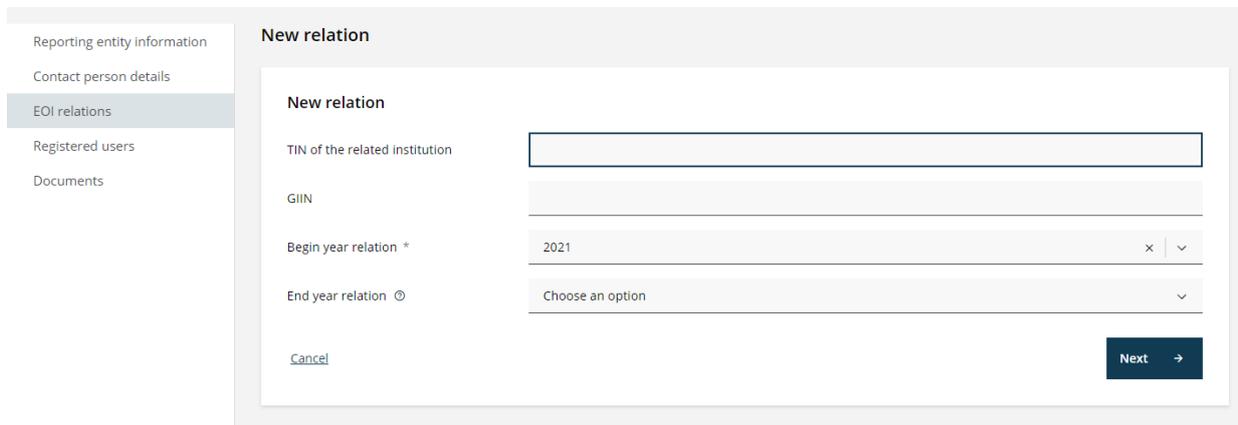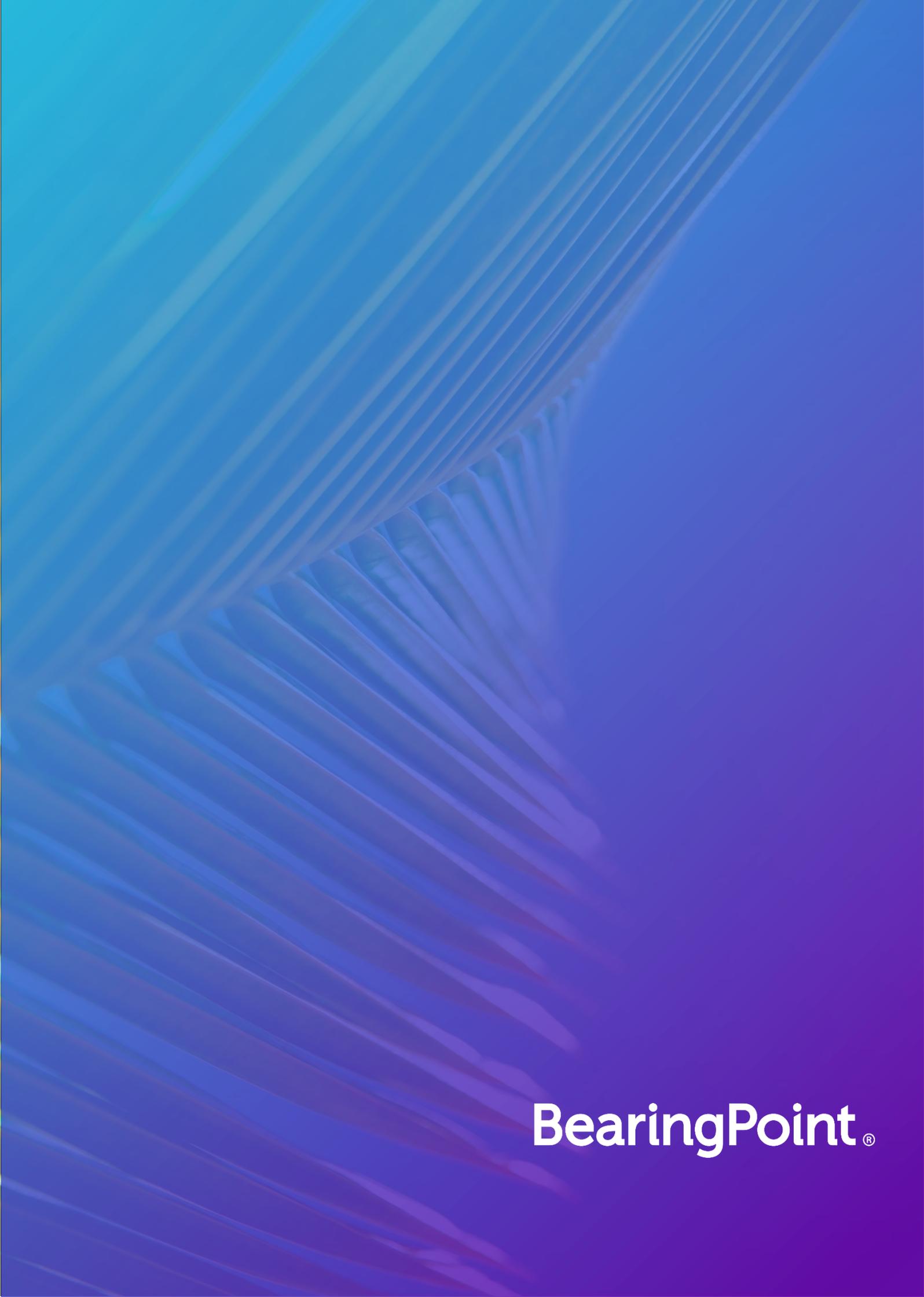

Figure 4-4 Add new EOI relation

By clicking **"Next"**, the MDES portal will verify that the TIN or GIIN is known to the competent authority and that it is not related (as an EOI relation) to another financial institution user account in MDES.

If the TIN or GIIN is either unknown to the system or already linked to another financial institution user in MDES, the MDES portal will show an error. Please contact the competent authority directly if this error is shown.

Note: After creating a new user account, an EOI relation is automatically created for the financial institution if the status of the portal is in "Release for relations management and testing".