



GUIDE TO COMPLETING THE ADDITIONAL INFORMATION FORMS

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It should be noted that these notes do not have the force of law. If you are in any doubt as to your obligation under the law you should seek independent professional advice.

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1. INTRODUCTION

- 1.1 The British Virgin Islands Financial Accounts Reporting system (“BVIFARs”) has been updated to allow Reporting Financial Institutions (“RFIs”) and Non-Reporting Financial Institutions (“NRFIs”) to provide additional information to the International Tax Authority (“ITA”). This new requirement is only applicable to Financial Institutions (“FIs”) with obligations under the Common Reporting Standard (“CRS”).
- 1.2 Users will be able to submit the required additional information through the filing process within BVIFARs. This guide is provided to navigate you through the new filing process for “Additional Information form RFI” and “Additional Information NRFI”. It is noted that the contents of these forms are subject to change.
- 1.3 The filing deadline is 9 months from the end of each financial period. Any late submissions will be penalized. If any extensions to this deadline are required please contact the International Tax Authority (“ITA”) compliance team at compliance@bviita.vg.
- 1.4 Under the Mutual Legal Assistance (Tax Matters) Act, Revised Edition 2020 (“MLA”), the Virgin Islands has identified a Virgin Islands Financial Institution (“VIFI”) as any FI that is resident in the Virgin Islands but excludes any branch of that FI that is located outside of the Virgin Islands and any branch of a FI that is not resident in the Virgin Islands, if that branch is located in the Virgin Islands.
- 1.5 “Resident in the Virgin Islands” is further explained in the Common Reporting Standards Guidance Notes issued by the ITA as where the entity is resident for tax purposes. The guidance notes further explains that for an Entity to be considered as resident in the BVI that Entity (i.e. a Company or Partnership) must have been incorporated or formed in the BVI, has its place of effective management in the BVI or subject to financial supervision in the BVI. A Trust, however, would be considered to be resident in the Virgin Islands if one or more of its trustees are resident in the BVI, unless all information required to be reported in relation to the Trust is reported to another Participating Jurisdiction’s tax authority because the Trust is treated as resident for tax purposes there.

- 1.6 A FI is:
- a) a Custodial Institution;
 - b) a Depository Institution;
 - c) an Investment Entity; or
 - d) a Specified Insurance Company

- 1.7 Under the standard, all FIs will either be categorised as RFIs or NRFIs. To determine your classification please consider the following:

A NRFI will include a FI that is also:

- a) A Government Entity, International Organisation or Central Bank, other than with respect to payment that is derived from an obligation held in connection with a commercial financial activity of a type engaged in a Specified Insurance Company, Custodial Institution, or Depository Institution;
- b) A Broad Participation Retirement Fund; a Narrow Participation Retirement Fund; a Pension Fund of a Government Entity, International Organisation or Central Bank; or a Qualified Credit Card Issuer;
- c) Any other Entity that present a low risk of being used to evade tax, has substantially similar characteristics to any of the entities described in 1 and 2 above, and is defined in the BVI law as a NRFI, provided that the status of such Entity as NRFI does not frustrate the purposes of CRS; (It should be noted that there are no such NRFIs outlined in BVI Law as such if you are registered within this category please consider your CRS Classification and take the necessary steps);
- d) An Exempt Collective Investment Vehicle; or
- e) A Trust to the extent that the trustee of the trust is a RFI and reports all information required to be reported pursuant to section I of CRS with respect to all Reportable Accounts of the Trust.

If the FI is not a NRFI, then it is a RFI.

- 1.8 The additional information forms are different, and it is important for FIs to review their CRS classification to ensure that it is correctly registered and reporting in BVIFARs.

2. ADDITIONAL INFORMATION NRFI

OVERVIEW

- 2.1 This form consists of 2 questions which focuses on any changes in the activities or the structure of the NRFI. These changes may indicate a change in the FI's CRS classification and must be considered by the RFI as part of its annual review of its circumstances.
- 2.2 Question 1: Have activities changed during the reporting period? If yes, then outline those changes. The user can select yes or no from a drop-down box. The NRFI is expected to provide additional information where the answer to this question is yes. The user can elaborate on their answer using the free text box which will appear if "yes" is selected or through the file upload option. The NRFI is expected to outline the changes in its activities and provide supporting documentation concerning these changes.
- 2.3 Question 2: Has the structure changed during the reporting period? If yes, then outline those changes. The user can select yes or no from a drop-down box. The NRFI is expected to provide additional information where the answer to this question is yes. The user can elaborate on their answer using the free text box which will appear if "yes" is selected or through the file upload option. The NRFI is expected to outline the changes in its structure and provide supporting documentation concerning these changes.

3. CREATING AN ADDITIONAL INFORMATION FORM

NRFIs

1. Navigate to the Create a Filing screen using the menus at the top left of the screen. Select **Manage Filings > Create Filings**, as shown in the image below.



2. Once on the Create a Filing page, enter a Filing Name, under Filing Type select **Additional Information NRFI** and enter a Period End Date. The period end date must be the end of the last financial period of the entity. For instance, if you are reporting in 2025, the period for which you are report must end in December, 2024. If you are reporting in 2026 the period end date must be December, 2025.



BVI FINANCIAL ACCOUNT REPORTING SYSTEM

Damari Malone , Glacier Culebra 4, Ltd. (FI000311)



Create Filing

We need details about your filing so you will be able to identify it in the future. Please enter the details requested below.

The period end date identifies the reporting period for the filing. This should always be December 31st, except for Payments, where it should be June 1st.

Filing name:

Filing type:

- Additional Information NRFI
- Additional Information RFI
- Bulk Payment
- Change of Reporting Entity Information
- Change of Reporting Obligations
- CRS Filing Summary

Period end date:

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3. After you click “Create” and the filing is created successfully, click on the filing name.



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Filing Created Successfully

Your filing, named **NRFI Test 1**, has successfully been created with the reference "AI_NRFI05968".

You can now access the filing in the Draft Filings area.

[Return to Manage Filings](#)

4. Next, on the View Filing page, select “Edit”. Please complete the form as identified above in the Form Overview.



BVI FINANCIAL ACCOUNT REPORTING SYSTEM

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Menu



View Filing

Filing name: NRFI Test 1 Filing reference: AL_NRFI05968
Filing end date: 31/12/2023 Filing due date:
Filing status: No Data Categories:

Actions



Upload Data

Please select a form to view

NRFI Test. 1	Status: No Data
Additional Information NRFI	
AdditionalInfoNRFI Additional Info NRFI	Edit View

[Back](#)

- Once you have completed entering the needed information, select “Validate & Save”.

INTERNATIONAL TAX AUTHORITY
BVI FINANCIAL ACCOUNT REPORTING SYSTEM

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Menu

Form View

Information From Non-Reporting Financial Institutions NRFIs

Reporting Entity: Glacier Culebra 4, Ltd. (FI000311)
Period end date: 31/12/2023

NRFIs must provide the details of their activities/operations

1	Have activities changed during the reporting period? If yes, then outline those changes.	Yes	Outline the changes here.	Choose File
2	Has the structure changed during the reporting period? If yes, then outline those changes.	No		Choose File

Save As Draft Validate & Save

[Back](#)

- When you return to the View Filing page, and your status has changed to “Ready to Submit,” you will then “Validate & Submit” your filing.

INTERNATIONAL TAX AUTHORITY
BVI FINANCIAL ACCOUNT REPORTING SYSTEM

Damari Malone , Glacier Culebra 4, Ltd. (FI000311)

Menu

View Filing

Filing name: NRFI Test 1 Filing reference: AI_NRFI05968
Filing end date: 31/12/2023 Filing due date:
Filing status: Ready to Submit Categories:

Actions

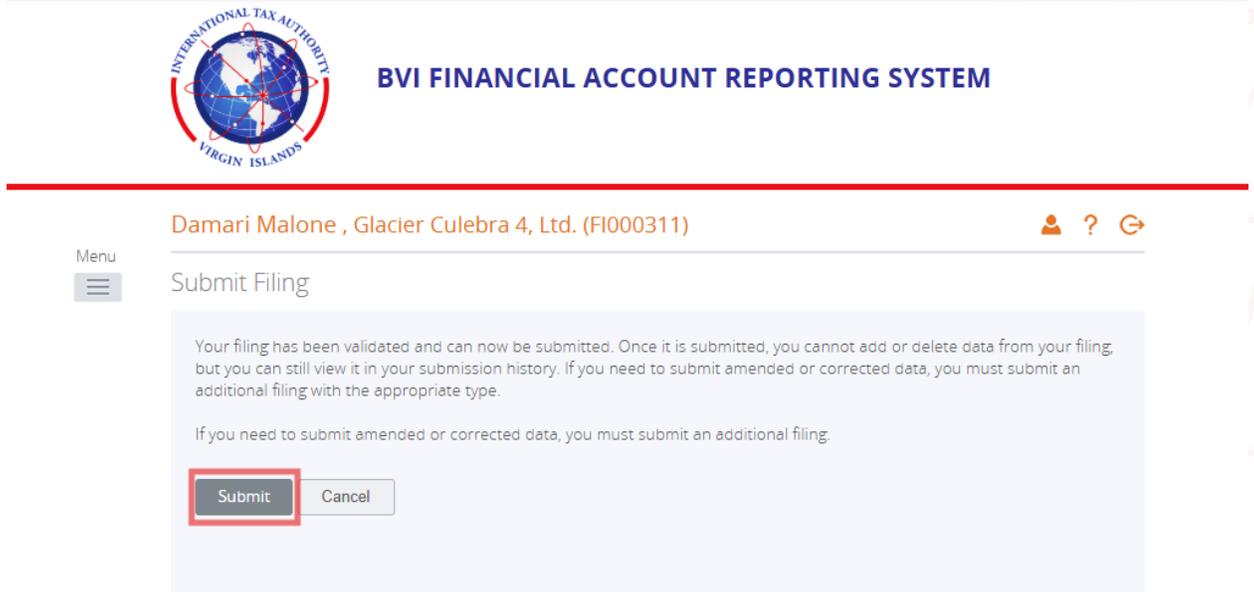
Validate & Submit Upload Data

Please select a form to view

NRFI Test 1	Status: Ready to Submit
Additional Information NRFI ⓘ	Clear
AdditionalInfoNRFI Additional Info NRFI	Clear Edit View

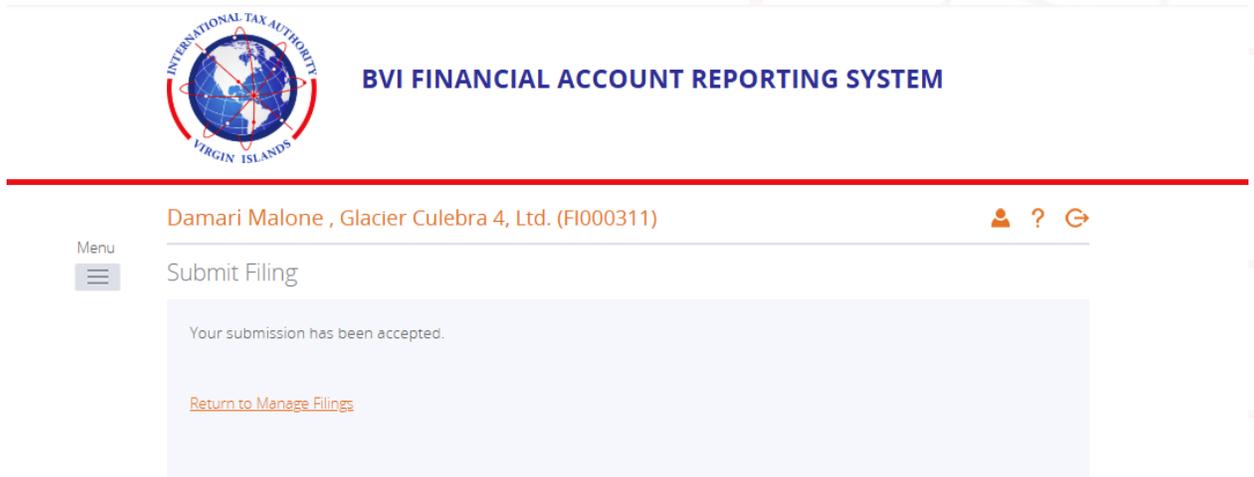
[Back](#)

7. Once there are no errors in your filing, you will then submit.



The screenshot displays the BVI Financial Account Reporting System interface. At the top left is the logo of the International Tax Authority, Virgin Islands, featuring a globe. To the right of the logo is the text "BVI FINANCIAL ACCOUNT REPORTING SYSTEM". Below this is a red horizontal line. The main content area shows the user's name "Damari Malone , Glacier Culebra 4, Ltd. (FI000311)" and a "Menu" icon. The page title is "Submit Filing". A light blue box contains the following text: "Your filing has been validated and can now be submitted. Once it is submitted, you cannot add or delete data from your filing, but you can still view it in your submission history. If you need to submit amended or corrected data, you must submit an additional filing with the appropriate type." Below this text is another line: "If you need to submit amended or corrected data, you must submit an additional filing:". At the bottom of the box are two buttons: "Submit" (highlighted with a red border) and "Cancel".

8. You will then receive message confirm that the submission has been accepted.



The screenshot displays the BVI Financial Account Reporting System interface, similar to the previous one. It shows the logo, the text "BVI FINANCIAL ACCOUNT REPORTING SYSTEM", the user's name "Damari Malone , Glacier Culebra 4, Ltd. (FI000311)", and the "Menu" icon. The page title is "Submit Filing". A light blue box contains the message: "Your submission has been accepted." Below this message is a link: "[Return to Manage Filings](#)".

4. ADDITIONAL INFORMATION RFI

FORM OVERVIEW

4.1 This form consists of 19 questions which gives the reporting financial institution an opportunity to demonstrate their systems, policies and procedures to the ITA. This information is important as a starting point to understanding the RFI's implementation of and compliance with CRS.

4.2 Question 1: Total number of Financial Accounts. Numeric field. Please identify all financial accounts held by the RFI during the last financial year.

A Financial Account is an account maintained by a FI, and includes a Depository Account, a Custodial Account and:

- a) in the case of an Investment Entity, any equity or debt interest in the FI. Notwithstanding the foregoing, the term "Financial Account" does not include any equity or debt interest in an Entity that is an Investment Entity solely because it (i) renders investment advice to, and acts on behalf of, or (ii) manages portfolios for, and acts on behalf of, a customer for the purpose of investing, managing, or administering Financial Assets deposited in the name of the customer with a FI other than such Entity.
- b) in the case of a FI not described in subparagraph C(1)(a) of the Common Reporting Standards ("CRS"), any equity or debt interest in the FI, if the class of interests was established with a purpose of avoiding reporting in accordance with Section I of CRS; and
- c) any Cash Value Insurance Contract and any Annuity Contract issued or maintained by a FI, other than a non-investment-linked, non-transferable immediate life annuity that is issued to an individual and monetises a pension or disability benefit provided under an account is an Excluded Account.

The term "Financial Account" does not include any account that is an Excluded Account.

4.3 Question 2: No. of Reportable Accounts. Numeric Field. Please identify all reportable accounts held by the RFI during the last financial year.

A Reportable Account means an account held by one or more Reportable Persons or by a Passive NFE with one or more Controlling Persons that is a Reportable Person, provided it has been identified as such pursuant to the due diligence procedures described in Sections II through VII of CRS.

4.4 Question 3: Jurisdiction of residence of each account holder. The first field is a Numeric Field and it will be populated once information is populated in the lines immediately below. The user can add and delete additional lines, as necessary. On each line the user can select

the applicable jurisdiction from a drop-down box and enter the number of account holders in that jurisdiction. Please note that this is not limited to reporting jurisdictions, but all jurisdictions of residence of account holders within the RFI.

E.g. if the RFI identifies 300 account holders in relation to the accounts that they hold and the jurisdiction of residence of all your account holders are: United Kingdom, Spain, Gibraltar, Guam and the United States, the filing should be as follows:

1. United Kingdom - 100
2. Spain - 50
3. Gibraltar - 50
4. Guam - 100
5. United States - 50

4.5 Question 4: No. of Preexisting Accounts. This question has 5 parts and requires the RFI to identify preexisting accounts that fall within each category as follows:

- (a) The overall number of preexisting accounts held by the RFI should be included in 4. A preexisting account is an account that had been in existence as at 31 December, 2015.
- (b) Part a requires the total number of high value preexisting accounts held by the RFI. A High Value Account is a Preexisting Individual Account with an aggregate balance or value that exceeds USD 1 000 000 as of 31st December, 2015 or 31 December of any subsequent year.
- (c) Part b requires the total number of low value accounts held by the RFI. A Lower Value Account means a Preexisting Individual Account with an aggregate balance or value as of 31st December, 2015 that does not exceed USD 1 000 000.
- (d) Part c requires total number of entities accounts. An Entity Account is an account held by one or more Entities.
- (e) Part d requires the total number of individual accounts. An Individual Account is an account held by one or more individuals.

It is expected that an account may be classified as both an individual account or an entity account where there are joint holders that are both individual and entities. In those circumstances the account will be counted in this report under the individual accounts category and under the entity account category.

- 4.6 Question 5: No. of new accounts. This question has 5 parts and requires the RFI to identify the number of new accounts that fall within each category as follows:
- (a) The RFI is required to identify the overall number of new accounts held in response to 5. A new account is any account that has been opened by the RFI on or after 1st January, 2016.
 - (b) Please put n/a in a or leave the response blank as the standard does not apply a threshold for high or low values accounts in relation to new accounts.
 - (c) Please put n/a in b or leave the response blank as the standard does not apply a threshold for high or low values accounts in relation to new accounts.
 - (d) Part c requires total number of entities accounts. An Entity Account is an account held by one or more Entities.
 - (e) Part d requires the total number of individual accounts. An Individual Account is an account held by one or more individuals.

It is expected that an account may be classified as both an individual account or an entity account where there are joint holders that are both individual and entities. In those circumstances the account will be counted in this report under the individual accounts category and under the entity account category.

- 4.7 Question 6. No. of self-certifications collected. Numeric field. Please identify the number of self-certifications collected by the RFI. There may be cases where the RFI would have collected more than 1 self-certification form in reference to 1 Financial Account, in those cases please count each self-certification form collected. For example:

The RFI has 3 financial accounts as follows:

Account no.1 – 3 account holders - 3 self-certifications collected

Account no 2 – 1 account holder – 1 self-certification collected

Account no 3 – 4 account holders – 4 self-certifications collected

In that section the FI would report 8 self-certification forms.

- 4.8 Question 7. No. of Excluded Accounts held and the category of those excluded Accounts. Numeric field. The total number of excluded accounts will be populated as the RFI includes the line items directly below.

The RFI is able to select each category of excluded account and provide the number of excluded accounts that fall within each category. You can add and delete fields as appropriate under this selection.

The term excluded account means any of the following accounts:

- a) Retirement or pension account that satisfies the following requirements:
 - i. the account is subject to regulation as a personal retirement account or is part of a registered or regulated retirement or pension plan for the provision of retirement or pension benefits (including disability or death benefits);
 - ii. the account is tax-favoured (i.e. contributions to the account that would otherwise be subject to tax are deductible or excluded from the gross income of the account holder or taxed at a reduced rate, or taxation of investment income from the account is deferred or taxed at a reduced rate);
 - iii. information reporting is required to the tax authorities (tax authorities in the Virgin Islands is the Inland Revenue Department) with respect to the account;
 - iv. withdrawals are conditioned on reaching a specified retirement age, disability, or death, or penalties apply to withdrawals made before such specified events; and
 - v. either (i) annual contributions are limited to USD 50,000 or less, or (ii) there is a maximum lifetime contribution limit to the account of USD 1,000,000 or less, in each case applying to rules set forth in paragraph C of Section VII for account aggregation and currency translation.

A Financial Account that otherwise satisfies the requirement of subparagraph C(17)(a)(v) will not fail to satisfy such requirements solely because such Financial Account may receive assets or funds transferred from one or more Financial Accounts that meet the requirements of subparagraph C(17)(ab) or (b) or from one or more retirement or pension funds that meet the requirements of any of subparagraph B95) through (7).

- b) An account that satisfies the following requirements:
 - i. the account is subject to regulation as an investment vehicle for purposes other than for retirement and is regularly traded on an established securities market, or the account is subject to regulation as a savings vehicle for purposes other than for retirement;
 - ii. the account is tax-favoured (i.e. contributions to the account that would otherwise be subject to tax are deductible or excluded from the gross income of the account holder or taxed at a reduced rate, or taxation of investment income from the account is deferred or taxed at a reduced rate);
 - iii. withdrawals are conditioned on meeting specific criteria related to the purpose of the investment or savings account (for example, the provision of educational

or medical benefits), or penalties apply to withdrawals made before such criteria are met; and

- iv. annual contributions are limited to USD 50,000 or less, applying the rules set forth in paragraph C of Section VII for account aggregation and current translation.

A Financial Account that otherwise satisfies the requirement of subparagraph C(17)(b)(iv) will not fail to satisfy such requirements solely because such Financial Account may receive assets or funds transferred from one or more Financial Accounts that meet the requirements of subparagraph C(17)(a) or (b) or from one or more retirement or pension funds that meet the requirements of any of subparagraph B(5) through (7).

- c) A life insurance contract with a coverage period that will end before the insured individual attains age 90, provided that the contract satisfies the following requirements:
 - i. periodic premiums, which do not decrease over time, are payable at least annually during the period the contract is in existence or until the insured attains age 90, whichever is shorter;
 - ii. the contract has no contract value that any person can access (by withdrawal, loan, or otherwise) without terminating the contract;
 - iii. the amount (other than death benefit) payable upon cancellation or termination of the contract cannot exceed the aggregate premiums paid for the contract, less the sum of mortality, morbidity, and expense charges (whether or not actually imposed) for the period or periods of the contract's existence and any amounts paid prior to the cancellation or termination of the contract; and
 - iv. the contract is not held by a transferee for value.
- d) An account that is held solely by an estate if the documentation for such account includes a copy of the deceased's will or death certificate;
- e) An account established in connection with any of the following:
 - i. a court order or judgement.
 - ii. a sale exchange, or lease of real or personal property, provided that the account satisfies the following requirements:
 - i. the account is funded solely with a down payment, earnest money, deposit in the amount appropriate to secure an obligation directly related to the transaction, or a similar payment, or is funded with a Financial Asset that is deposited in the account in connection with the sale, exchange, or lease of the property;
 - ii. the account is established and used solely to secure the obligation of the purchaser to pay the purchase price of the property, the seller to pay any

- contingent liability, or the lessor or lessee to pay for any damages relating to the leased property as agreed under the lease;
- iii. the asset of the account, including the income earned thereon, will be paid or otherwise distributed for the benefit of the purchaser, seller, lessor, or lessee (including to satisfy such person's obligation) when the property is sold, exchanged, or surrendered, or the lease terminates;
 - iv. the account is not a margin or similar account established in connection with a sale or exchange of a Financial Asset; and
 - v. the account is not associated with an account described in subparagraph C(17)(f).
- iii. an obligation of a Financial Institution servicing a loan secured by real property to set aside a portion of a payment solely to facilitate the payment of taxes or insurance related to the real property at a later time.
 - iv. an obligation of a Financial Institution solely to facilitate the payment of taxes at a later time
- f) A Depository Account that satisfies the following requirements:
- i. the account exists solely because a customer makes a payment in excess of a balance due with respect to a credit card or other revolving credit facility and the overpayment is not immediately returned to the customer; and
 - ii. beginning on or before [xx/xx/xxxx]¹, the Financial Institution implements policies and procedures either to prevent a customer from making an overpayment in excess of USD 50,000, or to ensure that any customer overpayment in excess of USD 50,000, is refunded to the customer within 60 days, in each case applying the rules set forth in paragraph C of Section VII for currency translation. For this purpose, a customer overpayment does not refer to credit balances to the extent of disputed charges but does include credit balances resulting from merchandise returns.
- g) Any other account that presents a low risk of being used to evade tax, has substantially similar characteristics to any of the accounts, described in subparagraphs C917)(a) through (f), and is defined in the laws of the Virgin Islands as an Excluded Account, provided that the status of such an account as an Excluded Account does not frustrate the purposes of the Common Reporting Standard.

4.9 Questions 8 – 19 outlined at 4.12 gives the RFI the RFI to describe its organization, processes and procedures relating to the CRS.

¹ It is noted that no date is included here as the BVI has not implemented any rules specific to these types of accounts. RFIs must pay attention to specific elections and further details of the implementation of CRS outlined in the CRS Guidance Notes issued by the ITA. Where no further details are provided a RFI cannot hold accounts in these categories.

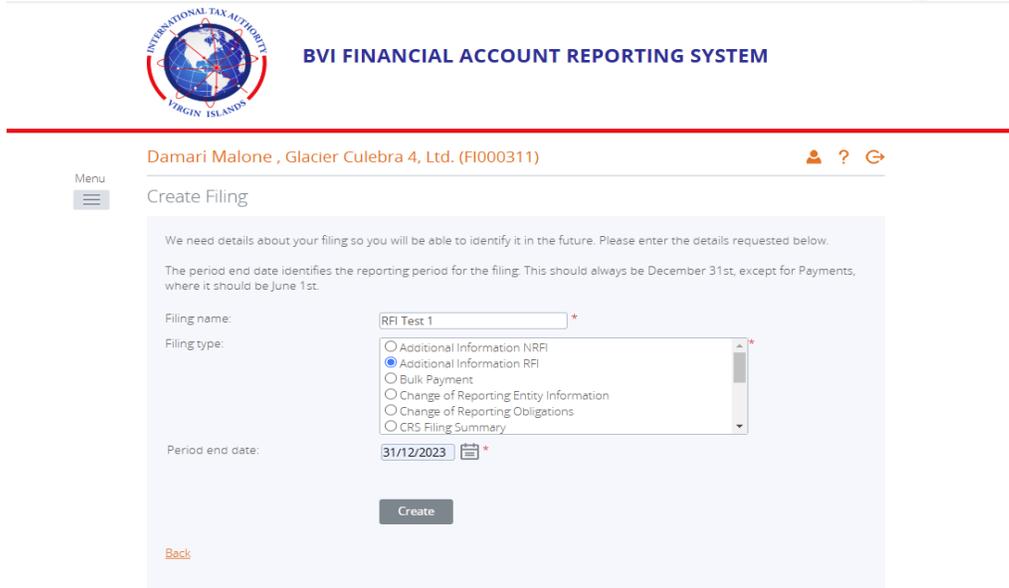
- 4.10 Question 8 – 10 and 15 – 19 have a yes or no selection. If the answer is yes for any of these questions there is a free text field for the RFI to provide further information. If the answer is No, the free text field does not appear however, the RFI has the opportunity upload an attachment that can provide a reason for selecting No, if necessary.
- 4.11 Question 11 – 14 are free text fields where the RFI is able to describe or explain the necessary processes or procedures applicable to the question.
- 4.12 Question 8 – 19 are as follows:
- Question 8: Do you have due diligence procedures are in place for new accounts? Please describe these.
 - Question 9: Do you have due diligence procedures are in place for pre existing accounts? Please describe these.
 - Question 10: Do you have procedures in place to identify a change in circumstances? Please describe these.
 - Question 11: How are your CRS reports conducted and what procedures do you have in place to ensure timely reporting of CRS reports? Please describe.
 - Question 12: Please describe your process for obtaining or validating self certification of account holders.
 - Question 13: How do your review and identify undocumented accounts?
 - Question 14: Please describe your governance structure and the parties responsible for CRS compliance.
 - Question 15: Do you have a training programme for CRS Compliance? Please describe and also identify the persons who are subject to this training programme.
 - Question 16: Does your RFI have a presence in multiple jurisdictions? If yes please name those jurisdictions.
 - Question 17: Do you have any documentation of internal processes such as new account onboarding, pre-existing account due diligence, change in circumstance etc.?
 - Question 18: Does your organization have policies and procedures? If they cover all of the areas above please feel free to upload a copy of the policy and procedure in response to the above relevant questions.
 - Question 19: Has the RFI collected TINs in all required circumstances?
- 4.13 The upload attachments option is not linked to any specific question, the RFI is at liberty to upload letters of explanations, policies and procedures or any other supporting documentations for the responses provided.

5. Creating an Additional Information Filing – RFI

1. Navigate to the Create a Filing screen using the menus at the top left of the screen. Select Manage Filings > Create Filings, as shown in the image below.

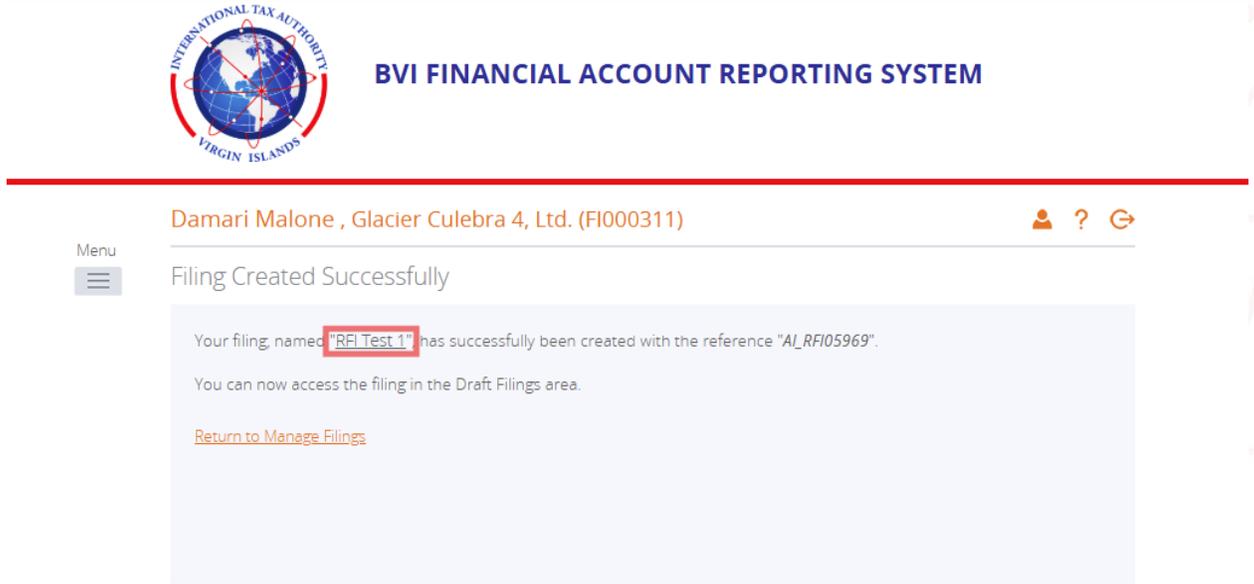


2. Once on the Create a Filing page, enter a Filing Name, under Filing Type select **Additional Information NRFI** and enter a Period End Date. The period end date must be the end of the last financial period of the entity. For instance, if you are reporting in 2025, the period for which you are report must end in December, 2024. If you are reporting in 2026 the period end date must be December, 2025.



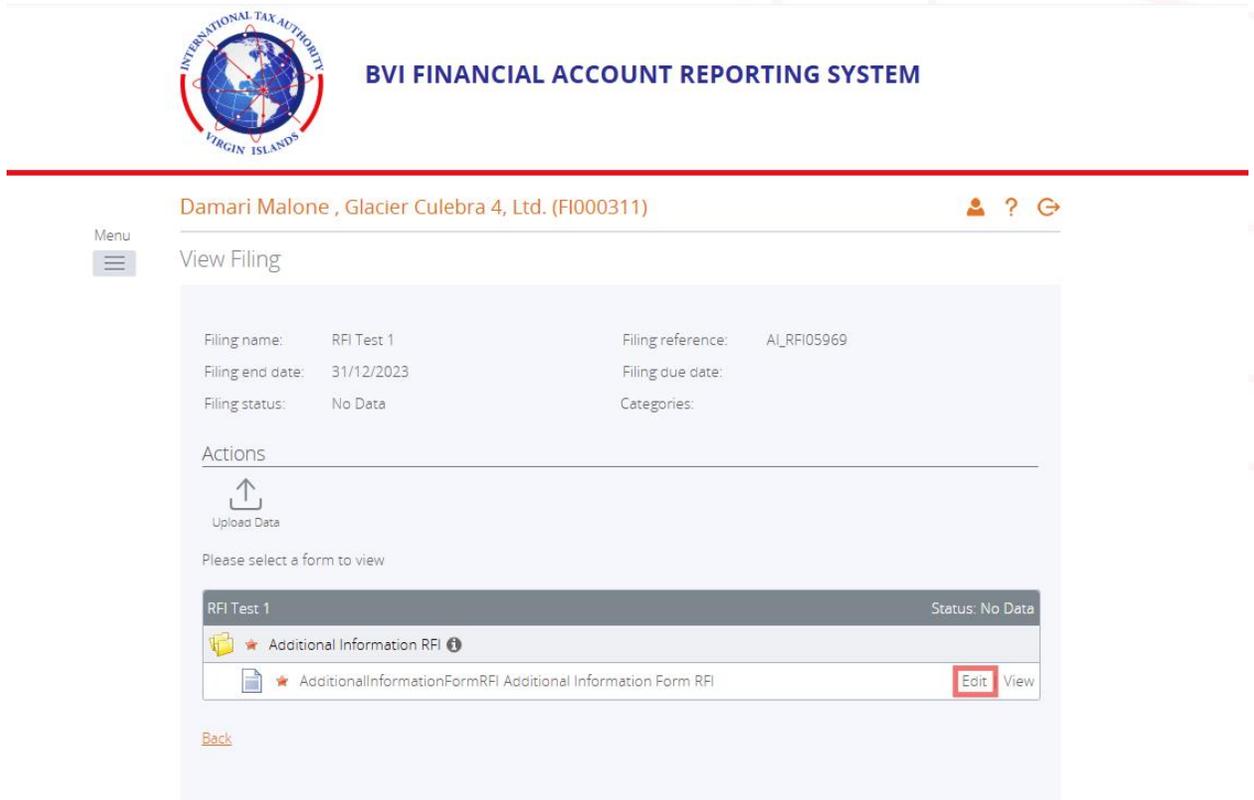
The screenshot shows the 'Create Filing' page in the BVI Financial Account Reporting System. At the top left is the logo for the International Tax Authority, Virgin Islands. The system name 'BVI FINANCIAL ACCOUNT REPORTING SYSTEM' is displayed in blue. The user is logged in as 'Damari Malone, Glacier Culebra 4, Ltd. (FI000311)'. A navigation menu on the left shows 'Create Filing' as the active page. The main content area contains the following text: 'We need details about your filing so you will be able to identify it in the future. Please enter the details requested below. The period end date identifies the reporting period for the filing. This should always be December 31st, except for Payments, where it should be June 1st.' The form fields are: 'Filing name:' with the value 'RFI Test 1'; 'Filing type:' with a dropdown menu showing 'Additional Information NRFI' selected; and 'Period end date:' with the value '31/12/2023'. A 'Create' button is located at the bottom of the form. A 'Back' link is visible at the bottom left of the form area.

3. After you click “Create” and the filing is created successfully, click on the filing name.



The screenshot shows the BVI Financial Account Reporting System interface. At the top left is the logo of the International Tax Authority, Virgin Islands. The title is "BVI FINANCIAL ACCOUNT REPORTING SYSTEM". Below the title, the user is identified as "Damari Malone , Glacier Culebra 4, Ltd. (FI000311)". A "Menu" icon is on the left. The main heading is "Filing Created Successfully". The message states: "Your filing, named 'RFI Test 1' has successfully been created with the reference 'AI_RFI05969'. You can now access the filing in the Draft Filings area." There is a link "Return to Manage Filings".

4. Next, on the View Filing page, select “Edit”. This is where you will enter the Additional Information RFI.



The screenshot shows the "View Filing" page in the BVI Financial Account Reporting System. The user is "Damari Malone , Glacier Culebra 4, Ltd. (FI000311)". The page title is "View Filing". It displays filing details: "Filing name: RFI Test 1", "Filing reference: AI_RFI05969", "Filing end date: 31/12/2023", "Filing due date:", "Filing status: No Data", and "Categories:". Under "Actions", there is an "Upload Data" button. Below that, it says "Please select a form to view". A table shows a row for "RFI Test 1" with status "No Data" and a sub-row for "Additional Information RFI" with an "Edit" button highlighted in red. There is also a "View" button. A "Back" link is at the bottom.

5. In the Form View page, this is where you will enter information on the Financial Institute accounts, their values, procedures and evidence to confirm these claims. **(Please note that all the fields must be completed before the form can be Validated to be submitted.)**

Once all the information has been entered and accurate, click on “Validate & Save”.



BVI FINANCIAL ACCOUNT REPORTING SYSTEM

Menu Damari Malone , Glacier Culebra 4, Ltd. (FI000311)

Form View

Additional Information Form RFI

Reporting Entity: Glacier Culebra 4, Ltd. (FI000311)
 Period end date: 31/12/2023

1	Total number of financial accounts	<input type="text" value="3"/>
2	No. of reportable accounts	<input type="text" value="1"/>
3	Jurisdiction of residence of each account holder	<input type="text" value="3"/>
<input type="text" value="1"/>	<input type="text" value="1"/> Anguilla <input type="button" value="Delete"/>	
<input type="text" value="2"/>	<input type="text" value="1"/> Aruba <input type="button" value="Delete"/>	
<input type="text" value="3"/>	<input type="text" value="1"/> Antigua And Barbuda <input type="button" value="Delete"/>	

4	No. of preexisting accounts	<input type="text" value="4"/>
a	No. of high value	<input type="text" value="1"/>
b	No. of low value	<input type="text" value="1"/>
c	No. of entity accounts	<input type="text" value="1"/>
d	No. of individual accounts	<input type="text" value="1"/>
5	No. of new accounts	<input type="text" value="4"/>
a	No. of high value	<input type="text" value="1"/>
b	No. of low value	<input type="text" value="1"/>
c	No. of entity accounts	<input type="text" value="1"/>
d	No. of individual accounts	<input type="text" value="1"/>
6	No. of self-certifications collected	<input type="text" value="2"/>
7	No. of Excluded Accounts held and the category of those excluded accounts	<input type="text" value="2"/>
<input type="text" value="1"/>	<input type="text" value="1"/> Retirement and Pensions <input type="button" value="Delete"/>	
<input type="text" value="2"/>	<input type="text" value="1"/> Term Life Insurance <input type="button" value="Delete"/>	

8	Do you have due diligence procedures are in place for new accounts? Please describe these.	Yes	Please describe...
9	Do you have due diligence procedures are in place for pre existing accounts? Please describe these.	No	
10	Do you have procedures in place to identify a change in circumstances? Please describe these.	Yes	Please describe...
11	How are your CRS reports conducted and what procedures do you have in place to ensure timely reporting of CRS reports? Please describe		Please describe...
12	Please describe your process for obtaining or validating self certification of account holders		Please describe...
13	How do your review and identify undocumented accounts?		Please describe...
14	Please describe your governance structure and the parties responsible for CRS compliance		Please describe...
15	Do you have a training programme for CRS Compliance? Please describe and also identify the persons who are subject to this training programme	Yes	Please describe...
16	Does your RFI have a presence in multiple jurisdictions? If yes please name those jurisdictions	No	
17	Do you have any documentation of internal processes such as new account onboarding, pre-existing account due diligence, change in circumstance etc.?	No	
18	Does your organization have policies and procedures? If they cover all of the areas above please feel free to upload a copy of the policy and procedure in response to the above relevant questions.	Yes	
19	Has the RFI collected TINs in all required circumstances?	Yes	

Attachments

Evidence 1

Evidence 2

Add

2024 ..

2024 ..

Delete

Delete

6. When you return to the View Filing page, and your status has changed to “Ready to Submit, you will then “Validate & Submit” your filing.



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View Filing

Filing name:	RFI Test 1	Filing reference:	AI_RFI05969
Filing end date:	31/12/2023	Filing due date:	
Filing status:	Ready to Submit	Categories:	

Actions

Validate & Submit

Upload Data

Please select a form to view

RFI Test 1	Status: Ready to Submit
Additional Information RFI ⓘ	Clear
AdditionalInformationFormRFI Additional Information Form RFI	Clear Edit View

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7. Once there are no errors in your filing, you will then submit.



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Submit Filing

Your filing has been validated and can now be submitted. Once it is submitted, you cannot add or delete data from your filing, but you can still view it in your submission history. If you need to submit amended or corrected data, you must submit an additional filing with the appropriate type.

If you need to submit amended or corrected data, you must submit an additional filing.

8. You will then receive a post stating that the submission has been accepted.



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Submit Filing

Your submission has been accepted.

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