

1. No TIN

The IRS has issued Notice 2017-46 according to which for Model 1 countries in case TIN information is not available, nine A's (AAAAAAAAA) should be populated for TIN element of Individual Account Holders, US Specific Persons and Controlling persons, provided that conditions described under the Notice. For Passive NFE and ODFI AccountHolderTypes TIN element could be omitted from XML report in case not available.

We wanted to clarify what approach will be taken by Bahamas in this respect:

- If the above standard IRS approach would apply? And if yes, would Date of Birth be mandatory element in case TIN element is populated with nine A's (AAAAAAAAA) for Individual Account Holder and Controlling Person.

The standard IRS approach would apply, the TIN should be populated with nine A's and Date of Birth provided.