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An Approach to CRS Compliance

July 2015



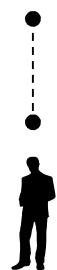
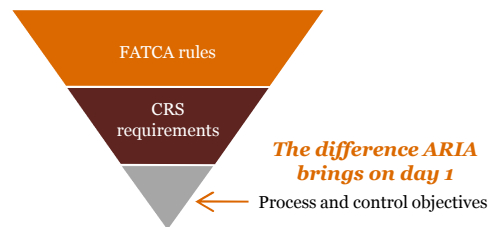
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Overview: ARIA Compliance Framework

ARIA (Aggregated Risk Impact Assessment) is cloud-based technology that uses business intelligence and data visualisation software to provide a framework for conducting a gap analysis, identifying change required in the businesses and monitoring and managing future change. It also provides a framework ensuring the FATCA & CRS solution is designed and operating effectively.

1 Identify business change required by CRS

- ARIA's library of technical requirements are linked to control objectives/business processes
- The content is tailored to account for your policy and business decisions.



2 Communicate Requirements to the Businesses

- Control tasks are communicated to the FATCA/CRS leads in each business in plain English.

Where compliance projects end today

5 Build / Implement

- We support you with the prioritisation, build and implementation of changes required to achieve compliance.
- ARIA's Workflow tool tracks progress by BU or geography.



6 Compliance Effectiveness / Governance

- ARIA is used to evaluate and rate how effectively controls are operating in the business.
- Responsibility and Accountability for CRS compliance is informed by which divisions in the business have responsibility for a particular control.

The benefit of this approach is a controls based implementation



4 Design Effectiveness / Recommendations

- Any changes required for compliance are targeted to meet a specific process / control gap.
- Using ARIA to compare FATCA controls with the control objective framework provides a way to review the design effectiveness of these controls
- PwC can support you with the design through:
 - Market insight around how others are approaching these issues.
 - Knowledge of the regulations and what tax authorities require you to do in practice.
 - Latest developments around guidance / announcements.

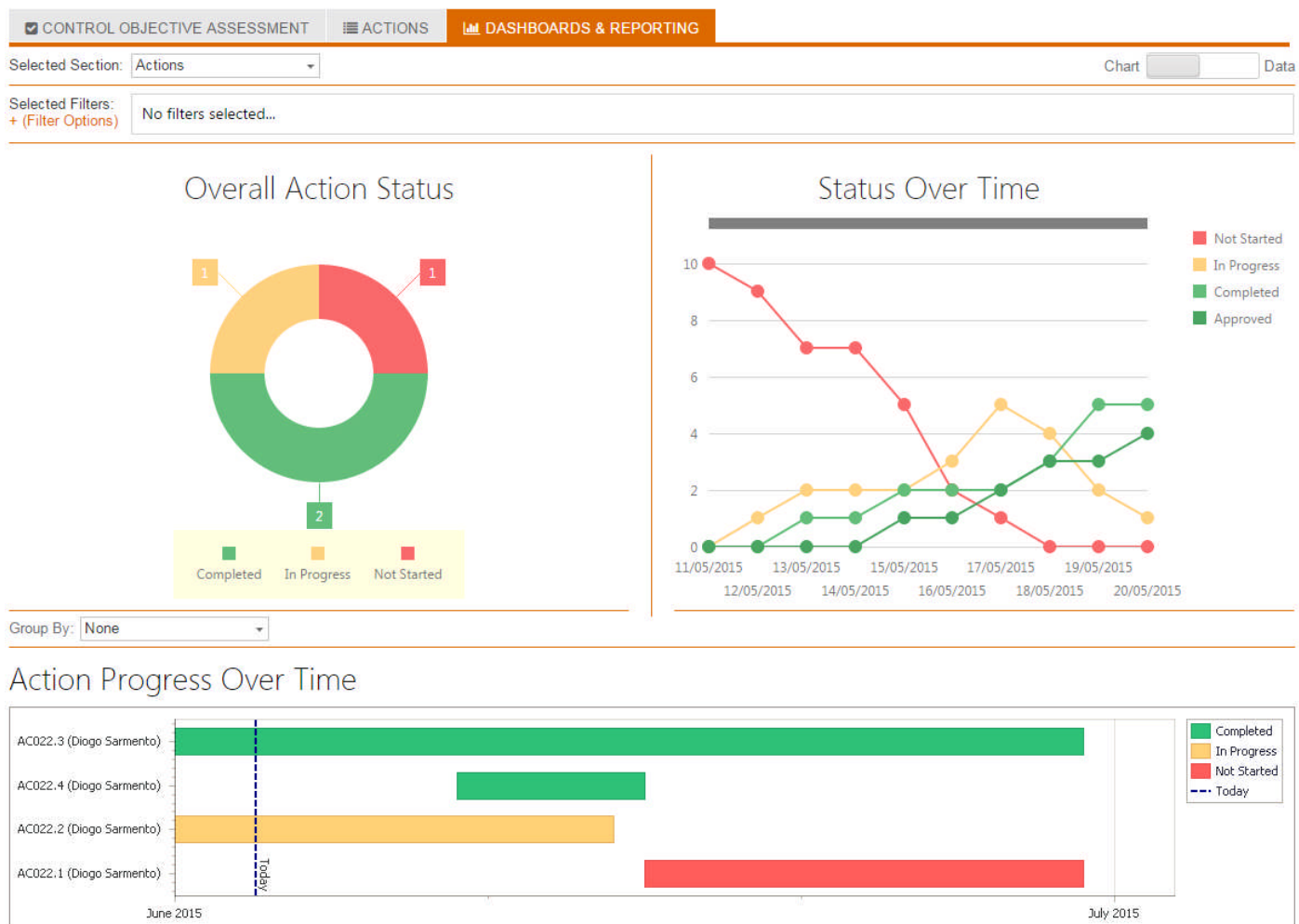
ARIA can also be used to conduct an analysis of the capabilities of third party service providers such as transfer agents, administrators and custodians



3 Initial Assessment

- For each business unit we work with you to complete an assessment that evaluates whether your existing FATCA controls/ process achieve CRS compliance.
- Mapping controls for each business to the ARIA framework provides the baseline for compliance.
- Based on this assessment we determine the specific process/control changes required to achieve compliance.

ARIA – Selected Dashboards



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