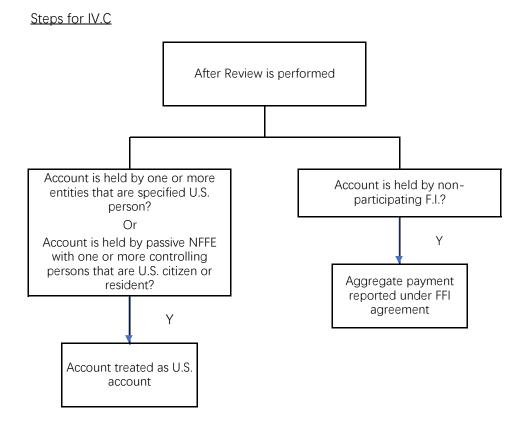
- IV C. Enity account with respect to which reporting is required
 - With respect to B, the following entity accounts are subject to reporting:
 - i) account held by one or more **entities** that are **specified U.S. person**,
 - ii) account held by **passive NFFEs** with one or more **controlling persons** who are U.S. citizens or residents, or
 - iii) accounts held by **non-participating Foreign Financial Institutions (NPFFI)** that should be treated as accounts for which aggregate payments are required to be reported under **FFI agreement**.



Paragraph 2 of Article 4, HK-US IGA (the Agreement) proivdes that

(2) Significant Non-Compliance

The U.S. Competent Authority shall notify the HKSAR Competent Authority when the U.S. Competent Authority has determined that there is significant <u>noncompliance with the</u> requirements of an **FEI Agreement** or **this Agreement** with respect to a Reporting HKSAR Financial Institution. If the non-compliance is not resolved within a period of 12 months after notification of significant non-compliance is first provided by the U.S. Competent Authority, the United States shall treat the Reporting HKSAR Financial Institution as a **Nonparticipating Financial Institution pursuant** to this paragraph 2.

