Country-by-Country Reporting "CbCR" Design & Implementation

Request for Proposal

December 2019 – Version 1.0

تعليمات هامه
Important instructions
يجب على المورد الذي يرغب في المشاركة ان تتوافق الرخصة التجارية والأنشطة المدرج تحتها ضمن المتطلبات المطلوبة وفي حالة عدم توافقها سيتم استبعاد مشاركته.
The supplier who would like to participate, Trading License activities listed on it must comply with this tender requirement, and in case of non-compliance, his participation will be excluded .
هام جداً: رجاءً الاطلاع وتطبيق جميع ما جاء بالصفحة الأخيرة في كراسة الشروط هذه.   **Please View and applyy all the mentioned in the Last Page of this RFP.**

8 December 2019

This document contains 18 pages

Contents

- # **Introduction**

  ### **Background**

  The Ministry of Finance ("The Ministry", or "MOF") is responsible for implementing all fiscal, monetary and industrial policies for the overall development of the United Arab Emirates ("UAE").

  The global tax system has been undergoing reform driven by the G20, the Organization for Economic Cooperation and Development "OECD", the European Union and the US. The principal objectives of these reforms are to tackle tax avoidance, improve the coherence of international tax rules and ensure a more transparent tax environment. Through the BEPS Inclusive Framework, the G20 and OECD have brought together over 130 jurisdictions to collaborate on the implementation of the 15 BEPS Actions that provide governments with domestic and international mechanisms to achieve the above objectives.

  As a member of the BEPS Inclusive Framework, the UAE has committed to playing its part in implementing the necessary mechanisms in its domestic laws.

  In this respect, the UAE has introduced and Country-by-Country Reporting "CbCR" regulations in 2018.

This document is a Request for Proposal ("RFP") addressed to system integrators selected by MoF to partner with MoF in implementing a CbCR solution.

Objectives

The objective of the RFP is to select a prime solution provider to partner with MoF to implement a CbCR solution. The solution objective is to allow companies to submit their CbCR requirements through the MoF system. MoF would then collect and aggregate the data using the CbCR solution and provide required reports to international authorities / regulators.

The RFP is by invitation only and is sent to SIs selected by MoF.

Invited bidders are expected to respond to the RFP to meet the requirements of MoF as per Section 2 and according to the guidelines mentioned in Section 3.

Selection Criteria

The following are the 8 key considerations for MoF in evaluating the responses to this RFP:
- The profile of the System Integrator – size and scale of the organization, experience and credentials of similar size, scale and culture
- The proposed product / products
- The maturity of the product / products
- The product vendors and their references
- Compliance to MoF's functional scope

- Compliance to MoF's non-functional scope
- Compliance to MoF's scope of services
- Cost of the solution

Program Timelines

MoF expects the solution to be fully operational and a full handover to happen from the vendor to MoF by 1st September 2020. Bidders should prepare an approach for the implementation of a CbCR solution that can meet this timeline.

In order to capture CbCR notifications for the fiscal year 2019, MoF will be operating an interim notification solution. MoF expects the bidder to import these existing notifications into the target system before the go-live date.
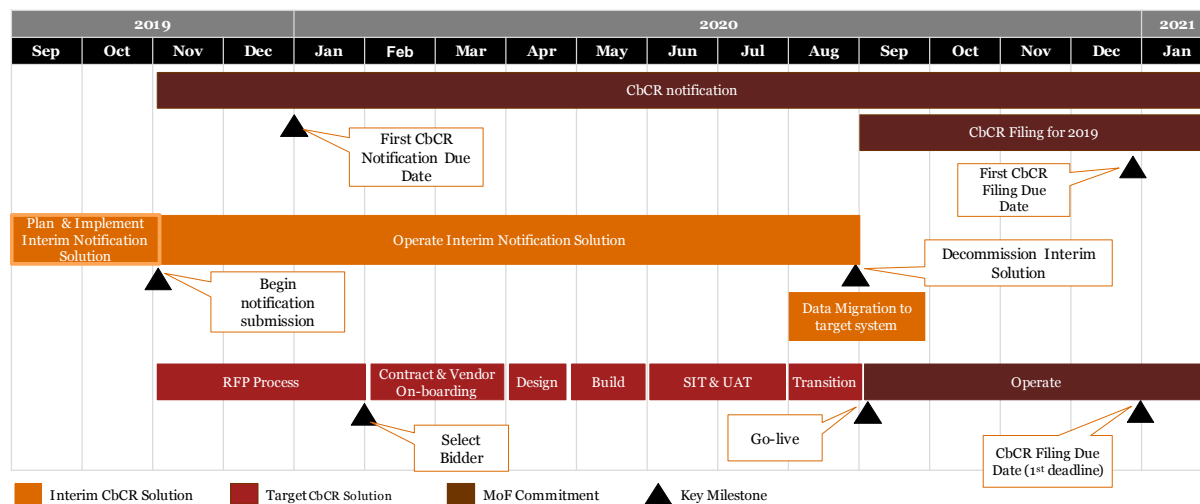
Figure 1. Indicative Timeline

	2019			2020												2021
Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan

CbCR notification

CbCR Filing for 2019

First CbCR Notification Due Date

First CbCR Filing Due Date

Plan & Implement Interim Notification Solution

Operate Interim Notification Solution

Decommission Interim Solution

Begin notification submission

Data Migration to target system

RFP Process — Contract & Vendor On-boarding — Design — Build — SIT & UAT — Transition — Operate

Select Bidder

Go-live

CbCR Filing Due Date (1st deadline)

Legend: Interim CbCR Solution · Target CbCR Solution · MoF Commitment · Key Milestone

Working with other service providers

MoF reserves the right to appoint an advisory firm (Project Manager) who will be the central point of contact for all service providers once the contract is awarded and work formally commences.

To ensure that the various stakeholders are updated and informed at the right time, the successful bidder will be required to follow the project management and progress management processes defined by the Project Manager.

Scope of Work

This section of the document provides information on the following:

1- Functional scope,
2- Non-Functional scope,
3- Services expected from the IT Service Provider

Functional Scope

This section of the document provides a high level view of the functional scope covering CbCR key processes, stakeholders, solution components to process mapping and the CbCR schema released by OECD.

Please refer to the Excel sheet in Appendix B for the full list of functional requirements. Bidders are requested to populate the attached Excel sheet, indicating compliance with requirements and providing justification for compliance/non-compliance.

Bidders are encouraged to suggest improvements to the requirements as well as additional services that will help MoF meet its objectives and to demonstrate their understanding of MoF requirements. These additions will be viewed favourably in the evaluation process.

The key processes that MoF would like the solution to support are:

Process	Description
Registration	The process by which Multi-National Entities "MNE" sign-up and create an account to be able to file their CbCR notification and report.
Filing CbCR notification	The process by which MNEs file their CbCR notification which is a year before submitting the report.
Filing CbCR report	The process by which MNEs submit their CbCR filing with information in the required CbCR tables.
CbCR aggregation and validation	The process by which the system aggregates the CbCR data and validates its compliance.
Reporting	The process by which MoF can generate reports to meet its business requirements.
Conversion to XML	The process by which the report is converted to XML for data exchange.
Information exchange	The process by which MoF submits the CbCR report to international authorities / regulators.

Below represents a high level / indicative business process of the CbCR solution with the stakeholders involved.
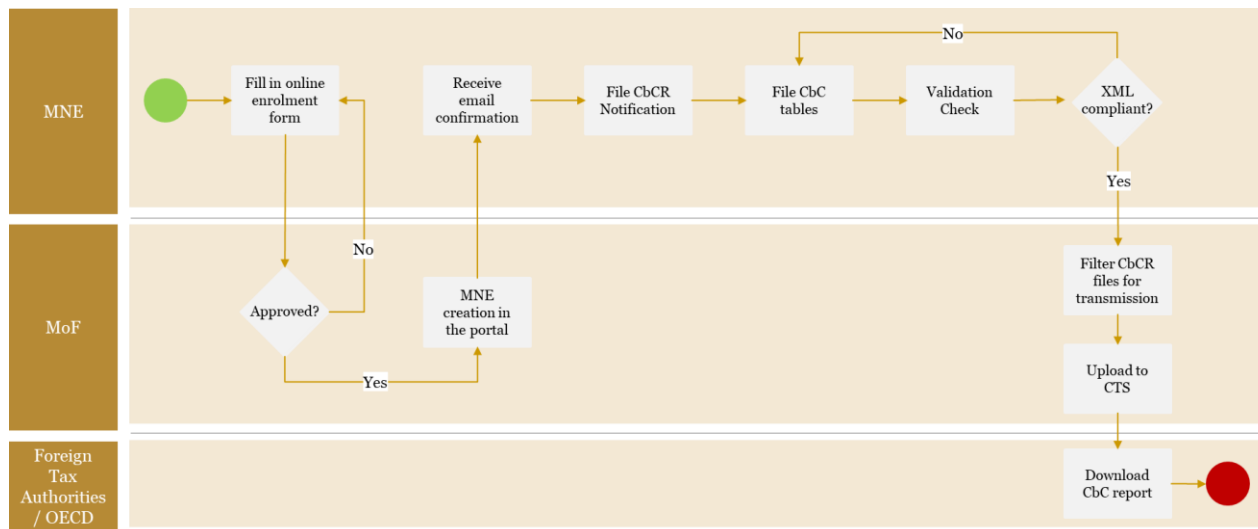
Figure 2. Indicative CbCR process

The CbCR processes will be implemented in a layered application architecture that includes the following components:

- Web / Presentation layer
- Application layer
- Database layer
- Analytics layer

The description of these components and its applicability to the processes are provided in the figure below:

	Registration	Notification	CbC Filing	Data Validation & Aggregation	Reporting & Analytics	Conversion to XML	Upload to CTS
Web Layer	☑	☑	☑	☑	☑		☑ (Web Interface only)
App Layer	☑	☑	☑	☑	☑	☑	☑
DB Layer	☑	☑	☑	☑	☑	☑	☑
Analytics Layer			☑	☑	☑		

Figure 3. CbCR Components & Process Mapping

The CbCR solution should contain the XML schema and notification form which was released by the OECD. The schema includes the following tables:

1   Table 1: Includes the financial information required from the MNE for all its available tax jurisdictions.
2   Table 2: Includes the business activities that are performed by the MNE for all its available tax jurisdictions.
3   Table 3: Allows the MNE to add any supporting information to back up the information in Tables 1 and 2, and this is a simple free-text form.

The CbCR schema for "Table 1" released by the OECD includes at a minimum the following fields. Please refer to the table found in the excel sheet in Appendix B.

CbCR Table 1

Name of the MNE Group:	
Fiscal year concerned:	
Reporting currency:	

| No. | Tax jurisdiction | Revenues | | | Profit (loss) before income tax | Income tax paid (on cash basis) | Income tax accrued - current year | Stated capital | Accumulated earnings | Number of employees | Tangible assets other than cash & cash equivalents |
		Unrelated party	Related party	Total							
1											
2											
3											
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Figure 4. CbCR Schema Table 1

The CbCR schema for "Table 2" released by the OECD includes at a minimum the following fields. Please refer to the table found in the excel sheet in Appendix B.

CbCR Table 2

Name of the MNE Group:	
Fiscal year concerned:	
Reporting currency:	

No.	Tax jurisdiction	Constituent entities resident in the tax jurisdiction	Tax jurisdiction of organisation of incorporation if different from tax jurisdiction of residence	Main Business Activities												
				Research and Development	Holding or managing intellectual property	Purchasing or procurement	Manufacturing or production	Sales, marketing or distribution	Administrative, management or support services	Provision of services to unrelated parties	Internal group finance	Regulated financial services	Insurance	Holding shares or other entity instruments	Dormant	Other*
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Figure 5. CbCR Schema Table 2

The CbCR notification form released by OECD should have at a minimum the following fields:

S. No.	Field Name	Data Type	Description
1.	Group Name	Alphanumeric	Name of the group that is generally used
2	Name of the Group's Ultimate Parent Entity "UPE"	Alphanumeric	Name of the Group UPE
3	Group UPE Jurisdiction	Enumerated	This is a full list of country jurisdictions to select from.
4	Group UPE Address	Alphanumeric	The address / city where the Group UPE resides
5.1	Group UPE Identification Type	Enumerated	The type of ID that the Group UPE uses and that could be: 1. Tax ID No. 2. VAT ID No. 3. Trade License No. 4. None
5.2	أ. Group UPE Tax Number ب. Group UPE VAT number ج. Group UPE Trade License Number د. None	• Numeric • Numeric • Alphanumeric • Text	A company should fill in the field based on the drop down option they selected in field "5.1"
6	Reporting Entity Type	Enumerated	The company filing CbCR on behalf of the UPE
7	Reporting Entity Name	Alphanumeric	The name of the reporting entity
8	Reporting Entity Jurisdiction	Enumerated	This is a full list of country jurisdictions to select from.
9	Reporting Entity Address	Alphanumeric	The address / city where the reporting entity resides

10.1	Reporting Parent Entity Identification Type	Enumerated	The type of ID that the UPE uses and that could be: - Tax ID No. - VAT ID No. - Trade License No. - None
10.2	• Entity Tax Identification Number • Entity VAT number • Entity Trade License Number • None	• Numeric • Alphanumeric • Numeric • Text	A company should fill in the field based on the drop down option they selected in field "10.1"
11	Reporting period	Date	The period for where the CbCR will be filed
12.1	Constituent Entity Name	Alphanumeric	The name of the constituent entity
12.2	Constituent Parent Entity Identification Type	Enumerated	The type of ID that the UPE uses and that could be: ❖ Tax ID No. ❖ VAT ID No. ❖ Trade License No. ❖ None
12.3	- Entity Tax Identification Number - Entity VAT number - Entity Trade License Number - None	• Numeric • Alphanumeric • Numeric • Text	A company should fill in the field based on the drop down option they selected in field "12.2"
13	Name of UAE entity filing	Alphanumeric	The name of the entity filing the CbC report in the UAE.
14.1	UAE Entity Filing CbCR Identification Type	Enumerated	The type of ID that the UPE uses and that could be: - Tax ID No.

			- VAT ID No. - Trade License No. - None
14.2	• Entity Tax Identification Number • Entity VAT number • Entity Trade License Number • None	• Numeric • Alphanumeric • Numeric • Text	A company should fill in the field based on the drop down option they selected in field "14.1"
15	Name of contact person	Character	Name of the contact person from the Entity
16	Email address	Alphanumeric	Email of the contact person from the Entity
17	Phone Number	Number	Phone number of the contact person from the Entity

Non-Functional Scope

Please refer to the Excel sheet in Appendix B for the full list of non-functional requirements. Bidders are requested to populate the attached Excel sheet, indicating compliance with requirements and providing justification for compliance/non-compliance.

Bidders are encouraged to suggest improvements to the requirements as well as additional services that will help MoF meet its objectives and to demonstrate their understanding of MoF requirements. These additions will be viewed favourably in the evaluation process.

The Non Functional Scope is categorized into the following areas:

Work Products	Description
Audit Trails	This category includes details such as who inserted, changed, or deleted the data, the prior value, the new value, the type of change, the date and time of the change as well as a reference to the record being changed (a snapshot before and after the change)

Flexibility	The ability to customize the solution where needed e.g. specific local nuances, changes in the notification template, changes in CbCR fields, etc.
Infrastructure	This category should describe all infrastructure, system and network components required to run the solution.
Migration	This includes the migration of the existing CbCR notifications to the target system.
Integration	The ability for the solution to integrate with the external entities required for CbCR such as the Commercial Transmission System "CTS" which is operated by the OECD.
Performance	This section describes the expected number of CbCR notifications and filings per calendar year.
Security	This category describes the main security requirements for the solution.
Usability	The solution should be easy to use by the end users including MNEs and MoF staff.

Services Scope

The bidder implementation methodology should at a minimum cover the below work products. Key deliverables for each work product are illustrated below.

MoF requires the vendor to be on-site during the entire duration of the project.

Work Products	Key Deliverables
Project Management	Project Charter Project Plan Project Status Report Steering Committee Report Risk, Actions, Issues and Decisions Log
Requirements	Business Requirements Document Business Process Models Use Cases Requirements Traceability Matrix
Analysis & Design	As-Is Architecture for Interim CbCR notification solution Data Conversion Approach

	Logical Data Model (SI)
	Physical Data Model (SI)
	Solution Specification
Development	Code Management Approach
	User Story or equivalent requirement model
	Visual Design
	Wireframes
	User Interface Information Architecture
	Post Implementation Documentation
Testing	Test Approach
	Test Cases and Scenarios
	Test Completion Criteria
	Test Completion Report
Migration	Migration Plan and Approach
Training	End-User Training Strategy
	End-User Training Plan
Deployment	Deployment Strategy
	Deployment Plan
	Post Implementation Criteria
	Go-Live Criteria
	System Operations Manual
	System Architecture
	System Deployment Manual
	User Acceptance Test Results
Support	Support Model
	Support Plan

Guidelines for Responding to the RFP

Language

MoF would like bidders to submit the proposal in English.

In addition, an Executive Summary should be prepared in Arabic and English.

Format of Response

The technical and commercial proposals should be provided as per the forms in Appendices A, B and C.

Timelines

The following table sets out the timelines for this RFP process:

1. Item	2. Key Date
Receive signed NDAs from bidders	9th December 2019
RFP Issuance	9th December 2019
Intend to Bid response received	11th December 2019
Clarification questions due*	16th December 2019
Clarification questions answered	22nd December 2019
Technical & commercial proposals due	31st December 2019
System demonstration for shortlisted candidates (2 hrs. each) **	week beginning 5th January 2020
Complete evaluation	31st January 2019
Award contract	16th February 2019

Any clarification received after the due date will be responded to on a best effort basis.
*** Please plan to have core team members present for the demonstration. We strongly recommend that all bidders manage their calendars in advance, taking into account this key date.*

Contact Information

Any queries regarding this RFP should be sent to: mrhendawy@mof.gov.ae Please note that this email should not be used for proposal submission.

Submission Logistics

Proposals are to be submitted physically to the below address:

Mr. Majid Omran
Ministry of Finance
Dubai, UAE
Email: maomran@mof.gov.ae

Use of Partners & Subcontractors

MoF appreciates that bidders may not be able to provide all the services requested in the RFP internally and may need to form a partnership with another organization.

If a bidder intends to use subcontractor(s), the bidder must identify in its bid the names of the subcontractors and the portions of the work the subcontractors will perform, including a clear RACI matrix for all the activities in the project. MoF will hold the bidder accountable and responsible for the subcontractor's performance and outputs. MoF will only enter into <u>ONE</u> contract for the entire scope of services with the bidder.

No addition or modification to the list of sub-contractors / partners will be allowed during the subsequent stages of the bidding process or the implementation phase, without the express written approval from MoF.

Conflict of Interest

Any conflict of interest or potential conflict of interest on the part of a potential vendor or individual employees/officers of a potential vendor must be fully disclosed to MoF.

Proposal Validity and Currency

All proposals must be valid for a period of 120 days from the time of submission. All currency must be in United Arab Emirates Dirham (AED).

Working Time

During the project, the successful bidder shall follow the MoF working hours for all client interactions and onsite activity.

Appendix A – Form of a Technical Proposal

Executive Summary (maximum 3 pages)

Please provide an executive summary showing your understanding of the requirements, your capabilities and your value proposition to meet MoF's requirements.

Bidder Profile

▪ **Bidder Information**

Please provide the following information:

No.	Requested Information	Answer/ Remarks
-	Organization name	
-	Address (street, zip code, town/ city, country)	
-	Website address	
-	Year company was established	
-	Contact person	
-	Contact person number	
-	Contact person email	
-	Company Trade License number within the UAE (If you are using a subcontractor for any component of the work requested, please also provide their trade license.)	
-	Annual turnover (Revenue) for the past 5 years	
-	Total No. of employees	
-	No. of Employees - CbCR software development and support	
-	No. of English speaking staff	
-	No. of Arabic speaking staff	
-	No. of available local skills (within UAE)	

-	No. of staff having CbCR system experience	
-	SI Partners in the UAE	

▪ **Financial Information**

Please provide financial information in the form of the table below for the most recent 5 financial years:

No.	Requested Information	Year 1	Year 2	Year 3	Year 4	Year 5
●	Annual Turnover (revenue)					
●	Annual Turnover from tax products					

▪ **References**

Please provide information in the form of the table below for 5 references of CbCR solution implementation projects. Mentioning references in the middle east/GCC region is a plus.

No.	Requested Information	Answer/ Remarks
(1)	Client name	
(2)	Client contact and phone number	
(3)	Country	
(4)	Year of implementation	
(5)	Duration of implementation	
(6)	Duration of contract	
(7)	Was the contract renewed?	
(8)	Delivery Model	
(9)	Implementation challenges	
(10)	Number of target users	
(11)	Number of notifications filed	
(12)	Number of CbCR reports generated	
(13)	Outcomes	
(14)	Methodology	

(15)	Did the solution include FATCA or CRS capabilities	
(16)	Additional Information	

Partners and Subcontractors

Please list all partners and subcontractors that you will be working with. For each separate partner/subcontractor, please provide a RACI Matrix that explains the specific responsibilities of each party.

Please fill the information for that individual partner/subcontractor using Bidder Information, References, and Financial Information templates as per Appendix A.

Please note that you must include signed NDAs from all partners and subcontractors that you are proposing as part of the submission.

Conflict of Interest

Please specify if there is any conflict of interest or any potential conflict of interest.

Solution Roadmap (maximum 2 pages)

Please describe your future solution roadmap indicating information about your last 3 major releases and planned major releases of your CbCR solution indicating:

1- Version numbers of these releases
2- Timelines for these releases
3- Key features of these releases

Proposed Organization structure and Key person CVs

Proposals should include the below:

4- Organogram during the various phases;
5- Staffing plan for the implementation;
6- CVs of key staff already identified highlighting key skills and number of years of experience, experience in the region, Public Sector experience, experience in similar projects, language fluency, location during the project life cycle;

7- Specify responsibilities of key roles;

Project Implementation Approach and Project Plan

Please describe your implementation approach for the build of the solution along with a detailed project plan (in Microsoft Project format). The proposal should contain at a minimum:

8- Description of the activities/step in each step of the implementation;
9- Key deliverables with samples;
10- MoF responsibility for each activity/step
11- Full time equivalent (FTE) resources from bidder on site during the activity/step and any off-site resources FTE;
12- WBS of the project plan broken down at a granularity of WBS activity covering maximum of 2 weeks each;
13- MoF activities clearly identified in the project plan with anticipated end-dates;
14- Project plan with clear critical path and all dependant relationships clearly highlighted; and

Key Project Assumptions and Risks

Please describe the major assumptions relevant to the project from a scope, time, quality and cost perspective. Clearly identify and number the key project risks, identify probability of occurrence, significance of impact, overall risk rating, identified mitigations and responsible party. The proposal should contain a detailed Microsoft Excel based risk log.

Proposed SLAs

Please propose a detailed SLA document for the project. SLA should identify the key service provided, for each service identify the acceptable service level, frequency of measurement, and metrics for calculation. The proposal should have:
15- Detailed SLA proposal;
16- Any tools that will be implemented for SLA monitoring and reporting; and
17- Preferred mechanism for incentivising/dis-incentivising SLA adherence.

List of IT components

Please describe all IT solutions provided as part of your solution. The proposal should contain:

18- IT Asset inventory (with component name, OEM, version/model number and key technical specs);
19- List of tools that will be implemented for project management, IT help desk, customer support, SLA monitoring
20- High level functional architecture;
21- High level application architecture;
22- High level data architecture;
23- High level network architecture;

Core Application(s) detail(s)

Please describe the core applications that will be implemented as part of the project. The proposal should contain:

24- Key modules of the application;
25- Confirmation on language support;
26- List of application features currently available and that can be demonstrated;
27- Technology details of the application(s) – such as programing language, type of client supported, licensing details, ability to customize or enhance or expand the solution, skills required to support, supported OS and DB;
28- List of key reports provided to MoF;
29- List of key workflows supported by the system(s);
30- List of assumption on screen customizations (enhancements or modifications), interfaces, alerts, workflows and integrations; and
31- List of key assumptions and key drivers for IT effort such as number or complexity of mobile apps (if applicable).

Appendix B – Requirements to Functional & Non-Functional Requirements

Please refer to the Excel sheet "MoF_CbCR_Requirements_v1.0" for the functional and non-functional requirements. Bidders are requested to populate the attached Excel sheet, indicating compliance with requirements and providing justification for compliance/non-compliance.

Bidders are encouraged to suggest improvements to the requirements as well as additional services that will help MoF meet its objectives and to demonstrate their understanding of MoF requirements. These additions will be viewed favourably in the evaluation process.

Appendix C – Form of a Commercial Proposal

Bidders are expected to provide a detailed financial model for the project. This should include detailed cost breakdown. The cost breakdown should cover breakdown of capital expenditure and operating expenditure.

Key cost heads should include at a minimum IT costs but not limited to licensing requirements, 3rd party licensing requirements, operating systems, databases, implementation and support, etc.

The vendor is expected to supply hardware requirements in terms of type and quantity that will support the CbCR solution.

Please indicate and explain all the assumptions made for the commercial proposal

#	Assumptions

المتطلبات الإلزامية

برجاء عدم ذكر قيمة عطاءكم المالي في العرض الفني وأيضاً عدم وضع صورة عن الكفالة البنكية الابتدائية أو نموذج جدول بيانات المورد في العرض الفني أو ضمن مرفقات العرض الفني، **كما يحظر على جميع الموردين إعطاء سعر العطاء عبر الهاتف أو البريد الإلكتروني لأي كان.**

هام جداً: المورد الذي يرغب بالمشاركة، ملزم برفع وتوفير المستندات التالية على الموقع الإلكتروني حصراً:

(**عدد 1**) **عرض فني** بصيغة (MS Word + PDF) يرفع على النظام فقط، باللغتين العربية والإنجليزية (**إن أمكن**).

(**عدد 1**) **عرض مالي** بصيغة (MS Word + PDF) يرفع على النظام فقط، باللغتين العربية والإنجليزية (**إن أمكن**).

(**عدد 1**) **ملف PDF** صورة عن (NDA + الرخصة التجارية + كتاب المخول بالتوقيع المعتمد من محاكم الدولة) يرفع على النظام فقط.

(**عدد 1**) تعبئة {نموذج (8) جدول البيانات المطلوبة للتعاقد مع المورد} المرفق من قبل الوزارة، ويرفع على النظام بصيغة الـ Word Doc. فقط (**لا يتطلب توقيع أو ختم**).

....

إن كان حجم ملفات عطاءاتكم أكبر من (5MB)، برجاء تجزئته إلى عدة أجزاء لإرفاق العروض كاملة.

تقديم الكفالة البنكية الابتدائية (5%):

قيمة العرض المقدم	الشـــــــــروط
مليون درهم إماراتي أو أقل	(لا) **يشترط** تقديم كفالة بنكية ابتدائية بقيمة 5 % من العرض المقدم من الشركة.
تزيد قيمته عن مليون درهم إماراتي	**يشترط** تقديم كفالة بنكية ابتدائية بقيمة 5 % من العرض المقدم من الشركة.

قيمة العرض المقدم للخدمات الاستشارية	الشـــــــــروط
ثلاث ملايين درهم إماراتي أو أقل	(لا) **يشترط** تقديم كفالة بنكية ابتدائية بقيمة 5 % من العرض المقدم من الشركة.
تزيد قيمته عن ثلاثة ملايين درهم إماراتي	**يشترط** تقديم كفالة بنكية ابتدائية بقيمة 5 % من العرض المقدم من الشركة.

متطلبات العرض المالي: (ضرورة ذكر وتوضيح ما يلي):

.. مهام العمل (Scope of Work) ‏ – الصيانة والضمان **(إن وجد)** – مدة التوريد والتركيب والتسليم **(إن وجد)** – مدة تنفيذ المشروع. – عدد الـ Men on Site لهذا المشروع **(إن وجد)**.

.. آلية / شروط الدفع: تكتب بشكل تفصيلي، على أن تكون الصيغة **(على سبيل المثال لا الحصر):**

الدفعة **(الأولى / الثانية / الثالثة)**: 00% تدفع بعد (توريد سلعة / تقديم خدمة / الانتهاء من تسليم مشروع) ...إلخ وهذا ينطبق على جميع دفعات المشروع.

- الدفعة المقدمة ((Payment Conditions without the Advance Payments)):

إذا رغب المورد بدفعة مقدمة يتوجب عليه إحضار كفالة بنكية بقيمة الدفعة المقدمة وبنسبة لا تزيد عن 25% بحد اقصى من إجمالي قيمة العقد، وبنفس شروط ومدة كفالة حسن التنفيذ.

- يرجى العلم بأنه غير مطلوب تسليم أي نسخ أو مستندات ورقية، باستثناء الكفالة الابتدائية الـ5% "إن وجد".