
Country-by-country reporting

Who will be subject to CbCR?

Country by Country Reporting (CbCR) applies to multinational companies (MNCs) with a combined revenue of euros 750 million or more

When will CbC reports need to be filled?

Country by Country (CbC) reports will need to be filed 12 months after the fiscal year has ended, starting with the first financial year starting after 1st January 2016.

Background to Common Reporting Standards (CRS)

INFORMATION TO BE SHARED

Each country will exchange with the other country the below information

a. the name, address, Tax Identification Number (TIN) and date and place of birth of each Reportable Person

b. the account number

c. the name and identifying number of the Reporting Financial Institution;

d. the account balance or value (as of the end of the relevant calendar year or, if the account was closed during such year or period, the closure of the account)

Background to Common Reporting Standards (CRS)

DATE OF AGREEMENT

Exchange of information has agreed among countries on 6th May, 2014

METHOD OF GETTING INFORMATION

- Presently the information will be given automatically
- Previously have to request for the information

FREQUENCY OF GETTING INFORMATION

We can get the information annually

Background to Common Reporting Standards (CRS)

What is a "Reporting Financial Institution?" What is

a "reportable person"?

Participating countries are to determine between them what accounts are reportable and then to establish specific agreements to accommodate the sharing of information

So, who are the Reporting Financial Institutions?

Reporting Financial Institution

The term "Reporting Financial Institution" means any Participating Jurisdiction Financial Institution that is not a Non-Reporting Financial Institution.

)

CRS Participating Countries:

Reporting from 1 January 2017

Anguilla, Argentina, Barbados, Belgium, Bermuda, British Virgin Islands, Bulgaria, Cayman Islands, Colombia, Croatia, Curaçao, Cyprus, Czech Republic, Denmark, Dominica, Estonia, Faroe Islands, Finland, France, Germany, Gibraltar, Greece, Greenland, Guernsey, Hungary, Iceland, India, Ireland, Isle of Man, Italy, Jersey, Korea, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Mexico, Montserrat, Netherlands, Niue, Norway, Poland, Portugal, Romania, San Marino, Seychelles, Slovak Republic, Slovenia, South Africa, Spain, Sweden, Trinidad and Tobago, Turks and Caicos Islands, United Kingdom

Reporting from 1 January 2018

Albania, Andorra, Antigua and Barbuda, Aruba, Australia, Austria, The Bahamas, Belize, Brazil, Brunei Darussalam, Canada, Chile, China, Cook Islands, Costa Rica, Ghana, Grenada, Hong Kong (China), Indonesia, Israel, Japan, Kuwait, Marshall Islands, Macao (China), Malaysia, Mauritius, Monaco, Nauru, New Zealand, Qatar, Russia, Saint Kitts and Nevis, Samoa, Saint Lucia, Saint Vincent and the Grenadines, Saudi Arabia, Singapore, Saint Maarten, Switzerland, Turkey, United Arab Emirates, Uruguay, Vanuatu

The US is not a participant of CRS. It has its own FATCA regime.

Non-Reporting Financial Institution

B. Non-Reporting Financial Institution

The term "Non-Reporting Financial Institution" means any Financial Institution that is:

a. a Governmental Entity, International Organization or Central Bank, other than with respect to a payment that is derived from an obligation held in connection with a commercial financial activity of a type engaged in by 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 Governmental Entity, International Organization or Central Bank; or a Qualified Credit Card Issuer;

c. **any other Entity that presents a low risk of being used to evade tax**, has substantially similar characteristics to any of the Entities described in subparagraphs B (1)(a) and (b), **and is defined in domestic law as a Non-Reporting Financial Institution**, provided that the status of such Entity as a Non-Reporting Financial Institution does not frustrate the purposes of the Common Reporting Standard; …

Reporting as a prelude to taxation or prosecution

United States

AML records the beneficial owners of financial arrangements, globally. This made it possible to introduce, implement and enforce FATCA

United Kingdom

The registration of UK property ownership from 1st April,2013 preceded the introduction of ATED

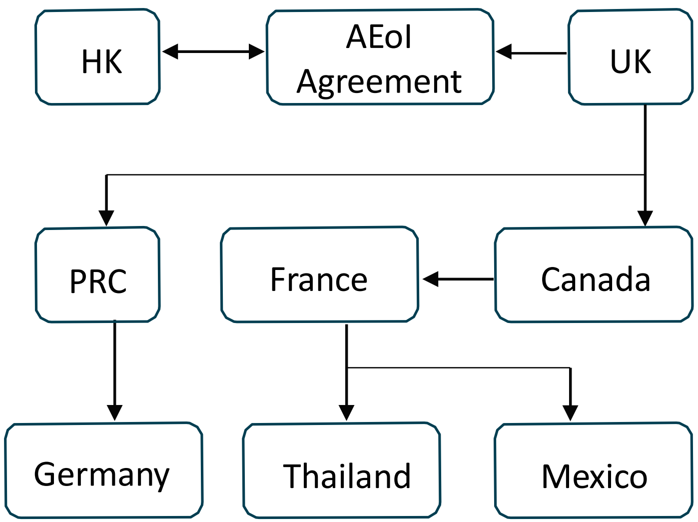
AUTOMATIC EXCHANGE OF INFORMATION

The new global standard on automatic exchange of information (AEOI) reduces the possibility for tax evasion. It provides for the exchange of non resident financial account information with the tax authorities in the account holder's country of residence. Participating jurisdictions that implement AEOI send and receive pre-agreed information each year, without having to send a specific request.

As new information is brought to light by AEOI, the importance of the current standard of exchange of information on request (EOIR) will also increase. The two standards of AEOI and EOIR are therefore complementary, working together to enhance the effectiveness of tax administrations efforts in addressing international tax evasion.

The standard requires not only deposit taking banks to report, but also custodial institutions, certain investment entities and certain insurance companies. The type of account information to be reported on includes account balances, interest, dividends and sale and redemption proceeds from Financial assets.

Multilateral Effect of “Pass Through” Information



Applies equally to counter-parties involved in any transaction, however trivial