Inland Revenue Department
The Government of the Hong Kong Special Administrative Region
of the People's Republic of China

Recent Legislative Amendments – Crypto-Asset Reporting Framework and Amendments to Common Reporting Standard



November 2026

Disclaimer

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Today's Agenda

1 **Enacted Law, But Not Yet In Operation**



2 **Crypto-Asset Reporting Framework**

3 **Amendments in relation to Common Reporting Standard**

4 **Q&A Session**



1

Enacted Law, But Not Yet In Operation

1. Enacted Law, But Not Yet In Operation – The Background

Inland Revenue (Amendment) (Automatic Exchange of Information) Ordinance 2026

- "AEOI Amendment Ordinance"
- Address the comments of the Organisation of Economic Co-operation and Development
- Strengthen the administrative framework of the Common Reporting Standard (CRS) in Hong Kong

Inland Revenue (Amendment) (Crypto-Asset Reporting Framework and Amended Common Reporting Standard) Ordinance 2026

- "CARF Amendment Ordinance"
- Implement the Crypto-Asset Reporting Framework (CARF) in Hong Kong
- Implement the latest amendments to the CRS (amended CRS) in Hong Kong

1. Enacted Law, But Not Yet In Operation – The Timeline

AEOI Amendment Ordinance	CARF Amendment Ordinance
From 1 January 2027 onwards	
• Mandatory Registration of AEOI Portal Account • Enhanced Record Keeping Requirements under CRS	• Mandatory Registration of CARF Portal Account* • Introduction of Due Diligence, Reporting and Record Keeping Requirements under CARF
From 1 January 2028 onwards	
	• Inclusion of Digital Financial Products under CRS • Refined Due Diligence and Reporting Requirements under CRS

*CARF Portal is still under development and scheduled to be launched in September 2027.

2

Crypto-Asset Reporting Framework

2. Crypto-Asset Reporting Framework – The Core

01 Nexus rules



Which persons are within the scope of CARF?

Who is subject to CARF obligations in Hong Kong?

02 Due diligence obligations



Why due diligence is required under CARF?

How to identify the subjects for reporting?

03 Reporting obligations



What information is required under CARF?

When should the information be reported?

2. Crypto-Asset Reporting Framework – The Core

04 Recordkeeping requirements



What is the specified period?

Who is/are responsible?

05 Other requirements



What are the requirements?

2. Crypto-Asset Reporting Framework – Reporting Crypto-Asset Service Providers

01 | Nexus rules



Which persons are within the scope of CARF?

Who is subject to CARF obligations in Hong Kong?

Reporting Crypto-Asset Service Providers (RCASPs)

- **Any individual or entity that**
- **Provides a service effectuating exchange transactions for or on behalf of customers; and**
- **Conducts that service as a business.**



2. Crypto-Asset Reporting Framework – Reporting Crypto-Asset Service Providers

01 | Nexus rules



Which persons are within the scope of CARF?

Who is subject to CARF obligations in Hong Kong?

Exchange Transactions

- **Any exchange between relevant crypto-assets and fiat currencies; and**



- **Any exchange between one or more forms of relevant crypto-assets.**

2. Crypto-Asset Reporting Framework – Reporting Crypto-Asset Service Providers

01 | Nexus rules



Which persons are within the scope of CARF?

Who is subject to CARF obligations in Hong Kong?

Relevant Crypto-assets

- **All crypto-assets, excluding:**
- **Central Bank Digital Currency**
- **Specified Electronic Money Product; and**
- **Crypto-assets that cannot be used for payment or investment purposes**



2. Crypto-Asset Reporting Framework – Reporting Crypto-Asset Service Providers

01 | Nexus rules



Which persons are within the scope of CARF?

Who is subject to CARF obligations in Hong Kong?

Examples of RCASPs

- **Crypto-asset exchanges**
- **Operators of crypto-asset ATMs**
- **Dealers**
- **Brokers**
- **Persons making available a trading platform**



2. Crypto-Asset Reporting Framework – Nexus Rules

01 | Nexus rules



Which persons are within the scope of CARF?

Who is subject to CARF obligations in Hong Kong?

HKRCASPs

- **RCASPs with a nexus in Hong Kong:**



- **Tax Resident in Hong Kong;**
- **Incorporated in or organised under the laws of Hong Kong, and has legal personality in Hong Kong or has an obligation to file tax returns with respect to its income to IRD;**

2. Crypto-Asset Reporting Framework – Nexus Rules

01 | Nexus rules



Which persons are within the scope of CARF?

Who is subject to CARF obligations in Hong Kong?

HKRCASPs (cont.)

- **Managed from Hong Kong;**
- **Have a regular place of business in Hong Kong; or**



- **Have a branch based in Hong Kong through which relevant transactions are effectuated**

2. Crypto-Asset Reporting Framework – Nexus Rules

01 | Nexus rules



Which persons are within the scope of CARF?

Who is subject to CARF obligations in Hong Kong?

Relevant Transactions

- **Exchange Transactions; or**
- **Transfer of relevant crypto-asset**



2. Crypto-Asset Reporting Framework – The Purposes

02 | Due diligence obligations



Why due diligence is required under CARF?

How to identify the subjects for reporting?

Purposes of Due Diligence

- **Identify crypto-asset users and controlling persons**



- **Determine the tax jurisdictions of crypto-asset users and controlling persons**
- **Collect relevant information for reporting compliance**

2. Crypto-Asset Reporting Framework – The Procedures

02 | Due diligence obligations



Why due diligence is required under CARF?

How to identify the subjects for reporting?

Due Diligence Procedures

- **Obtain self-certifications from the crypto-asset users and controlling persons when taking in new customers**



- **For pre-existing customers, obtain self-certifications by 1 January 2028**

2. Crypto-Asset Reporting Framework – The Procedures

02 | Due diligence obligations



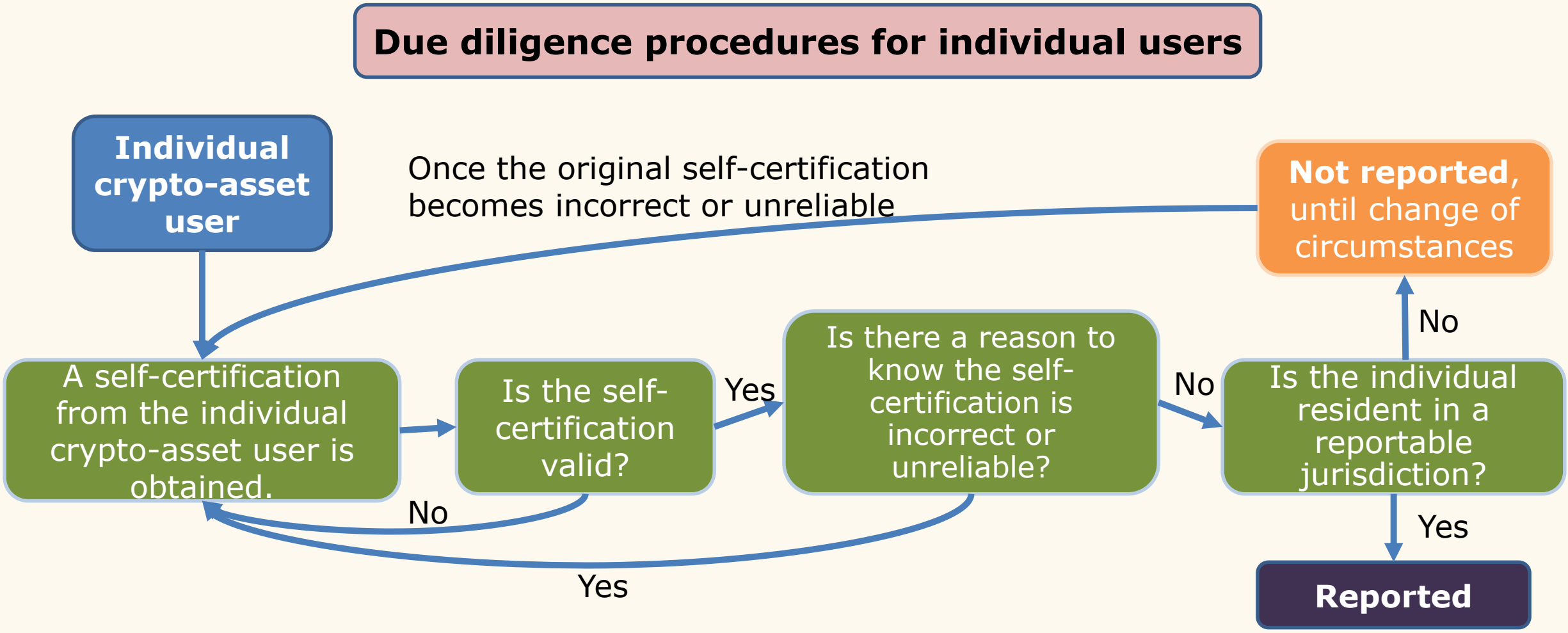
Why due diligence is required under CARF?

How to identify the subjects for reporting?

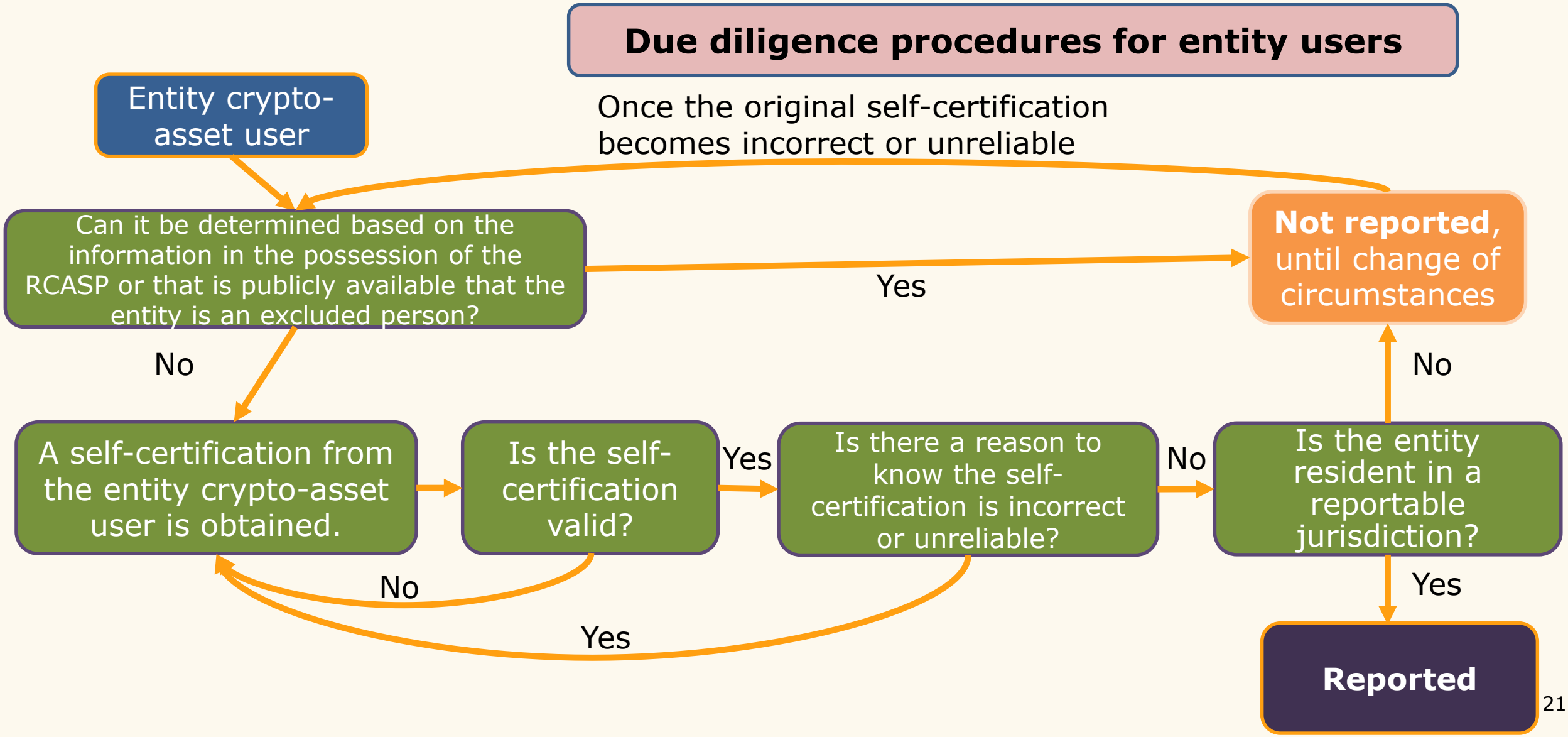
Due Diligence Procedures (cont.)

- **Confirm the reasonableness of the self-certifications for identifying jurisdictions of residence**
- **If there is a change of circumstances, obtain afresh a valid self-certification, or a reasonable explanation and documentation**

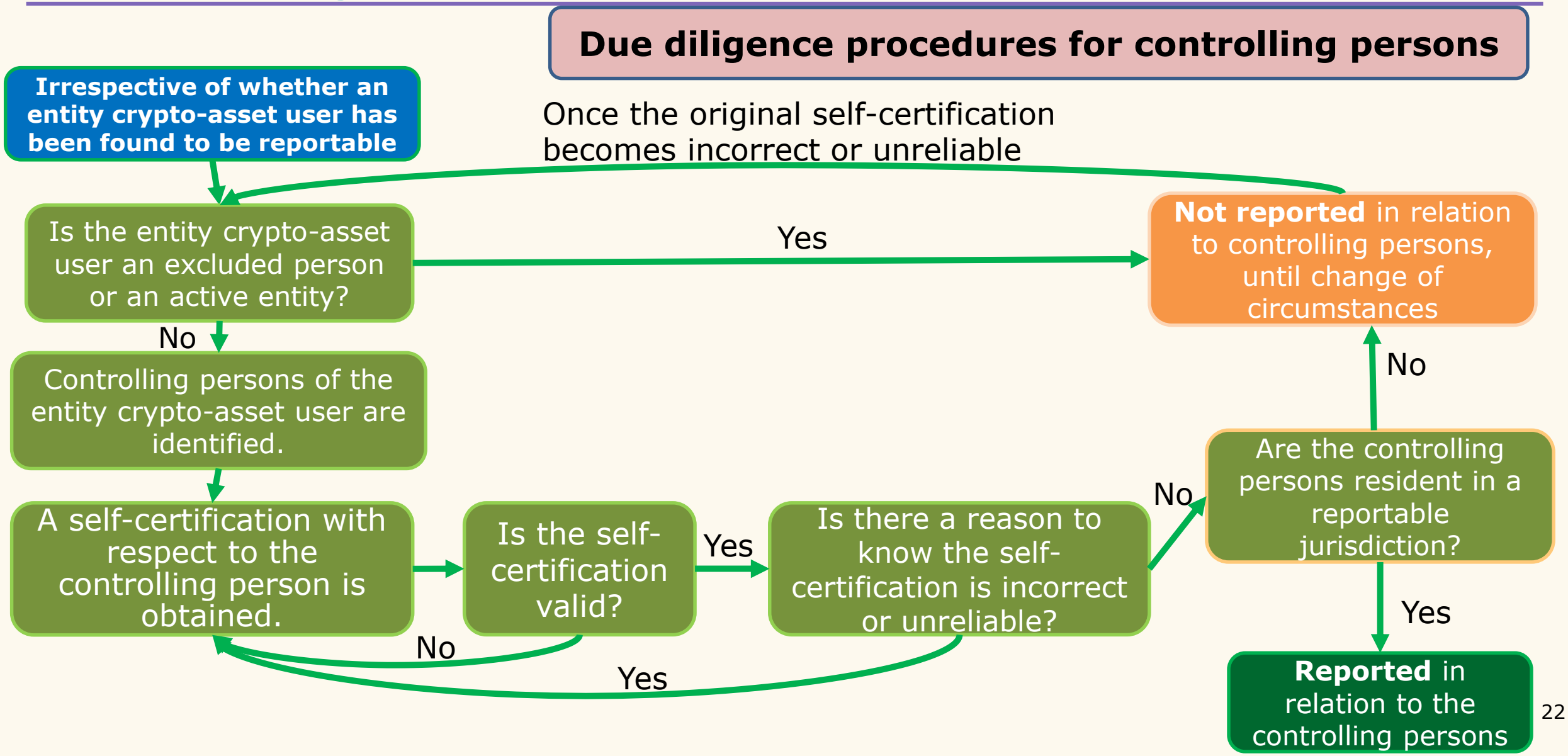
2. Crypto-Asset Reporting Framework – Due Diligence Procedures



2. Crypto-Asset Reporting Framework – Due Diligence Procedures



2. Crypto-Asset Reporting Framework – Due Diligence Procedures



2. Crypto-Asset Reporting Framework – Required Information

03 | **Reporting obligations**



What information is required under CARF?

When should the information be reported?

Required Information

- **Identification information of the RCASP;**
- **Identification information of each reportable crypto-asset user / controlling person of entity crypto-asset user;**



2. Crypto-Asset Reporting Framework – Required Information

03 | Reporting obligations



What information is required under CARF?

When should the information be reported?

Required Information (cont.)

- **Aggregated transaction information for each type of relevant crypto-asset with relevant transactions effectuated;**



- **Nil return is required.**

2. Crypto-Asset Reporting Framework – Submission

03 | Reporting obligations



What information is required under CARF?

When should the information be reported?

Submission Details

- **CARF return to be issued annually in January, starting from 2028**



- **Submission to be completed by early June via CARF Portal (under development)**
- **HKRCASPs required to register an account in the CARF Portal**

2. Crypto-Asset Reporting Framework – Record Keeping Requirements

04 | Recordkeeping requirements



What is the specified period?

Who is/are responsible?

Requirements
• **Must keep sufficient records of the information reported in CARF Return to enable the correctness and accuracy of such information to be readily ascertained, including cessation and dissolution.** • **A period of 6 years immediately after the CARF Return due date**



2. Crypto-Asset Reporting Framework – Persons Responsible for Record Keeping

04 Recordkeeping requirements



What is the specified period?

Who is/are responsible?

Persons responsible for record keeping after the entity is dissolved

- **For a dissolved entity that was an HKRCASP at any time during the 6 years before dissolution:**
  - **Every specified officer; or**
  - **Designated officer of the entity**

  are responsible.





2. Crypto-Asset Reporting Framework – Persons Responsible for Record Keeping

04 | **Recordkeeping requirements**



What is the specified period?

Who is/are responsible?

Persons responsible for record keeping after the entity is dissolved

- **Specified officer: every person who was responsible for the management (e.g. director, trustee) of the entity immediately before dissolution**



2. Crypto-Asset Reporting Framework – Persons Responsible for Record Keeping

04 | Recordkeeping requirements



What is the specified period?

Who is/are responsible?

Persons responsible for record keeping after the entity is dissolved

- **Designated officer:**
  - **One of specified officers; or**
  - **person who performed managerial functions under the immediate authority of a person responsible for the management of the entity (e.g. director, trustee)**



2. Crypto-Asset Reporting Framework – Designation of Designated Officer

04 Recordkeeping requirements



What is the specified period?

Who is/are responsible?

Designation requirements

- Made by a notice signed by the designated officer and containing the required details
- Accompanied by agreement evidenced in writing by <u>all</u> specified officers, unless the Commissioner is satisfied that there is reasonable cause for the agreement not being made by all specified officers



2. Crypto-Asset Reporting Framework – Requirements of a Designation Notice

04 | Recordkeeping requirements



What is the specified period?

Who is/are responsible?

Requirements of a designation notice

- Signed by the designated officer
- Setting out designated officer's:
  - Capacity in relation to the entity
  - Contact details
  - Date of designation
- Accompanied by evidence of agreement



2. Crypto-Asset Reporting Framework – Validity and Effective Date of Designation

04 | **Recordkeeping requirements**



What is the specified period?

Who is/are responsible?

Validity and effective date of designation

- **A designation notice is valid from:**
  - **Date of receipt by the Commissioner; or**
  - **(if no unanimous agreement of designation) date on which the agreement is regarded as so made by the Commissioner**
- **A valid designation is effective from the stated designation date**



2. Crypto-Asset Reporting Framework – Cessation of Designation

04 Recordkeeping requirements



What is the specified period?

Who is/are responsible?

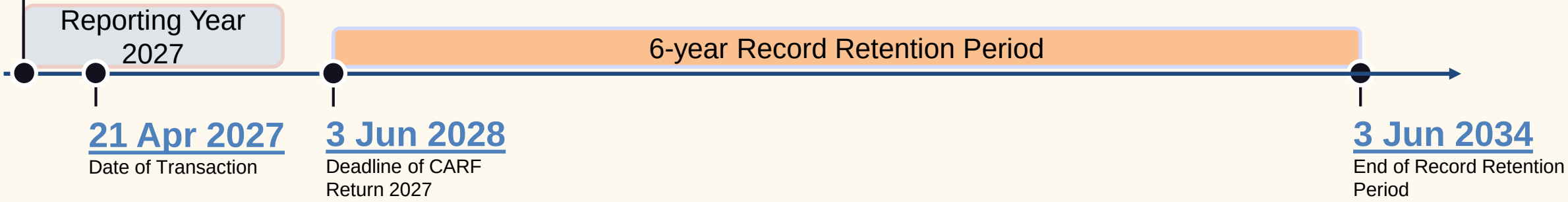
Cessation of designation

- Designation of a person ceases to have effect on the earliest of:
  - A date depending on when the notice of cessation of designation is received by the Commissioner (if any such receipt); and
  - Date of designation of another designated officer stated in the designation notice (if such notice is received by the Commissioner)



2. Crypto-Asset Reporting Framework – Examples of Record Keeping Requirements

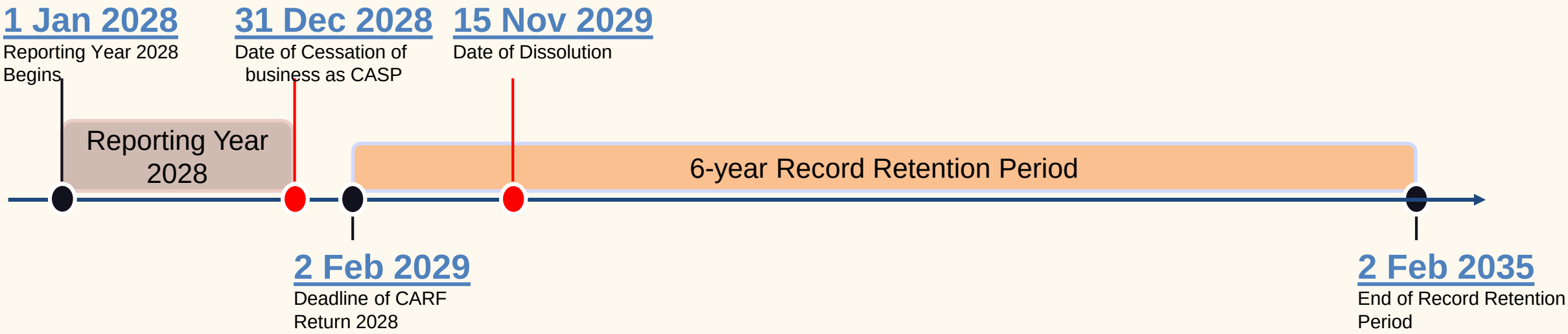
Example: Normal case



- **CARF Return (issued on 3 Jan 2028) due date: 3 Jun 2028**
- **End of record retention period: 3 Jun 2034**

2. Crypto-Asset Reporting Framework – Examples of Record Keeping Requirements

Example: Cessation and Dissolution of HKRCASP



- **Ceased as an HKRCASP: 31 Dec 2028**
- **CARF Return (issued on 2 Jan 2029) due date: 2 Feb 2029**
- **Dissolution: 15 Nov 2029**
- **End of record retention period: 2 Feb 2035 (6 years after cessation as an HKRCASP)**

2. Crypto-Asset Reporting Framework – Examples of Record Keeping Requirements

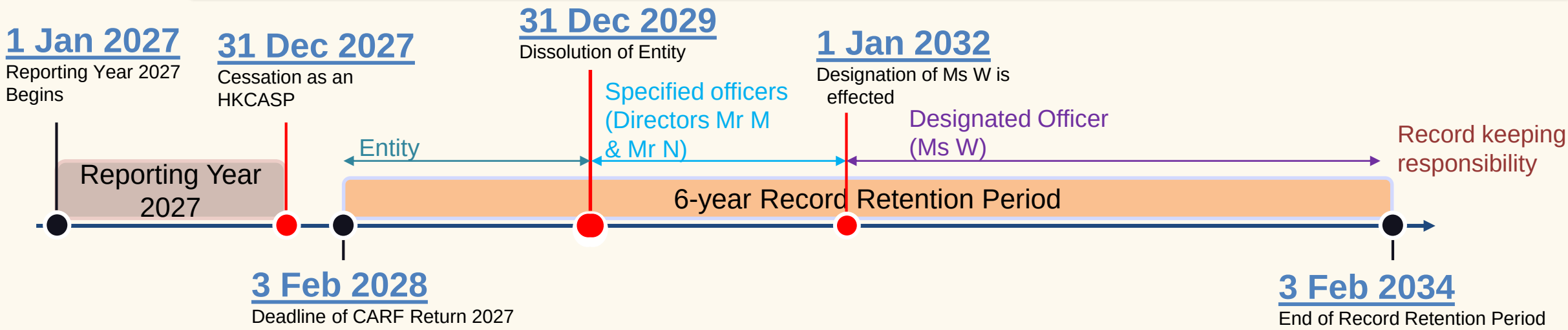
Example: Cessation and Dissolution of HKRCASP; Resignation of Director; No Designation of Designated Officer



- **Ceased as an HKRCASP: 31 Dec 2027**
- **CARF Return (issued on 3 Jan 2028) due date: 3 Feb 2028**
- **Directors: Mr X (resigned on 31 Dec 2030), Mr Y and Mr Z**
- **Dissolution: 31 Dec 2032**
- **End of record retention period: 3 Feb 2034**
- **Specified officers responsible for record keeping: Mr Y and Mr Z**

2. Crypto-Asset Reporting Framework – Examples of Record Keeping Requirements

Example: Cessation and Dissolution of HKRCASP; Resignation of Director; Designation of Designated Officer



- **Ceased as an HKRCASP: 31 Dec 2027**
- **CARF Return (issued on 3 Jan 2028) due date: 3 Feb 2028**
- **End of record retention period: 3 Feb 2034**
- **Dissolution: 31 Dec 2029**
- **Persons responsible for record keeping:**
  - **Specified officers: Mr M and Mr N (directors) [up to 31 Dec 2031]**
  - **Designated officer: Ms W [from 1 Jan 2032 to 3 Feb 2034]**

2. Crypto-Asset Reporting Framework – Other Requirements

05 | Other requirements



What are the requirements?

Details

- **Notify new address within 1 month after change**
- **Give a notice of cessation as an HKRCASP within 1 month after cessation**
- **Give a notice of recommencement as an HKRCASP within 1 month after recommencement**





2. Crypto-Asset Reporting Framework – Other Requirements

05 | **Other requirements**



What are the requirements?

Details

- **After cessation but before recommencement as HKRCASP, the individual or entity concerned must:**
  - **notify change of address within 1 month after change**
  - **ensure record keeping requirement is complied**





2. Crypto-Asset Reporting Framework – Other Requirements

05 | **Other requirements**



What are the requirements?

Details

- **After dissolution, all specified officers or the designated officer (if any) of the entity must:**
  - **give a notice of dissolution within 1 month**
  - **ensure record keeping requirement is complied**





2. Crypto-Asset Reporting Framework – Other Requirements

05 | **Other requirements**



What are the requirements?

Details

- **After dissolution:**
  - **If only specified officers: the specified officer must give a notice of change of his/her address within 1 month**
  - **If with designation of designated officer: the designated officer must give a notice of change his/her address within 1 month**





2. Crypto-Asset Reporting Framework – Key Takeaway

From Now to 31 Dec 2026	Conduct an early review on whether you are an HKRCASP
	Confirm if due diligence procedures are in place
From 1 January 2027	CARF comes into operation
By 1 January 2028	Obtain a self-certification from pre-existing crypto-asset users
Before 31 January 2028	Register with CARF Portal*
Before early June 2028 (for records relating to 2027)	File CARF Return on time
Until early June 2034 (for records relating to 2027)	Ensure sufficient records has been kept





*CARF Portal is still under development and scheduled to be launched in September 2027.

3

Amendments in relation to Common Reporting Standard

3. Amendments in relation to Common Reporting Standard Reporting Financial Institution Self-assessment Tool

https://www.ird.gov.hk/eng/tax/aeoi/assessment_tool.htm



3. Amendments in relation to Common Reporting Standard

01 Key Features of Amended CRS



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

02 Operational Issues



Dual Reporting under Amended CRS and CARF

Implementation Timeline of Reporting under Amended CRS

03 Mandatory Registration



Registration Deadline for Reporting Financial Institutions

Registration for Other Reporting Financial Institutions

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Financial Accounts

- **Specified Electronic Money Products (SEMP)**
- **Central Bank Digital Currency (CBDC)**
- **Indirect investments in relevant crypto-assets, through derivatives and investment vehicles**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Specified Electronic Money Products (SEMP)

- **Digital representation of a single fiat currency;**
- **Issued on receipt of funds for the purpose of making payment transactions;**
- **Represented by a claim on the issuer denominated in the same fiat currency;**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Specified Electronic Money Products (SEMP) (cont.)

- **Accepted in payment by a natural or legal person other than the issuer; and**
- **By virtue of regulatory requirements to which the issuer is subject, redeemable at any time and at par value for the same fiat currency upon request of the holder of the product**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | Key Features of Amended CRS



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Central Bank Digital Currency (CBDC) and Indirect Investment on Crypto-asset

- **CBDC**
  - **Digital fiat currency issued by a central bank**
- **Indirect investments in relevant crypto-assets, through derivatives and investment vehicles**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Amended Definitions

- **Financial Assets**
  - **Include derivative contracts referencing crypto-assets**
- **Investment Entity**
  - **Include crypto-assets as a category of eligible investments**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Amended Definitions (cont.)

- **Depository Institution**
  - **Include digital money providers that hold SEMPs and CBDCs for benefit of customers**
- **Depository Account**
  - **Include accounts that represent SEMPs and CBDCs held for customers**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Key Takeaways

- **Existing RFIs**
  - **Review existing product offerings and re-classify any newly in-scope products**
  - **Assess your client base for financial accounts or account holders (individuals or entities) now covered under amended CRS**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Key Takeaways (cont.)

- **Newly in-scope RFIs**
  - **If you offer or hold any of the above, you are in scope under the Amended CRS.**
  - **An RFI has to register in the AEOI Portal.**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | Key Features of Amended CRS



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Key Takeaways (cont.)

- **Existing or Newly in-scope RFIs**
  - **Collect the CRS data of Account Holders in respect of newly in-scope products from 1 Jan 2028**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Enhanced Reporting Requirements

- **Whether a valid self-certification has been obtained**
- **Role of controlling persons and the role(s) of equity interest holders in an investment entity**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Enhanced Reporting Requirements (cont.)

- **Whether the account is a pre-existing account or a new account**
- **Whether the account is a joint account, and the number of joint account holders**
- **Type of financial account (e.g. depository account, custodial account)**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Key Takeaways

- **Existing RFIs**
  - **Ensure systems and processes are updated for enhanced reporting requirements**
  - **Prepare the upgrade for the reporting systems and mapping to the new schema (to be adopted for Return 2028, reporting in 2029) and test file generation and validation**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Key Takeaways (cont.)

- **Newly in-scope RFIs**
  - **Ensure systems and processes are established to collect and report all required data, including the enhanced reporting requirements**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Enhanced Due Diligence Requirements

- **No reliance on tiebreaker rules**
  - **Account holder is required to <u>self-certify all jurisdictions of tax residence</u> and be treated as tax resident in all identified jurisdictions**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Enhanced Due Diligence Requirements (cont.)

- **Determining on controlling persons of account holder**
  - **The AML/KYC procedures can be relied upon if those are consistent with 2012 FATF Recommendations; otherwise, the RFI must apply substantially similar procedures.**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Enhanced Due Diligence Requirements (cont.)

- **Self-certification**
  - **To apply the due diligence procedures for pre-existing accounts if self-certification cannot be obtained in exceptional circumstances**
  - **<u>Not a standard procedure</u>**



3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Enhanced Due Diligence Requirements (cont.)

- **Citizenship by Investment /Residence by Investment (CBI/RBI)**
  - **To take further measures to ascertain jurisdiction of residence in the self-certifications**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Key Takeaways

- **Existing RFIs**
  - **Review onboarding processes and due diligence procedures**
  - **Update internal CRS policies, controls and guidance**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Key Takeaways (cont.)

- **Newly in-scope RFIs**
  - **Design and implement the onboarding processes and due diligence, including the enhanced one**
  - **Create internal CRS policies, controls and guidance**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Excluded Account

- **Exempt low-risk digital money products given the limited monetary value stored**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Excluded Account (cont.)

- **Capital contribution accounts**
  - **Limited period of time**
  - **Incorporation of a new company or a pending capital increase**
  - **Adequate safeguards in place**

3. Amendments in relation to Common Reporting Standard
Key Features of Amended CRS

01 | **Key Features of Amended CRS**



Expansion of Scope of "Financial Accounts"

Enhanced Reporting and Due Diligence Requirements

Changes to "Excluded Account" and NRFIs

Non-reporting Financial Institutions (NRFIs) (cont.)

- **Qualified non-profit entity**
  - **tax-exempt charities (obtained a recognition of tax exemption status under section 88 of IRO)**
  - **Such entity to demonstrate to IRD that all the specified conditions are met**

3. Amendments in relation to Common Reporting Standard
Dual Reporting under Amended CRS and CARF

02 | **Operational Issues**



Dual Reporting under Amended CRS and CARF

Implementation Timeline of Amended CRS

Dual Reporting

- **Under amended CRS, crypto-assets are included as a type of financial asset**
- **RFIs to report gross proceeds from sale or redemption of financial assets (i.e. crypto-assets)**
- **RCASPs to report transactions information of crypto-assets**

3. Amendments in relation to Common Reporting Standard
Dual Reporting under Amended CRS and CARF

02 | Operational Issues



Dual Reporting under Amended CRS and CARF

Implementation Timeline of Amended CRS

Optional Election

- **If the information has already been reported under CARF, RFIs not required to report the same information under the amended CRS, but not vice versa**
- **(Optional) RFIs may elect to report under the amended CRS in addition to CARF**

3. Amendments in relation to Common Reporting Standard Implementation Timeline

02 | **Operational Issues**



Dual Reporting under Amended CRS and CARF

Implementation Timeline of Amended CRS

Implementation Timeline

- **Starting From 1 January 2028:**
  - **Amendments in relation to amended CRS to be effective in Hong Kong**
  - **Financial Account Information Return XML Schema 3.0**

XML

- **September 2029:**
  - **First exchange of data by IRD under the amended CRS**

3. Amendments in relation to Common Reporting Standard Registration Deadline

03 | **Mandatory Registration**



Registration Deadline for Reporting Financial Institutions

Registration for Other Reporting Financial Institutions

Registration Deadline: Effective from 1 January 2027

The FI is an RFI as at 31 December 2026

On or before 31 March 2027

The FI becomes an RFI on or after 1 January 2027

On or before 31 January of the year following the calendar year in which the FI first becomes an RFI

3. Amendments in relation to Common Reporting Standard Registration Deadline

03 | **Mandatory Registration**



Registration Deadline for Reporting Financial Institutions

Registration for Other Reporting Financial Institutions

Examples		
The FI first becomes an RFI on:		**Registration Deadline:**
24 November 2026 31 December 2026	→	31 March 2027
1 January 2027 31 December 2027	→	31 January 2028

3. Amendments in relation to Common Reporting Standard Registration for Other Reporting Financial Institutions

03 | **Mandatory Registration**



Registration Deadline for Reporting Financial Institutions

Registration for Other Reporting Financial Institutions

Responsible RFI	
Subject RFI being Responsible RFI:	**Type of Other RFIs to be registered:**
Umbrella Fund	**Sub-funds of the umbrella fund**
Pooling agreement or approved pooled investment fund	**Schemes participating in a pooling agreement or an approved pooled investment fund**

3. Amendments in relation to Common Reporting Standard Registration for Other Reporting Financial Institutions

03 | **Mandatory Registration**



Registration Deadline for Reporting Financial Institutions

Registration for Other Reporting Financial Institutions

Responsible RFI	
Subject RFI being Responsible RFI:	**Type of Other RFIs to be registered:**
Trustee	**Trusts**
Fund manager / Investment manager	**Funds or trusts managed by the fund manager or investment manager**

3. Amendments in relation to Common Reporting Standard Registration for Other Reporting Financial Institutions

03 | Mandatory Registration



Registration Deadline for Reporting Financial Institutions

Registration for Other Reporting Financial Institutions

Important Notes

- **<u>No separate Financial Account Information Return</u> for each Other RFIs**
- **Report the information of Subject RFI and Other RFIs (including nil reporting) in <u>one single Return</u> of the Subject RFI**



3. Amendments in relation to Common Reporting Standard Registration for Other Reporting Financial Institutions

03 | Mandatory Registration

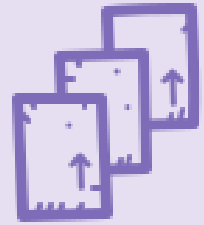


Registration Deadline for Reporting Financial Institutions

Registration for Other Reporting Financial Institutions

Important Notes

- **Same Reporting Period for Subject RFI and Other RFIs**
- **Separate Data File for each RFI**



4

Q&A Session

4. Q&A Session -



https://www.ird.gov.hk/eng/tax/dta_aeoi.htm (For CRS)

https://www.ird.gov.hk/eng/tax/dta_carf.htm (For CARF)



aeoi_gen@ird.gov.hk (For CRS)

carf_gen@ird.gov.hk (For CARF)

Thank you

