

**GOVERNMENT OF ANTIGUA AND BARBUDA**  
**INLAND REVENUE DEPARTMENT**  
**COMMON REPORTING STANDARD (CRS) COMPLIANCE FORM**  
**2026 EDITION — INCORPORATING CIRCULARS NO. 1–9 OF 2026**

Issued pursuant to the Automatic Exchange of Financial Account Information Act No. 11 of 2016 (as amended) and the Automatic Exchange of Financial Account Information Regulations No. 18 of 2017

Furtherance of: Regulations 3, 4, 5 and 7

**\* Denotes mandatory field. All questions must be answered. Submit via the IRD AEOI Online Portal.**

Ref	Question	Response
<b>SECTION 1 – FINANCIAL INSTITUTION PROFILE DATA</b>		
1.1	FI Name *	
1.2	FI Portal Registration Number *	
1.3	Reporting Period (calendar year under review) *	
1.4	Is the FI registered with the Inland Revenue Department? *	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.5	Date of registration (if Yes to 1.4) *	
1.6	Taxpayer Identification Number (TIN) issued by IRD	
1.7	Please confirm the nature of the FI's business activities (select all that apply): <input type="checkbox"/> Depository Institution <input type="checkbox"/> Custodial Institution <input type="checkbox"/> Investment Entity (Type A – primarily conducts investment activities) <input type="checkbox"/> Investment Entity (Type B – managed by another Financial Institution) <input type="checkbox"/> Specified Insurance Company <input type="checkbox"/> Active NFE <input type="checkbox"/> Passive NFE <input type="checkbox"/> Non-Financial Entity (NFE) – Other <input type="checkbox"/> Non-Reporting Financial Institution (NRFI) <input type="checkbox"/> Other (specify below)	
1.8	Please provide a detailed explanation of the FI's business activities and the rationale for the classification selected in 1.7	
<b>1.9 – Trust and Corporate Service Providers (TCSP) / Managed Entities [Circular No. 3/2026]</b>		
1.9	Are you engaged with any Trust and Corporate Service Provider (TCSP) in relation to your business operations?	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.9a	Please list all legal persons or legal arrangements (trusts, partnerships, etc.) managed or administered by the FI	
1.9b	For each trust listed, indicate whether the FI is acting as trustee	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
1.9c	Has the FI classified each managed entity for CRS purposes (e.g., Passive NFE, Investment Entity)? If so, provide classifications	
1.9d	Explain the rationale for each classification applied	
1.9e	What measures are in place to ensure managed entities comply with CRS obligations (due diligence and reporting)?	
1.9f	How does the FI monitor ongoing CRS compliance for entities it manages or administers?	
<b>1.10 – Digital Assets and Emerging Financial Products</b>		

Ref	Question	Response
1.10a	Does the FI offer or maintain electronic money products (e.g., digital wallets, prepaid card accounts)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.10b	Does the FI offer or custody Central Bank Digital Currencies (CBDCs)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.10c	Does the FI facilitate exposure to crypto-assets via derivatives or investment structures?	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.10d	Does the FI maintain digital asset accounts through intermediaries or investment vehicles (e.g., trusts, funds)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.10e	If Yes to any of 1.10a–1.10d, describe the product(s) or service(s) and nature of exposure	
<b>SECTION 2 – FINANCIAL ACCOUNT DATA</b>		
2.1	Please confirm the currency used for CRS reporting purposes is USD *	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.2	Total number of Financial Accounts held by the FI for the reporting period *	
2.3	Total value (USD) of Financial Accounts held by the FI for the reporting period *	
2.4	Total number of Reportable Accounts (including accounts with digital asset or CBDC exposure) *	
2.5	Total value (USD) of Reportable Accounts (include e-money, CBDC and crypto-asset exposure) *	
<b>2.6–2.11 – Non-Reportable Accounts</b>		
2.6	Does the FI have any Non-Reportable accounts for the reporting period? *	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.7	If Yes to 2.6, please confirm the reason(s) the account(s) are considered Non-Reportable	
2.8	Provide further details of Financial Accounts where the Account Holder is not a Reportable Person but is a Reportable Jurisdiction Person	
2.9	<b>Non-Reportable Accounts — Account Holder is a Financial Institution:</b> Total number of Non-Reportable Accounts: Total USD value: Number/value unknown? <input type="checkbox"/> Yes <input type="checkbox"/> No	
2.10	Provide further classification details of Financial Accounts where the Account Holder and all Controlling Persons are not Reportable Jurisdiction Persons	
2.11	<b>Non-Reportable Accounts — US Persons:</b> Total number of Non-Reportable Accounts: Total USD value: Number/value unknown? <input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>2.12–2.18 – Excluded Accounts [Circular No. 7/2026]</b>		
2.12	Does the FI have any Excluded Accounts? *	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Uncertain
2.13	Is the existence, number or value of any Excluded Account unknown?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.14	Total number of Excluded Accounts	
2.15	Total value (USD) of Excluded Accounts	

Ref	Question	Response
2.16	Has the FI completed the mandatory review of all Excluded Account classifications required by Circular No. 7 of 2026 (deadline: 30 September 2026)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> In progress
2.17	Number of accounts identified as incorrectly classified as Excluded following the mandatory review	
2.18	Has the FI submitted corrected CRS returns for any accounts that were incorrectly classified as Excluded?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<b>SECTION 3 – AML/KYC AND ACCOUNTING</b>		
3.1	Does the FI have audited Financial Statements?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.2	Which entity carries out the FI's AML/KYC obligations?	<input type="checkbox"/> FI itself <input type="checkbox"/> Third-party service provider
3.3	Name of entity/service provider (if applicable)	
3.4	Location of entity/service provider (if applicable)	
3.5	Are AML/CFT obligations performed in accordance with Antigua and Barbuda law?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.6	Was the FI audited by the ONDCP for AML/KYC purposes during the last reporting period?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.7	Does the FI provide ongoing internal training on AML/KYC procedures to its officers?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.8	Frequency of AML/KYC training	<input type="checkbox"/> Monthly <input type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annually <input type="checkbox"/> Annually <input type="checkbox"/> Other
3.9	Who facilitates the AML/KYC training?	<input type="checkbox"/> FI itself <input type="checkbox"/> External provider
3.10	Date of last AML/KYC training	
3.11	Has the FI implemented enhanced due diligence for preexisting entity accounts with incomplete indicia? [Circular No. 6/2026]	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.12	Has the FI updated AML/KYC procedures to identify Reportable Persons holding crypto-assets through indirect means?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>3.13–3.17 – CBI/RBI Enhanced Due Diligence [Circular No. 4/2026]</b>		
3.13	Does the FI have documented procedures to identify CBI/RBI documentation presented by Account Holders or Controlling Persons?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.14	Does the FI flag accounts where CBI/RBI documentation is on file for enhanced due diligence?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.15	Where a self-certification claims tax residence in a CBI/RBI jurisdiction, does the FI require documentary evidence of genuine tax nexus beyond the CBI/RBI document itself?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
3.16	Has the FI completed the review of existing accounts with CBI/RBI documentation on file required by Circular No. 4 of 2026 (deadline: 30 September 2026)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> In progress
3.17	Number of accounts where the self-certification was revised or reporting corrected following the CBI/RBI review	
<b>SECTION 4 – CRS PROCESS AND COMPLIANCE</b>		
4.1	Which entity reviews Account Holder information and drafts the Reportable Accounts list for management review?	<input type="checkbox"/> FI itself <input type="checkbox"/> Third-party service provider
4.2	Name of entity/service provider (if applicable)	

Ref	Question	Response
4.3	Location of entity/service provider (if applicable)	
4.4	Has the FI established and maintained written policies and procedures complying with its CRS obligations under Antigua and Barbuda legislation? *	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.5	Has the FI implemented and complied with its written policies and procedures? *	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<b>4.6–4.12 – Self-Certification [Circular No. 3/2026]</b>		
4.6	Has the FI complied with CRS legislation in relation to self-certification requirements?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.7	Does the FI obtain a valid self-certification at account opening for all New Individual and Entity Accounts?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.8	Where day-two procedures are applied, does the FI have strong measures in place to obtain self-certifications within 90 days of account opening?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – day-two not used
4.9	Does the FI apply a reasonableness test to all self-certifications received?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.10	Does the FI obtain self-certifications from Controlling Persons of Passive NFEs?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4.11	Has the FI updated its self-certification forms to include all mandatory fields (TIN and issuing country, date and place of birth, updated Controlling Person classification)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partially
4.12	Does the FI have documented procedures for identifying, recording and acting on changes of circumstances affecting Account Holder tax residency status?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>4.13–4.17 – Tax Identification Numbers (TINs) [Circular No. 1/2026]</b>		
4.13	Has the FI complied with CRS legislation regarding the requirement to obtain TINs? *	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.14	Does the FI collect a TIN for each jurisdiction of tax residence at account opening for New Accounts?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.15	For Preexisting Accounts where a TIN is absent, has the FI made documented reasonable efforts to obtain it?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – no missing TINs
4.16	Does the FI apply TIN reason codes (A/B/C) only on an account-by-account basis with documented evidence?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.17	Has the FI completed outstanding reasonable efforts for missing TINs and reported the outcome to the IRD by 30 September 2026 (per Circular No. 1/2026)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> In progress
<b>4.18–4.21 – Date of Birth (DOB) [Circular No. 2/2026]</b>		
4.18	Has the FI complied with CRS legislation regarding the requirement to obtain date of birth information? *	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.19	Does the FI collect a complete DOB (day/month/year) for all individual Account Holders and Reportable Controlling Persons at account opening?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.20	For Preexisting Accounts where a DOB is absent, has the FI made documented reasonable efforts to obtain it?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – no missing DOBs
4.21	Has the FI completed outstanding reasonable efforts for missing DOBs and reported to the IRD by 30 September 2026 (per Circular No. 2/2026)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> In progress
<b>4.22–4.26 – Preexisting Accounts [Circular No. 6/2026]</b>		

Ref	Question	Response
4.22	Has the FI completed electronic record searches for all Lower Value Preexisting Individual Accounts (deadline: 31 December 2017)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4.23	Has the FI completed enhanced review (electronic + paper search + relationship manager inquiry) for all High Value Preexisting Individual Accounts (deadline: 31 December 2016)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4.24	Has the FI reviewed Preexisting Entity Accounts above the USD 250,000 threshold (deadline: 31 December 2017)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4.25	Has the FI applied look-through procedures to identify Reportable Controlling Persons for Passive NFE entity accounts?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4.26	Where Preexisting Account reviews remain outstanding, has the FI reported to the IRD by 30 September 2026 (per Circular No. 6/2026)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – all reviews complete
<b>4.27–4.31 – Undocumented Accounts [Circular No. 5/2026]</b>		
4.27	Does the FI have any Undocumented Accounts (Preexisting Individual Accounts where due diligence was completed but tax residence could not be established)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.28	Before classifying an account as Undocumented, does the FI complete written outreach (two written requests over 90 days) and an electronic record search?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4.29	Has the FI applied account restrictions to all Undocumented Accounts?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4.30	Are Undocumented Accounts reported in the FI's annual CRS submission using the applicable jurisdiction code ('XX')?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4.31	Are Undocumented Accounts reviewed annually, including re-outreach to Account Holders?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<b>4.32–4.37 – Anti-Avoidance and Anti-Circumvention [Circular No. 8/2026]</b>		
4.32	Does the FI have a documented anti-avoidance and anti-circumvention policy covering all OECD-recognised circumvention schemes?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.33	Does the FI's policy expressly address: CBI/RBI misuse, nominee arrangements, account fragmentation, offshore entity structures, insurance product reclassification and late self-certification substitution?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partially
4.34	Does the FI have an escalation process for suspected circumvention accounts (senior compliance officer review before a self-certification is accepted or rejected)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.35	Has the FI reviewed its anti-avoidance policy and reported any material gaps to the IRD by 30 September 2026 (per Circular No. 8/2026)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> In progress
4.36	Does the FI have documented procedures prohibiting staff from advising Account Holders that CBI/RBI documentation alone establishes CRS tax residence?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.37	Where a circumvention arrangement has been identified, has the FI: disregarded the arrangement, reported correctly, and retained documentation?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – none identified
<b>4.38–4.42 – Records, Systems and Policies</b>		
4.38	Has the FI maintained CRS records for a minimum of six years?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Ref	Question	Response
4.39	Has the FI updated its policies and procedures to reflect the 2022 and 2025 CRS amendments (e-money, CBDC, crypto-assets, enhanced due diligence)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partially
4.40	Are the FI's IT/reporting systems capable of capturing all mandatory data fields required under the revised CRS Standard (including TIN, DOB, place of birth)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Partially
4.41	Does the FI refrain from relying solely on a FATCA GIIN as a substitute for the CRS TIN or as evidence of Financial Institution status under the CRS? [Circular No. 1/2026 and Circular No. 3/2026]	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.42	Does the FI hold and maintain access to the current OECD Commentary to the CRS (including updates) for use by compliance staff? [Circular No. 9/2026]	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>4.43–4.46 – CRS Training</b>		
4.43	Does the FI provide ongoing internal training on CRS procedures to its officers?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.44	Frequency of CRS training	<input type="checkbox"/> Monthly <input type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annually <input type="checkbox"/> Annually <input type="checkbox"/> Other
4.45	Who facilitates CRS training?	<input type="checkbox"/> FI itself <input type="checkbox"/> External provider
4.46	Date of last CRS training	
<b>SECTION 5 – REPORTING HISTORY</b>		
5.1	For which reporting period(s) has the FI submitted CRS filing(s)?	2017 <input type="checkbox"/> 2018 <input type="checkbox"/> 2019 <input type="checkbox"/> 2020 <input type="checkbox"/> 2021 <input type="checkbox"/> 2022 <input type="checkbox"/> 2023 <input type="checkbox"/> 2024 <input type="checkbox"/> 2025 <input type="checkbox"/>
5.2	For which reporting period(s) has the FI submitted Nil CRS filing(s)?	2017 <input type="checkbox"/> 2018 <input type="checkbox"/> 2019 <input type="checkbox"/> 2020 <input type="checkbox"/> 2021 <input type="checkbox"/> 2022 <input type="checkbox"/> 2023 <input type="checkbox"/> 2024 <input type="checkbox"/> 2025 <input type="checkbox"/>
5.3	Has the FI submitted any corrected CRS returns during the reporting period?	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.4	If Yes to 5.3, state the reporting year(s) corrected and the reason for correction	
<b>SECTION 6 – UNDOCUMENTED ACCOUNTS — SUMMARY DATA [Circular No. 5/2026]</b>		
6.1	Does the FI have Undocumented Accounts, including accounts associated with electronic money products, CBDCs or crypto-assets where self-certification is incomplete or unreliable, or where neither documentary evidence nor self-certification has been received?	<input type="checkbox"/> Yes <input type="checkbox"/> No
6.2	Total number of Undocumented Accounts at end of reporting period	
6.3	Total aggregate value (USD) of Undocumented Accounts at end of reporting period	
6.4	Number of Undocumented Accounts where account restrictions have been applied	
6.5	Number of Undocumented Accounts reviewed and re-classified during the reporting period	
6.6	Has the FI reported all Undocumented Accounts in its CRS submission using the applicable jurisdiction code?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<b>SECTION 7 – NON-PROFIT ORGANISATIONS (NPOs)</b>		

Ref	Question	Response
7.1	Does the FI maintain accounts for any Non-Profit Organisations (NPOs)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
7.2	Have such NPOs been reviewed against OECD criteria for genuine NPOs?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
7.3	Are eligibility records and supporting documents maintained for NPO accounts?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<b>SECTION 8 – 2026 CIRCULAR REMEDIATION STATUS</b>		
<b>All RFIs must report progress against the 30 September 2026 remediation deadlines imposed by the 2026 Circulars.</b>		
Circ. 1	TINs: Reasonable efforts completed and outcome reported to IRD	<input type="checkbox"/> Complete <input type="checkbox"/> In progress <input type="checkbox"/> Not started
Circ. 2	DOBs: Reasonable efforts completed and outcome reported to IRD	<input type="checkbox"/> Complete <input type="checkbox"/> In progress <input type="checkbox"/> Not started
Circ. 3	Self-Certifications: Procedures updated; day-two and reasonableness test applied	<input type="checkbox"/> Complete <input type="checkbox"/> In progress <input type="checkbox"/> Not started
Circ. 4	CBI/RBI: Existing account review completed and outcome reported	<input type="checkbox"/> Complete <input type="checkbox"/> In progress <input type="checkbox"/> Not started
Circ. 5	Undocumented Accounts: Verification review completed and outcome reported	<input type="checkbox"/> Complete <input type="checkbox"/> In progress <input type="checkbox"/> Not started
Circ. 6	Preexisting Accounts: Outstanding reviews completed and outcome reported	<input type="checkbox"/> Complete <input type="checkbox"/> In progress <input type="checkbox"/> Not started
Circ. 7	Excluded Accounts: Mandatory re-classification review completed and outcome reported	<input type="checkbox"/> Complete <input type="checkbox"/> In progress <input type="checkbox"/> Not started
Circ. 8	Anti-Avoidance: Policy reviewed; material gaps reported to IRD	<input type="checkbox"/> Complete <input type="checkbox"/> In progress <input type="checkbox"/> Not started
Circ. 9	OECD Commentary: Current copy held; procedures benchmarked	<input type="checkbox"/> Complete <input type="checkbox"/> In progress <input type="checkbox"/> Not started
8.10	If any remediation is still in progress or not started, please describe the steps being taken and the expected completion date	

**DECLARATION**

I hereby declare that the information given on this form is, to the best of my knowledge and belief, true and correct, and that I have the authority to disclose the information provided. I understand that a Financial Institution that refuses to, or fails to, provide information requested by the Competent Authority, without lawful or reasonable excuse; fails to file information as and when required; makes a false statement or omits information required; or fails to file in the manner required, is liable to a penalty of Ten Thousand United States Dollars (USD 10,000) for each instance of non-compliance, and a daily penalty of USD 5,000 for continued non-compliance, under the Automatic Exchange of Financial Account Information Act No. 11 of 2016 (as amended) and the Automatic Exchange of Financial Account Information Regulations No. 18 of 2017.

**Authorised Signatory**

Full Name: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date (DD/MM/YYYY): \_\_\_\_\_

**Second Authorised Signatory (if required)**

Full Name: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date (DD/MM/YYYY): \_\_\_\_\_

**Official Stamp / Seal**