



**GOVERNMENT OF ANTIGUA AND BARBUDA**

*Ministry of Finance*  
*Inland Revenue Department*  
Woods Centre, Friars Hill Road  
St. John's, Antigua, W.I.  
Telephone: 1(268)468-9475.  
Fax No: 1(268)462-3175.

**INLAND REVENUE DEPARTMENT**  
**CIRCULAR NO. 1 OF 2026**

**TO:**

All Reporting Financial Institutions (RFIs)

**DATE:**

18<sup>TH</sup> May 2026

**CIRCULAR CONTENT:**

AEOI – CRS

**SUBJECT:**

**Tax Identification Numbers (TINs) — Collection, Reporting and Monitoring Requirements**

**IMPORTANT NOTICE**

This Circular supersedes and replaces **Circular No. 1 of 2024** in its entirety. All guidance previously issued under **Circular No. 1 of 2024** is hereby withdrawn. Reporting Financial Institutions must apply the guidance in this Circular with immediate effect.

**This revision reflects recommendations made by the Global Forum on Transparency and Exchange of Information for Tax Purposes as part of its peer review of Antigua and Barbuda's AEOI/CRS framework.**

This Circular must be read together with:

- Circular No. 2 of 2026 (Date of Birth — Collection, Reporting and Monitoring Requirements);
- Circular No. 3 of 2026 (Self-Certification Requirements — Amended Guidance);
- Circular No. 6 of 2026 (Preexisting Accounts — Due Diligence Procedures);
- the Automatic Exchange of Financial Account Information Act, 2016 (as amended); and
- the Automatic Exchange of Financial Account Information Regulations, 2017 (as amended).

**1. Background and Risk Context**

This Circular is issued pursuant to the Automatic Exchange of Financial Account Information Act, 2016 (as amended) and the Automatic Exchange of Financial Account Information Regulations, 2017 (as amended) to correct material deficiencies in Circular No. 1 of 2024 and to set out the complete and authoritative position on Tax Identification Number (TIN) obligations under the Common Reporting Standard (CRS) as implemented in Antigua and Barbuda.

## 2. Legal Basis

The obligation to collect and report TINs arises under the Automatic Exchange of Financial Account Information Act, 2016 (as amended), which gives force of law to the CRS in Antigua and Barbuda. Under the CRS, RFIs must report the TIN of each Reportable Person for every Reportable Account maintained.

A TIN is the functional identifier used by the tax authority of the Account Holder's or Controlling Person's jurisdiction of residence. It may take different forms in different jurisdictions (for example: National Insurance Number, Social Security Number, fiscal code) and is not limited to identifiers issued by the Inland Revenue Department of Antigua and Barbuda.

## 3. TIN Obligations by Account Type

### 3.1 New Individual and Entity Accounts

For all New Accounts, RFIs must obtain a valid self-certification from the Account Holder at account opening. That self-certification must include the Account Holder's TIN for each jurisdiction of tax residence. Where the Account Holder is a Passive NFE, the RFI must also obtain the TINs of each Reportable Controlling Person.

An RFI may not defer TIN collection except in the strictly limited day-two circumstances set out in Circular No. 3 of 2026. Where those procedures apply, the TIN must be collected within **90 days** of account opening. Where the Account Holder's jurisdiction of tax residence does not issue TINs, the self-certification must **confirm this expressly**. A blank TIN field without explanation is not acceptable.

### 3.2 Preexisting Individual and Entity Accounts

For Preexisting Accounts identified as Reportable Accounts where the TIN is absent, the RFI must make **reasonable efforts** to obtain it. Reasonable efforts are a mandatory CRS obligation. See Section 4 of this Circular.

### 3.3 FATCA GIIN Reliance — Not Permitted

It is **not permissible** for an RFI to rely solely on a FATCA GIIN as a substitute for the TIN required under the CRS. A GIIN does not establish CRS Financial Institution status and may not be used in place of a CRS TIN. See also Circular No. 3 of 2026.

## 4. Reasonable Efforts to Obtain a TIN

Where a TIN is not available for a Reportable Account, the RFI must:

- contact the Account Holder in writing requesting the TIN for each jurisdiction of tax residence;
- search all electronically searchable records held by the RFI for a TIN captured in any other context (AML/KYC files, withholding records, customer profiles);
- review official identification documents on file to determine whether they contain or allow derivation of the TIN;
- where the Account Holder confirms no TIN has been issued, document that response as the basis for its absence; and
- document in writing the steps taken, the date of each step, the outcome, and the reason the TIN was not obtained, and retain that record in the Account Holder's CRS file.

The following do not constitute reasonable efforts: leaving the TIN field blank without inquiry; recording unavailability on a general assumption; or using a reason code without account-specific documentation.

## 5. Use of “No TIN Available” Reason Codes

The following reason codes may be used in Antigua and Barbuda where the underlying basis is documented on an account-by-account basis:

- **Reason A:** the jurisdiction of residence does not issue TINs to its residents;
- **Reason B:** the Account Holder is unable to obtain a TIN — RFIs must demonstrate the specific steps taken; and
- **Reason C:** a TIN is not required under the domestic law of Antigua and Barbuda for accounts of this type.

Reason codes may **not** be applied generically across a portfolio. Systematic use without account-level evidence constitutes a reporting deficiency and may attract penalties.

## 6. Supervisory Monitoring and Audit

The IRD monitors per-RFI TIN completion rates annually. Following each filing cycle, the IRD calculates the proportion of records with blank, reason-coded, or placeholder TIN fields, benchmarks those rates against the Global Forum average (15% missing), and formally flags outlier RFIs in the Risk Matrix and audit selection process.

During audits, the IRD verifies: whether TINs are available and, if absent, whether reasonable efforts were made; whether reason codes are applied account-by-account; and whether FATCA GIINs are being misused as CRS TIN substitutes. Non-compliance may result in:

- findings of non-compliance and corrective action requirements;
- submission of corrected CRS reports; and
- penalties under Section 10 of the Act, including USD 10,000 per failure and a daily penalty of USD 5,000 for continued non-compliance.

## 7. Internal Controls and Staff Training

RFIs must ensure that:

- account opening systems capture TIN as a mandatory field with validation controls preventing blank entries or clearly invalid formats;
- self-certification forms require explicit TIN provision per jurisdiction of tax residence or express identification of the reason it is unavailable;
- back-office validation procedures cross-reference TINs against the expected format for the relevant jurisdiction;
- staff are trained on TIN obligations and the steps constituting reasonable efforts; and
- internal CRS policies and procedures are updated to reflect this Circular with immediate effect.

## 8. Effective Date and Remediation

This Circular takes **immediate effect**. RFIs must complete outstanding reasonable efforts to obtain missing TINs and report the outcome to the IRD by **30 September 2026** using the AEOI-CRS Compliance Form. Where a TIN is obtained through remediation, corrected CRS returns must be submitted for all affected reporting periods.

**Further Information**

Questions regarding this Circular may be directed to the AEOI/EOI Unit at:

[aeoi.confidential@ab.gov.ag](mailto:aeoi.confidential@ab.gov.ag)

Further information is available on the IRD website at <https://ird.gov.ag/index.php/fatca-and-crs> and in the relevant legal framework: the Automatic Exchange of Financial Account Information Act No. 11 of 2016 and the Automatic Exchange of Financial Account Information Regulations No. 18 of 2017, together with all relevant amendments.

*Commissioner*

*Inland Revenue Department*

*May 2026*