



GOVERNMENT OF ANTIGUA AND BARBUDA

Ministry of Finance
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INLAND REVENUE DEPARTMENT

CIRCULAR NO. 2 OF 2026

TO:

All Reporting Financial Institutions (RFIs)

DATE:

18TH May 2026

CIRCULAR CONTENT:

AEOI – CRS

SUBJECT:

Date of Birth — Collection, Reporting and Monitoring Requirements

IMPORTANT NOTICE

This Circular supersedes and replaces **Circular No. 2 of 2024** in its entirety. All guidance previously issued under **Circular No. 2 of 2024** is hereby withdrawn.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. 1 of 2026 (Tax Identification Numbers — 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 Purpose

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 replace Circular No. 2 of 2024 and to set out the authoritative position on the collection and reporting of date of birth (DOB) information under the Common Reporting Standard (CRS) as implemented in Antigua and Barbuda.

2. Legal Basis and Definition

The obligation to collect and report DOB arises under the Automatic Exchange of Financial Account Information Act, 2016 (as amended) as part of the due diligence process. Under the CRS, RFI's must report the date of birth of each Reportable Person who is a natural person in respect of every Reportable Account. For Passive NFEs with Reportable Controlling Persons, the DOB of each Reportable Controlling Person must also be reported.

Date of birth means the complete date — day, month, and year — on which the Reportable Person was born. It must be reported in the format specified in the applicable CRS XML Schema (YYYY-MM-DD). A partial date, an approximate date, or a year-only entry does not satisfy the DOB reporting obligation.

3. DOB Obligations by Account Type

3.1 New Individual Accounts

For all New Individual Accounts, the DOB of the Account Holder must be collected through the self-certification obtained at account opening. The self-certification form must include a mandatory DOB field. An account may not be treated as documented where the self-certification does not include the Account Holder's DOB.

Where day-two procedures apply (see Circular No. 3 of 2026), the DOB must be collected as part of the self-certification obtained within 90 days of account opening. Strong measures must be in place to ensure this occurs within the required period.

3.2 New Entity Accounts — Controlling Persons

For New Entity Accounts where the Entity Account Holder is a Passive NFE, the DOB of each Reportable Controlling Person must be collected through the self-certification obtained from that Controlling Person at account opening (or within 90 days where day-two procedures legitimately apply).

3.3 Preexisting Individual Accounts

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

3.4 Preexisting Entity Accounts — Controlling Persons

For Preexisting Entity Accounts where a Passive NFE has Reportable Controlling Persons and the DOB of any such Controlling Person is absent, the RFI must make **reasonable efforts** to obtain it. See Section 4.

4. Reasonable Efforts to Obtain a DOB

Where a DOB is not available for a Reportable Person in a Reportable Account, the RFI must:

- contact the Account Holder (or, for Controlling Persons, the Entity Account Holder or the Controlling Person directly) in writing requesting the DOB;
- search all electronically searchable records held by the RFI for a DOB captured in any other context, including AML/KYC files, account opening documentation, or customer profile systems;
- review official identification documents held for the Account Holder or Controlling Person (passport, national ID, driver's licence) to determine whether the DOB can be extracted from those documents; and
- document in writing the steps taken, the date of each step, the outcome, and — where the DOB was not obtained — the reason, and retain that record in the Account Holder's CRS file.

The following do not constitute reasonable efforts: reporting without DOB without taking any steps to obtain it; recording DOB as unavailable on a general assumption; or leaving the DOB field blank based on the absence of the information in a single system without searching other records.

5. Reporting DOB under CRS

DOB must be reported for each Reportable Person who is a natural person in the RFI's annual CRS submission. The DOB must be reported in the format YYYY-MM-DD as specified in the CRS XML Schema. Where a DOB is reported without a TIN or vice versa, the RFI must document the reason and must have made reasonable efforts to obtain both before reporting either field as unavailable.

DOB may not be substituted by age, approximate year of birth, or any other indicator. Where DOB cannot be obtained despite reasonable efforts, the RFI must record the steps taken as evidence that the reasonable efforts obligation was met.

6. Supervisory Monitoring and Audit

The IRD monitors per-RFI DOB completion rates following each CRS filing cycle and benchmarks those rates against the Global Forum average. RFIs with systematically low DOB completion rates are flagged in the Risk Matrix and incorporated into the audit selection process.

During audits, the IRD verifies: whether DOB is present for all Reportable Persons; whether, where absent, reasonable efforts were made and documented; and whether partial or approximate DOBs have been reported. 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:

- self-certification forms include a mandatory DOB field that cannot be left blank at account opening;
- account opening systems validate that a complete DOB (day, month, year) has been provided before the self-certification is accepted;
- back-office validation procedures include a check that the DOB provided is in the correct format and is consistent with identification documents on file;
- staff are trained on DOB obligations and the steps constituting reasonable efforts for Preexisting Accounts; 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 DOBs and report the outcome to the IRD by **30 September 2026** using the AEOI-CRS Compliance Form. Where a DOB is obtained through remediation, corrected CRS returns must be submitted for all affected reporting periods.

9. Further Information

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

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*