



International Priorities & Initiatives

CRS Industry Briefing

5 March 2026
Baha Mar Convention Center
Grand Hyatt, Baha Mar



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CRS Industry Briefing

Moderated Q & A with the Attorney General

Participants:

- Senator the Hon. L. Ryan Pinder, K.C., Attorney General & Minister of Legal Affairs
- Thea Munroe, Deputy Manager, Office of the Executive Director



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COFFEE BREAK

5 March 2026
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CRS Assessment & The Bahamas' Preparedness Initiatives

Adrianna Knowles-Rahming
Senior Counsel, Legal & Regulatory Affairs Unit
Ministry of Finance



Ministry of Finance

Common Reporting Standard Update

5 March 2026

CRS UPDATES

CRS AEOI ONSITE ASSESSMENT

- Onsite visit (15–17 July 2025)
- The Bahamas' Rating: **Non-Compliant**
- **Recommendations** on The Bahamas' 2nd Round of Effectiveness Review for the OECD and Global Forum's Transparency and Exchange of Information for Tax Purposes Common Reporting Standard – Automatic Exchange of Information (“CRS – AEOI standards”)

ACTION STEPS

- Automatic Exchange of Financial Account Information (Delegation) Order, 2025
- Multilateral Memorandum of Understanding Concerning the Delegation of Functions and Powers of the Competent Authority to the Designated Supervisory Authorities for Monitoring Compliance with and Enforcement of the Automatic Exchange of Financial Account Information Act, 2016

ACTION STEPS

- Engagement of a CRS Project Coordinator
- Establishment of a CRS Steering Committee
- CRS AEOI Working Group
- Issuance of penalties for late filing

ACTION STEPS

- **CRS AEOI Administrative Penalties Framework**
- **Revised CRS AEOI Compliance Strategy**
- **Revised and updates CRS AEOI Guidance
Notes/Guidelines**

PROPOSED LEGISLATIVE AMENDMENTS

- Mandatory registration/deregistration on the AEOI portal for all Financial Institutions (Reporting Financial Institutions and Non Reporting Financial Institutions)
- Amended definition of Non-Reporting Financial Institution
- Nil reporting requirement for all Reporting Financial Institutions without CRS reportable account holders

PROPOSED LEGISLATIVE AMENDMENTS

- Establishment of a CRS Automatic Exchange of Information Steering Committee
- Limitation for Penalties

PROPOSED LEGISLATIVE AMENDMENTS

- Repeal and replacement of section 15A of the principal Act — *issuance of compliance notices by the Competent Authority as a remedial mechanism to secure compliance with the Act and the Regulations*
- Repeal and replacement of section 15B of the principal Act — *establishes a structured regime of administrative penalties*

PROPOSED LEGISLATIVE AMENDMENTS

- Align filing deadlines in law and guidance (Regulations)
- Up to date Participating and Reportable Jurisdictions Lists to include Rwanda and Uganda

CRS UPDATES

TIME FRAMES

- The Bahamas providing updates (Q2 2026);
- Updating the information (Q2 2026); and
- Preparing a consolidated report for approval (and publishing) (Q3/Q4 2026).

AMENDMENTS TO THE CRS

- **First exchanges by 30 September 2028**
- **Reporting of digital assets**

CRYPTO ASSETS REPORTING FRAMEWORK ("CARF")

- **First exchanges by 30 September 2028**
- Reporting of Crypto Assets

**COMMON REPORTING
STANDARD**

THE END

&

THANK YOU



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CRS Industry Briefing

CRS Framework in The Bahamas

Lamysha Cox
Legal Counsel, Office of Legal Counsel
Securities Commission of The Bahamas

CRS Origin

- Developed by the OECD at the request of the G20.
- Growing global concern over offshore tax evasion and financial secrecy.
- Need for a common, multilateral framework to replace fragmented bilateral information exchange.
- Released in 2014 as the international standard for Automatic Exchange of Financial Information (AEOI).
- Implemented by over 100 jurisdictions, including The Bahamas.

International Commitment



2014

- The Bahamas committed to the OECD's Common Reporting Standard as part of the global move toward enhanced tax transparency.

2017

- The Government of The Bahamas acceded to the Multilateral Convention on Mutual Administrative Assistance in Tax Matters.

Local Implementation

2016

- First step in establishing the legislative framework by enacting the Automatic Exchange of Financial Account Information Act, 2016 (AEOI Act)

- Four core components
- OECD determined that the AEOI Legislative Framework is in place and fully consistent with the requirements of the AEOI Terms of Reference.

Automatic Exchange Of Financial Account Information Act, 2016

- Primary legislation establishing the legal framework for the implementation and oversight of CRS in The Bahamas.

Automatic Exchange Of Financial Account Information Regulations, 2017

- Provides further details on reporting obligations, i.e., form, method, substance and timing of information returns.

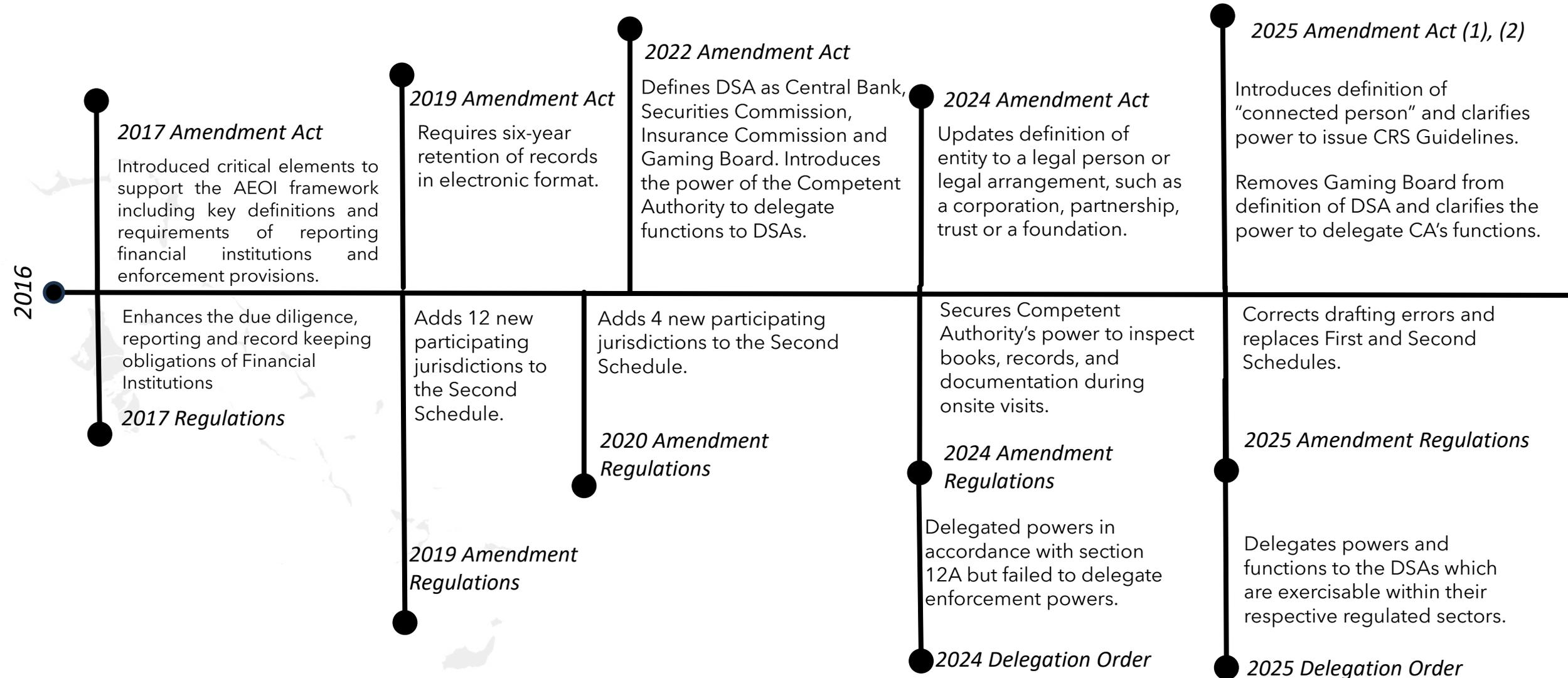
Automatic Exchange Of Financial Account Information CRS Guidelines

- Translates the legal framework into practical compliance expectations for Reporting Financial Institutions

Automatic Exchange Of Financial Account Information (Delegation) Order, 2025

- Enables effective CRS supervision by empowering domestic regulators to perform key Competent Authority functions

Evolution of AEOI Legislative Framework



Operational Framework

2025

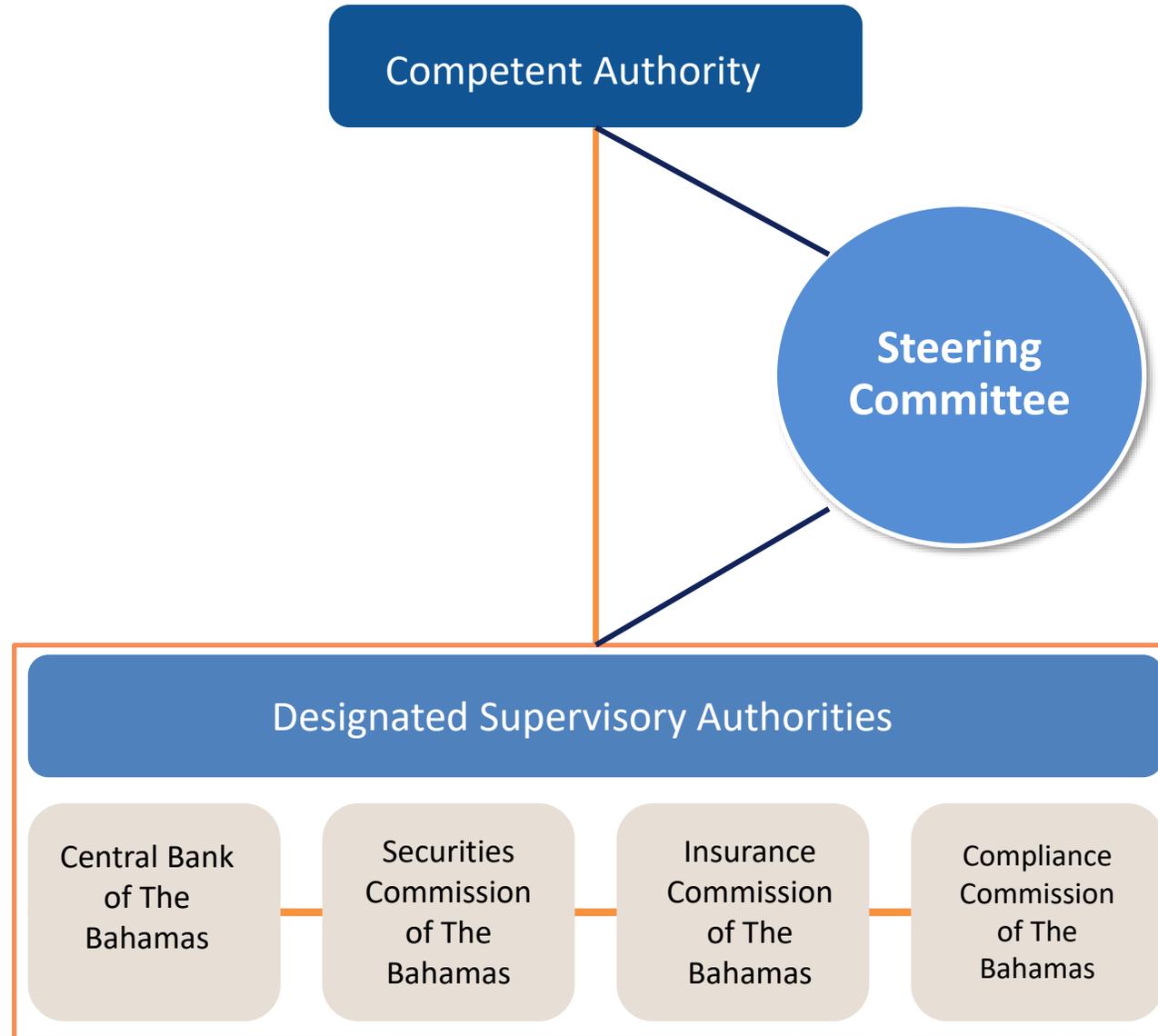
- Establishment of a Multilateral Memorandum of Understanding between the Competent Authority and Designated Supervisory Authorities

2026

- First meetings of the Steering Committee established by the MMOU

2026

- *Ongoing development of a nationalized compliance strategy based on the OECD's Model Administrative Compliance Strategy.*



Designated Supervisory Authority

Intelligence

- Gather and analyse intelligence
- Risk identification

Compliance

- Compliance monitoring
- Investigate non-compliance

Enforcement

- Issue compliance notices
- Impose sanctions for non-compliance
- enter into settlement agreements
- conduct examinations/inspections

Compliance Commission

Data Management & Analytics

- Supervision and oversight of registration and de-registration on the CRS Reporting Portal.
- Monitoring and enforcement of the filing of electronic returns by Financial Institutions.
- Management of the operations of the CRS AEOI Reporting Portal.

01

COMPETENT AUTHORITY

The Competent Authority maintains overall and ultimate responsibility for the implementation and compliance oversight of CRS.

02

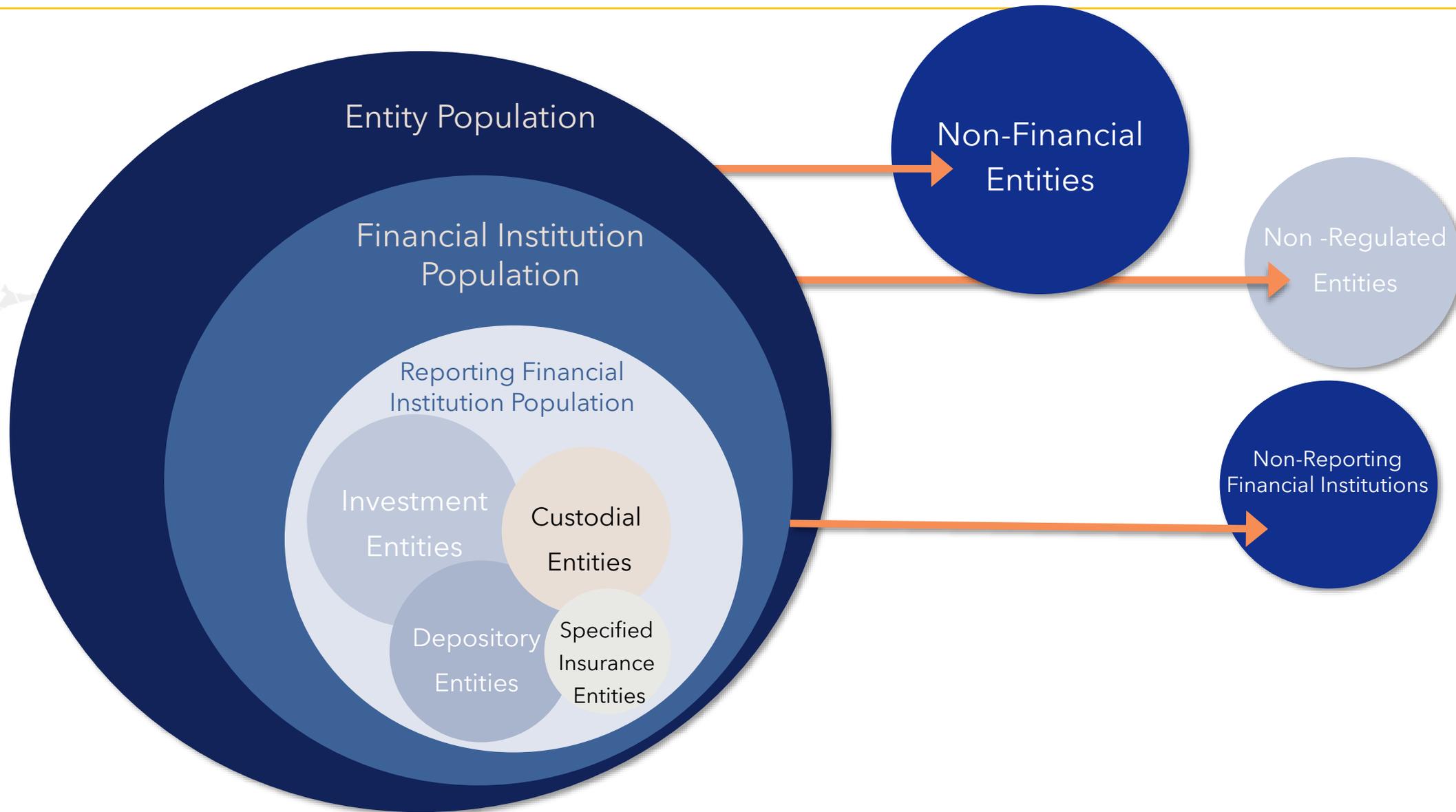
COMPLIANCE COMMISSION

Compliance Commission is responsible for the supervision, oversight, use and operational management of the AEOI Portal and data analytics.

03

ALL DSAs

Each DSA is responsible for exercising the delegated powers in respect of entities falling within its regulated sectors.



CORE OBLIGATION

The CRS requires Reporting Financial Institutions (RFIs) to identify and report financial accounts held by non-resident persons to their domestic tax authority for automatic exchange with relevant partner jurisdictions.



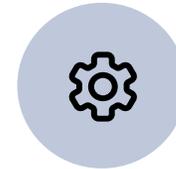
Identify

- Determine whether the entity qualifies as a Reporting Financial Institution.
- Identify reportable accounts and account holders' tax residency.



Conduct Due Diligence

- Obtain valid self-certifications.
- Review indicia of foreign tax residency.
- Classify entities and controlling persons correctly.



Report

- Submit annual CRS returns through the AEOI Portal.
- Ensure data is accurate, complete, and timely.



Maintain Records

- Keep documentation supporting classifications and due diligence.
- Be able to demonstrate compliance upon regulatory review.

Coordination and Governance

Is there clear institutional accountability and strong coordination among authorities responsible for CRS oversight?

Identification of RFI Population

Has the jurisdiction conducted a comprehensive and ongoing identification of full RFI population?

Risk Assessment

Is there a documented, data driven risk assessment that informs supervisory priorities and compliance monitoring?

Due Diligence Procedures

Are there robust due diligence procedures to accurately identify account holders, controlling persons and their tax residency?

Undocumented Accounts

Is there active monitoring of levels of undocumented accounts and following up on missing self-certifications?

Data Quality and Reporting Accuracy

Is the data exchanged complete, accurate and filed in a timely manner?

Effective Enforcement

Is the jurisdiction applying credible and proportionate enforcement actions to address CRS non-compliance?







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Overview of FI Population & Sectoral Risk Assessments

Jerryse Rolle
Manager, Risk Analytics
Securities Commission of The Bahamas

- The Bahamas introduced the Automatic Exchange of Financial Account Information Act, 2016, as amended (the “CRS Act”) and the Automatic Exchange of Financial Account Information Regulation, 2017 (“CRS Regulation”).
- With the Automatic Exchange of Financial Account Information (Competent Authority) (Delegation of Functions) Order, 2024 (“CRS Order”), the Competent Authority has delegated the responsibility of administering and ensuring compliance with the CRS Act to Designated Supervisory Authorities.
- SCB responsibilities include conduct of CRS desk-based reviews and on-site audits to verify the level of compliance with CRS obligations among entities under its supervision and entities that are managed or administered by entities under its supervision.

KEY CRS RESPONSIBILITIES**The Competent Authority**

- Administer implementation of the CRS
- Country CRS Risk Strategy
- Exchange of information

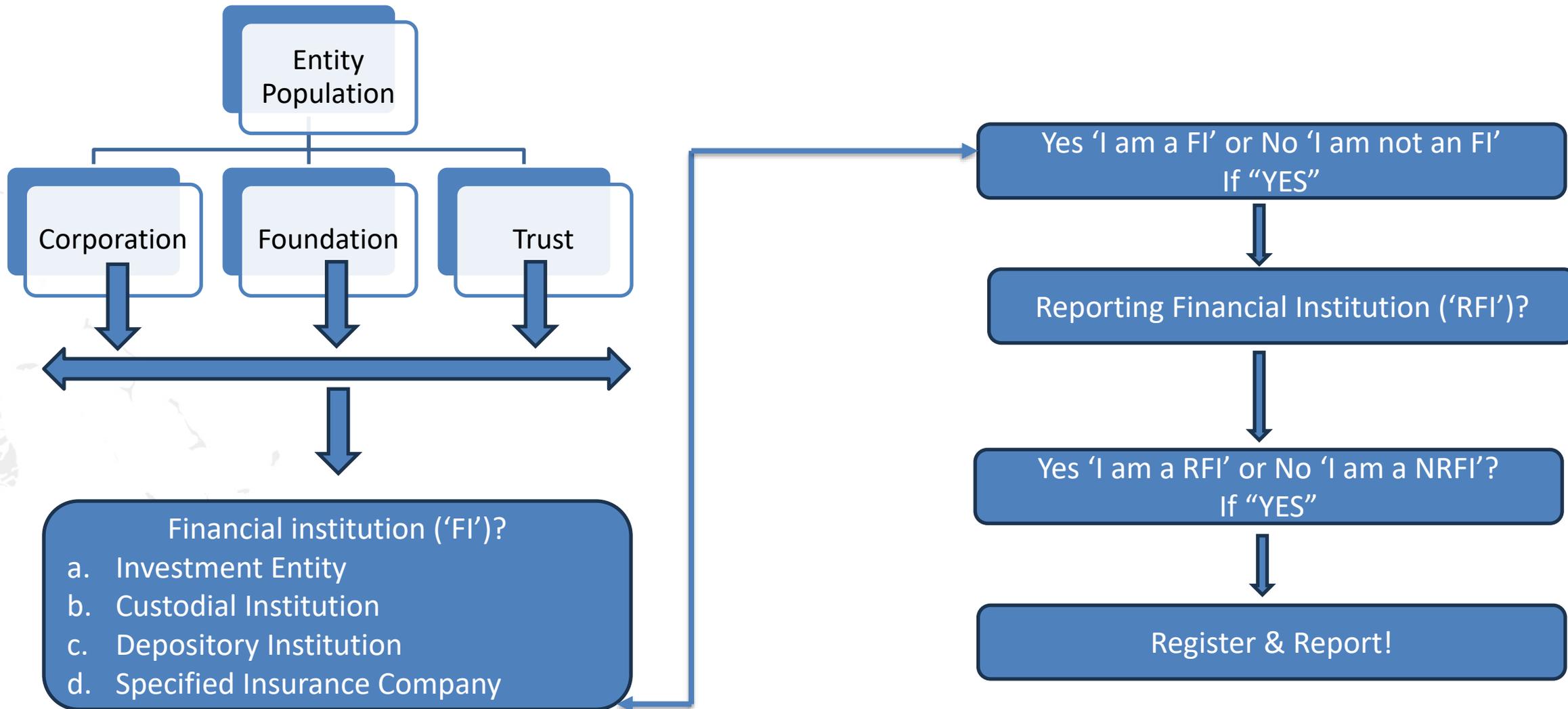
Securities Commission of The Bahamas

- Compliance & Enforcement Activities
- CRS Guidance Notes
- Training

Reporting Financial Institution

- Identification of Reportable accounts
- Due Diligence obligations
- Duty to keep records

***List is not exhaustive.**



Information Sources used to identify RFIs

CRS AEOI Portal

- Maintenance of Accurate Registration
- Review listing of CRS Reports submitted

On-Site & Desk Based Audits

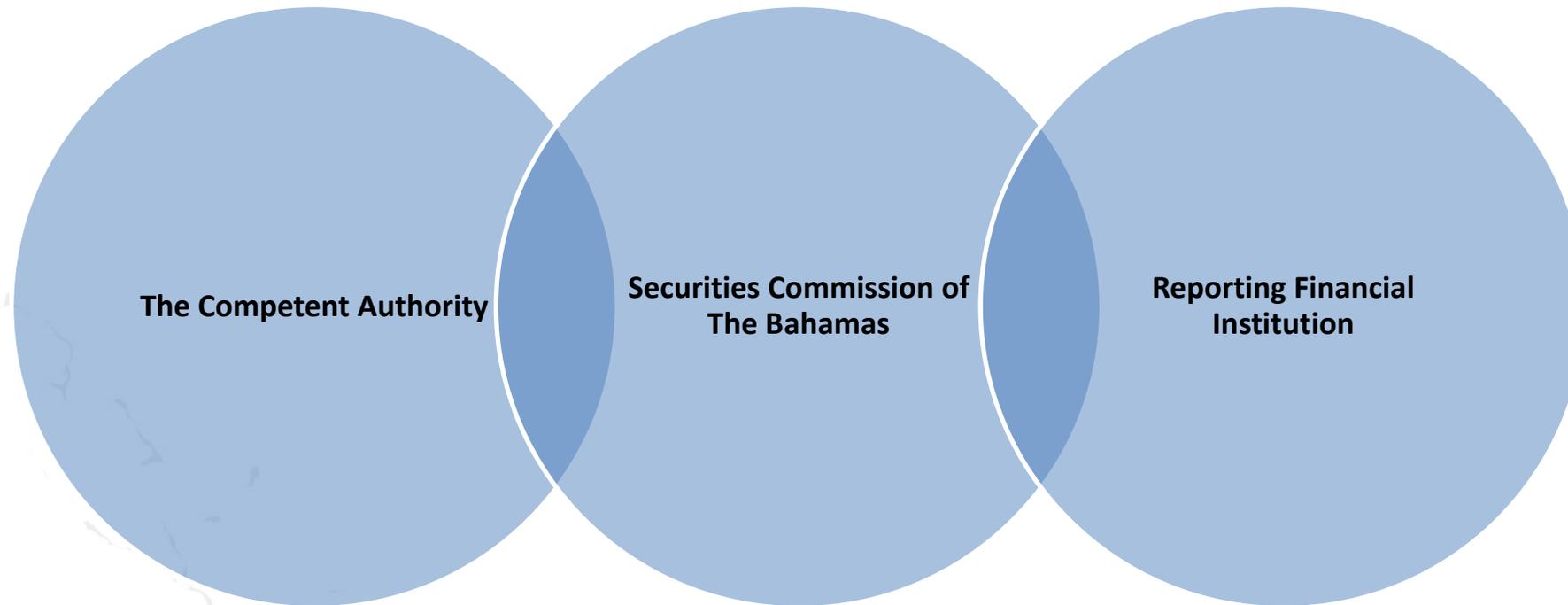
- Review of CRS Entity Classifications
- Identification of Non-/late-filers
- Inaccurate account information

General Knowledge of The Bahamas Financial Services Industry

- Entities within the SCB Industry

***List is not exhaustive**

CRS Risk Management Process



Risk-Based Approach



Benefits of a Risk-Based Approach

- Structured method for Compliance Activities
- Efficiency & Effectiveness at the Regulatory Level
- Focused treatment of compliance risks. No “one-size-fits-all” approach.

CRS Risk Assessment Methodology

- OECD Risk Based Guidance
- Risk Assessments support The Bahamas in ensuring effective implementation of the AEOI standard across the financial services industry
- No “one-size-fits-all” approach
- Risk Assessment tools include Risk Matrix and method for Risk Ratings

Risk Matrix

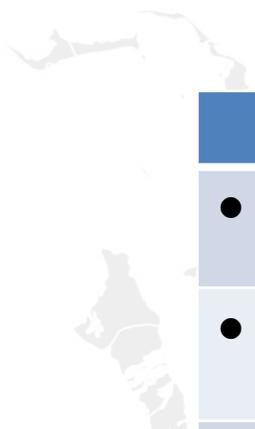
- Based on the priority of jurisdiction specific CRS risks that will impact Reporting Financial Institutions.

Risk Ratings

- Based on the Risk Ratings assigned, this will support the compliance and/ enforcement actions.

CRS Specific Risks

- As CRS risk evolves, The Bahamas continues to pay attention to new or emerging risks within the sector.
- The OECD recently provided an update to identified risks within the CRS sector.



	Risk Name	Risk Level
●	Misuse of schemes of citizenship and/or residency by investment for avoidance purposes	HIGH
●	Absence of TIN or Functional Equivalent numbers (New accounts)	
●	Inaccurate/incorrect residency information reported and exchanged	
●	Quality of beneficial ownership (BO) information in register inaccurate/ Unreliable BO information in register.	
●	Insufficient IT infrastructure in RFI	

Types of Assessments

1. Self-Risk Assessment
2. Sectoral CRS Assessment
3. Other Related CRS Assessments



Self-Risk Assessment

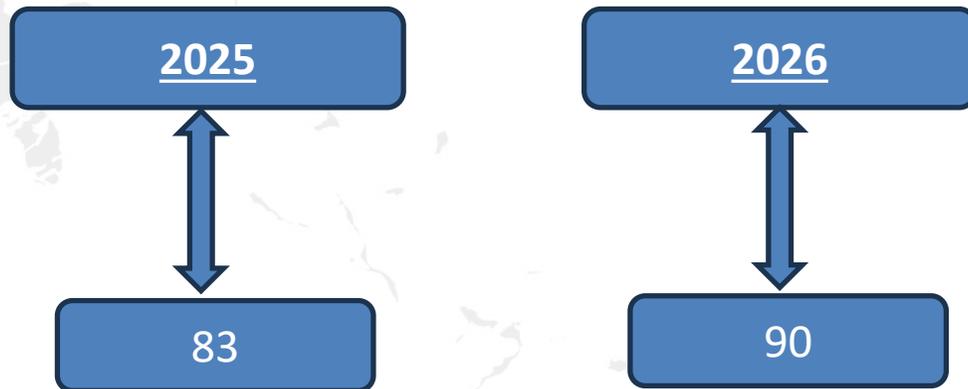
- SCB conducted last in June 2025
- Assessment focused on the areas below:
 - Risk Management framework that included CRS Compliance
 - CRS Policies & Procedures
 - Robust IT Systems for CRS Compliance
 - Undocumented Accounts

Sectoral Risk Assessment

- Data from Compliance and Enforcement activities
 - General CRS risk outcomes
 - Undocumented Accounts
 - Late filing in the portal
 - Penalties assessed against SCB Registrants and Licensees
- Data from AEOI Portal
- Data from Self-Risk Assessment & other relevant CRS Assessments

CRS Examination Priorities

1. Examine the applicable registrant and licensee compliance with the CRS Act.
2. Detail findings (if any) from the CRS compliance examination performed by the Commission.
3. Increase number of CRS thematic examinations 2026



CRS Examinations Breakdown-2025				
FCSPA	IFA	SIA	Investment Funds	TOTAL
21	13	32	17	83

No. of CRS
Breaches - 2025



14

Penalties Imposed for
Non-Compliance!!

Common Breaches Identified

- Self-Certification Forms
- Late filing in the portal
- Failure to identify reportable accounts
- Failure to meet CRS Due Diligence Requirements



- Late Filings in the CRS Portal
- Breaches identified during on-site & Desk based reviews
 - Lack of response to information requests (i. e. surveys)

Next Steps

- Risk Surveys
- On-going Assessments of the Capital Markets Industry.
 - CRS Risk Assessments
 - AML/CFT/CPF Assessments
 - General Risk Assessments
- Assessment of Penalties for Licensees and Registrants of The Commission.
- On-going support –2026 OECD CRS Review





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2026 Preparedness Initiatives & Industry Readiness

Christina Rolle
Executive Director
Securities Commission of The Bahamas

Global Forum Peer Review on Automatic Exchange of Financial Account Information (AEOI)
Overall determination on the legal framework: In Place But Needs Improvement

Review of the AEOI Legal frameworks			Initial Review of effectiveness in practice of AEOI		
CR1 Domestic Legal Framework	CR2 International Legal Framework	Overall Determination	CR 1 (Domestic information collection and reporting)	CR2 (International information exchange)	Overall rating
In Place But Needs Improvement	In Place	In Place But Needs Improvement	Non-Compliant	On Track	Non-Compliant

Source: Peer Review of the Automatic Exchange of Account Information 2024 Update, OECD

2016

Automatic Exchange of Financial Account Information Act (CRS Act) Enacted

2018

CRS Guidance Notes Issued

2020 - 2021

Global Forum Conducts Initial Peer Review of The Bahamas

2024

Amendments to the CRS Act and Regulations.

Automatic Exchange of Financial Account Information (Competent Authority) (Delegation of Functions) Order, 2024 Issued

2017

Automatic Exchange of Financial Account Information Regulations Enacted

2018

Data Exchange under CRS commences: Bahamas transmits to 36 "Partners"

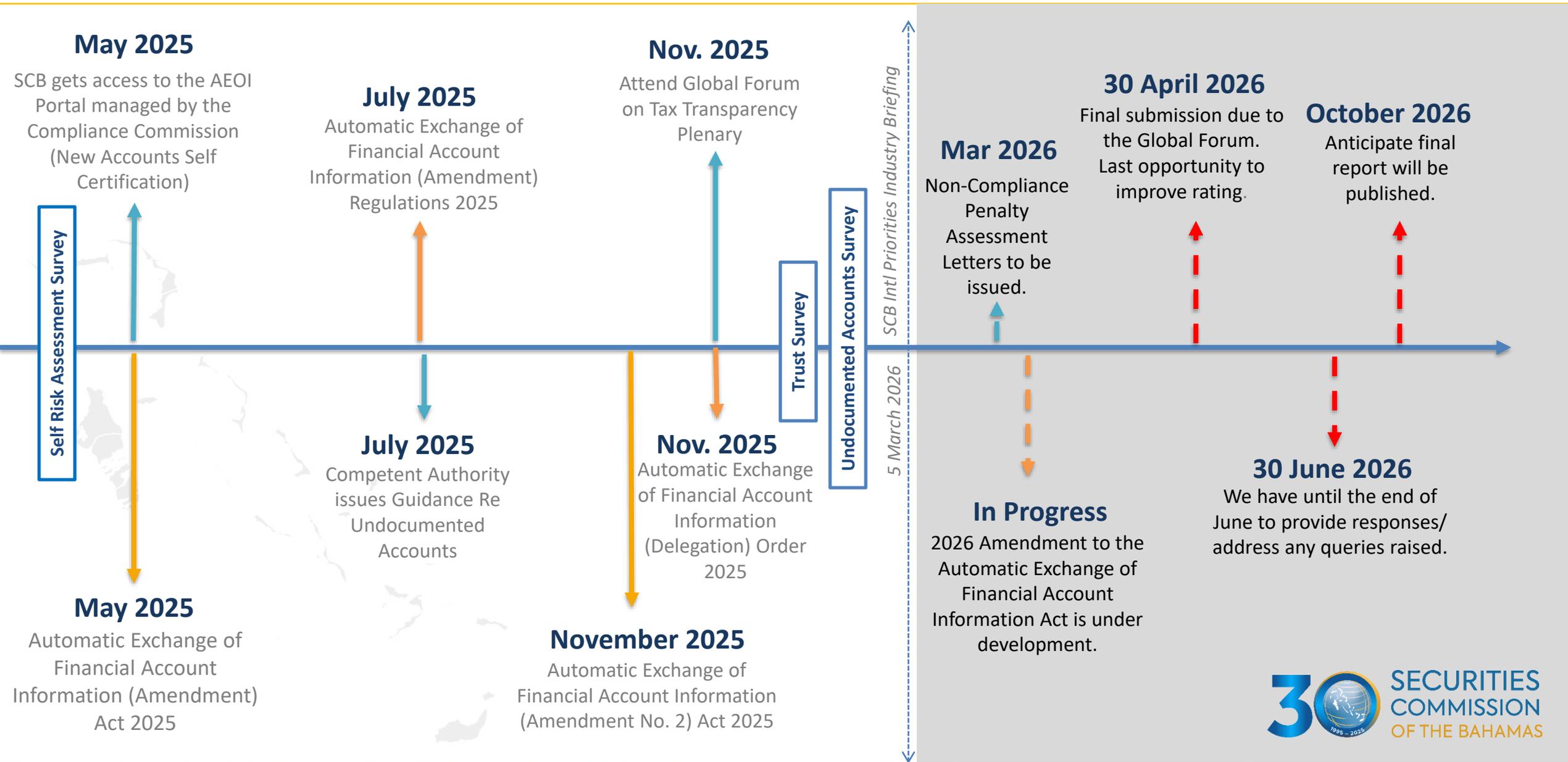
2024

Global Forum AEOI 2024 Update The Bahamas:
CR1 In Place but Needs Improvement
CR2 Non-Compliant

2024

Initial CRS Risk Assessment Survey Sent to Registrants and Licensees 1 October

27 March 2025 SCB Int'l Priorities Industry Briefing



Automatic Exchange of Financial Account Information Act, 2016

*(Amended 2017,
2019, 2022, 2024
and 2025)*

Automatic Exchange of Financial Account Information Regulations, 2017

*(Amended 2019,
2020, 2024, 2025)*

Automatic Exchange of Financial Account Information (Delegation) Order, 2025

Guidance Notes: Common Reporting Standard for Automatic Exchange of Financial Account Information in Tax Matters

*(3 August 2018, last
updated 21 June 2024 by
the Competent Authority)*

Guidance: Automatic Exchange of Financial Account Information Undocumented Accounts

*(Issued 11 July 2025
by the Competent
Authority)*

Automatic Exchange of Financial Account Information (**Amendment No. 2**) Act, 2025

Examinations Department



Supervision Department



Enforcement Department



CRS/AML focused
Examinations
Target: 50 before
30 June.

Additional 50
examinations before
end of 2026.

CRS Sector Risk
Assessments by Risk &
Analytics Department.



Desk based thematic
reviews of
approximately 30
percent of
licensed/registered
entities **not** subject to
examinations.



Penalty letters to be
issued for
non-compliance.

Penalties for CRS
non-compliance and
other AEOI breaches
for **2024 and 2025** will
be issued by end of
March 2026.

RFI CRS Self-Risk Assessment, Issued in Q2,2025

CRS policies and procedures
Risk management Framework
Due diligence requirements
CRS reporting (i.e. filing of accurate CRS data)

*Penalties will be assessed
for non-compliance with
surveys issued or failure to
provide requested
information!*

CRS Undocumented Accounts Survey, Issued Q4, 2025

Maintenance of “undocumented accounts” for CRS purposes by RFI’s
Where applicable: Custody of “undocumented accounts”; details regarding the number of accounts.

CRS Trust Survey, Issued Q4,2025

Provision of corporate services to trust companies.
Where applicable: the licensee/registrant was required to detail the services provided (i.e., acting as a trustee to a Purpose Trust)

Status: All surveys completed. Data informed Country and SCB CRS risk assessment.



The Automatic Exchange of Financial Account Information Act provides for the development of a specific ladder of penalties



SECURITIES COMMISSION
OF THE BAHAMAS

Penalty framework under development:

Scope

Framework

Sanctions

Penalties for CRS will be assessed for non-compliance with surveys issued or failure to provide requested information!

Any CRS breach/non-compliance can be sanctioned by the Designated Supervisory Authority.

Automatic penalties for statutory breaches. Regular breaches may be addressed through a *Notice to Comply* or direct penalties after investigation.

Ability to fine up to \$300,000. Ladder will detail the fines that apply for each category.



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Thank you!

Q&A Session



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