



Belize Tax Service Department

Guidance Note on the Common Reporting Standard for the Automatic Exchange of Information in Tax Matters

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1. Abbreviations

AEOI	Automatic Exchange of Information
BCAA	Bilateral Competent Authority Agreement
BIAC	Business and Industry Advisory Committee to the OECD
CA	Competent Authority
CRS	Common Reporting Standard
DCA	Designated Competent Authority
FATF	Financial Action Task Force
FATCA	Foreign Account Tax Compliance Act
FI	Financial Institution
FSC	Financial Services Commission
GINN	Global Intermediary Identification Number
MAATMA	Mutual Administrative Assistance in Tax Matters Act
MCAA	Multilateral Competent Authority Agreement
OECD	Organization for Economic Co-operation and Development
RFI	Reporting Financial Institution
SI	Statutory Instrument

2. Overview

This Guidance Note is issued to assist Reporting Financial Institutions in understanding their obligations, to increase compliance, educate, enhance efficiency, and reduce errors in reporting. The OECD has developed extensive and comprehensive materials for the consistent application and interpretation of the CRS by all jurisdictions. This Guidance Note is specific to Belize and is not intended to replace the CRS Standards and implementation guidelines as referenced to below. Financial Institutions may seek additional professional advice as it relates to CRS. Future amendments to the legislation may be included in this note periodically.

3. CRS Background

The Common Reporting Standard (CRS) was developed by the Organization for Economic Co-operation and Development (OECD) in response to the globalization of the financial sector, and the ability for individuals and entities to hold money and assets outside of their jurisdiction of tax residence. While there are a majority who comply with their tax obligations, there remain a few who choose to use financial structures to evade tax.

The CRS is the result of the drive by the G20 nations to develop a global standard for the automatic exchange of financial account information. Developed by the OECD, the CRS aims to maximize tax compliance and tax transparency and reduce tax evasion and tax avoidance.

In October 2015 Belize, signed a Multilateral Competent Authority Agreement (MCAA) to begin exchanging information using the CRS framework from 2017. Since then, more jurisdictions have either signed the MCAA, or made a commitment to automatically exchange, resulting in over 100 jurisdictions which have indicated that they will exchange information on financial accounts. Under the CRS, the Competent Authority is under a duty to obtain specified financial account information from their Financial Institutions and automatically forward that information to exchange partners annually.

4. CRS Implementation in Belize

The CRS was implemented in Belize through the Mutual Administrative Assistance in Tax Matters Act, 2017 (Act 18 of 2017), which authorized the automatic exchange of financial information for CRS purposes. The Act came into force on the 1st of January 2017. This Act has since received several amendments and is now referred to as the [Mutual Administrative Assistance in Tax Matters Act, Revised Edition of 2020](#) (the Act).

The regulations can be found in the [Mutual Administrative Assistance in Tax Matters \(Automatic Exchange of Financial Account Information\) Regulations](#) (the Regulations).

5. The Belize Competent Authority

Pursuant to Section 2 of the Act, the Belize Competent Authority is the Financial Secretary (FinSec). The delegated functions of the FinSec are separated into two categories, AEOI and EOIR, these functions are carried out by the Director General of the Belize Tax Service assigned to the AEOI and the Director General of the Financial Services Commission assigned to the EOIR. This Guidance deals specifically with matters concerning AEOI, therefore, the Director General of the Belize Tax Service will be referred to in this Guidance as the ‘Designated Competent Authority’.

The Designated Competent Authority (DCA) is responsible for ensuring that Financial Institutions comply with their obligations under the legislation.

Financial Institutions will report the information required under the CRS to the DCA which will in turn exchange information with partner jurisdictions that have satisfied the requisite confidentiality and data safeguards standards and have the appropriate legal instruments and legislative frameworks in place.

6. Confidentiality and Data Safeguards

All information exchanged is subject to the confidentiality rules and other safeguards provided for in the Convention, including the provisions limiting the use of the information exchanged and, to the extent needed to ensure the necessary level of protection of personal data, in accordance with

the safeguards which may be specified by the supplying Competent Authority as required under its domestic law and listed in Annex C.

7. Reporting to the Designated Competent Authority/Register on AEOI Portal

Reporting and other notifications must be done through the Belize AEOI portal available at <https://aeoiportal.bts.gov.bz/>.

8. Duty to Notify the Competent Authority

In accordance with Section 14 of the Act, Belize Reporting Financial Institutions having reporting obligations are required to notify the DCA no later than 30th April in the first calendar year in which the reporting FI is required to comply with reporting obligations.

This notification is fulfilled by way of enrollment to the CRS portal.

Information required for reporting financial institutions to enrol to the portal is as follows:

Financial Institution Particulars	Primary User Particulars
• Financial institution name • Institution type • GIIN (where applicable) • Tax Identification Number (where applicable) • Registered office address • Email address (where applicable)	• Name • Email address • Telephone number • Digital copy of passport or Social Security card (.jpeg/.pdf only) • Digital copy of authorization letter from company director or high-level manager (.jpeg/.pdf only)

9. Register for AEOI

- Visit <https://aeoiportal.bts.gov.bz/> to enroll.
- Follow the instructions on the home page.
- Complete the Financial Institution and Primary User Enrolment Form and submit for approval.

- An email will be sent upon approval/rejection.
- If application is approved, instructions will be provided to create the account.
- If application is rejected, the reason(s) for rejection will be provided in an email and resubmission should be done.

10. De-registration

A Reporting Financial Institution requesting de-registration for reasons including dissolution, change in domicile or no longer falls under the definition of Reportable Financial Institution, must submit a letter to the Designated Competent Authority stating the reason for de-registration.

Documentary evidence must be provided to support such reason. Relevant identification must be attached to such request from high level management. The request will be reviewed to determine if such Financial Institution is up to date with its CRS reporting obligations. A notification will be sent advising of the approval of the de-registration.

11. Reportable Accounts

Reportable account means an account held by one or more Reportable Persons or by a Passive NFE with one or more Controlling Persons that is a Reportable Person, provided it has been identified as such pursuant to the due diligence procedures described in Sections II through VII of the Standard.

12. Reportable Person

A reportable person is a person who may be required to pay taxes in the one of the 72 jurisdictions¹ with which Belize has a Competent Authority Agreement.

13. Passive NFE

A passive NFE is not an active NFE.

¹ A listing of the 72 jurisdictions can be found on the Belize Tax Service website at <https://bts.gov.bz/belize-exchange-partners/>.

14. Active NFE²

An Active NFE earns a significant portion of its income from manufacturing, sales, providing services, or anything else that can be considered ‘active business operations’. Active NFEs get more than 50% of their gross income from active trade or business or have more than 50% of their assets in operational business activities that generate income.

15. Preexisting Individual Account

Preexisting accounts are accounts held by an RFI as of 31 December 2016. RFIs must carry out enhanced review within the calendar year following the year which the account becomes a high value account³.

If based on this review such account is identified as a reportable account, the RFI must report the required information about such account with respect to the year it is identified as a reportable account unless the account holder ceases to be a reportable person.

16. Undocumented Accounts

For preexisting individual account, the RFI must apply an electronic or paper search to establish the residence for tax purposes. If these searches fail, then a self-certification is required. If all efforts fail, the RFI must report the account as an undocumented account and report the jurisdiction as Belize.

17. Reporting

Section 11 of the Act provides that reporting FIs must file reports on or before the 31st of March following the calendar year the report relates. A reporting financial institution shall, in respect of the first reporting year (2017)⁴ and each subsequent calendar year, collect and make an information return setting out the information required to be reported under the Standard.

² More information on Active NFE can be found in Subsection D (9) of Section VIII of the Common Reporting Standard.

³ A high value account is a preexisting individual account with an aggregate balance or value that exceeds USD \$1,000,000 as of 31 December 2016 or 31 December of any subsequent year.

⁴ Provided that it is within the six (6) years. E.g. If an FI registers for CRS in 2025, then the FI would be required to report on all reportable accounts held from 2019 onward.

18. Financial Institution

A financial institution means a custodial institution, a depository institution, an investment entity or a specified insurance company as is described in the Standard.

19. Custodial Institution

Custodial Institutions are entities that hold, as a substantial portion of their business ($\geq 20\%$), financial assets (e.g., securities or cash) for the account of others. This includes entities like banks, broker-dealers, and other financial institutions that take custody of or hold financial assets for clients.

20. Depository Institution

Depository entities are entities that accept deposits in the ordinary course of a banking or similar business. For example, savings banks, commercial banks and credit unions. An entity is not considered to be engaged in a banking or similar business if it solely accepts deposits from persons as collateral or security in connection with the sale or lease of property, or pursuant to a similar financing arrangement between the entity and the person holding the deposit.

21. Investment Entity

An investment entity is an entity that primarily conducts one or more of the following activities or operations for or on behalf of a customer:

- Trading in money market instruments (e.g., cheques, bills, certificates of deposit, derivatives), foreign exchange, exchange, interest rate, and index instruments, transferable securities, or commodity futures trading;
- Individual and collective portfolio management; or
- Otherwise investing, administering, or managing financial assets or money on behalf of other persons; or the gross income of which is primarily attributable to investing, reinvesting, or trading in financial assets, provided the entity is managed by another entity that is a Depository Institution, Custodial Institution, Specified Insurance Company, or Investment Entity described in subparagraph A(6)(a).

Examples of Investment Entities include trading securities, hedge funds, private equity firms, and mutual funds.

22. Specified Insurance Company

Specified Insurance Companies are entities engaged in issuing or holding insurance contracts, such as life insurance or annuity products. Most life insurance companies are generally considered Specified Insurance Companies. However, most holding companies of insurance companies and insurance brokers are not considered Specified Insurance Companies.

Information required to be reported in accordance with CRS as follows:

Account	Information to be Reported
Each Reportable Person either holds a reportable account or is a Controlling Person of a reportable account.	▪ Name ▪ Address ▪ Jurisdiction of tax residence ▪ Tax Identification Number (TIN) ▪ Date of Birth ▪ Account number or functional equivalent ▪ Account balance or value
Custodial Accounts	▪ Total gross amount of interest ▪ Total gross amount of dividends ▪ Total gross amount of other income paid or credited to the account. ▪ Total gross proceeds from the sale or redemption of financial assets paid or credited to the account.
Depository Account	Total amount of gross interest paid or credited to the account within the calendar year.
Other Accounts	Total amount of gross interest paid or credited to the account, including the aggregate amount of redemption payments made to the Account Holder within the calendar year.

23. Obligations of Financial Institutions

Financial Institutions are required to:

- Identify account holders and reportable persons.
- Collect and verify accurate and complete data from account holders.
- Validate the information provided to ensure its correctness.
- Submit accurate and comprehensive reports to the Belize Tax Service Department.
- Retain records detailing the methods and processes used to collect the data.

24. Common Reporting Errors

Common reporting error issues include:

- Incomplete or Incorrect Account Holder Information
 - Missing or outdated details, such as Tax Identification Numbers (TINs), dates of birth, or contact information, can lead to compliance issues.
- Errors in Data Formatting
 - Issues like XML schema errors, invalid characters, or incorrect date formats can cause data submission failures or misinterpretation.
- Misinterpretation of Excluded Accounts
 - Financial institutions may mistakenly report accounts that should be excluded, such as dormant accounts, leading to unnecessary or incorrect reporting.

25. Dormant Account

An account is considered dormant if:

- the account holder has not initiated any transaction related to the account or any other account held with the Reporting Financial Institution in the past three years;
- the account holder has not communicated with the Reporting Financial Institution regarding the account or any other account held with the institution in the past six years;
- the account is classified as dormant under the institution's standard operating procedures;
- for a cash value insurance contract, the reporting financial institution has not communicated with the account holder regarding the account or any other account held by the account holder in the past six years.

26. Non-Reporting Financial Institutions

Pursuant to Section VIII subparagraph B of the Standard, FIs who have no reporting obligation under AEOI includes:

Non-reporting FIs
▪ Government Entities
▪ International Organizations
▪ Entity that presents low risk of being used to evade tax
▪ Narrow Participating Retirement Fund
▪ Exempt Collective Investment Vehicle
▪ Central Banks

▪ A Documented Trust to the extent that the trustee of the trust is an RFI and reports all information required to be reported pursuant to the Standard with respect to all Reportable Accounts of the trust.
▪ Broad Participating Retirement Fund
▪ Pension fund of a Government/International Organization/Central Bank
▪ Qualified credit card issuer

27. Wider Approach

Belize has opted to a wider approach to CRS under which FIs are required to collect and retain required information on all accounts held or controlled by all non-residents.

Information obtained from non-residents is not reportable until Belize has established an exchange relationship with such jurisdiction.

28. Closed Accounts

Where an account held or controlled by one or more reportable person is closed during a reporting period, the reporting FI shall report the account. The reporting FI shall report the name, address, account number and other details, but not disbursements made within the reporting period nor account balance at time of closing.

29. CRS Key Dates

The following are the effective dates for the implementation of the CRS in Belize:

1. Pre-existing Accounts to be subjected to due diligence procedures are those in existence as of 31 December 2016.
2. New Accounts requiring self-certification by the account holder or controlling person are those opened on or after 1 January 2017.
3. The review of Pre-existing High Value Individual Accounts as of 31 December 2016 must be completed by 31 December 2017.
4. The first CRS reporting period ends on 31 December 2017 (i.e. calendar year 2017).
5. CRS reporting due date for FIs is 31 March.
6. Due date for notification from reporting FIs (by way of enrolment) is 30 April.

7. First exchange of information by Belize to exchange partner jurisdictions was 30 September 2017.
8. Exchange date for transmission of reports to exchange partner jurisdictions is 30 September.

30. Participating Jurisdictions

A participating jurisdiction is a jurisdiction that has agreed and met the requirements to exchange CRS information.

A complete list of participating jurisdictions is available at

<https://www.oecd.org/content/dam/oecd/en/topics/policy-issues/tax-transparency-and-international-co-operation/crs-mcaa-signatories.pdf>

31. Reportable Jurisdictions

Belize has entered bilateral exchange relationships agreement with other jurisdictions by way of a notification to the of the OECD's Coordinating Body Secretariat.

The OECD publishes a complete lists of exchange relationships available at:

<http://www.oecd.org/tax/automatic-exchange/international-framework-for-the-crs/exchange-relationships/>

32. Self-Certification

The Business and Industry Advisory Committee (BIAC) to the OECD has drafted the following self-certification forms to assist with the implementation of the CRS. The form⁵ serves as an illustration of how financial institutions may request customer information however, the use of this particular form is not regarded as mandatory.

A Financial Institution is not required to provide customers with tax advice or to perform a legal analysis to determine the reasonableness of self-certification. Instead, as provided in the Standard, for New Accounts the Financial Institution may rely on self-certification made by the customer unless it knows or has reason to know that the self-certification is incorrect or unreliable (reasonableness test) per The Standard Section IV A and its associated commentary.

⁵ All the information present in the form must be captured for the purpose of self-certification.

33. Valid Self-Certification

In addition to the self-certification form, Financial Institutions are now required to collect supporting documentation to verify the information provided by the individual or entity. The required documentation may include:

- Government-issued IDs to confirm the name and date of birth.
- Passport to validate the place of birth.
- Proof of address (e.g., utility bill, bank statement).
- Tax Identification Number (TIN) documentation.
- Legal status documents (e.g., residency permit, visa, or business registration certificates).

For entities:

- Shareholder register.
- Ownership structure.
- Proof of business activities (e.g., contracts, licenses).
- Financial documents (e.g., bank statements, financial statements, or tax returns) to verify financial status and source of funds.
- Signature verification (e.g., signature sample or document requiring the individual/entity's signature).
- Enhanced due diligence documentation for high-risk individuals/entities (e.g., source of wealth verification or background checks).
- Nationality/residency verification (e.g., national ID card or government-issued residency documentation).
- This documentation ensures compliance with regulatory requirements and helps accurately validate the information provided.

34. Due diligence - Section II – VII

The due diligence procedure is to identify a reportable account, which is an account held by one or more reportable persons or by a passive non-financial entity with one or more controlling person.

35. Excluded Accounts

Pursuant to Schedule 1 of the Regulations; for the purpose of the CRS the following are excluded accounts:

Certain Retirement Accounts or Products	Certain tax-favored Accounts or Products
Pension schemes under the Pensions Act or Social Security Act	A dormant account (other than an annuity contract) with a balance that does not exceed US\$1,000.

36. Nil Returns

RFIs who hold no reportable accounts within a calendar year are required to file nil reports. Nil reports are completed by creating and submitting a filing summary on the AEOI portal.

37. Use of Service Providers

The Act allows for the appointment of third-party agents or service providers by reporting FIs to fulfil due diligence and reporting obligations.

The Reporting FI shall ensure that it continues to have access to and is able to produce to the competent authority records and documentary evidence used to identify and report on reportable accounts. Further, the Reporting FI is responsible for any failure on the part of its agent or service provider.

38. Currency Translations

When a financial institution needs to check the balance or value of an account that is in a currency other than US dollars (USD), they first convert the threshold limits into the account's currency. This means they change the USD threshold amount into the currency of the account.

39. AML/KYC Procedures

The customer due diligence procedures of a Reporting Financial Institution pursuant to the anti-money laundering or similar requirements to which such Reporting Financial Institution is subject. The AML/KYC procedures may be used to determine:

- (a) High value account
- (b) New individual account
- (c) To determine whether the information indicates that the Account Holder is resident in a Reportable Jurisdiction.
- (d) Determine controlling person of an Account holder
- (e) Confirms the reasonableness of self-certification.
- (f) Pre-existing accounts

40. Due Diligence Modifications

Under section 4 of the CRS Regulations, Belize Financial Institutions may choose to apply modified due diligence rules.

This includes:

- a. the due diligence procedures for new accounts to preexisting accounts;
- b. the due diligence procedures for high value accounts to low value accounts;
- c. the residence address test, as described in subparagraph B (1) of Section III of the Standard, to a lower value account; or
- d. paragraphs A to C of Section V of the Standard to determine whether a preexisting entity account is subject to the due diligence procedures described in Section V of the Standard.

41. Guidance on Enhanced Due Diligence

The CRS Standards provides guidance as to the required due diligence; however, an FI can perform enhanced due diligence as guided below.

CRS Issues	Reference
Allowing due diligence procedures for New Accounts to be used for Pre-existing Accounts	New Individual Commentary on Section IV New Entity Commentary on section VI
Allowing the due diligence procedures for High-Value Accounts to be used for Low Value Accounts	Commentary on Paragraph C of Section III - Paragraphs 33 – 52
Residence address test for Lower Value Accounts	Commentary on Subparagraph B(1) of Section III - Paragraphs 7 to 19
Threshold of \$250,000 for Pre-existing Entity Accounts	Commentary on Paragraph B and C of Section V - Paragraphs 5 – 7
Controlling Persons of a trust	Commentary on Section VIII - Paragraphs 134 to 136
Active NFE status and treatment of passive income	Commentary on Section VIII - Paragraphs 121 to 131

42. Administrative Penalties

Failure to Retain Information

Every Reporting Financial Institution who fails to retain for the statutory period the information obtained in accordance with the Act or the regulations made thereunder or the record of the steps taken to comply with this Act or the regulations in respect of a financial account is liable to a penalty of \$10,000 for each such failure.

Exception: The Reporting Financial Institution should establish that it made a reasonable effort to retain the information or record for the statutory period.

Failure to File

Cap 103:03 of The Mutual Administrative Assistance in Tax Matters Act and Subsidiary Laws Section 8 Act 14/2022 (Amendment) Sec4(1) gives the Competent Authority the power to apply sanctions for failure to report and failure to report on time.

Every Reporting Financial Institution who fails to file an information return in the time and manner required under this Act or the regulations made thereunder is liable to a penalty of \$10,000 for each such failure.

Failure to Conduct Due Diligence

Section 2 gives the power to apply sanctions for incomplete or incorrect reports and for incomplete due diligence procedure.

Section 4 gives the Competent Authority the power to apply sanctions for no self- certification(s) for New Account.

Every reporting financial institution who fails to conduct the due diligence procedures required under this Act or the regulations made thereunder is liable to a penalty of \$10,000 for each such failure.

Administrative Penalty for Account Holders

Every person who knowingly and willfully makes a false statement or omission in respect of any material particular or consequential information required to be included on an information return or self-certification under this Act or the regulations made thereunder, is liable to a penalty of \$5,000 for each such false or deceptive return or self-certification.

43. Appendix 1 - Core Documents for CRS

- The [Multilateral Competent Authority Agreement](#) (MCAA), which can be found in Schedule II of The Mutual Administrative Assistance in Tax Matters Act, Revised Edition of 2020 (the Act), it provides the international legal framework for the automatic exchange of information.
- The [Common Reporting Standard](#) (CRS) which contains due diligence rules for financial institutions. This can also be found in Schedule III of the Act.
- The [Commentaries on the CRS](#) which is an integral part of the CRS intended to illustrate and assist with interpretation of its provisions; and
- [The CRS XML Schema User Guide](#).

44. Appendix 2 - OECD CRS Literature

The OECD has developed a comprehensive Automatic Exchange Portal which is the primary source of CRS material and resources.

<http://www.oecd.org/tax/automatic-exchange/common-reporting-standard/>

The Common Reporting Standard implementation handbook contains due diligence and reporting rules for financial institutions and governments.

https://www.oecd.org/en/publications/standard-for-automatic-exchange-of-financial-information-in-tax-matters-implementation-handbook-second-edition_841e9512-en.html

CRS FAQs

[CRS-related Frequently Asked Questions](#)

45. Appendix 3 - Sample Self-Certification Form

Individual Self-Certification Form

https://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/CRS_INDIVIDUAL_Self-Cert_Form.pdf

Entity Self-Certification Form

https://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/CRS_ENTITIES_Self-Cert_Form.pdf

Controlling Person Self-Certification Form

http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/CRS_CONTROLLING_PERSONS_Self-Cert_form.pdf

Reporting Financial Institution must now request documentary evidence from account holders to support the self-certification form.

Approval and Acknowledgment of Guidance Notes

The undersigned acknowledges having reviewed the Guidance Notes. Any changes to this document will be coordinated with and approved by the undersigned or their designated representative.

Version	Date	Approver	Title	Signature
1.0	February 19th, 2025	Michelle Longsworth	Director General	
1.0	February 19th, 2025	Vilma Broaster	Deputy Director General	
1.0	February 19th, 2025	Lisa Clare	Deputy Director General	
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