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Singapore Expands International Tax Transparency Framework: What Reporting Singaporean Financial Institutions (“SGFIs”) Need to Do Next

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The Inland Revenue Authority of Singapore (“**IRAS**”) has announced three significant international tax transparency developments on 11 August 2026:

1. Amendments to Singapore's Common Reporting Standard (“**CRS**”) framework (“**Amended CRS / CRS 2.0**”) and publication of the Fifth Edition of the CRS e-Tax Guide;
2. Introduction of the Crypto-Asset Reporting Framework (“**CARF**”) through new regulations and publication of the CARF e-Tax Guide; and
3. Amendments to the Income Tax (International Tax Compliance Agreements) (United States of America) Regulations 2020 relating to Foreign Account Tax Compliance Act (“**FATCA**”) (the “**FATCA Regulations**”).

Collectively, these developments represent the most significant expansion of Singapore's automatic exchange of information (“**AEOI**”) regime since CRS was first implemented. Reporting SGFIs should act early to assess operational, onboarding, due diligence, reporting and governance impacts before the new requirements take effect.

Amended CRS / CRS 2.0: Scope and Reporting Obligations Are Expanding

Singapore has committed to implementing the OECD's amended CRS standards, with exchanges under the amended framework expected to commence from 2028. The newly published Fifth Edition of the CRS e-Tax Guide incorporates the following changes into Singapore's domestic framework.

Key changes for Reporting SGFIs

The amended CRS broadens the types of assets and products that may fall within reporting scope, including:

- Certain Specified Electronic Money Products ("**SEMPs**");
- Central Bank Digital Currencies ("**CBDCs**"); and
- Certain indirect holdings of crypto-assets through financial accounts.

In addition, Reporting SGFIs will be required to report more granular information, including:

- Whether valid self-certifications have been obtained;
- Whether an account is a pre-existing or new account;
- Whether the account is jointly held;
- The type of financial account;
- Additional information relating to controlling persons and beneficial ownership.

What should Reporting SGFIs do now?

Review product offerings

Banks, insurers, e-money providers, fund managers and investment platforms should determine whether any products that were previously outside CRS scope may now become reportable under the amended rules.

Assess onboarding processes

Existing CRS self-certification forms, account opening documentation and KYC procedures may need updating to capture new data points required under CRS 2.0.

Evaluate data readiness

Additional reporting fields will require systems enhancements. Institutions should assess whether existing client and account databases can support the expanded reporting requirements.

Conduct a gap analysis

A cross-functional review involving tax, compliance, operations, technology and legal teams should be performed well ahead of the first reporting cycle.

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CARF Introduces a New Reporting Regime for Crypto-Assets

Perhaps the most significant development is the enactment of Singapore's CARF Regulations 2026, which comes into effect on 1 January 2027. CARF is an OECD-developed framework designed to enhance tax transparency in relation to crypto-assets and address reporting gaps not covered under CRS.

Who may be affected?

Unlike CRS, which primarily applies to financial institutions, CARF targets Reporting Singaporean Crypto-Asset Service Providers ("**SGCASPs**") that facilitate relevant crypto-asset transactions for customers.

The regime may impact entities involved in:

- Crypto-asset exchange services;
- Brokerage activities;
- Certain custodial arrangements;
- Intermediary platforms facilitating crypto-asset transactions.

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What will need to be reported?

Reporting SGCASPs will be required to collect, verify and report information relating to:

- Reportable crypto-asset users;
- Controlling persons of relevant entities;
- Tax residency information;
- Reportable crypto-asset transactions.

What should Reporting SGFIs do now?

Determine whether CARF applies

Traditional financial institutions should not assume CARF is irrelevant. Even if your core business is traditional banking or asset management, offering digital asset custody, tokenized fund access, or crypto derivatives can inadvertently trigger CARF status. Conduct a formal applicability assessment across all business lines.

Enhance customer due diligence procedures

CARF introduces distinct due diligence and self-certification requirements. Existing AML/KYC frameworks should be reviewed to ensure they can support tax reporting requirements under CARF.

Prepare operational infrastructure

Unlike CRS/FATCA reporting regime, crypto transactions can involve high-volume datasets. Institutions should evaluate system capabilities for transaction capture, validation and reporting.

Establish governance structures

Institutions entering CARF for the first time should define ownership responsibilities across compliance, tax, risk and technology teams.

FATCA Updates: Continue Monitoring Compliance Obligations

The IRAS has also announced amendments to the FATCA Regulations, which form part of Singapore's FATCA implementation framework.

While the FATCA changes appear less transformative than the CRS and CARF developments, Reporting SGFIs should not overlook them.

Reporting SGFIs should:

- Review the amended regulations and any accompanying IRAS guidance;
- Assess whether existing FATCA classifications, controls or reporting processes require updates;
- Ensure consistency across FATCA, CRS and CARF compliance frameworks to avoid duplicate or conflicting processes.

Given the growing convergence of international transparency regimes, institutions are increasingly expected to adopt a holistic approach to tax information reporting rather than managing FATCA, CRS and CARF separately.

Key Takeaways for Reporting SGFIs

The 11 August 2026 announcements demonstrate Singapore's continued commitment to international tax transparency and alignment with OECD standards. For Reporting SGFIs, the key message is clear:

Action items for the next 3 - 6 months

- Assess whether the amended CRS expands the scope of products and accounts within your reporting perimeter.
- Review client onboarding, self-certification and due diligence procedures.
- Conduct a data and systems readiness assessment for enhanced CRS reporting fields.
- Determine whether any part of your business could fall within CARF as a Reporting SGCASP.
- Build governance and operational frameworks to comply with CARF from 1 January 2027.
- Review FATCA compliance processes following the amendments to the FATCA Regulations.

Institutions that begin preparation early will be better positioned to manage implementation costs, reduce compliance risks and avoid reporting challenges when the first CRS 2.0 and CARF reporting cycles commence.

While many institutions have mature FATCA and CRS compliance programmes today, the introduction of CRS 2.0 and CARF shifts the focus from merely collecting tax residency information to managing increasingly sophisticated datasets across both traditional financial assets and digital assets. Early readiness assessments will be critical to achieving a smooth transition and ensuring continued compliance.

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