

# **Standard for Automatic Exchange of Financial Account Information in Tax Matters**

## *Table of contents*

Abbreviations and acronyms .....	7
I. Introduction .....	9
II. Model Competent Authority Agreement and Common Reporting Standard .....	19
A. Model Competent Authority Agreement .....	21
B. Common Reporting Standard .....	29
III. Commentaries on the Model Competent Authority Agreement and the Common Reporting Standard .....	63
A. Commentaries on the Model Competent Authority Agreement .....	65
Introduction .....	65
Commentary on the Preamble .....	67
Commentary on Section 1 .....	68
Commentary on Section 2 .....	71
Commentary on Section 3 .....	72
Commentary on Section 4 .....	77
Commentary on Section 5 .....	79
Commentary on Section 6 .....	89
Commentary on Section 7 .....	90
B. Commentaries on the Common Reporting Standard .....	93
Introduction .....	93
Commentary on Section I .....	94
Commentary on Section II .....	106
Commentary on Section III .....	110
Commentary on Section IV .....	127
Commentary on Section V .....	135
Commentary on Section VI .....	143
Commentary on Section VII .....	149
Commentary on Section VIII .....	158
Commentary on Section IX .....	207

<b>Annexes</b> .....	213
<i>Annex 1. Multilateral Model Competent Authority Agreement</i> .....	215
<i>Annex 2. Nonreciprocal Model Competent Authority Agreement</i> .....	223
<i>Annex 3. Common Reporting Standard User Guide</i> .....	230
<i>Annex 4. Example Questionnaire</i> .....	277
<i>Annex 5. Wider Approach to the Common Reporting Standard</i> .....	284
<i>Annex 6. Declaration on Automatic Exchange of Information in Tax Matters</i> ..	301
<i>Annex 7. Recommendation of the Council on the Standard for Automatic Exchange of Financial Account Information in Tax Matters</i> .....	305