

CARF/DAC8 for bankers, investors and wealth advisors

Crypto Asset Reporting Framework (CARF) – OECD Standard, EU DAC8

A comprehensive introduction to the incoming crypto disclosure regimes featuring the practical operational consequences for banks, investors and their advisors (e.g. asset managers, fiduciaries, financial advisors)



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Paul Foster Millen Paul Foster Millen (NYU School of Law, J.D. '05, LL.M in Tax '18) is the founder and principal of Millen Tax & Legal GmbH in Zurich, Switzerland. He serves as the lead advisor for Swiss banks, trust companies and single family offices on an array of tax and regulatory topics. Overall, he specialises in the US federal tax consequences of cross-border income flows and asset holdings for non-US Persons. His matters of specific expertise include CRS/FATCA and CARF/DAC8. He is a prolific writer and presenter, co-authoring the influential five-part series of CARF articles in Tax Notes International known as "Old Tricks for New Dogs". He is the co-proprietor of the CRS & FATCA General Store and CARFtools websites.

Dissimilarities between CRS and DAC8

9.00 OECD's CARF & EU's DAC8: Europe's digital asset/crypto currency reporting regimes

- What are CARF and DAC8?
- CARF/DAC8 timeline, committed jurisdictions and related regimes
- What are the similarities between CARF/DAC8 and CRS?
- Ultimate aims
- Structure/methodology
- Choice of reporting parties
- Due diligence techniques
- Reportable Information
- What are the key dissimilarities between CARF/DAC8 and CRS?
- Regulated activities
- Affected parties
- Reporting triggers
- Account holders and look-through classifications
- Reportable information
- The digital asset regulatory landscape

Impact on investors and advisors

10.15 Key CARF/DAC8 points for digital asset investors and their advisors

- Review past positions/uncertainties/interpretations to confirm status and treatment under CARF/DAC8
- Broad definitional scopes implicate array of digital asset investments
- How do you hold your crypto?

- How do you trade your crypto?
- Will your CRS structure be subject to look-through treatment for CARF/DAC8?
- What other types of transactions are relevant for CARF/DAC8 (e.g. purchases of goods & services)?
- What other contact points might you have with RCASPs?

11.00 Coffee break

Operational impact on Luxembourg banks

11.15 Key CARF/DAC8 points for Luxembourg banks

- Intro to DAC8 in Luxembourg (a/k/a Lux CARF)
- What makes a Luxembourg bank into an RCASP?
- What types of Relevant Crypto-Assets might a Luxembourg bank hold?
- How to identify the population of account holders relevant to CARF
- CARF/DAC8 due diligence – The requirements and exceptions for banks
- CARF/DAC8 reporting – The requirements and exceptions for banks
- Operational alignment with CRS 2.0
- Enforcement & miscellaneous provisions

12.15 Q&A

12.30 End of the seminar

LUXEMBOURG, TUESDAY 21 OCTOBER 2025, 9.00-12.30, HOTEL LE ROYAL / ONLINE

INFORMATION & REGISTRATION

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FEE

580 euros
Additional participants from the same company: -50%

AF 1441

I register to the seminar "CARF for bankers, investors and wealth advisors" on 21 October.

☐ I will attend in the conference room ☐ I will attend online on Zoom.

Full name

Position Company.....

Address

Zip code/City

Tel Mobile.....

E-mail.....

Date Signature.....