

CRS / FATCA reporting: frequent mistakes, complex structures, avoiding duplication and inconsistencies

- > The multiple CRS/FATCA obligations applicable to complex cross-border investment structures
- > Frequent classification errors leading to reporting mistakes
- > The incomplete or inconsistent reporting flows observed in multi-entity structures
- > Why do certain structures allow for a single, coherent reporting



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Latifa advises international clients on complex tax matters, with strong expertise in FATCA, CRS, DAC6, QI, FASTER, and Pillar 2. She is the former Head of Operational Tax & Advisory at Forvis Mazars, and previously worked at Société Générale and Natixis Wealth Management, where she led operational tax teams and managed Operational tax guidance for entities in Luxembourg, Switzerland, and Monaco.

CRS Reporting obligations: what are the most frequent and costly mistakes?

The mistake of believing that reporting in a foreign jurisdiction exempts an entity from performing a CRS classification analysis at the level of the relevant structure:

- How is this fundamental distinction the source of numerous unintentional non-compliance cases?

Lack of awareness of the multiple CRS and FATCA obligations applicable to complex cross-border investment structures

- At which level do these obligations actually arise: fund, management entity, investors?
- Example: international partnership investing in a regulated fund – obligations arise at GP level and not solely at fund level.

Frequent classification errors leading to reporting mistakes

- How can the recurring confusion between FI and NFE be explained?
- Example: investment holding with limited substance incorrectly classified as a passive NFE, whereas an FI classification may be required under CRS.

Why are incomplete or inconsistent reporting flows observed in multi-entity structures?

- Example: investment vehicles with intermediate holding companies generating multiple reporting chains and errors in identifying beneficial owners.

What are the main CRS / FATCA risks identified depending on the type of structure?

- Investment holdings: risk of incorrect CRS classification.
- Multi-vehicle structures: lack of alignment in reporting chains.
- Trusts with multiple parties involved: unclear allocation of reporting obligations.

To report or not to report (legally)?

- Is the real question to avoid reporting?
- Why do certain structures allow for a single, coherent reporting, while others generate multiple chains leading to administrative complexity?
- How does ex ante reflection on “who reports” make it possible to optimize the administrative burden without breaching CRS / FATCA rules?

How should reporting be positioned at the correct legal and operational level?

Key principles of declarative design:

- What are the potential reporting entities?
- When and how should reporting be centralized?
- How can duplication and inconsistencies be avoided?
- Why and how should classification choices be documented?

Practical illustrations:

- How to choose the most reporting-efficient jurisdiction without altering economic substance or business rationale?
- How do different legal vehicles present distinct levels of transparency and CRS / FATCA exposure?

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PRACTICAL INFORMATION

Venue
Zurich Sheraton Hotel
Pfungstweidstrasse 100, Zurich

Visio conference on Zoom

The Zoom link and the documentation will be sent to the participants on 28 May in the afternoon. Academy & Finance provides technical assistance during the conference.

How to register

by phone: +41 (0) 22 849 01 11
by fax: +41 (0) 22 849 01 10
by e-mail: info@academyfinance.ch
by post: Academy & Finance SA
3 rue Neuve-du-Molard, CH-1204 Geneva
www.academyfinance.ch

Fees

620 CHF (+ VAT 8.1%)
Additional registrations from the same company: - 50%

Registration and payment

Payment is made by bank transfer or by credit card. Credit card payments will be debited immediately upon receipt of card details. In any case, we will send you an invoice by email.

Substitution & cancellation policy

Substitutions from the same company are accepted at any time. Cancellation requests must be received in writing, by fax or by post up to the following dates end of business :

- 22 May refund of 90%
- after 22 May no refund will be made for cancellation.

REGISTRATION FORM

I register for the seminar "CRS / FATCA reporting" on 29 May 2026.

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

FIRST PARTICIPANT

Full name.....
Position.....
E-mail.....

SECOND PARTICIPANT (-50%)

Full name.....
Position.....
E-mail.....

Company.....
Address.....
Postcode..... City.....
Tel Mobile.....

Person to which the invoice must be sent for payment:

Name..... Email.....
Bank transfer Mastercard VISA
Credit card No : ____/____/____/____ Expiry date : ____/____
Cardholder.....
Date Signature.....

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