

Investment structures and CRS / FATCA reporting

> What risks for the client and for the bank?

> Which lawful structuring decisions can optimize reporting?



Latifa Tabia,

Operational Tax and Structuring
Expert, Luxembourg

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. Latifa holds degrees in Wealth Legal and Tax Engineering from Université Panthéon-Assas and Université Panthéon-Sorbonne, and the Luxembourg tax qualification (Cycle A and Cycle B).

MISTAKES RELATED TO CRS / FATCA REPORTING OBLIGATIONS

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?

Example: investment holding with limited substance incorrectly classified as a passive NFE, whereas an FI classification may be required under CRS.

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.

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.

Frequent classification errors leading to reporting mistakes

- How can the recurring confusion between FI and NFE be explained?

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.

AVOIDING RECLASSIFICATION RISKS AND COMPLEX REPORTING CHAINS

Why does integrating CRS, FATCA and DAC6 at the structuring stage reduce the risk of reclassification and avoid complex reporting chains?

- How does each structuring decision (jurisdiction, vehicle, governance) influence:
 - the reporting perimeter,
 - the future operational burden,
 - the overall risk profile?
- How does proactive compliance become a tool for tax and reputational risk mitigation in an increasingly transparent international environment?

The risk of challenging a CRS / FATCA classification (FI vs NFE) due to inconsistencies between substance, governance and the business rationale of the structure

- Interaction between international taxation, substance, governance and business rationale:
 - What is meant by real substance and how must it be demonstrated?
 - How can coherent governance aligned with the real economic activity be ensured?
 - Why must the business rationale be formalized and documented?

POSITIONING REPORTING AT THE APPROPRIATE LEGAL AND OPERATIONAL LEVEL

To report or not to report (legally)? How should reporting be positioned at the correct legal and operational level?

- 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?

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?

Investment structures and CRS / FATCA reporting

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 "Investment structures and 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.....