



# KPMG AEOI Updates & Tracking Service

## FATCA/CRS Alert



<b>Date:</b>	18 August 2025	<b>Alert Type:</b>	Document
<b>Country:</b>	United Kingdom	<b>Regime:</b>	FATCA/CRS
<b>Document Type:</b>	Guidance		

### United Kingdom: Issued Updates to the International Exchange of Information Manual

On 05 August 2025, His Majesty's Revenue and Customs (HMRC) of the United Kingdom updated its International Exchange of Information Manual (IEIM) to revise section IEIM402880 (Due Diligence - Pre-Existing Individual Accounts - Lower Value Accounts - Curing Indicia). The update clarifies the process for curing unambiguous indicia of a U.S. place of birth under FATCA. Per the updated guidance, Reporting Financial Institutions (FIs) may cure indicia that unambiguously indicate a U.S. place of birth if they obtain or have previously reviewed and maintain the following documentation:

- A self-certification confirming the account holder is neither a U.S. citizen nor a U.S. tax resident;
- A non-U.S. passport or other government-issued identification evidencing the account holder's citizenship or nationality in a country other than the U.S., and
- a copy of the account holder's Certificate of Loss of U.S. Nationality or a reasonable explanation for:
  - The absence of the certificate despite renouncing U.S. citizenship, or
  - Why U.S. citizenship was not acquired at birth.

Further, On 06 August 2025, HMRC updated section IEIM905400 (Circumstances in which a Penalty will not Apply). The updated guidance provides that no penalty will apply for reporting inaccurate or incomplete information where the individual has taken reasonable care to comply with the requirements. For all

### United Kingdom Contacts:



**Peter Grant**  
Partner

[Peter.Grant@KPMG.co.uk](mailto:Peter.Grant@KPMG.co.uk)



**Rohini Sanghani**  
Director

[rohini.sanghani@KPMG.co.uk](mailto:rohini.sanghani@KPMG.co.uk)

other types of penalties, no penalty will be applicable where the individual has a reasonable excuse for the failure to comply.

---

Reference: [Guidance on U.S. indicia](#) and [Guidance on Penalties](#)

For information on KPMG's global AEOI network professionals, please email [GO-FM AEOI Program Support](#).

For more information on KPMG AEOI Updates & Tracking Service, please see [here](#).

For additional summaries of the latest AEOI developments, please visit KPMG's TaxNewsFlash-FATCA/IGA/CRS Insights page, [here](#).

## Contact us



**Laurie Hatten-Boyd**  
**Principal**  
T: +1 206 213 4001  
E: [lhattenboyd@kpmg.com](mailto:lhattenboyd@kpmg.com)

Some or all of the services described herein may not be permissible for KPMG audit clients and their affiliates or related entities.

Learn about us:



[kpmg.com](https://kpmg.com)



**Kelli Wooten**  
**Principal**  
T: +1 404 739 5888  
E: [kwooten@KPMG.com](mailto:kwooten@KPMG.com)

© 2025 KPMG LLP, a Delaware limited liability partnership and a member firm of the KPMG global organization of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved. USCS010555-1A

The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organization.