



KPMG AEOI Updates & Tracking Service

FATCA/CRS Alert



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

On 26 September 2025, His Majesty's Revenue and Customs (HMRC) of the United Kingdom updated its *International Exchange of Information Manual* (IEIM) to introduce a new section, IEIM404510 (Mandatory Registration), under section IEIM404500 (Reporting Format). This update follows the issuance of the *International Tax Compliance (Amendment) Regulations 2025* (found [here](#)), which introduces a new mandatory registration requirement for Reporting Financial Institutions (RFIs) and Trustee-Documented Trusts (TDTs).

The key updates are as follows:

- RFIs and TDTs are now required to register with HMRC's AEOI service by the later of 31 December 2025 or 31 January following the calendar year in which they first qualify as an RFI or TDT for CRS/FATCA purposes. Each RFI and TDT must complete a separate registration.
- RFIs that are already registered do not need to take any further action.
- TDTs must be registered by their own name, while the trustee should be listed as a contact person.
- A single registration applies to both FATCA and CRS. Entities falling within the scope of only one regime are not required to notify HMRC of which regime applies.
- Registration is a one-time requirement. Once registered, the entity remains registered for future years unless it chooses to deregister.

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- Entities with no reportable accounts are not obligated to file NIL returns, although they may choose to do so voluntarily.

Impact of CRS 2.0:

- Entities such as Electronic Money Institutions will qualify as RFIs under the implementation of CRS 2.0, effective from 01 January 2026. Consequently, the registration deadline for these entities is set for 31 January 2027.
- Financial Institutions (FIs)—such as charities that qualify as Qualified Non-Profit Entities—will be excluded from reporting obligations under CRS 2.0 and may deregister from HMRC's AEOI service starting 1 January 2026. HMRC has also clarified that any such non-profit organization that has never held reportable accounts, and therefore has not registered with the AEOI service, is not required to register by 31 December 2025.

Reference: [Guidance on Mandatory Registration](#)

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](#).

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