



KPMG AEOI Updates & Tracking Service CRS Alert



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Country:	Liechtenstein	Regime:	CRS

Liechtenstein: Issued Newsletter 03/2026 on CRS Updates, Including the Implementation of CRS 2.0

On 02 April 2026, the Liechtenstein Tax Authority issued Newsletter 03/2026, providing the following updates:

— Revision of the AEOI-Guidance:

The Tax Authority published an updated version of its AEOI-Guidance (found [here](#)) on 27 March 2026. The key changes are as follows:

- Chapter 3.2.6.2 has been updated to clarify the treatment of cash-value insurance contracts and annuity insurance contracts where a trust (società fiduciaria) acts as the policyholder.
- New definitions have been introduced under margin no. 140 in relation to:
 - Foundation-like structured establishments;
 - Foundation-like trust enterprises with legal personality (registered trusts); and
 - Other foundation-like asset structures.
- Margin no. 595 has been updated to align with the AEOI-Guidance of 03 May 2024 (found [here](#)). Specifically, Liechtenstein passive Non-Financial Entities (NFEs) are required to provide Reporting Financial Institutions (RFIs) with details of their controlling persons at the time of account opening, including:

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- The controlling persons' jurisdictions of tax residence; and
- Their tax identification numbers (TINs).

Where a passive NFE fails to comply with this requirement, the relevant RFI must notify the Tax Authority within three months following the relevant reporting period (margin nos. 578 et seq.).

Notably, the current version of the AEOI-Guidance does not yet reflect the OECD's revisions to the Common Reporting Standard (CRS 2.0), which took effect in Liechtenstein on 01 January 2026. The first reporting to the Tax Authority under CRS 2.0 is due by 30 June 2027, covering the 2026 reporting period.

The Tax Authority expects to publish a further updated version of the AEOI-Guidance, incorporating CRS 2.0, during Q3 2026.

— **Overview of CRS 2.0:**

Under CRS 2.0, RFIs are required to report additional information, including:

- Confirmation of whether a valid self-certification has been obtained for each reportable person;
- Details of the roles of Controlling Persons of passive NFEs;
- Details of the roles of Equity Interest Holders in Investment Entities;
- An indication of whether the account is a joint account and, if so, the number of joint account holders; and
- Identification of the type of financial account, along with an indication of whether the account is a Pre-existing Account or a New Account.

Additionally, "Qualified Charitable Entities" may now be treated as Non-Reporting Financial Institutions (NRFIs), provided they submit an application using the electronic form made available by the Tax Authority (found [here](#)). Existing Liechtenstein qualified charitable entities must submit this application to the Tax Authority by 30 June 2026.

By contrast, charitable Active NFEs are not affected by this change unless the underlying conditions change. They are not required to submit an application and, in general, no immediate action is needed.

Further, CRS 2.0 introduces two new categories of excluded accounts. Specifically:

- Depository Accounts representing specific electronic money products (SEMPs) below certain thresholds; and
- Capital contribution accounts that meet specified conditions.

are now treated as excluded accounts and are therefore exempt from reporting obligations.

CRS reports for the 2025 reporting period, which are due by 30 June 2026, are not affected by CRS 2.0 and must continue to be prepared in accordance with the current standard.

— **Reasonable Efforts to Obtain TINs and Dates of Birth (DOBs):**

The Tax Authority further requires RFIs to make reasonable efforts to obtain TINs and dates of birth (DOBs) for reportable pre-existing accounts, and to collect this information mandatorily for new accounts at the time of account opening.

To meet this requirement, RFIs are expected to use every available opportunity, including contacting account holders, to obtain any missing information. DOBs are generally collected as part of the due diligence requirements (SPG/SPV). Accordingly, RFIs must ensure that DOBs are included in CRS reports.

— **Submission of Individual CRS Reports:**

RFIs may submit CRS reports to the Tax Authority using either of the following methods:

- Submission of bulk CRS reports in XML format; or
- Direct entry of the relevant information through the individual CRS reporting interface.

Notably, the individual CRS reporting interface now allows RFIs to record more than one controlling person of a passive NFE at the same time, up to a maximum of 10.

— **Amendments to the CRS XML Schema and Reporting Portal:**

Beginning in 2027, all CRS reports, including new reports (OECD1), as well as correction and deletion reports (OECD2 and OECD3), must be submitted using the new OECD XML Schema Version 3.0 (found [here](#)).

To facilitate this transition, the Tax Authority intends to update the reporting portal. As a result, the portal will be unavailable from the beginning of December 2026 until mid-January 2027.

CRS reports and correction reports may still be submitted using the current OECD XML Schema Version 2.0 until the end of November 2026.

Additionally, on 14 April 2026, the Tax Authority issued an updated version of its CRS Reporting Instructions in accordance with XML Schema Version 2.0 (found [here](#)), as well as an updated version of its Additional Instructions relating to XML Schema Version 2.0 or 3.0 (found [here](#)).

Reference (German): [Newsletter 03/2026](#)

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

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