



# KPMG AEOI Updates & Tracking Service CRS Alert



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## Hungary: Issued Guidance on the Fulfillment of CRS Obligations

On 16 April 2026, the National Tax and Customs Administration (NAV) of Hungary issued guidance on the proper fulfillment of Common Reporting Standard (CRS) obligations.

The key updates are as follows:

### — Key considerations relating to information reporting:

#### — Transition to the new ONYA system

Effective from the 2025 reporting period (form 25AEOI), NAV has introduced the Online Form Filling Application (ONYA) (found [here](#)), replacing the legacy General Form Filling Framework (ÁNYK). In line with the new data fields in ONYA, the reporting schema has also been changed. RFIs must ensure that they are technically prepared for this transition well in advance of the reporting deadline.

#### — Reporting for trusts:

Where a trust qualifies as an RFI but lacks independent legal personality, its reporting obligation must be fulfilled by its authorized representative, generally the trustee. With effect from the 2025 reporting period, a separate Form 25AEOI must be submitted for each trust.

The report must include:

- The trust's tax identification number (TIN); and
- The details of the trustee submitting the report.

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— **Reporting for legal entities:**

Where an RFI is a legal entity with independent legal personality, the report must be submitted in the RFI's own name, even if another legal entity, such as a fund manager, acts on its behalf.

— **Changes to account type classifications:**

In the 25AEOI Partial Document (previously the M-01 sheet), the account type field previously labelled as "other account type" has been renumbered and divided into two new categories:

- "Insurance Contract with Surrender Value, Annuity Insurance Contract"; and
- "Equity Share or Debt Instrument".

RFIs that previously reported account information under the "other account type" classification must now reclassify those accounts into one of these two new categories.

— **Data fields effective from 2026:**

With effect from 01 January 2026, new data fields have been introduced in the Data Provision Sub-Document (previously Form M), including:

- CRS Declaration/self-certification (yes/no) for the:
  - Account Holder
  - Controlling Person
- Number of joint account holders
- Account Category (New or Existing)
- Role of Equity Owner.

These new fields must first be used for reporting for the 2026 reporting period. They will also apply for any late or corrected filings made using Form 25AEOI.

— **Common errors in due diligence and reporting processes:**

— **Valid self-certification for new individual accounts:**

For each New Individual Account, an RFI must obtain a self-certification at the time of account opening and validate it based on the information collected through anti-money laundering (AML) and customer due diligence (CDD) procedures.

Where any discrepancy is identified, the self-certification cannot be considered valid or accepted. If the self-certification is not validated at the time of the account

opening and the RFI subsequently becomes aware of information or circumstances that cast doubt on its validity, a new valid self-certification must be collected. Until a valid self-certification is obtained, the RFI must:

- Apply the due diligence procedures for pre-existing accounts to the new account; and
- Report the account based on the information available.

If the RFI is unable to obtain a valid self-certification, it must be able to demonstrate that it exercised the standard of care reasonably expected in the circumstances.

The OECD's Commentary to the CRS Standard provides a 90-day grace period from the date of account opening for RFIs to obtain a valid self-certification for new accounts.

— **Treatment of TINs:**

A valid self-certification must include:

- Date of birth
- Jurisdiction(s) of tax residence
- TIN issued by the jurisdiction of tax residence

If an RFI knows, or has reason to believe, that any of this information is incorrect or has not been validated, the self-certification must not be accepted.

A TIN may be treated as clearly incorrect, where:

- The account holder declares foreign tax residence but provides a Hungarian TIN; or
- The TIN format is clearly invalid (for example, "11111" or "12345...").

— **Reporting requirements for non-reportable persons:**

Under the CRS, information on non-reportable persons may be reported only where the non-reportable person is a Passive Non-Financial Entity (NFE) with a Controlling Person who is a Reportable Person.

Accordingly, if the account holder is an Active NFE, or if the Controlling Person is resident only in Hungary, that person is not considered a Reportable Person and does not need to be reported.

Where a Passive NFE is itself a Reportable Person but has no reportable Controlling Persons, the account holder type must be reported as CRS103.

— **Missing information on controlling persons:**

For New Accounts, a self-certification must be obtained from the account holder or the Controlling Person to determine whether the Controlling Person of a Passive NFE is a Reportable Person.

If the RFI does not obtain a self-certification directly from the Controlling Person, the self-certification provided by the Passive NFE will be considered valid, provided it includes the Controlling Person's details, such as:

- Tax residence
- TIN
- Date of birth

As Controlling Persons may themselves be Reportable Persons, RFIs must pay particular attention to identifying and reporting them correctly.

— **Required currency in reported amounts:**

With reference to the OECD's CRS Commentary, monetary amounts must be reported in the currency in which the account is maintained. If an account is maintained in more than one currency, the RFI may choose any one of those currencies for reporting purposes.

— **Special due diligence requirements:**

— **Identification of Passive NFEs:**

Under the CRS due diligence process, an RFI is not always required to obtain a declaration from an account holder to determine whether it is a Passive NFE. This is the case where the RFI can determine, based on information available in its own records or publicly available information (including the publicly available list of financial institutions (FIs) registered under FATCA maintained by the US Internal Revenue Service (IRS), [here](#)), that the account holder is either an Active NFE or an FI other than one defined in VIII/D/7.(b).

Notably, the IRS's public list of FIs is not, on its own, a reliable source and should not be used to classify an account holder as an FI without further consideration.

— **Citizenship by Investment or Residence by Investment (CBI/RBI) scheme:**

Where an account holder or a Controlling Person declares tax residence in a jurisdiction that offers a potentially high-risk CBI/RBI scheme, RFIs must not rely solely on the self-certification without performing additional verification.

Such verification should include reviewing the OECD's analysis (found [here](#)) and making further inquiries, including:

- Whether the residence rights were obtained through a CBI/RBI scheme;
- Whether the account holder has tax residence in any other jurisdiction;
- Whether the account holder spent more than 90 days in any other jurisdiction during the previous year; and
- Whether the account holder filed income tax returns during the previous year.

These additional checks, along with any supporting evidence collected, help the RFI determine whether the self-certification can reasonably be considered reliable.

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Reference (Hungarian): [Guidance on CRS Obligations](#).

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