



OG/33/2026

22<sup>nd</sup> January 2026**Chief Executive Officer**

All Banks

All Investment Business Licensees (Cat. 1,2,4)

All Life Insurance Providers

All Trust Service Providers

All Family Office Licensees

All Bahrain Domiciled CIUs Operators

All Payment Service Providers

Licensed Central Depository

Licensed Securities Brokers-Dealers

Licensed Securities Brokers

Manama

Kingdom of Bahrain

Dear All,

**Directive on the Automatic Exchange of Information for Tax Purposes –  
Amended Common Reporting Standard**

This Directive is issued with the authority of the Governor of the Central Bank of Bahrain (the “CBB”) pursuant to his powers under Article (38) of the Central Bank of Bahrain and Financial Institutions Law promulgated by Law No. (64) of 2006, as amended, and Article (69) of Legislative Decree No. (23) of 2016 with respect to Trusts.

This Directive is further to the issuance of Directive OG/212/2017 on 30<sup>th</sup> April 2017 requiring licensees to comply with and implement the amendments made to the Common Reporting Standard (“CRS”) and its Commentaries (the Standard), which were approved by the Council of the Organisation for Economic Co-operation and Development on 8 June 2023.

The CRS has been amended to include new digital financial products, such as Specified Electronic Money Products and Central Bank Digital Currencies, and to cover crypto-asset-related derivatives and investment entities, in line with the development of the Crypto-Asset Reporting Framework (“CARF”). Additionally, the amendments improve reporting and due diligence procedures, introduce new categories for non-profit investment entities and capital contribution accounts, and expand the CRS Commentary for more consistency and clarity. The Amendments to the Common Reporting Standard could be accessed through the following link: [https://www.oecd.org/en/publications/international-standards-for-automatic-exchange-of-information-in-tax-matters\\_896d79d1-en.html](https://www.oecd.org/en/publications/international-standards-for-automatic-exchange-of-information-in-tax-matters_896d79d1-en.html).



Accordingly, the CBB hereby notifies licensees that they must comply with the Standard. Licensees must comply with and implement all the requirements of the Standard, including, but not limited to, the due diligence and reporting obligations specified therein in order to enable the Kingdom of Bahrain to fulfil its obligations under the Multilateral Convention on Mutual Administrative Assistance in Tax Matters ("MAC"), the Multilateral Competent Authority Agreement on Automatic Exchange of Financial Account Information ("MCAA") and the Addendum to the MCAA.

This Directive may be cited as the Amended CRS Directive and shall come into force on 1 January 2026.

## 1) Definitions:

In this Directive and for the purpose of applying the Standard:

**“Standard”** means the Common reporting Standard (“CRS”), including the Commentaries thereon, approved by the Council of the Organisation for Economic Co-operation and Development on 15 July 2014 and **then amended and approved on 8 June 2023**, which contains reporting and due diligence procedures for the exchange of information on an automatic basis, as amended from time to time.

## 2) Modifications applied to the Standard

A. For the purposes of applying this Directive, the Standard:

- a) The term **“Non-Reporting Financial Institution”** as referenced to Subparagraph B(1) of Section VIII of the Standard also includes “Qualified Non-Profit Entity”.
- b) The term **“Qualified Non-Profit Entity”** means an Entity resident in the Kingdom of Bahrain that has obtained confirmation by the Ministry of Social Development, Ministry of Industry and Commerce, or the Ministry of Justice, Islamic Affairs and Waqf in the Kingdom of Bahrain that such Entity meets all the following conditions:
  - (i) it is established and operated in the Kingdom of Bahrain exclusively for religious, charitable, scientific, artistic, cultural, athletic, or educational purposes; or it is established and operated in the Kingdom of Bahrain and it is a professional organisation, business league, chamber of commerce, labour organisation, agricultural or horticultural organisation, civic league organisation or an organisation operated exclusively for the promotion of social welfare;
  - (ii) it is exempt from income tax in the Kingdom of Bahrain;



- (iii) it has no shareholders or members who have a proprietary or beneficial interest in its income or assets;
- (iv) the applicable laws of the Kingdom of Bahrain or the Entity's formation documents do not permit any income or assets of the Entity to be distributed to, or applied for the benefit of, a private person or a noncharitable Entity other than pursuant to the conduct of the Entity's charitable activities, or as payment of reasonable compensation for services rendered, or as payment representing the fair market value of property which the Entity has purchased; and
- (v) the applicable laws of the Kingdom of Bahrain or the Entity's formation documents require that, upon the Entity's liquidation or dissolution, all of its assets be distributed to a Governmental Entity or other Entity that meets the conditions set out in i) to v), or escheat to the government of the Kingdom of Bahrain or any political subdivision thereof.

B. In addition to the dates specified in Section 1(3)(b) of Directive OG/212/2017, the relevant dates to be applied in the Standard are:

- (i) for subparagraphs C.9 (Preexisting Account), C.14 (Lower Value Account) and C.15 (High Value Account) of Section VIII, if the account is treated as a Financial Account solely by virtue of the amendments made to the Standard in 2023, as of 31 December 2025;
- (ii) for subparagraph C.10 (New Account) of Section VIII, if the account is treated as a Financial Account solely by virtue of the amendments made to the Standard in 2023, 1 January 2026;
- (iii) for subparagraph C.6 of Section III, if the account is treated as a Financial Account solely by virtue of the amendments made to the Standard in 2023, as of 31 December 2025;
- (iv) for paragraph D of Section III (completion date for review of Preexisting Individual Accounts), if the accounts are treated as Financial Accounts solely by virtue of the amendments made to the Standard in 2023, as of 31 December 2026 in the case of High Value Accounts, and as of 31 December 2027 in the case of Lower Value Accounts;
- (v) for each occurrence in paragraphs A and B of Section V, if the account is treated as a Financial Account solely by virtue of the amendments made to the Standard in 2023, as of 31 December 2025;
- (vi) for the first occurrence in subparagraph E.1 and the occurrence in subparagraph E.2 of Section V, if the account is treated as a Financial Account solely by virtue of the amendments made to the Standard in 2023, as of 31 December 2025;





- (vii) for the second occurrence in subparagraph E.1 of Section V, if the account is treated as a Financial Account solely by virtue of the amendments made to the Standard in 2023, as of 31 December 2027.
- (viii) for paragraph 4 of the CRS Commentaries on Section IV and paragraph 7 of the CRS Commentaries on Section VI, 1 January 2026.
- (ix) for paragraph 82 of the CRS Commentaries on Section VIII, if the account is treated as a Financial Account solely by virtue of the amendments made to the Standard in 2023, as of 31 December 2025.

### 3) Transitional Measures:

- a) The information solely described in the amendments to Section I of the Standard in 2023 shall be reported in respect of the calendar year 2026 and every following calendar year.
- b) Notwithstanding section 3(a) above, under subparagraph A(1)(b) and A(6)(bis) of Section I of the Standard, with respect to each Reportable Account that is maintained by a Reporting Financial Institution as of 31 December 2025 and for reporting periods ending by the second calendar year following such date, information with respect to the role(s) by virtue of which each Reportable Person is a Controlling Person or Equity Interest holder of the Entity is only required to be reported if such information is available in the electronically searchable data maintained by the Reporting Financial Institution.

### 4) Status of the CRS Commentaries:

The CRS Commentaries as amended are binding and Reporting Financial Institutions must apply the CRS as amended in accordance with such Commentaries. Amendments were made in the following sections of the CRS Commentaries:

- a) Commentary on Section I;
- b) Commentary on Section IV;
- c) Commentary on Section V;
- d) Commentary on Section VI;
- e) Commentary on Section VII;
- f) Commentary on Section VIII;
- g) Commentary on Section IX; and
- h) Commentary on Section X.

**5) Due Diligence Requirements of the Standard:**

All Reporting Financial Institutions must comply with all the due diligence requirements of the Standard. Amendments were made in the following sections of the Standard:

- a) Section V: Due Diligence for Preexisting Entity Accounts
- b) Section VI: Due Diligence for New Entity Accounts
- c) Section VII: Special Due Diligence Rules

**6) Reporting requirements of the Standard:**

All Reporting Financial Institutions must comply with all the reporting requirements of the Standard. Amendments were made to Section I: General Reporting Requirements of the Standard.

**7) Definitions of the Standard:**

The terms defined under the Standard must be applied. Amendments were made to Section VIII: Defined Terms.

**8) Enforcement Action:**

Failure of a licensee to comply with any of the provisions of this Directive will result in enforcement action as indicated in the CBB Law and Trust Law against the licensee.

**9) Anti-avoidance:**

If a Financial Institution or any other person enters into any arrangements or engages in a practice the main purpose or one of the main purposes of which can reasonably be considered to be to avoid an obligation imposed under this Directive, the Financial Institution or the person is subject to the obligation as if the person had not entered into the arrangement or engaged in the practice.

Yours faithfully,

**Khalid Humaidan**  
Governor