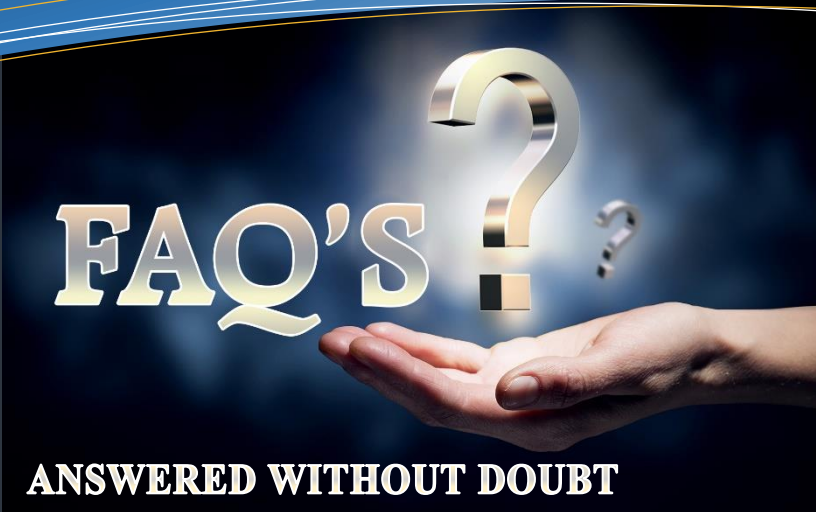


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## Issue highlights

Tax residency of untaxed entities



## this issue

Frequently  
Asked  
Questions

### Tax residency of untaxed Non Financial Entities

I am a Brazilian resident owning and managing an Active NFE incorporated in the BVI. Where will bank report the company to?

I am a Chinese resident owning and manage an investment entity. Where will bank report the company to?

I am a Russian resident owning and an Active NFE managed by a US manager. Where will bank report the company to?

### Tricky questions for trustees

Trusts earning fees through underlying company and distributing through underlying company



**Why is listed on a public stock exchange not automatically equivalent to an Active NFE regularly traded entity**



**Is listed co an active NFE or a non reportable person?**

**Closure of account vs closure of entity**

Close of investment entity –  
who reports at year end

CRS page 150 No need  
to check financial  
statements to check  
categorisation



# Investment entity holds subsidiaries that engage in business or trades

NFE holds subsidiaries that engage in business or trades that are investment entities



**NFE holds subsidiaries that engage in business or trades is always an Active NFE less than 80%**

Irrevocable insurance

OTC

Cash is not a fa

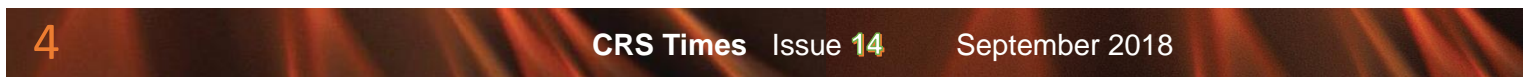
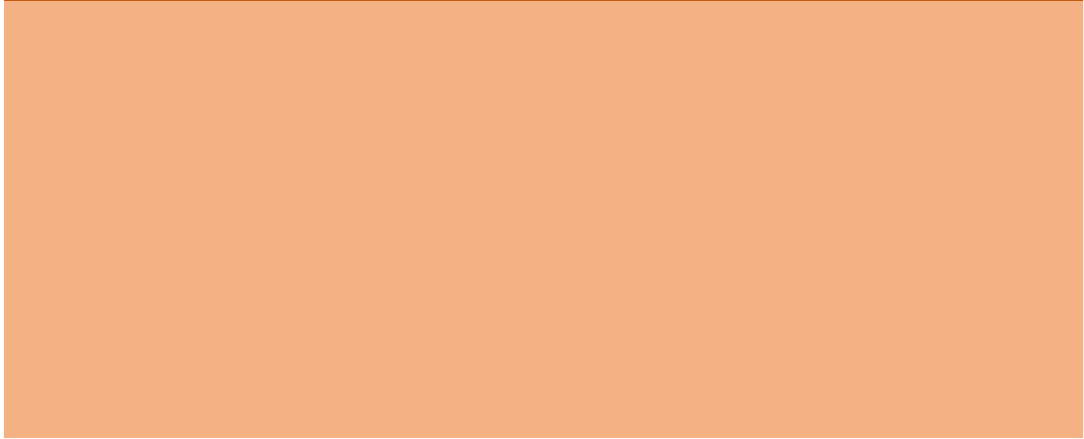




Trustee retirement  
plan protected cells  
BPRP

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Why?





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Please submit questions and  
issues you wish me to cover

Thank You

