

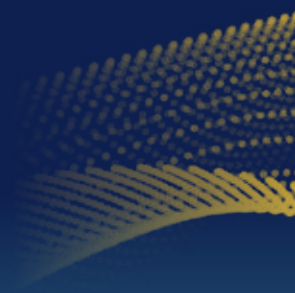
GLOBAL FORUM ON
**TRANSPARENCY AND EXCHANGE OF
INFORMATION FOR TAX PURPOSES**

Tax Transparency in Asia 2025

Asia Initiative Progress Report



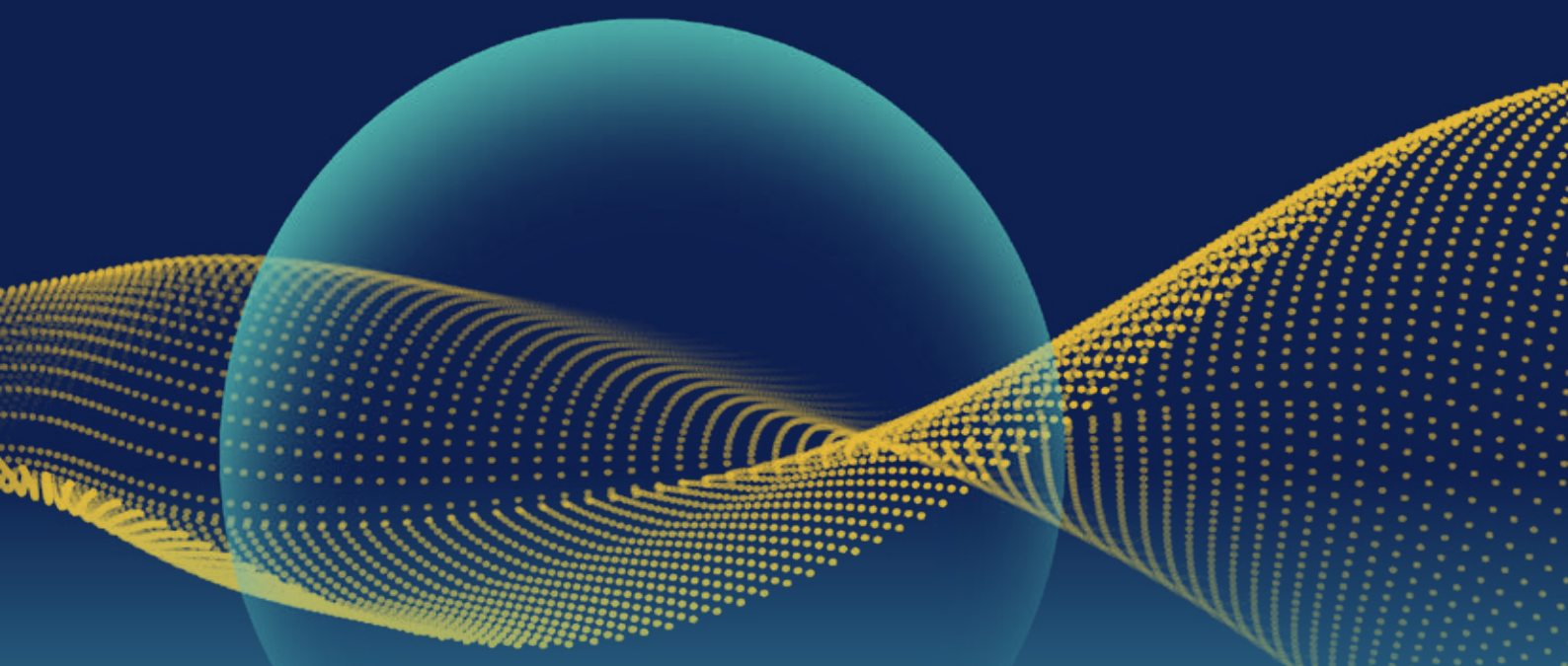
17th Global Forum
plenary meeting,
26-28 November 2024,
Asunción, Paraguay.



17^{ème} Réunion plénière du Forum mondial
Charia del Foro Global
2024 | Asunción, Paraguay
January 2024



17^{ème} Réunion plénière du



The Asia Initiative

As in all regions of the world and despite the progress achieved, tax evasion and other illicit financial flows (IFFs) remain an issue in Asia, depriving governments of much-needed resources for their development strategies. In the wake of the COVID-19 pandemic's enormous economic toll, this concern was an even more pressing one. Mobilising domestic resources from the fight against tax evasion was not just a matter of fairness for the Asian region, but an urgent necessity to rebuild public trust, and protect the future of social and economic recovery.

To support these efforts and ensure greater tax co-operation in the region, the idea of an Asia Initiative to enhance regional co-operation and develop a platform for greater collaboration, peer-experience sharing, especially designed to respond to the specific needs of its members, blossomed. Building on the two successful regional initiatives for Africa and Latin America previously launched by the Global Forum on Transparency and Exchange of Information (Global Forum), and taking advantage of the momentum created by Indonesia's G20 Presidency in 2022, the Asia Initiative was launched in 2021 and formally established in 2022.

The political momentum behind the Asia Initiative was driven by the ministerial-level endorsement of the Bali Declaration by 13 Asian members of the Global Forum on 14 July 2022, in the margins of the G20 Finance Ministers and Central Bank Governors' meeting in Bali, Indonesia. Calling for an enhanced use of tax transparency for sustainable domestic resource mobilisation in the Asian region, the Bali Declaration is the cornerstone of the Asia Initiative. It aims to maximise the effective use of the information exchanged to tackle tax evasion and other IFFs and sustain the mobilisation of domestic resources across the region.

In record time, the Asia Initiative successfully evolved into a comprehensive, politically supported framework, with a clear action plan to support regional efforts in implementing and using the international tax transparency standards to better recover and mobilise domestic resources.

Since 2022, the Initiative counts 17 members and 6 global and regional partners that contribute to and support the Bali Declaration.

To meet its objectives, the members of the Asia Initiative agreed an ad-hoc governance under which Mr Suryo Utomo, Director General of Taxes of Indonesia, became the first Chair of the Asia Initiative in 2022, after which, and considering the size and the diversity of the Asian region, a permanent governance and mandate were agreed until 2026, with the option to renew it beyond that term. To steer the work and measure the progress made towards the objectives of the Bali Declaration, a co-chairing system was adopted. The Co-Chairs are appointed for a two-year mandate with one year overlap.

In 2024, the work was steered by Mr Sanjay Malhotra, Revenue Secretary of the Department of Revenue of India, and Mr Rustam Badasyan, replaced by Mr Eduard

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SIGNATORIES OF THE BALI DECLARATION AND MEMBERS OF THE ASIA INITIATIVE

Armenia • Brunei Darussalam • China (People's Republic of) • Hong Kong (China) • India • Indonesia • Japan • Kazakhstan • Korea • Macau (China) • Malaysia • Maldives • Mongolia • Pakistan • Philippines • Singapore • Thailand

Hakobyan, as Chairman of the State Revenue Committee, Armenia. In 2025, Mr Eduard Hakobyan continues his role as Co-Chair, joined by Mr Hassan Zareer, Commissioner General of the Maldives Inland Revenue Authority, who will serve as Co-Chair until 2026.

GOVERNANCE OF THE ASIA INITIATIVE

Date	Chair and Co-Chair	Jurisdiction
2022	Mr Suryo Utomo	Indonesia
2023	Mr Suryo Utomo and Mr Sanjay Malhotra	Indonesia and India
2024	Mr Sanjay Malhotra and Mr Rustam Badasyan	India and Armenia
2025	Mr Eduard Hakobyan and Mr Hassan Zareer	Armenia and Maldives

As part of the Asia Initiative’s mandate, members agree on the implementation of a high-level work plan setting the Initiative’s priorities for achieving the objectives of the Bali Declaration. This high-level work plan is structured around outreach, baseline actions and complementary actions.

The baseline actions aim to ensure that all members of the Asia Initiative have an adequate legal, organisational

and monitoring framework that allows them to fully benefit from Exchange of Information (EOI), such as participation in the Convention on Mutual Administrative Assistance in Tax Matters (MAAC), the setup of an efficient EOI function, the effective implementation of international tax transparency standards, and the training of relevant tax officials on EOI. The complementary actions are implemented on a voluntary basis, in addition to the baseline activities, to help interested members make use of the other co-operation possibilities offered by the MAAC. They include advanced forms of co-operation to tackle tax evasion and other IFFs and to improve domestic resource mobilisation, such as effective use of financial account information automatically exchanged (CRS data), EOI on Value Added Tax (VAT) or Goods and Services Tax (GST), the wider use of EOI data for non-tax purposes, assistance in the recovery of tax claims, and other forms of co-operation (e.g. spontaneous EOI, simultaneous audits, and tax examination abroad).

Members of the Asia Initiative meet twice a year to take stock of their progress and discuss ways of addressing the remaining challenges. The Asia Initiative remains open to any Asian member of the Global Forum endorsing the Bali Declaration.

PLAN OF ACTIVITIES FOR THE ASIA INITIATIVE

I. Baseline actions	Agreed fundamental actions for which all Members should establish a legal, organisational and monitoring framework to obtain the greatest benefit from EOI					
II. Complementary actions	Wider use of EOI data	Effective use of CRS data	Recovery of tax claims	EOI on VAT/GST	Other forms of administrative tax cooperation	Other areas of interest

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PARTNERS OF THE ASIA INITIATIVE

Asian Development Bank • Commonwealth Association of Tax Administrators • European Bank for Reconstruction and Development • International Finance Corporation • Study Group on Asia-Pacific Tax Administration and Research • World Bank

Preface

Each passing year brings new progress in matters of tax transparency, and 2024 is no exception. In retrospect, one thing comes to the forefront: cross-jurisdictional collaboration in Asia and beyond is not only expanding, it is working. Asian jurisdictions that are members of the Global Forum on Transparency and Exchange of Information for Tax Purposes (Global Forum), continue to strengthen their collective action reaffirming their commitment to greater tax transparency and the fight against tax evasion. The results are prominent, with additional revenues being identified year after year. The Asia Initiative's role in driving these advancements is both significant and measurable.

In today's unpredictable global landscape, Asian members of the Global Forum (Asian members) have their resilience tested. Strengthening domestic revenues remains crucial in navigating geopolitical uncertainties, while maintaining a steady path toward sustainable growth. As the world's most dynamic economy, Asia must keep forging its own course, ensuring that the conditions for continued prosperity remain firmly in place.

The Asia Initiative has become a critical capacity-building platform through the strong engagement of its 17 members. From high-level political support to the Bali Declaration in July 2022, to tangible investments in capacity building and innovation throughout 2022-24, Asia Initiative members have demonstrated a firm commitment to collaboration. Through experience-sharing, pooling resources to enhance tax co-operation, and developing practical solutions, a strong culture of collective accountability is built. This shared spirit has transformed the Asia Initiative into more than just a technical platform – it is a thriving community of peers working side by side, ensuring inclusive progress for all.

One of the key objectives of the Initiative has been to enhance the involvement of Asian countries in multilateral efforts to combat tax evasion, ensuring the region as a whole reaps the benefits of tax transparency. The Initiative has been successful on that front with seven Asian countries non-member of the Global Forum attending Asia Initiative meetings in 2024. Their participation as observers has fostered valuable interactions with both Global Forum and Asia Initiative members as well as partners. These exchanges have led to new connections and facilitated strategic discussions that could further strengthen collaboration.

Alongside this notable progress, the Asia Initiative has continued to drive forward its high-level priorities through the implementation of its annual work plan, approved in 2024 in Yerevan, Armenia. Hundreds of officials have received trainings to effectively implement and utilise the tax transparency standards. Additionally, the Initiative's Working Group dedicated to enhancing the use of automatic exchange of financial account information has already delivered valuable tools to

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ASIAN MEMBERS OF THE GLOBAL FORUM

Armenia • Azerbaijan • Brunei Darussalam • Cambodia • China (People's Republic of)
• Georgia • Hong Kong (China) • India • Indonesia • Japan • Kazakhstan • Korea
• Macau (China) • Malaysia • Maldives • Mongolia • Pakistan • Philippines
• Singapore • Thailand • Uzbekistan • Viet Nam

In italics, members of the Global Forum which are not members of the Asia Initiative.

improve data matching and explored potential use of this information, further supporting tax authorities' efforts to tackle tax non-compliance.

The outlook remains promising as continued investment leads to greater outcomes. For the second year in a row, Asian members of the Global Forum have identified over a billion euros of additional revenue driven by the implementation and effective use of international tax transparency standards. This achievement underscores their unwavering commitment to advancing tax transparency efforts and taking the necessary steps to fully realise Asia's potential in this domain.

While the achievements of the past three years are truly commendable, disparities in the effective use of exchange of information tools persist. Some Asian members of the Global Forum still face real challenges – technical, institutional, and resource-related – that limit their ability to fully leverage the framework they have established. Addressing these disparities is essential, and the Asia Initiative remains committed to providing tailored support, fostering knowledge-sharing, and ensuring the entire region advances together.

The road ahead presents challenges, yet the commitment across the community remains strong. With the collaborative spirit of the Asia Initiative, the region is well-positioned to achieve the goals set in the Bali Declaration, strengthen tax systems, and secure the resources necessary for inclusive development.

This report, *Transparency in Asia 2025: Asia Initiative Progress Report*, reflects the unwavering dedication of Asian members in implementing and using tax transparency standards to combat tax evasion and other illicit financial flows, ultimately benefiting their citizens.

Through collaboration with the Global Forum and other development and technical partners, Asian members have taken concrete actions to meet the objectives of the Bali Declaration. We extend our sincere gratitude to all involved in these efforts and look forward to continuing our shared work toward greater transparency, fairness and integrity in the tax systems.



Mr Hassan Zareer
Co-Chair
Asia Initiative



Ms Zayda Manatta
Head of the Global
Forum Secretariat



Gaël Perraud
Chair
Global Forum



Mr Eduard Hakobyan
Co-Chair
Asia Initiative

Acknowledgements

This third edition of the *Tax Transparency in Asia* report was prepared by the Secretariat of the Global Forum on Transparency and Exchange of Information for Tax Purposes (Global Forum)¹. It presents the progress of the Asia Initiative, in which 17 members of the Global Forum participated for the year 2024.

The Global Forum Secretariat would like to acknowledge with much appreciation the Asian Development Bank, the Commonwealth Association of Tax Administrators, the European Bank for Reconstruction and Development, the International Finance Corporation, the Study Group of Asia Pacific Tax Administration and Research, and the World Bank Group for promoting the tax transparency agenda in Asia.

The Global Forum Secretariat is also immensely grateful to the donor organisations who, in 2024, contributed to the funding of the Asia Initiative specifically or supported more broadly the Global Forum’s capacity-building programme which benefited Asian countries. These include Japan, which particularly supported the Asia Initiative, as well as the European Union, France, Germany, Ireland, the Netherlands, Norway, Spain, Sweden, Switzerland, and the United Kingdom.

Finally, the authors extend special thanks to the officials from the ministries of finance and tax administrations of all the 20 Asian members of the Global Forum which provided data by responding to the 2025 Global Forum Survey and of Asian jurisdictions² and partners which generously shared quotes, experiences in the form of testimony, interviews and case studies. The data and responses received under the 2025 Global Forum Survey were analysed and form the basis for the insights presented in the report and have been critical to its quality.

1. This report was prepared by the following staff of the Global Forum Secretariat: Seiya Akishimo, Aurore Arcambal, Namiko Kobayashi, Raynald Vial and Lena Walder under the supervision of Hakim Hamadi, Head of the Capacity-Building and Outreach Unit, and Zayda Manatta, Head of the Global Forum Secretariat.

2. Data was provided by 20 Asian members. The authors would especially like to thank the following Asian jurisdictions and partners for their specific contributions: Armenia, Azerbaijan, Brunei Darussalam, Cambodia, China (People’s Republic of), Georgia, Hong Kong (China), India, Indonesia, Japan, Kyrgyzstan, Korea, Malaysia, Maldives, Mongolia, Pakistan, Philippines, Singapore, Sri Lanka, Thailand and the Asian Development Bank (ADB) and the Study Group on Asia-Pacific Tax Administrations and Research. As a member of the ADB, Georgia agreed to share its tax transparency journey in this report.



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7th Asia Initiative meeting, 25 November 2024, Asunción, Paraguay.

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Abbreviations and acronyms

ADB	Asian Development Bank
AEOI	Automatic Exchange of Information
AML/CFT	Anti-money laundering and counter-financing of terrorism
APRG	Automatic Exchange of Information Peer Review Group
Asian member	Asian jurisdiction member of the Global Forum on Transparency and Exchange of Information for Tax Purposes.
CARF	Crypto-Asset Reporting Framework
CARF-MCAA	Multilateral Competent Authority Agreement pursuant to the Crypto-Asset Reporting Framework
CRS	Common Reporting Standard
CRS-MCAA	Multilateral Competent Authority Agreement on Automatic Exchange of Financial Account Information
CTS	Common Transmission System
DRM	Domestic resource mobilisation
DTC	Double Taxation Convention
EOI	Exchange of Information
EOIR	Exchange of Information on Request
FATF	Financial Action Task Force
Global Forum	Global Forum on Transparency and Exchange of Information for Tax Purposes
GST	Goods and Services Tax
IFFs	Illicit Financial Flows
ISM	Information Security Management
MAAC	Convention on Mutual Administrative Assistance in Tax Matters
OECD	Organisation for Economic Co-operation and Development
SGATAR	Study Group on Asia-Pacific Tax Administration and Research
TIEA	Tax Information Exchange Agreement
ToR	Terms of Reference
VAT	Value Added Tax
VDP	Voluntary Disclosure Programme

Executive summary

Asian members of the Global Forum on Transparency and Exchange of Information for Tax Purposes (Global Forum) remain steadfast in their commitment to advancing tax transparency standards. Their continuous efforts to strengthen their exchange of information (EOI) framework, train personnel, and utilise EOI tools demonstrate a sustained dedication to effective implementation of these standards. By reinforcing these capabilities, they are enhancing tax co-operation and ensuring meaningful progress in the fight against tax evasion and other illicit financial flows.



Executive summary

These investments are paying off with at least EUR 24 billion additional revenue (tax, interest and penalties) identified through the implementation and use of the tax transparency standards since 2009. For the second consecutive year, annual additional revenue has surpassed EUR 1 billion, reaching EUR 1.9 billion in 2024. Of this total, EUR 1.7 billion was generated through exchange of information on request (EOIR) and offshore investigations, while around EUR 200 million resulted from automatic exchange of financial account information, including related voluntary disclosure programmes. These impressive figures underscore the critical role of tax transparency in curbing tax evasion and securing essential public resources.

These results also reflect the strong commitment to the tax transparency agenda, demonstrated by several key milestones achieved in 2024. The collective efforts of Asian members of the Global Forum (Asian members), backed by political support, capacity-building initiatives, and strategic collaborations, have played a crucial role in driving tangible progress:

- The Philippines ratified the Convention on Mutual Administrative Assistance in Tax Matters (MAAC) getting ready to reap the benefits of an expanded scope of partners and forms of administrative assistance from 2025 onwards.
- Azerbaijan successfully passed its Second Round of EOIR Peer Review and obtained a Compliant rating.
- Georgia successfully passed its Second Round of EOIR Peer Review with a Largely Compliant rating obtained and started its first reciprocal automatic exchanges, joining the 15 Asian members which have started exchanging financial account information automatically¹.
- Armenia, committed to exchanging financial account information automatically by 2025, has passed legislation in 2024 to enable the first exchanges by September 2025.
- Nine Asian members committed to work towards swiftly implementing the automatic exchange of information on crypto-asset transactions to

commence these exchanges, in principle, by 2027 or 2028. Four have already signed the necessary international legal instrument taking one of the first steps towards implementation.

Through effective joint coordination between the Initiative's leadership, its members and partners, and the Secretariat of the Global Forum, significant progress has been made in engaging Asian countries that have not yet joined the Global Forum. These efforts have focused on raising awareness on the benefits of tax transparency, facilitating their participation in the Asia Initiative meetings, and encouraging them to join multilateral and regional efforts to advance the tax transparency agenda. In 2024, seven non-Global Forum members took part in at least one Asia Initiative meeting as observers, strengthening connections and paving the way for further collaboration. These outreach efforts continue as well with Asian members which have not yet endorsed the Bali Declaration, taking advantage of high-level regional meetings hosted by partners in the region and attended by key stakeholders.

Overall, Asian members have effectively implemented the EOIR standard, with 94% of the Asian members fully assessed in the Second Round of EOIR Peer Review obtaining a satisfactory rating. Additionally, Asian members implementing the Common Reporting Standard on Automatic Exchange of Financial Account Information (CRS) which have been peer-reviewed also obtained a satisfactory outcome: (i) 86% of them have a legal framework considered in general in place for the implementation of the CRS, although some improvements are needed for 21% of them; (ii) 83% of these jurisdictions are also on-track for ensuring an effective implementation of the CRS in practice.

Capacity building is at the core of the Asia Initiative. By providing bilateral technical assistance, developing knowledge tools and delivering training and experience-sharing events, the Global Forum Secretariat and its partners are supporting Asian jurisdictions in fully implementing and benefiting from the tax transparency standards. In 2024, one of the key priorities was to assist Asian members in addressing the gaps identified in their EOIR and/or CRS peer reviews and preparing them for their upcoming reviews or reassessments.

1. As a member of the Asian Development Bank, Georgia agreed to share its tax transparency journey in this report.

Some of the figures of the capacity building offered in 2024 are telling:

- Over 1 000 officials from 32 Asian jurisdictions have attended 33 training and sharing-experience events organised by the Global Forum Secretariat, including with partners, on different areas of tax transparency.
- 17 Asian jurisdictions benefited from bilateral technical assistance.
- 57% of the Asian participants in capacity-building activities were female officials.
- Asian officials strengthened their skills in an advanced Train the Trainer Programme made of five thematic sessions over the year. They conducted 9 local training sessions and trained over 1 200 officials from their respective jurisdictions.
- 5 women from 5 Asian members successfully participated in the 2024 Women Leaders in Tax Transparency programme, which aims at supporting gender equality and promotion of female leadership.

- 31 officials from 9 Asian members participated in the Information Security Management Network, aimed at building capacities and sharing experience in this very technical area, which is critical to ensure an appropriate confidentiality and data safeguards framework for EOI.

The Asia Initiative members took an important step forward in advancing specific actions to support interested members in building their capacities and expertise in various forms of administrative co-operation under the MAAC. A key milestone in 2024 was the development and delivery of two tools by the Initiative's Working Group on Effective Use of Automatically Exchanged Data, which was established in 2023. The *Step-by-Step Guide on Cleansing and Matching CRS Data* and the *Guide on Tax Adjustment Based on CRS Data* directly address the specific needs of Asia Initiative members, enabling them to maximise the benefits of CRS exchanges and bolster domestic resource mobilisation efforts.

Building on these promising outcomes and recognising the need to unlock the full potential of tax transparency in Asia, the Initiative, the Global Forum Secretariat, and its partners will continue to support members in maximising the use of EOI.



A local training in China in 2024 by certified trainers from the Global Forum's Train the Trainer Programme.



↻ 6th Asia Initiative meeting, 24-25 June 2024, Yerevan, Armenia.

↻ Regional Training, 24-27 September 2024, Nagpur, India



↻ Regional Beneficial Ownership Workshop, 3-5 July 2024, Manila, Philippines



Tax transparency in Asia at a glance



While Asian jurisdictions engaged in the Global Forum on Transparency and Exchange of Information for Tax Purposes (Global Forum) have made significant progress in enhancing tax transparency and generating substantial revenue from it, non-member Asian countries are missing out on the benefits of adopting the tax transparency standards, which could help them generate additional revenue. However, among Global Forum members in Asia (Asian members), the degree of implementation of tax transparency standards and their application in combating tax evasion vary. This disparity is largely influenced by differences in size, economic development, and membership duration. Overall, despite these differences, Asian members have established the necessary infrastructure to effectively participate in exchange of information (EOI), satisfactorily implemented

the standards and are reaping the benefits. The Asia Initiative has played a key role in addressing the region's specific capacity-building needs, contributing significantly to the progress achieved in recent years.

The Asia Initiative in 2024

17 signatories of the Bali Declaration: Armenia, Brunei Darussalam, China (People's Republic of), Hong Kong (China), India, Indonesia, Japan, Kazakhstan, Korea, Macau (China), Malaysia, Maldives, Mongolia, Pakistan, the Philippines, Singapore, and Thailand.

6 partners: Asian Development Bank / Asia Pacific Tax Hub, Commonwealth Association of Tax Administrators, European Bank for Reconstruction and Development, International Finance Corporation, Study Group on Asian Tax Administration and Research, and World Bank.

7 observers: Bangladesh, Kyrgyzstan, Lao (People's Democratic Republic), Nepal, Sri Lanka, Tajikistan and Turkmenistan.

Asia in the Global Forum

22 Asian jurisdictions are members of the Global Forum (13% of the total membership): Armenia, Azerbaijan, Brunei Darussalam, Cambodia, China (People's Republic of), Georgia*, Hong Kong (China), India, Indonesia, Japan, Kazakhstan, Korea, Macau (China), Malaysia, Maldives, Mongolia, Pakistan, Philippines, Singapore, Thailand, Uzbekistan, Viet Nam.

* As a member of the Asian Development Bank, Georgia agreed to share its tax transparency journey in this report.

Impact of Exchange of Information on domestic resource mobilisation in Asia

Over 2009-2024, Asian members have identified at least **EUR 24 billion** in additional revenue (tax, interest, and penalties) through Exchange of Information on Request (EOIR) and offshore investigation (EUR 10 billion), and Automatic Exchange of Financial Account Information (through the Common Reporting Standard (CRS) and related voluntary disclosure programmes (VDP) (EUR 14 billion). In 2024 alone, at least **EUR 1.9 billion** has been identified through EOIR (EUR 1.7 billion) and CRS (around EUR 200 million).

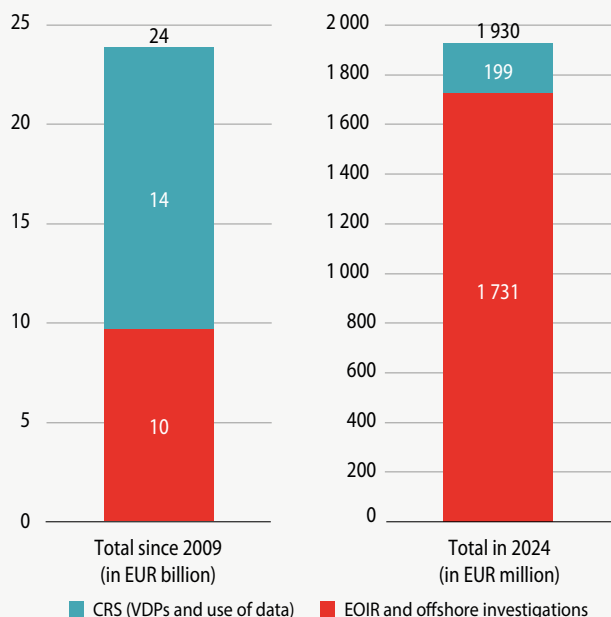
24
billion EUR
additional revenue
since 2009

At least EUR 24 billion in additional revenue have been identified by Asian members of the Global Forum since 2009.

1.9
billion EUR
additional revenue
identified in 2024

At least EUR 1.9 billion have been identified in 2024 through EOIR and CRS.

Revenues identified as a result of EOI since 2009 and in 2024



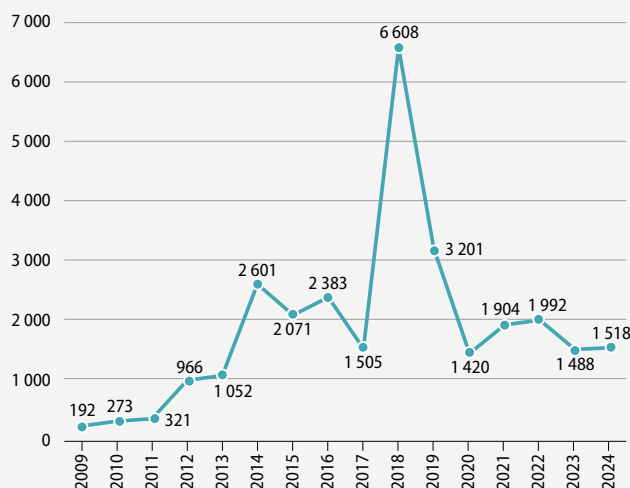
Note: Responses from 13 Asian members for EOIR and offshore investigations data and 10 for CRS.

Source: Global Forum surveys.

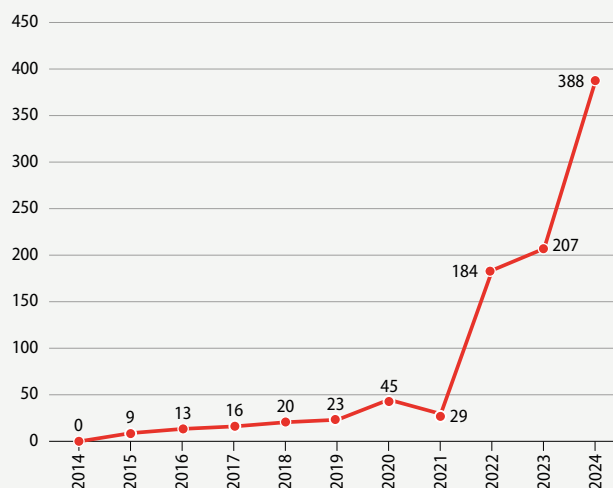
EOI requests sent by Asian members

In 2024, Asian members remained net providers of information, although they received 14% less (2 341) and sent 12% more (1 906) requests than in 2023. More experienced members have developed greater maturity in the use of EOIR, prioritising complex and high-potential cases, which has resulted in fewer requests being sent than in most of previous years (in particular between 2014 and 2022). Meanwhile, newer members are expanding their use of EOIR, benefiting from capacity-building efforts.

Number of requests sent by Asian members which joined **more than 10 years ago since 2009**



Number of requests sent by Asian members which joined **less than 10 years ago since 2014**



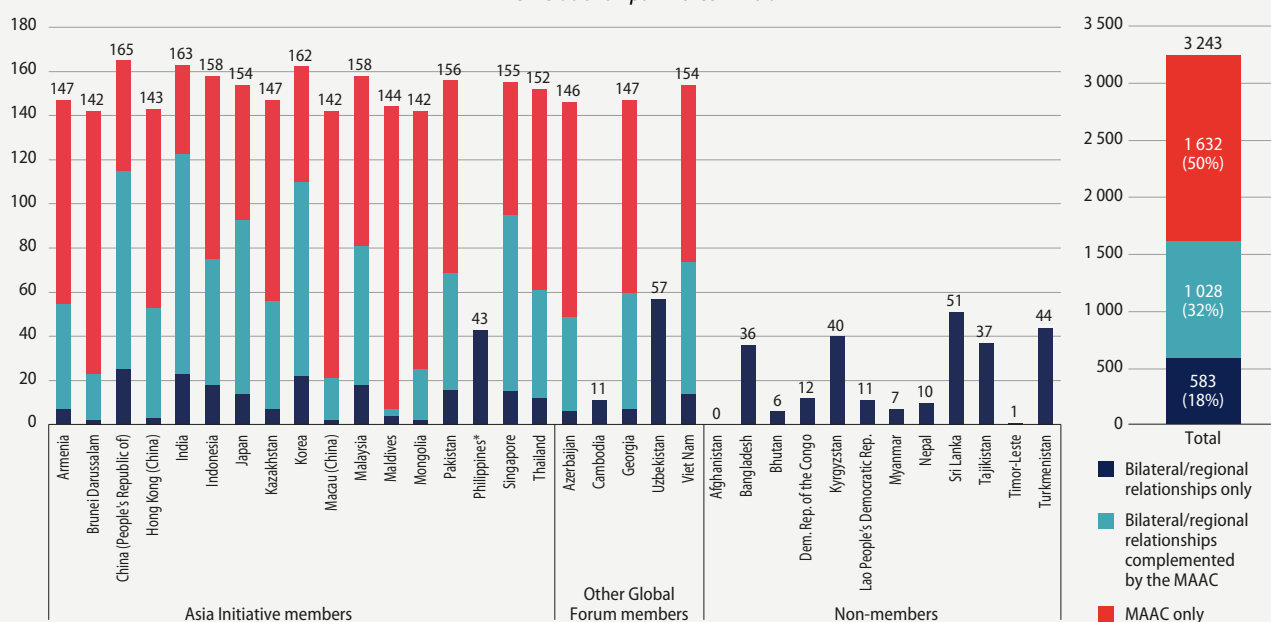
Note: Responses from 22 Asian members.

Source: Global Forum surveys.

Development of the EOI networks in Asia

Overall, 3 243 EOI relationships are in force in Asia, of which 2 660 (82%) are covered by the Convention on Mutual Administrative Assistance in Tax Matters (MAAC). Virtually all Asian Global Forum members have established a wide EOI network with foreign partners, with the MAAC playing a crucial role in aligning these relationships with international tax transparency standards. In contrast, non-Global Forum members generally have a more limited number of EOI partners, relying mainly on bilateral agreements that are not always in line with these standards.

EOI relationships in force in Asia



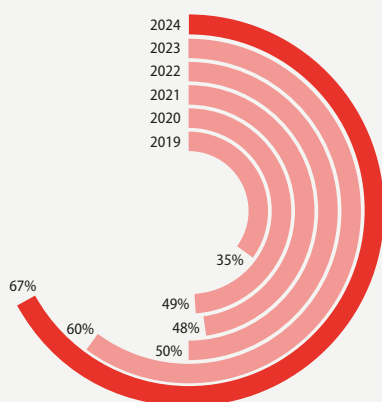
Note: Bilateral agreements include double tax conventions (DTCs) and tax information exchange agreements (TIEAs). Regional agreements include South Asian Association for Regional Co-operation (SAARC) and the Agreement between the Member States of the Commonwealth of Independent States on Co-operation and Mutual Assistance on issues of compliance with the tax legislation and combating violations in this area (CIS Agreement). *The Philippines ratified the MAAC domestically in 2024 and deposited their instrument of ratification with the OECD on 7 January 2025. The MAAC will enter into force as of 1 May 2025.

Source: Analysis done by the Global Forum Secretariat based on publicly available information.

Effective use of CRS data by Asian members

Asian members have made notable advancement in matching CRS data with domestic taxpayer information, which is the first step towards effectively using the received data. In 2024, the average automatic matching rate rose to 67%, marking a 7-percentage-point increase from the previous year. CRS data is mainly used to support risk assessment, tax audit and tax collection functions of Asian tax authorities.

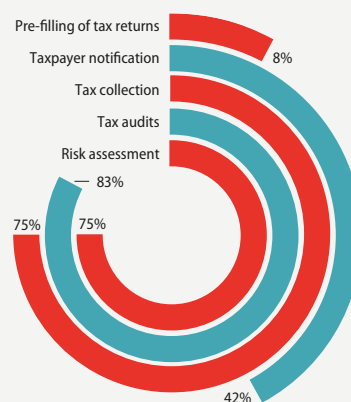
Average automatic matching rates for CRS data received, 2019-2024 (in %)



Note: Data on the automatic matching rate provided by 5, 5, 8, 7, 9 and 8 Asian members respectively that are exchanging CRS data automatically on a reciprocal basis. The labels show the percentage of the matching rate.

Source: Global Forum surveys.

Use of CRS data by Asian members in 2024 (in %)



Note: Responses from 12 Asian members showing the percentage of utilisation of this information in their tax activities.

Source: 2025 Global Forum survey.

Implementation of automatic exchange of information in Asia

Already 18 out of the 22 Asian members are committed to start CRS exchanges by a specific date, and 16 of them have already started, including Georgia in 2024. In addition, nine Asian members committed to implementing the Crypto-Asset Reporting Framework (CARF) in 2027 or 2028.

CRS	
Year of first exchanges	Asian Members
2017	India, Korea
2018	Azerbaijan, Brunei Darussalam, China (People's Republic of), Hong Kong (China), Indonesia, Japan, Macau (China), Malaysia, Pakistan, Singapore
2021	Kazakhstan
2022	Maldives
2023	Thailand
2024	Georgia
Commitment to start in 2025	Armenia
Commitment to start in 2027	Mongolia
Not yet committed to start by a specific date	Cambodia, Philippines, Uzbekistan, Viet Nam

CARF	
Year of first exchanges	Asian Members
Commitment to start in 2027	Azerbaijan, Indonesia, Japan, Korea
Commitment to start in 2028	Hong Kong (China), Malaysia, Mongolia, Singapore, Thailand
Jurisdiction of relevance not committed to start in 2027/2028	India*, Kazakhstan**, Philippines*, Viet Nam

Note: (*) India and the Philippines are in the process of making a political commitment to implement the CARF as part of the Global Forum's CARF commitment process which they expect to make in due course. (**) Early 2025, Kazakhstan committed to implement the CARF by 2027, bringing to 10 the number of Asian committed jurisdictions.

Source: For the status of the CRS commitments see <https://www.oecd.org/tax/transparency/documents/aeoi-commitments.pdf>, and for the status of the CARF commitments see <https://www.oecd.org/tax/transparency/documents/commitments-carf.pdf>.

2024 technical assistance in Asia

- 17 Asian jurisdictions benefited from bilateral technical assistance.
- Over 1 200 officials from 32 Asian jurisdictions, including 11 non-member Asian countries, have attended 33 Global Forum's training and sharing-experience events on different areas of tax transparency.
- The certified trainers from the 2022 and 2023 Train the Trainer cohorts conducted 9 local training sessions and trained 1 228 officials from their respective jurisdictions.
- 31 officials from 9 Asian members participated in the Information Security Management Network, aimed at building capacities and sharing experience in this technical area, which is critical to ensure an appropriate confidentiality and data safeguards framework for AEOL.
- 57% of the Asian participants in capacity-building activities were female officials.
- 5 women from 5 Asian members successfully participated in the 2024 Women Leaders in Tax Transparency programme, which aims at supporting gender equality and promoting female leadership.
- The Asia Initiative's Working Group on the effective use of CRS data held four meetings in 2024 and produced two deliverables: the *Step-by-Step Guide for Cleansing and Matching CRS Data* and the *Guide on Tax Adjustments Based on CRS Data*. Both documents were approved by Asia Initiative members during the Asia Initiative meeting held in November 2024 in Paraguay.

One step closer to full tax transparency's potential in Asia

1

Tax transparency continues to strengthen the integrity and fairness of national tax systems and boost government revenues. In 2024, like in precedent years, Asian members of the Global Forum on Tax Transparency and Exchange of Information for Tax Purposes (Global Forum) have worked towards securing public resources and ensuring equitable taxation, using exchange of information (EOI). The impact of this commitment is tangible since Asian members of the Global Forum (Asian members) have identified significant additional revenues in 2024. Tax transparency supports compliance and enforcement, contributing to the mobilisation of domestic resources, which is critical for sustainable development and public service delivery.

TAX TRANSPARENCY, A TOOL TO CURB ILLICIT FINANCIAL FLOWS AND STRENGTHEN PUBLIC FINANCES

Tax transparency is a powerful tool in the fight against tax evasion and other forms of illicit financial flows (IFFs), including corruption, money laundering, and terrorism financing. It also plays a crucial role in enhancing domestic resource mobilisation (DRM).

The tax transparency standards comprise the Standard on Transparency and Exchange of Information on Request (EOIR) and the Standards on Automatic Exchange of Information (AEOI), which are the Common Reporting Standard (CRS) and the Crypto-Asset Reporting Framework (CARF) which provide for AEOI

on financial accounts and on crypto-asset transactions respectively (see Table 1).

These international standards aim to improve transparency by ensuring the availability of critical information for tax authorities: legal and beneficial ownership, accounting, banking and other financial information. They are also designed to ensure access to this information by tax authorities and effective exchange of this information with foreign partners. By encouraging the adoption of robust domestic legal and administrative frameworks, the tax transparency standards enable tax authorities to detect, track and address tax fraud or tax evasion cases, including by accessing information available only from abroad through cross-border EOI.

“Malaysia recognises that robust tax transparency is fundamental to effective domestic resource mobilisation. The implementation of the critical tools of exchange of information, whether on request or automatic, has significantly strengthened our ability to detect offshore non-compliance, improve tax collection, and promote voluntary compliance. These measures not only enhance our capacity to fight tax evasion but also reinforce public confidence in our tax system. By aligning with international standards and actively participating in global tax transparency initiatives, Malaysia is ensuring that the financial resources needed for inclusive growth and sustainable development are mobilised efficiently and sustainably.”

Dr Abu Tariq Jamaluddin, Chief Executive Officer, Inland Revenue Board, Malaysia



TABLE 1. **The tax transparency standards**

<p>Transparency and exchange of information on request (EOIR)</p>	<p>The EOIR standard requires a jurisdiction's competent authority – usually, the tax authority – to provide to another jurisdiction's competent authority, on request, information that is foreseeably relevant for conducting a tax investigation and for enforcing its tax laws or the provisions of a tax agreement in force between the two jurisdictions.</p> <p>The EOIR standard is built around three axes of availability, access and exchange, which form the basis of its Terms of Reference (ToR)^(a):</p> <p>A. Availability of information: jurisdictions should ensure the availability of (i) legal and beneficial ownership information of all relevant legal entities and arrangements, (ii) accounting records and underlying documents, and (iii) banking information (including information on legal and beneficial owners of accounts).</p> <p>B. Access to information: jurisdictions should have the authority and powers to obtain relevant information for tax purposes, including legal and beneficial ownership, accounting and banking information.</p> <p>C. Exchange of information: jurisdictions should have legal basis and mechanisms, and an organisational framework that provides for exchange of information in a timely manner.</p> <p>All members of the Global Forum are committed to the implementation of the EOIR standard, and the level of compliance with this standard, both in terms of the legal and regulatory framework and the implementation in practice, is assessed under the Global Forum's peer review process to ensure a level playing field.</p> <p style="text-align: right;"><i>Continued on page 18...</i></p>
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One step closer to full tax transparency's potential in Asia

TABLE 1. **The tax transparency standards (continued)**

Automatic Exchange of Information (AEOI)	Common Reporting Standard (CRS)	<p>The CRS provides for automatic exchange of financial account information. It requires financial institutions to apply due diligence rules to identify financial accounts of tax residents in other jurisdictions and periodically collect and report related information to their local competent authorities. Subsequently, the competent authorities automatically exchange this information with the competent authorities of other jurisdictions (i.e. the jurisdiction of tax residence of the account holder). The CRS contains details as to the due diligence process that should be applied by financial institutions to determine what accounts are reportable and to whom the information should be reported (the jurisdiction(s) of tax residency) as well as the items of information that should be exchanged.</p> <p>While all members of the Global Forum are committed to the implementation of the CRS, developing countries without a financial centre are not required to adhere to a specific deadline. Instead, they can define an appropriate implementation timeline that considers their specific circumstances, with the support of the Global Forum Secretariat. As of end of 2024, a total of 127 jurisdictions are committed to exchanging financial account information automatically by 2027^(b). Jurisdictions implementing the CRS undergo a peer review process by the Global Forum. The peer reviews are carried out against the three Core Requirements (CR) of the CRS ToR^(c):</p> <p>CR 1: jurisdictions should ensure that all reporting financial institutions apply due diligence procedures which are in accordance with the CRS to review the financial accounts they maintain and collect and report the information required by the CRS.</p> <p>CR 2: jurisdictions should exchange information with all interested appropriate partners^(d) in accordance with the CRS, in a timely manner, ensuring it is sorted, prepared, validated and transmitted in accordance with the CRS.</p> <p>CR 3: jurisdictions should keep the information exchanged confidential and properly safeguarded and use it in accordance with the exchange agreement under which it was exchanged.</p>
	Crypto-Asset Reporting Framework (CARF)	<p>The CARF provides for the automatic exchange of information on transactions involving crypto-assets in a standardised manner with the tax residence jurisdictions of taxpayers on an annual basis. It sets out detailed rules regarding:</p> <ul style="list-style-type: none"> ● the scope of crypto-assets covered ● the entities and individuals subject to data collection and reporting requirements ● the transactions subject to reporting, as well as the specific information to be reported in relation to such transactions ● the due diligence procedures for identifying crypto-asset users and controlling persons, and for determining the relevant tax jurisdictions for reporting and exchange purposes. <p>In 2024, the Global Forum adopted a framework to support the widespread implementation of the CARF by relevant jurisdictions (i.e. jurisdictions hosting or seeking to host a relevant crypto-asset sector and therefore posing a risk to the level playing field). This includes process for identifying relevant jurisdictions, as well as a coordinated timeline for commencing exchanges under the CARF in 2027, or in 2028 for jurisdictions facing particular challenges with the 2027 deadline. Other jurisdictions can voluntarily implement the CARF in a practicable timeline with the support of the Global Forum Secretariat.</p> <p>As of the end of March 2025, 67 member jurisdictions of the Global Forum have committed to implementing the CARF in time for the first exchanges by 2027 or 2028.</p>

a. OECD (2025), *Handbook for Second Round Peer Reviews and New Monitoring Processes on Transparency and Exchange of Information on Request*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, <https://www.oecd.org/tax/transparency/documents/handbook-for-second-round-peer-reviews-and-new-monitoring-processes-on-transparency-and-exchange-of-information-on-request.pdf>.

b. This includes jurisdictions that committed to implement the CRS by a specific date in 2024. The status of AEOI commitments is available at <https://www.oecd.org/tax/transparency/AEOI-commitments.pdf>.

c. OECD (2018), *The Framework for the full AEOI reviews: the terms of reference*, available at <https://www.oecd.org/tax/transparency/documents/terms-of-reference-for-aeoi-reviews.htm>.

d. Interested appropriate partners are those interested in receiving information and that meet the required standards in relation to confidentiality and data safeguards.

Source: Global Forum Secretariat.

EOI therefore assists tax authorities in combating tax evasion while fostering voluntary compliance and strengthening public trust in the fairness of the tax system, ultimately mobilising domestic revenues to finance the development and public policies and services.

USING EXCHANGE OF INFORMATION TO MOBILISE DOMESTIC REVENUES FOR ASIA

Through the implementation and the use of the tax transparency standards, Global Forum members, have identified at least EUR 130 billion of additional revenue (taxes, interest, penalties) in the 2009-2023 period, including EUR 45 billion by developing countries (see Figure 1). This impressive amount may be higher as not all the members of the Global Forum are measuring the impact of EOI on DRM.

Of the 22 Asian members, 57% have processes in place to systematically measure the impact of EOI on DRM. The amount they have reported represented over 16.5% of the total EUR 130 billion additional revenues identified between 2009 and 2023.

In 2024, Asian members identified at least EUR 1.9 billion additional revenue (taxes, interest, penalties) in the context of the implementation and use of the tax transparency standards. This brings to a minimum of EUR 24 billion the total additional revenue identified since 2009 through EOI and related voluntary disclosure programmes (VDPs)¹ (see Figure 2). This illustrates the huge potential of cross-border co-operation between tax authorities to ensure that taxpayers effectively abide to their tax obligations and pay their tax liabilities, thus enabling governments to mobilise the much-needed resources for the development of their countries and for meeting their sustainable development goals.

The strong contribution of exchange of information on request to domestic revenue mobilisation in Asia

In 2024, eight Asian members reported identifying at least EUR 1.7 billion in additional revenues directly attributed to information obtained through EOIR and other offshore investigations. This boosts the total impact since 2009 to a minimum of EUR 10 billion, underscoring EOIR's critical role to DRM by combatting offshore tax evasion (see Figure 2). This significant result

1. A voluntary disclosure programme refers to an opportunity offered by tax authorities to non-compliant taxpayers to regularise their tax affairs under certain favourable conditions. These programmes generally include incentives for taxpayers, such as reduced interest and penalty charges, combined with protection against prosecution for tax offences.

FIGURE 1. Revenues identified between 2009-2023, by Global Forum members, in EUR billion

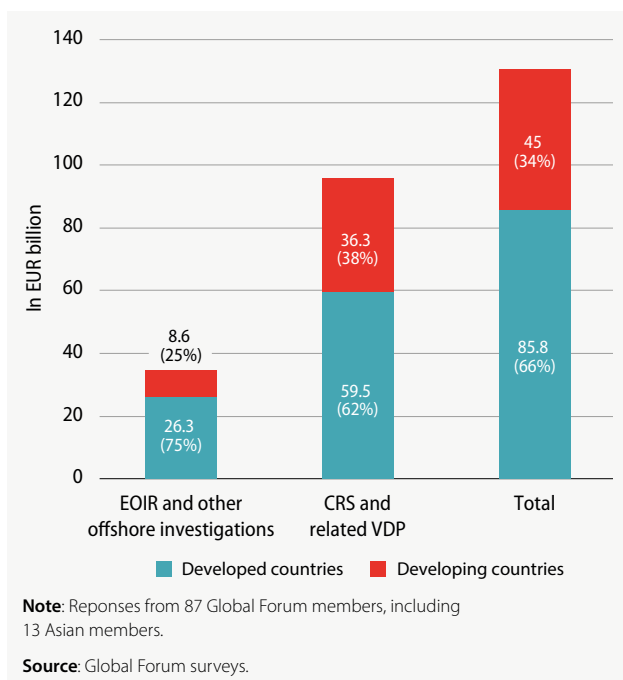
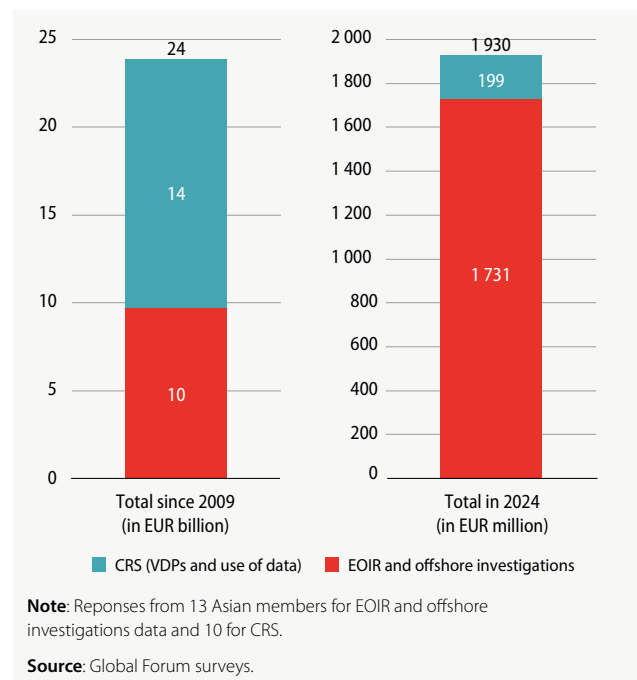


FIGURE 2. Revenues identified as a result of exchange of information since 2009 and in 2024



BOX 1. **INDONESIA – The successful use of exchange of information on request in a transfer pricing case**



The Indonesian Tax Authority conducted an audit of a palm oil company engaged in transfer pricing practices. The palm oil company income statement showed that most of the sales came from transactions with an affiliated entity in Jurisdiction X. The Indonesian palm oil company sourced its raw materials from its own plantations

Based on the audit, it was found that the affiliated company in Jurisdiction X acted as a global sales agent. Instead of delivering its palm oil products to Jurisdiction X, the Indonesian palm oil company shipped the products directly to ultimate buyers in several jurisdictions. Based on transfer pricing analysis, the tax auditor suspected that the gross profit margin of the affiliated company was too high for a company that acted merely as an intermediary, while the Indonesian palm oil company carried out more complex operations as a fully-fledged manufacturer.

In order to verify the situation, the tax auditor needed accounting information held by the affiliated company in Jurisdiction X. The Indonesian Competent Authority in

consultation with the tax auditor submitted a request for information to Jurisdiction X.

In less than 90 days, Jurisdiction X provided the requested information. Thanks to this information, the tax auditor was able to make necessary adjustments and successfully collected approximately EUR 1.9 million^(a) in additional tax revenue.

This case highlights the benefit of exchange of information on request in supporting not only fair and accurate tax assessments, but also domestic revenue mobilisation. To be effective, exchange of information request requires that both jurisdictions comply with the international standard. The requesting jurisdiction shall be able to meet the foreseeable relevance requirements, while the responding jurisdiction shall be able to provide the requested information in a timely manner.

Note: (a) Exchange rate as of 30 December 2024.

Source: Provided by the Directorate General of Taxes of Indonesia.

stems from integrating EOIR into the daily practices of tax auditors who effectively utilise the EOI infrastructure that their jurisdictions have strategically developed and implemented.

Box 1 illustrates the usefulness of EOIR in transfer pricing audits.

Overall, Asian members were net providers of information in 2024, although they received 14% less (2 341) and sent 12% more (1 906) requests than in 2023 (see Figure 3). Looking at the evolution since 2009 and apart from the 2017-2019 pic linked to a leak of offshore information and the first CRS exchanges, the number of outgoing requests remains in a range of 1 500 to 2 100 per year. The relative stability of this number over the past five years may be attributed to the substantial differences that exist in the levels of maturity, integration, and reliance on EOIR among various members (see Figure 4):

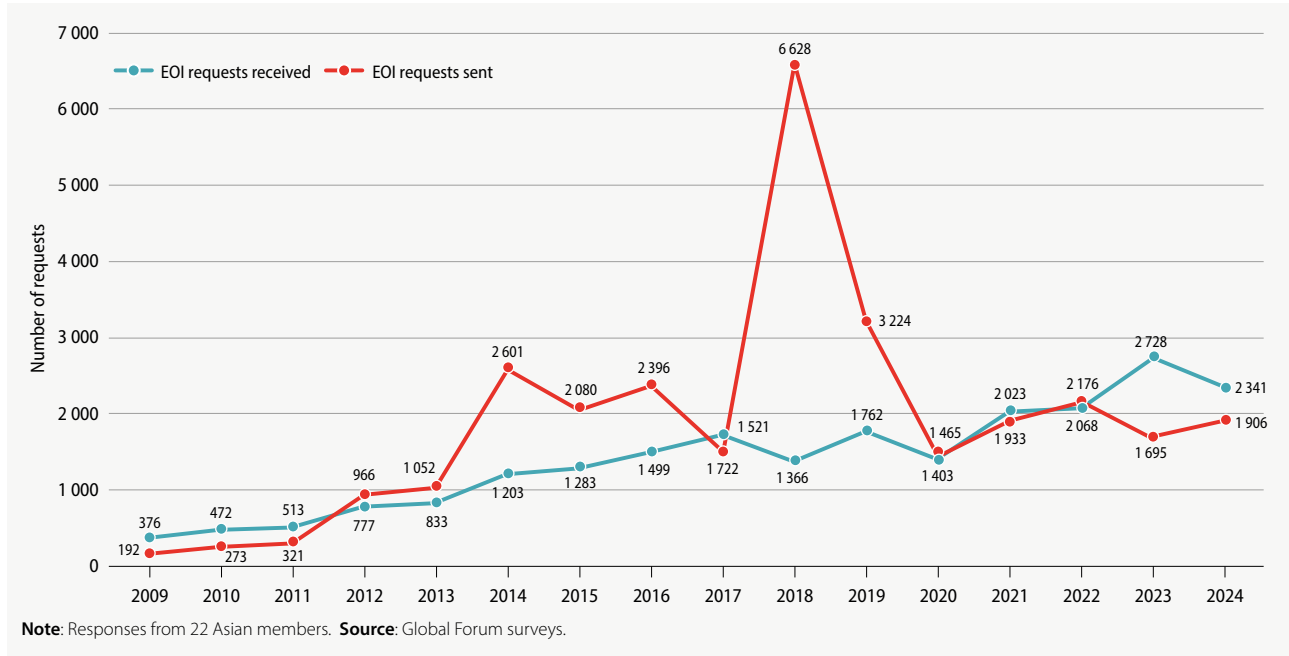
- Several Asian members have reached a high level of maturity in using the EOIR tool. With well-established processes and skilled auditors, they can more efficiently pinpoint the most relevant and promising

cases for EOIR. Their approach is more refined and targeted, which may lead to a comparatively lower volume of requests being sent than before.

- Some other members in the region are steadily integrating EOIR into their practices, leveraging newly established infrastructure. They are enhancing their ability to identify appropriate cases for cross-border EOI and are progressively sending a growing number of requests.
- Some Asian members make limited use of EOIR either due to the specific characteristics of their tax system that do not demand strong reliance on EOIR, or because they are at the early stages of the utilisation of EOIR.

Indeed, from 2009 to 2024, five Asian members accounted for 90% of all outgoing information requests (see Figure 5). In 2024, eight jurisdictions represented 93% of the region's outgoing requests, a slight decrease of 2% compared to 2023. While most of these jurisdictions are often of significant economic size, and have been leading the way in leveraging EOIR to combat tax evasion and generate substantial revenue, in 2024 again, more

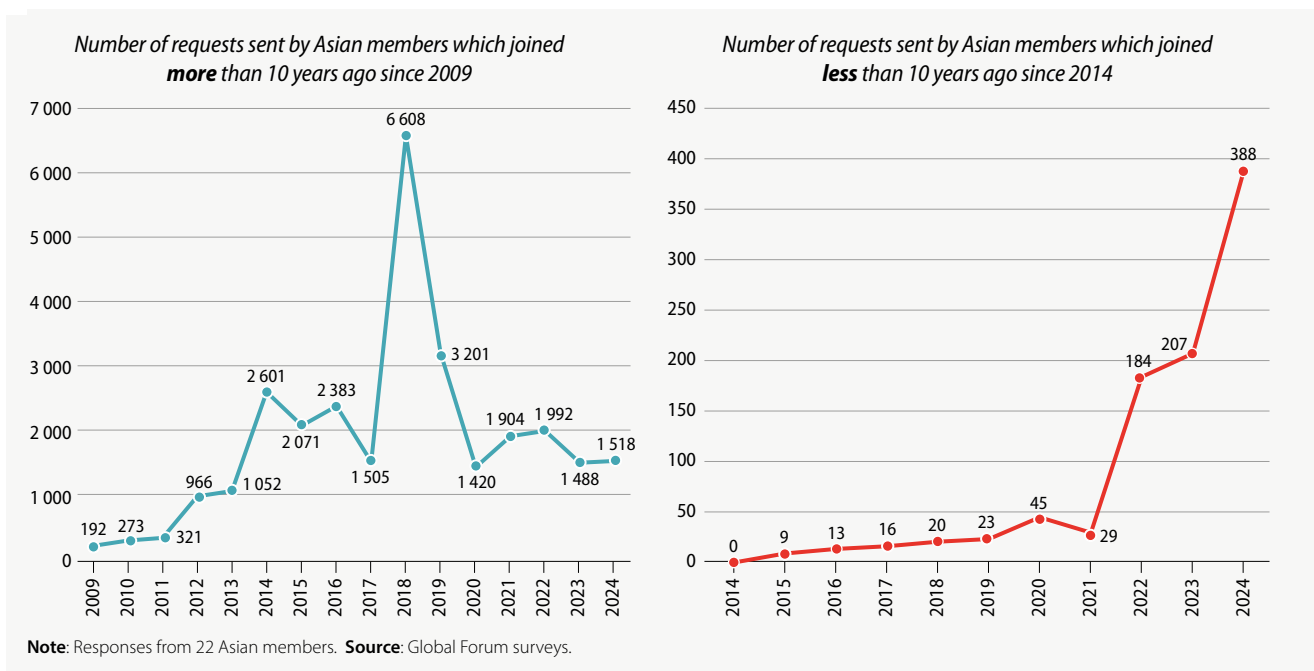
FIGURE 3. Number of requests for information sent and received by Asian members of the Global Forum, 2009-2024



recent joiners to the Global Forum are increasing the use of EOIR in their domestic compliance activities (see Figure 4). However, this also highlights an important challenge: many Asian members are still not making full use of EOIR leading to missed opportunities. Limited participation in EOIR may stem from various factors such

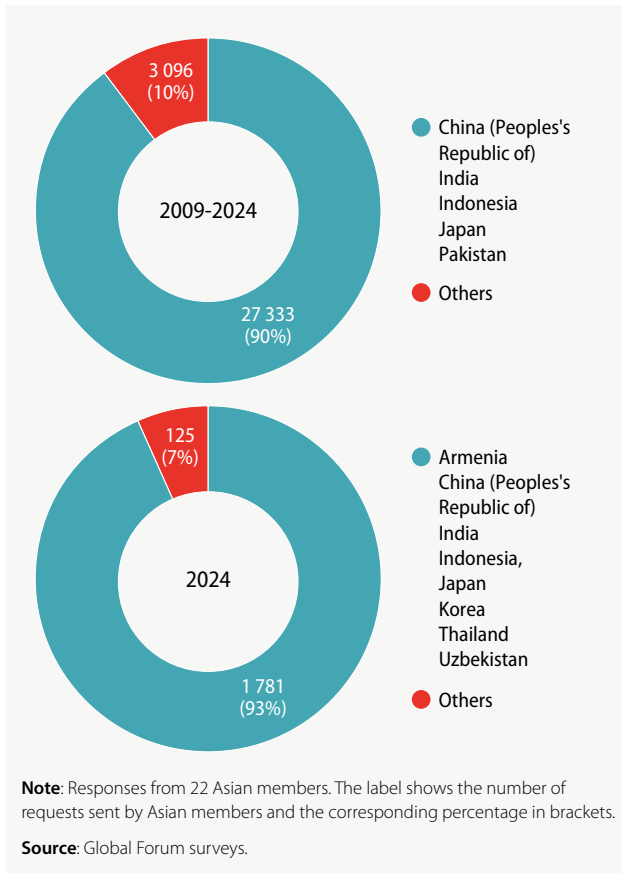
as capacity constraints, insufficient awareness within domestic audit units or lack of a strategy to integrate EOI as a visible function supporting other activities of the tax authority. Closing this gap is essential, requiring greater efforts to empower all Asian members to use EOIR effectively as a critical mechanism for DRM.

FIGURE 4. Total number of requests for information sent, by category of Asian members of the Global Forum, 2009-2024



One step closer to full tax transparency's potential in Asia

FIGURE 5. **Total Distribution of outgoing requests for information by Asian members of the Global Forum (in percentage)**



The steady impact of automatic exchange of financial account information on compliance and revenue mobilisation

In 2024, Asian members reported around EUR 200 million in additional revenue using CRS data and related VDP. Since the launch of the CRS in 2015, its implementation

by several Asian members contributed to generate over EUR 14 billion in cumulative additional revenue (see Figure 2). The CRS has become a powerful tool not only to promote voluntary compliance but also to uncover undeclared wealth and combat offshore tax evasion, with a visible impact on DRM (see Box 2).

Asian members reported receiving data on more than 64 million financial accounts in 2024, covering a staggering EUR 3.5 trillion in assets held abroad by their tax residents. This marks a 25% increase in the number of accounts received compared to the previous year, alongside a broader activation of bilateral CRS relationships (see Figure 6). One notable feature in 2024 was the asymmetry in data exchange: Asian members received 42% more information than they sent.

This highlights the continued relevance of CRS for detecting undeclared offshore assets, as taxpayers from the region still maintain significant assets abroad. For tax authorities, such information offers a new level of visibility, enabling better targeting of audits, improved risk assessment and enhanced voluntary compliance.

These figures highlight the relevance of CRS exchanges for detecting undeclared offshore assets. As the number of jurisdictions adopting the CRS both within and beyond Asia is continuously growing, Asian tax authorities are gaining an unprecedented level of visibility of their taxpayers' financial wealth, enabling better targeting of audits, improved risk assessment and enhanced voluntary compliance.

But receiving the data is only the beginning. The true potential of CRS lies in what happens next: matching it

BOX 2. JAPAN – An example of use of automatic exchanged financial account information in tax audits

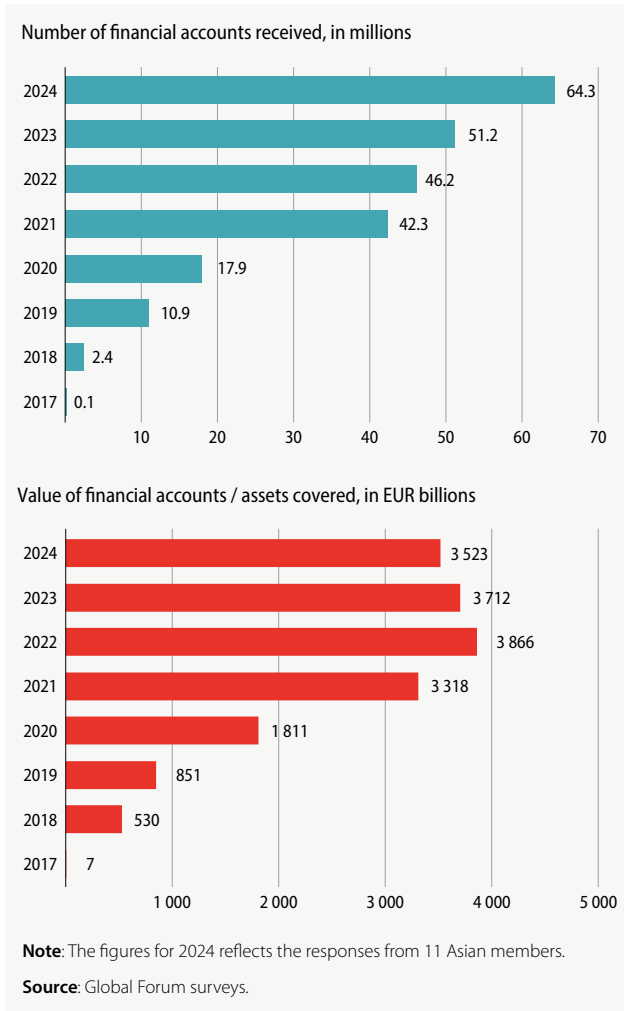
Japan has been exchanging information under the Common Reporting Standard (CRS) framework since 2018 and has since exploited the received CRS data in risk assessment and tax audits, leading to the identification of additional revenues.

In one notable case, the National Tax Agency (NTA) of Japan identified discrepancies between a taxpayer's declared income and foreign financial account information received

under the CRS. Following a detailed risk assessment and tax audit using CRS data and additional information obtained through a request for exchange of information pursuant to tax treaties, the NTA uncovered previously undeclared offshore income, including interests earned from foreign financial institutions. This led to an assessment of significant additional tax liabilities.

Source: Provided by the National Tax Agency of Japan.

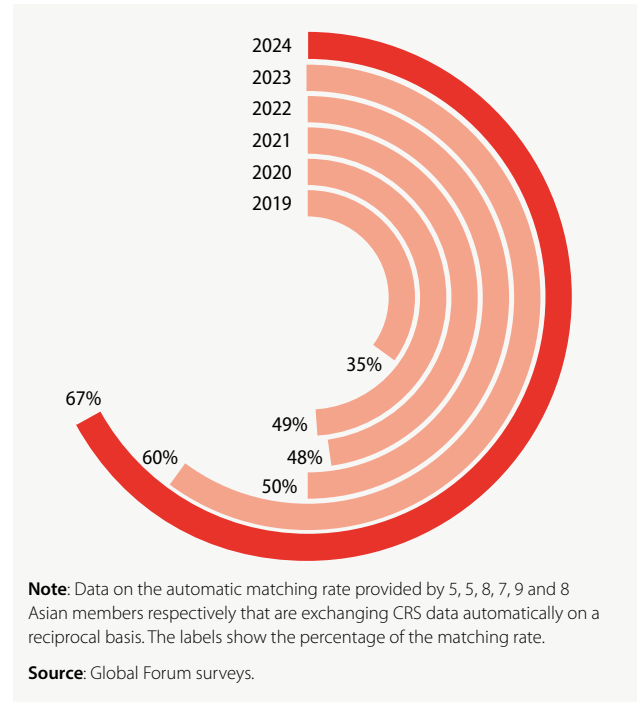
FIGURE 6. **Automatic exchange of financial account information, data received in 2017-2024** (as reported by Asian members)



with domestic taxpayer records, analysing discrepancies and taking actions. Since 2019, the region has made enormous strides in this area. In 2024, the average automatic matching rate (using IT tools to connect CRS data to domestic records via tax identification number, names and dates of birth) reached 67%, a 7 percentage-point increase from the previous year (see Figure 7).

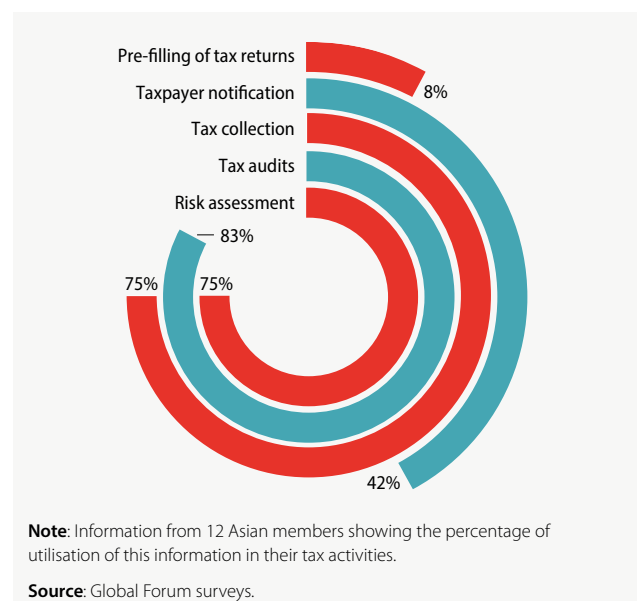
Although matching rates vary widely from 39% to 93%, all reporting Asian members improved their performance in 2024. In two cases, the gains were impressive, with increases of 20% and 35%, reflecting how quickly progress can be achieved with the right systems and support.

FIGURE 7. **Average automatic matching rates for Common Reporting Standard (CRS) data received, 2019-2024 (in %)**



This important improvement lies on an increased quality of the CRS data received (as compliance activities are carried out in supplying jurisdictions), the enhancement of the data matching methods in receiving jurisdictions, as well as experience-sharing activities, in particular under the Asia Initiative.

FIGURE 8. **Use of CRS data by Asian members in 2024**



One step closer to full tax transparency's potential in Asia

Beyond matching, utilising the data for compliance is the final step in turning data into real outcomes (see Box 3 and Box 4). Figure 8 reflects that 75% of Asian members participating in CRS exchanges report using CRS data for risk assessment, which helps focus resources on the most relevant cases. Even more strikingly, 82% are using CRS data in tax audits, making it a core tool for confirming taxpayer declarations and detecting underreporting or no-reporting. Although the trend indicates a more active use of the CRS data by most of the 14 Asian members receiving this data, the benefits are enjoyed unevenly. Many jurisdictions that

have been receiving CRS data from relatively recent years are still in the early stages of implementation and are focusing on developing internal expertise and understanding the data before using it for tax compliance purposes. Limited resources, competing priorities and the need for appropriate tools and training often mean that risk analysis based on CRS data is planned as a next step rather than an immediate one. Importantly, these jurisdictions remain committed to making full use of the data as their capacity grows and are receiving technical support to this effect.

BOX 3. MALAYSIA – A case study on the use of automatic exchanged financial account information on an offshore trust



Malaysia has been automatically exchanging information on financial accounts since 2018. This case study refers to an investigation initiated in the context of a Tax Inspector Without Borders (TIWB) Programme, which is a joint initiative of the Organisation for Economic Co-operation and Development (OECD) and the United Nations Development Programme (UNDP). The investigation process commenced mid-2023 and was completed mid-2024.

Background information

A Malaysian taxpayer appeared as a director, shareholder, partner and sole proprietor in various companies and businesses. Upon receiving Common Reporting Standard (CRS) data related to an offshore trust, the investigation commenced by processing Financial Intelligence Unit (FIU) data and intelligence reports. This led to the preparation of an operation order, surveillance and the conducting of a raid. Throughout the data gathering process and the raid, multiple local banks account and insurance policies were uncovered. It was also revealed that the taxpayer had received other income besides the income reported to the Inland Revenue Board of Malaysia.

Issues

The CRS data undisclosed the offshore trust as an insurance trust, which is an effective estate planning tool to remove the insurance proceeds from taxable income of the estate. An insurance trust is an irrevocable trust set up with a life insurance policy as the asset. It allows the grantor of the policy to exempt assets from their taxable estate and helps minimise the estate taxes owed by wealthier individual.

The taxpayer set up this offshore trust in a low tax Jurisdiction B through an investment company based in Asian Country C. The taxpayer acted as a settlor and had full control over the trust. The two following points were of concern for the tax authority.

- Was the monthly premium paid for the insurance policy derived from unreported income in Malaysia?
- Did the taxpayer report all relevant income to the Malaysian tax authority?

Detailed analysis

- FIU data analysis: The analysis on the FIU report and Order Section 48 revealed multiple counts of Cash Transaction Reports (CTR) and Suspicious Transaction Reports (STR), as well as multiple local insurance policies.
- CRS data analysis: The analysis of CRS data provided details about the existence of an insurance trust in low tax Jurisdiction B, alongside the receipt of an insurance policy that shows the financial capacity of the taxpayer.
- Evidence from raid conducted: A raid was conducted at the taxpayer's residence and business premises, leading to the discovery of evidence regarding additional income received by the taxpayer.
- Exchange of Information (EOI): An EOI request was submitted to the Asian Country C to obtain details on the taxpayer's bank statements and employer information.

Verification source of income used to obtain the trust insurance

- Confirmation was received regarding employment income from a company in the Asian Country C.
- Bank information of the taxpayer was obtained from Asian Country C.
- Tax authority of Asian Country C provided details regarding taxes paid by the taxpayer on income earned in Asian Country C.

Findings

- Issue on trust: the premiums paid for the insurance trust policy were derived from income earned in the Asian Country C, which had already been taxed in Country C. No issues of unreported income in Malaysia were identified.
- Issue on other income: additional Malaysian derived income was identified, which had not been reported in Malaysia. This income aligns with the taxpayer's capacity to pay premiums on local insurance policies.

Closure

Net worth analysis:

- The analysis of credit transactions revealed specific omissions in the taxpayer's Malaysian tax return.
- The analysis of debit transactions uncovered unexplained expenditures in the taxpayer's Malaysian tax return.
- The analysis of debit and credit transactions indicated other income that was either not reported or underreported to the Malaysian tax authority.

Conclusion and remark

The results on the net worth analysis led to an income discrepancy and additional tax imposed on the taxpayer. The use of all data, both local and from abroad, enabled a comprehensive analysis that facilitated the settlement of the case. The CRS data served as a "key that opened many doors".

Source: Provided by the Inland Revenue Board of Malaysia.



7th Asia Initiative meeting, 25 November 2024, Asunción, Paraguay.

BOX 4. HONG KONG (CHINA) – A case study on the use of automatic exchanged financial account information to detect and address tax avoidance



Hong Kong (China) has been exchanging automatically information on financial accounts since 2018. It maintains a tax regime built around a territorial source principle. Only income or profits arising in or derived from Hong Kong (China) are subject to tax. The following case illustrates how the Inland Revenue Department (IRD) of Hong Kong (China) used data obtained under the Common Reporting Standard (CRS) to detect and address a case of offshore tax avoidance involving an investment fund structure.

Use of CRS data in tax compliance work

CRS data plays a critical role in identifying potential non-compliance in Hong Kong (China). The IRD uses the CRS data to carry out tax risk assessments and select cases for tax audit. Data matching is vital in this process. Taxpayer identification number is the unique key, which enables the IRD to accurately link the incoming CRS data with the taxpayer records in the IRD's databases.

Once a potential case is identified, the responsible tax auditors would check the background information of the taxpayer, including publicly available information and information from tax filings, corporate documents and, crucially, CRS data. If the tax risk of the taxpayer is on the high side after a preliminary review, a formal tax audit will be initiated.

Case overview: Investment fund management structure

In this case, it was noted from the CRS data shared by a partner jurisdiction (Jurisdiction X, a tax-free jurisdiction) that a tax resident in Hong Kong (China), Mr A, held offshore accounts with substantial balances and incoming payments in Jurisdiction X. The initial investigation revealed that Mr A worked in investment management and controlled a company incorporated in Hong Kong (China), ABC Fund Advisor.

Further investigation uncovered that:

- i. ABC Fund Advisor provided advisory services to an investment fund managed by ABC Fund Manager, an entity domiciled in Jurisdiction X.
- ii. ABC Fund Manager received management and performance-based fees from global investors.

- iii. Nearly all fund management work, including research, decision-making, and investor relations, was carried out by staff employed by ABC Fund Advisor in Hong Kong (China).
- iv. ABC Fund Advisor was rewarded by a small cost-plus margin (e.g. 10%) over its operating expenses.
- v. ABC Fund Manager retained the residue of the profits, which was tax-free in its home jurisdiction, Jurisdiction X.

Findings and outcome

The IRD launched a tax audit on both Mr A and ABC Fund Advisor. It was found that:

- The management and performance-based fees from global investors received by ABC Fund Manager were very substantial.
- The substantive activities generating the income, which were performed by ABC Fund Advisor, took place in Hong Kong (China), not in Jurisdiction X.
- Mr A had accumulated huge amount of money, which came from the non-taxable profits from ABC Fund Manager, in his personal bank accounts in Jurisdiction X.

As a result of the tax audit, the IRD concluded that the arrangement was used to shift profits offshore to avoid tax and most of the profits of ABC Fund Manager should be attributed to ABC Fund Advisor and should be subject to profits tax in Hong Kong (China) as the business activities carried out by ABC Fund Advisor were done in Hong Kong (China). Appropriate adjustments were made to recover the tax undercharged.

Conclusion

This case underscores the value of CRS data in detecting offshore tax risks and ensuring profits are taxed where economic activities take place. It also demonstrates the ability of the tax administration to challenge arrangements designed to shift profits to low- or no-tax jurisdictions.

Source: Provided by the Inland Revenue Department of Hong Kong (China).

2

Cultivating an ambitious tax transparency agenda in Asia

As of 2024, 22 Asian jurisdictions have joined the Global Forum. Over the years, they have demonstrated their strong commitment and full engagement in advancing tax transparency to tackle tax evasion and other IFFs. They continue to prioritise tax transparency and maintain high levels of engagement both globally and regionally. Their active contributions to the subsidiary bodies of the Global Forum, the capacity-building activities, and their proactive stance on emerging topics materialise their tax transparency ambition. With their active participation in the three-year old Asia Initiative, 17 Asian members have given an additional impetus and dynamic to the tax transparency agenda in the region.

Cultivating an ambitious tax transparency agenda in Asia

A HIGH-LEVEL ENGAGEMENT: A BUILDING BLOCK FOR PROGRESS

In 2024, Asian members remained engaged to advance the tax transparency agenda.

The Global Forum outreach activities play a crucial role in sensitising policymakers and making them aware of the relevant options for their jurisdictions. They are key to raise awareness on the relevance of the tax transparency standards and to build the strong political buy-in much needed to drive the domestic legal and organisational reforms. They also support the implementation of the standards and the sharing of the associated benefits with decision-makers, high-level officials and civil society.

The Asia Initiative also took deliberate steps to increase political awareness on the potential of tax transparency by:

- participating in high-level meetings and events
- promoting the Bali Declaration
- promoting the participation of non-member Asian countries in key events
- demonstrating the impact of tax transparency on DRM through the Tax Transparency in Asia Report and Asia Initiative meetings.

Strengthening the tax transparency commitment in Asia

High-level engagement is a foundation stone in the global efforts to combat tax evasion. Countries have been recognising that addressing tax evasion is an imperative, a matter of fairness, equity, and public trust. Decision-makers and senior officials are playing a decisive role

in advancing robust tax transparency frameworks and endorsing exchange of information standards.

The Global Forum is bringing together 171 member jurisdictions, ensuring an effective global implementation of the tax transparency standards and providing for an inclusive and effective platform for international tax co-operation, enhancing the global fight against tax evasion and avoidance. The 22 Asian members represent almost 13% of the total membership of the Global Forum. However, over 10 Asian countries are still not participating in the work on tax transparency.

In 2024, the Secretariat had 15 high-level meetings with decision-makers and senior officials from member and non-member Asian countries. These meetings aim to raise awareness on the benefits of the implementation and the use of the standards, build critical dialogue to support domestic reforms and shape the capacity-building work in the region.

The high-level engagement is also done in co-operation with the partners of the Global Forum and the Asia Initiative. All have been advocating for the implementation of the tax transparency standards as a powerful tool to unlock the potential of tax transparency to Asia and have been taking concrete actions through their daily work to achieve this goal. Tax transparency being high in the priorities of its partners, the Asia Initiative benefitted from their full support in its journey. Through regional partnerships on joint events, outreach activities, promotion of the impact of the international co-operation work and the benefits of the standards implementation during events with their own constituencies, the contribution of the regional partners to the cause of EOI has been over the years a catalyst for the region.

“As Co-Chair of the Asia Initiative, I am honoured to work alongside the members of the Asia Initiative in advancing capacity-building efforts across Asia, with a strong focus on addressing the region’s unique needs. I am eager to continue progressing the tax transparency agenda and am confident that our members will remain actively engaged in combating tax evasion, tackling illicit financial flows, and promoting the sustainable mobilisation of domestic resources.”

Mr Eduard Hakobyan, Chairman of the State Revenue Committee, Armenia, and Co-Chair of the Asia Initiative (2025)



“I am proud of Asian Development Bank’s work with the Global Forum on Transparency and Exchange of Information for Tax Purposes. Our partnership is advancing technical assistance programs and fostering policy dialogue through the Asia Pacific Tax Hub, critical efforts to strengthen global tax transparency and promote financial integrity, domestic resource mobilisation, and sustainable development.”

Mr Masatsugu Asakawa, former President and Chair of the Board of Directors, Asian Development Bank (2019-2024)



In 2024, the Global Forum and its partners have continued to join their efforts and take advantage of the synergies that result of their common objectives, to update partners’ respective members on the latest developments in the EOI sphere, reiterate the importance of EOI and highlight the opportunities this tool may represent for any Asian country, which is not yet part of the multilateral efforts toward tax co-operation (see Table 2 and Box 5).

Promoting the Bali Declaration to drive the Asian tax transparency agenda

The 2022 Bali Declaration endorsed at ministerial level by 17 Asian members focuses on enhancing international co-operation through a regional capacity-building approach. Its objective is to support Asian members in sustaining their DRM efforts by ensuring the effective enforcement of their tax legal framework, which may be challenged by cross-border exchanges and mobility.

The 2024 efforts surrounding the Bali Declaration have as one of its focus raising awareness and showcasing the progress achieved by Asia Initiative members. This

exposure, facilitated through regional tax forums, has successfully engaged both Asian members not participating in the Initiative and Asian countries not yet members of the Global Forum. The leadership of the Asia Initiative has been instrumental in highlighting the benefits of participation, emphasising how the programme is tailored to the region’s unique needs and aspirations. Other Asia Initiative members have shared experience and encouraged their peers to participate in the Asia Initiative.

These proactive engagements have sparked interest among several jurisdictions, encouraging them to consider joining the Bali Declaration and benefit from the wealth of technical support, experience-sharing opportunities, and tools to further their DRM objectives.

A collective energy for a collective gain

2024 has been another rich and enriching year for the Asia Initiative.

The launch of the second annual progress report, *Tax Transparency in Asia 2024*¹, was one of the many

TABLE 2. **High-level engagements with Asian jurisdictions in 2024**

Date of the event	Name of the event	Place of the event
21 March 2024	18th Working Group of the Association of Southeast Asian Nations Tax Forum on Taxation.	Virtual
24-26 June 2024	Sixth high-level meeting of the Asia Initiative.	Yerevan, Armenia
16 October 2024	19 Working Group of the Association of Southeast Asian Nations Forum on Taxation.	Virtual
29-31 October 2024	53 rd Annual Meeting of the Study Group of Asia-Pacific Tax Administration and Research.	Seoul, Korea
25 November 2024	Seventh high-level meeting of the Asia Initiative.	Asuncion, Paraguay

Source: Global Forum Secretariat.

1. OECD, *Global Forum, Tax Transparency in Asia 2024, Asia Initiative Progress Report*, available at <https://www.oecd.org/tax/transparency/documents/tax-transparency-in-asia-2024.pdf>.

BOX 5. Partnering for transparency and sustaining the global tax transparency agenda

The Study Group on Asia-Pacific Tax Administration and Research (SGATAR) is a forum for tax administrators to enhance co-operation, improve administration and discuss issues related to tax administration. It became an observer of the Global Forum in 2023 and was among the first development partners to join the Asia Initiative.

Q1: How important is the tax transparency agenda for SGATAR members?

Tax transparency is a key element in enabling SGATAR member jurisdictions to ensure sustainable fiscal management. It prevents tax avoidance and tax evasion, enables fair and transparent tax administration, and ultimately contributes to expanding the tax base of member jurisdictions.

SGATAR has supported its member jurisdictions in effectively implementing international tax transparency standards by providing a range of assistance. For instance, at the 53rd SGATAR Annual Meeting held in October 2024, measures to improve the quality of Common Reporting Standard (CRS) data were discussed. In this way, SGATAR plays an important role as a platform for sharing experiences and solving common challenges among member jurisdictions.

Some SGATAR member jurisdictions are encountering difficulties in implementing the tax transparency standards, particularly in establishing a legal basis for CRS and implementing the necessary technological infrastructure. Given these specific needs, SGATAR may face challenges in providing the necessary customised support and capacity-building programmes, and in enabling a strengthened co-operation among member jurisdictions.

Q2: SGATAR and the Global Forum closely co-operated again this year, and SGATAR remains a strong partner of the Asia Initiative. How has the growing collaboration between SGATAR and the Global Forum created opportunities for members to benefit from complementary strengths in capacity building for advancing tax transparency?

The co-operation between SGATAR and the Global Forum has laid the foundation for strengthening member jurisdictions' capacity in the field of tax transparency and providing practical support for implementing tax transparency standards. In particular, the participation of the Global Forum in the 53rd SGATAR Annual Meeting held in October 2024 helped improve member jurisdictions' understanding of international standards and provided a valuable opportunity to actively share their implementation experiences. Many member jurisdictions indicated that the co-operation provided useful references to support their implementation efforts. They also agreed to continue more active exchanges of feedback and experiences.

SGATAR organises meetings attended by commissioners of tax administrations from the Asian-Pacific region. The participation of the Global Forum in these meetings has increased the likelihood that exchange of information will be recognised as a key agenda by the leadership of participating jurisdictions. We hope that the Global Forum will continue to have opportunities to present directly to the leadership of participating jurisdictions to raise awareness of the importance of exchange of information.

Source: Mr Kang Sungpal, Deputy Commissioner of the National Tax Service of Korea, Secretary-General of the 53rd SGATAR Annual Meeting.

highlights of the Sixth high-level meeting of the Asia Initiative held in June 2024 in Yerevan, Armenia.² The report highlights remarkable progress in the region's implementation of international standards, showcasing the tangible financial benefits derived from the use of EOI tools. Synergies between the Global Forum's regional

initiatives materialised with a hybrid session with the Co-Chairs of the Africa and Latin America Initiatives who shared the progress in their respective regions. The members also agreed on the 2024-2025 work plan of the Asia Initiative, and discussed and shared experience on a wide range of topics, such as ensuring transparency of

2. The meeting was attended by 56 participants from 13 Asia Initiative members and 4 partners. Statement of outcomes available at <https://www.oecd.org/tax/transparency/documents/6th-meeting-asia-initiative-outcomes.pdf>.



7th Asia Initiative meeting, 25 November 2024, Asunción, Paraguay.

beneficial ownership information, compliance of financial institutions with their CRS obligations, or effective use of CRS data. During those discussions, experienced members and less experienced ones exchanged views and learned from each other.

The Seventh High-Level Asia Initiative meeting was held in November 2024 in Asunción, Paraguay³ in the margins of the Global Forum Plenary meeting. On this occasion, the Asia Initiative welcomed its sixth partner, the European Bank for Reconstruction and Development, which promotes tax transparency in the context of its operations in the region. The participants welcomed two tools developed by the Working Group on Effective Use of CRS Data established by the Initiative: the *Step-by-Step Guide on Cleansing and Matching CRS Data* and the *Guide on Tax Adjustment based on CRS Data*. They also agreed to share them with the other regional initiatives to foster

3. The meeting was attended by 47 participants from 10 Asia Initiative members and 6 partners. Statement of Outcomes available at <https://www.oecd.org/tax/transparency/documents/7th-meeting-asia-initiative-outcomes.pdf>.

synergies. In this spirit, the *Guide to Maximise the Use of Exchange of Information on Request to Tackle Tax Evasion and Other Illicit Financial Flows and Mobilise Domestic Resources* developed under the Africa and Latin America Initiatives was discussed, considering the diversity of the region. The Asia Initiative also extended their heartfelt farewell to Mr Sanjay Malhotra, Co-Chair of the Asia Initiative until December 2024, and welcomed their new Co-Chair, Mr Hassan Zareer for 2025-2026.

One strategic axis of the Asia Initiative is to actively reach out to Asian countries not yet members of the Global Forum. This has been a core priority of the leadership of the Asia Initiative and strongly supported by the Asia Initiative members. The outreach activities aimed to raise awareness on the tax transparency requirements and benefits to inform the decision of Asian non-Global Forum members on whether committing to the tax transparency agenda.

In 2024, eight non-member Asian countries were invited to attend the high-level meetings of the Asia Initiative, as well as the Global Forum Plenary meeting as observers. Seven responded positively to the invitation, thanks to the strong collaboration with the Asian Development Bank (ADB) (see Box 6). Their attendance in person at high-level enabled bilateral strategic discussions with the Global Forum Secretariat but also with their peers in Asia and beyond. Participating in the meetings allowed them to witness the progress achieved, the support available and the benefits gained by member jurisdictions of all sizes and levels of development. Finally, they also interacted with the Chair of the Global Forum, Mr Gael Perraud.

“Coming from a small island nation, I deeply understand the power of resilience, the importance of connection, and the immense value of collaboration. I am honoured to step into this role as Co-Chair of the Asia Initiative, building upon the remarkable platform established by my predecessors over the past three years. This initiative provides us with an invaluable opportunity to learn from one another, enhance our competencies, and work together toward creating a more sustainable Asia. For Maldives and for our region, I am steadfast in my commitment to supporting capacity-building efforts and expanding participation in the Asia Initiative to ensure that the benefits of tax transparency are shared as broadly as possible.”

Mr Hassan Zareer, Commissioner General of the Maldives Inland Revenue Authority, and Co-Chair of the Asia Initiative (2025-2026).



Cultivating an ambitious tax transparency agenda in Asia

“Sri Lanka has made remarkable strides in stabilising its economy over recent years. Our tax reforms are aiming at ensuring long-term resilience and equitable growth, laying the foundation for sustainable progress. By fostering greater domestic cross-agency collaboration, we aim to address non-compliance and widen the taxpayer base, to ensuring that all taxpayers actively contribute to nationwide efforts to build a strong and sustainable economy. In recent years, the Inland Revenue Department (IRD) has established a High Net Wealth Unit, Risk Management Unit and Criminal Tax Investigation Unit and, this year, the Internal Affairs Unit is being established for the purpose of smooth functioning of the IRD. Although not yet a member of the Global Forum, our participation in its Plenary meeting in 2024 deepened our understanding of the benefits of tax transparency and its tangible impact on domestic resource mobilisation in other developing countries.”

Ms Rukdevi P. H. Fernando, Commissioner General of Inland Revenue, Inland Revenue Department, Sri Lanka



Second Train the Trainer Network meeting, 16-17 December 2024, Paris, France.

“Kyrgyzstan is actively and dynamically implementing significant tax reforms aimed at ensuring transparency, accessibility, and convenience of tax procedures, recognising that sustainable growth depends not only on sound domestic policies but also on closer international co-operation. As we advance our transformation through digital innovation and enhanced regional engagement, we highly value the opportunity for non-Global Forum member countries to become familiar with the achievements in global tax transparency and express our appreciation for the ongoing outreach efforts that help shape our future decisions. At present, we are working on aligning our national priorities with global efforts to accelerate transparency and build a more resilient economy.”

Mr Rakhmanov Mirlan Abdibatovich, Deputy Chairman of the State Tax Service, Kyrgyzstan



BOX 6. **A collective effort to strengthen engagement with Asian countries not yet members of the Global Forum**

The Asian Development Bank (ADB) is a key partner of the Asia Initiative and a longstanding observer to the Global Forum. Reaching out to non-members of the Global Forum in the region has been a priority for the Asia Initiative's members and, with the support of the ADB, seven Asian countries not members of the Global Forum could take part in at least one of the two high-level meetings of the Asia Initiative in 2024.

In 2021, the President of ADB brought his unwavering support to the launch of an Initiative for Asia. Shortly after, ADB became a partner of the Asia Initiative to further advance the tax transparency agenda in Asia in coordination with the Global Forum Secretariat.

ADB is comprised of 49 regional members, among which 30 Asian Developing Member Countries (DMCs) that ADB supports through projects aimed at creating economic and development impact. As DMCs, they also benefit from capacity building to assist them achieve sustainable, inclusive, and resilient growth.

Through its two arms, policy-based lending and capacity building, ADB has direct strategic dialogue with DMCs on critical reforms in the areas of domestic resource mobilisation and international tax co-operation. ADB can leverage its unique position to promote the tax transparency agenda and to pave the way for a smoother implementation of the international standards.

In 2024, ADB has made a significant contribution to the outreach efforts of the Asia Initiative by facilitating the direct exposure of eight non-member countries in the region to the tax transparency work, the progress achieved globally, and the significant benefits gained by developing countries globally from the implementation and the use of the tax transparency standards.

Ensuring that DMCs do not miss opportunities to mobilise sustainable revenues due to a lack of awareness or capacity is a shared commitment with the Global Forum Secretariat.

Building on the exposure the eight DMCs have now experienced, ADB and Global Forum will continue their dialogue to support interested DMCs in their tax transparency journey.

Source: Provided by the Asian Development Bank.



“Since 2018, Pakistan proudly served as a Peer Review Group member contributing over seven years to the international community's collective efforts to promote tax transparency and collaboration. This invaluable experience has provided us with first-hand insight into the review process, strengthened our understanding of the Standard of Transparency and Exchange of Information on Request, and allowed us to learn from common challenges faced by our peers. It has also helped foster stronger bilateral relationships and prepare our successful peer review which concluded with a Largely Compliant rating in 2022. Transitioning to the Peer Review and Monitoring Group marks an exciting new chapter to further contribute to advancing of global tax transparency and ensuring lasting progress in this crucial area.”

Mr Rashid Mahmood Langrial, Chairman of Federal Board Revenue, Pakistan



Cultivating an ambitious tax transparency agenda in Asia

TABLE 3. Participation of Asian members in the Global Forum work in 2024

Contribution	Role	Participation
Global Forum's bodies		
Global Forum Plenary	It is the decision-making body of the Global Forum. The Plenary may establish subsidiary bodies as deemed appropriate.	22 Asian members (13% of the members).
Steering Group	The Steering Group prepares and guides the work of the Global Forum (20 members)	5 Asian members are members of the Steering Group (25% of the members): China (People's Republic of), India, Indonesia, Japan (Vice-Chair) and Singapore.
Peer Review Group (PRG)*	The PRG reviews the EOIR standard (30 members).	6 Asian members are members of the PRMG (20% of the members): China (People's Republic of), Georgia, India (Vice-Chair), Indonesia, Korea and Pakistan.
Automatic Exchange of Information Peer Review Group (APRG/APRG+)	The APRG reviews one of the AEOI standards, the CRS (30 members). The APRG+ is an extended formation of the APRG, which reviews the requirements on confidentiality and data safeguards of the AEOI standards (33 members).	5 Asian members are members of the APRG (17% of the members): India (Chair), Japan, Korea, Malaysia and Singapore. 6 Asian members are members of the APRG+ (18% of the members): Georgia, India (Chair), Japan, Korea, Malaysia and Singapore.
Crypto-Asset Reporting Framework Group (CARF Group)	The CARF Group is responsible for the implementation of the CARF (52 members and the European Union). It is a voluntary group, which can be joined at any time by any member.	8 Asian members have joined the CARF Group so far (15% of the members): Armenia, Georgia, Hong Kong (China), India, Japan, Korea, Singapore and Thailand.
Group on Risk	The Group on Risk is an expert group tasked with the update of the Global Forum risk register (15 members).	2 experts from Asian member countries contribute to the work of the Group on Risk (13% of the members): Armenia and India.
Global Forum's peer review and capacity-building activities		
Assessors for EOIR peer reviews	The EOIR assessors are responsible for conducting the peer review of jurisdictions against the EOIR standard.	5 Asian members provided EOIR assessors (9% of the jurisdictions providing assessors): Armenia, Azerbaijan, Georgia, India and Japan.
Assessors for the EOIR Assessment Panel for the first cycle of enhanced monitoring	The Assessment Panel for the EOIR enhanced monitoring process 2025/2026 was constituted in 2024. It is mainly responsible for providing views and opinions in all situations where adverse consequences (issuance of new recommendations, downgrading of ratings, launch of in-depth review due to concerns raised by the Peer Review and Monitoring Group) are likely to arise for a jurisdiction. It is also involved in assessing the situation of jurisdictions that report having addressed all recommendations and wishing to be relieved from the obligation to report on those recommendations in future cycles. It is composed of 11 experts.	3 Asian members provided Assessors for the EOIR Assessment Panel (27% of the jurisdictions providing assessors): Armenia, Georgia and India.
Assessors for the AEOI peer reviews	The AEOI assessors are responsible for conducting the peer review of jurisdictions against the CRS.	6 Asian members provided CRS assessors (14% of the jurisdictions providing assessors): Azerbaijan, India, Indonesia, Japan, Malaysia and Singapore.
Assessors for confidentiality reviews	The assessors on confidentiality and data safeguards are responsible for conducting the assessments on confidentiality and data safeguards.	2 Asian members provided assessors for the confidentiality peer reviews (8% of the jurisdictions providing assessors): India and Singapore.
Experts in capacity-building activities	Experts from Global Forum members contribute to the capacity-building activities carried out, providing expertise and sharing experience.	44 experts from 13 Asian members shared their expertise and experience in capacity-building activities (28% of all experts sharing their experience): Armenia, China (People's Republic of), Georgia, Hong Kong (China), India, Indonesia, Japan, Korea, Malaysia, Maldives, Philippines, Singapore and Thailand.

Source: Global Forum Secretariat.

* As of 1 January 2025, the Global Forum started implementing its new Peer Review and Monitoring processes in the context of EOIR, which comprise three axes: (1) the enhanced monitoring process to which all assessed jurisdictions that have already completed the second round of reviews will be subject in a recurrent two-year cycle, (2) in-depth reviews for jurisdictions that have taken steps to address their recommendations and wish to have their ratings revised or in case of back-sliding or other concerns from the Peer Review and Monitoring Group, and (3) thematic reviews, which will focus on specific aspects of the standard across all jurisdictions. In this context, the PRG became the Peer Review and Monitoring Group (PRMG).

A REGION ACTIVELY INVOLVED IN THE TAX TRANSPARENCY WORK

All members of the Global Forum work on an equal footing to put an end to offshore tax evasion. In 2024, Asian members continued to take an active part and leading role in the Global Forum’s work by contributing to its technical and governance activities. They provided technical inputs and precious insights on discussions guiding the Global Forum decision-making processes. In addition, Asian members contributed to the peer review process by providing assessors and inputs, and to the capacity-building activities by sharing experience and

expertise in workshops and seminars organised by the Global Forum Secretariat.

Table 3 summarises the active participation of Asian members in the different components of the Global Forum’s work. The high participation of Asian members in the diverse subsidiary bodies show the region is driven by a sense of responsibility and purpose to support the effective operation of the tax transparency standards (see Box 7).

BOX 7. KOREA – Active participation in Global Forum’s working groups: an investment that’s worth it



Korea has become a member of the Automatic Exchange of Information Peer Review Group (APRG/APRG+) and the Crypto-Asset Reporting Framework Group (CARF) since their respective inception. The National Tax Service explains how its active participation in those subsidiary groups of the Global Forum has shaped Korea’s approach to exchange of information and how it has positioned Korea at the forefront of international efforts to combat tax evasion.

Korea’s active participation in the APRG and APRG+ underscores its commitment to advancing the global tax transparency agenda. This engagement has deepened our understanding of the challenges faced by countries in implementing all the requirements of the Common Reporting Standard (CRS) and has also highlighted possible approaches to strengthen our own implementation.

With a commitment to commence first exchanges on crypto-asset transactions by 2027, Korea has also joined

the CARF Group. We are glad to have contributed in 2024 to the development of policy documents, as well as a step-by-step guide to support the widespread implementation of the CARF. Our proactive involvement is helping us anticipate challenges encountered by other early adopters, supporting our CARF implementation and positioning Korea at the forefront of international efforts to address tax risks associated with crypto-assets.

Recognising the synergies between the CRS and CARF, we are leveraging our experience with CRS implementation to ensure consistency and efficiency across our automatic exchange framework. Participation in both the APRG/APRG+ and the CARF Group has enabled early technical engagement and valuable peer learning. We encourage other jurisdictions to join these working groups as they offer unique insights and enhances overall readiness.

Source: Provided by the National Tax Service of Korea.

“In the ever-evolving landscape of tax administration, India has consistently demonstrated its steadfast commitment to the effective implementation of the tax transparency standards. Recognising the dynamic nature of tax evasion risks, India has been contributing proactively to the Global Forum’s Group on Risk, by way of active participation in its work on identification and assessment of risks to the effective implementation of the standards. India remains fully committed to supporting the Global Forum’s aim of staying ahead of emerging risks and monitoring the evolution of existing risks, thereby upholding the integrity and effectiveness of the standards, as well as fostering a transparent and co-operative international tax environment.”

Mr Ramesh Narain Parbat, Member (Legislation), Central Board of Direct Taxes, Government of India





3

Translating political commitment into effective implementation in Asia

In 2024, Asian members have continued to advance the implementation of the tax transparency standards with concrete progress achieved in all critical components for the effectiveness of these standards. Most of the Asian members benefited from the capacity-building programme of the Global Forum Secretariat and other development partners in their endeavours

ROBUST INFRASTRUCTURES LAYING THE GROUNDWORK FOR EFFECTIVE EXCHANGE OF INFORMATION

To effectively participate in and benefit from the implementation of the tax transparency standards, a jurisdiction needs to invest in a minimum level of EOI infrastructure. The two key components for a sound EOI infrastructure are:

- a broad network of EOI relationships based on EOI agreements that establish the legal basis for administrative co-operation with foreign partner jurisdictions, supported by an enabling domestic legislation
- a well-functioning operational framework, which includes adequate staffing, training, documented processes, and tools to ensure consistent implementation.

Asian members benefit from a wide international network for exchange of information

Overall, 3 243 EOI bilateral relationships¹ are in force in Asia, of which 2 660 (82%) are covered by the MAAC. Virtually all Asian Global Forum members have established a wide EOI network with foreign partners, with the MAAC playing a crucial role in aligning these relationships with international tax transparency standards. In contrast, non-Global Forum members generally have a more limited number of EOI partners, relying mainly on bilateral agreements which generally provide for more restricted EOI and co-operation than the MAAC.

To carry out effective tax investigations or audits in a cross-border context, tax authorities need to obtain critical information which may be only available abroad. While the access powers of the tax authority only apply within its territory, the conclusion of

EOI agreements between jurisdictions to share information for tax purposes bridges the information gap. The EOI agreements are the legal basis under which tax authorities can obtain relevant information to have a better picture of the transactions involving a cross-border component, revenues generated in activities carried out abroad or assets located abroad. They allow tax auditors to access crucial information from another jurisdiction to advance their tax investigations.

Therefore, the wider the EOI network is, the greater the coverage of jurisdictions that will provide the information necessary to verify a taxpayer compliance with the tax laws. To develop their network, jurisdictions can conclude bilateral, regional or multilateral agreements.

Asian jurisdictions have entered into 1 778 EOI agreements, such as double tax conventions (DTCs)² or tax information exchange agreements (TIEAs),³ or regional agreements.⁴ Out of these agreements, 1 673 (94%) are in force in Asia (see Figure 9).⁵ The vast majority of these agreements in force are from Global Forum members (1 396 agreements representing around 83%), which have in general a wider network than non-Global Forum members. The latter have 277 EOI agreements (17%) in force, but with some important disparities, as the number of EOI agreements is comprised between none at all and 56.

Although these agreements provide a legal basis for EOI, not all of them are in line with the tax transparency standards as reflected in the model provision in Article 26 of the OECD Model Tax Convention on Income and Capital (OECD Model Tax Convention),⁶ the United Nations Model Double

1. EOI relationship refers to the existence of at least one agreement (either a DTC, a TIEA, a regional agreement or the MAAC) providing for EOI between two jurisdictions. For the purposes of this analysis, each regional agreement was broken down to reflect the individual bilateral "agreements" between participating countries, rather than counting a regional agreement as a single agreement.

2. DTCs are bilateral agreements between two jurisdictions designed to prevent the same income from being taxed twice. DTCs often include a provision for exchange of information between tax authorities.

3. TIEAs are bilateral agreements under which jurisdictions agree to exchange information for tax purposes.

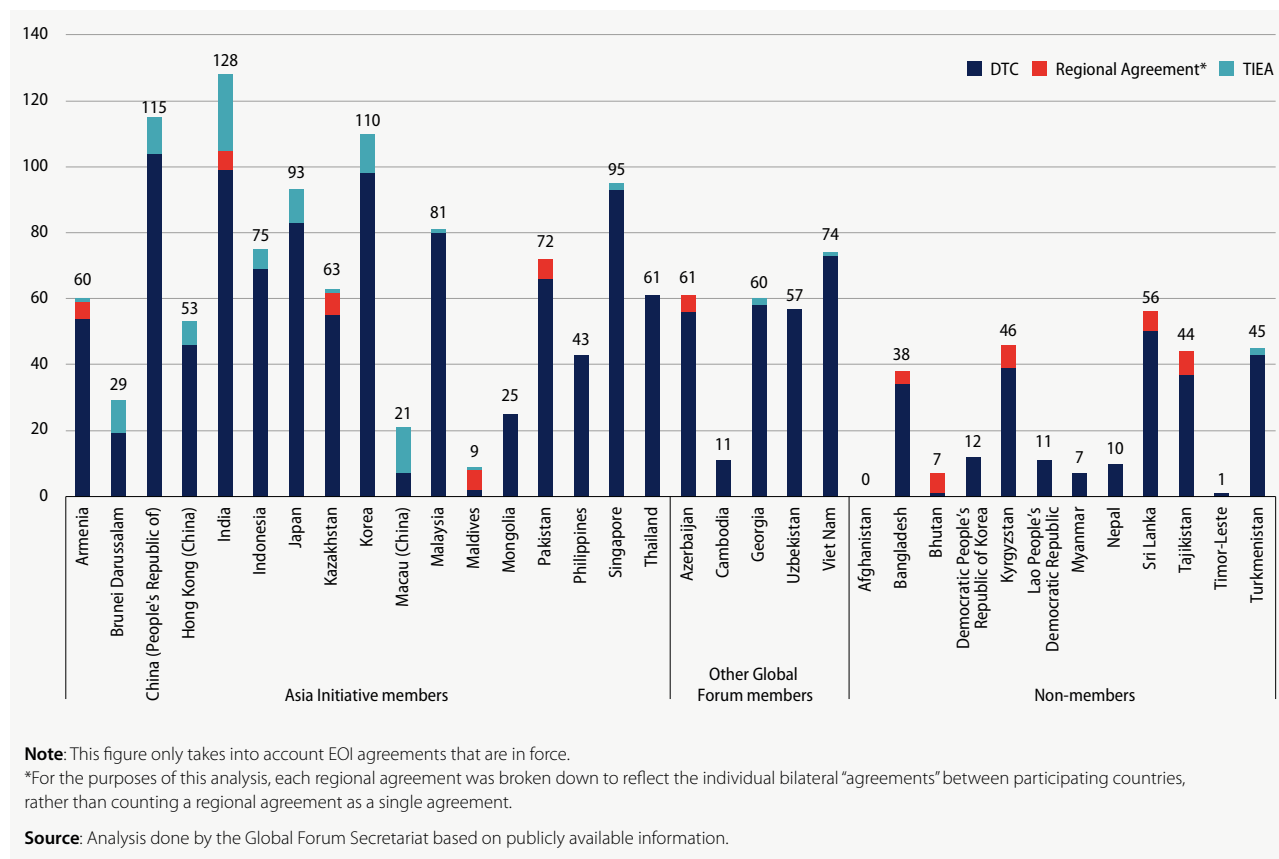
4. Regional agreements are agreements concluded by a group of jurisdictions, generally within the same region, that provide for international co-operation in tax matters. In Asia, these include the South Asian Association for Regional Co-operation (SAARC) and the Agreement between the Member States of the Commonwealth of Independent States on Co-operation and Mutual Assistance on issues of compliance with the tax legislation and combating violations in this area (CIS Agreement).

5. For this edition of *Tax Transparency in Asia*, the analysis has been done taking into account both members and non-members of the Global Forum, which may explain differences in the figures provided in previous editions.

6. OECD (2017), *Model Tax Convention on Income and on Capital: Condensed Version 2017*, OECD Publishing, Paris, https://doi.org/10.1787/mtc_cond-2017-en.

Translating political commitment into effective implementation in Asia

FIGURE 9. **Bilateral and regional agreements for exchange of information in force in Asia**



Tax Convention between Developed and Developing Countries (UN Model Tax Convention)⁷ and the OECD Model Agreement on Exchange of Information on Tax Matters (OECD TIEA Model) and its Commentary.⁸

An EOI agreement is considered to be in line with the standard if its EOI provisions contain wording that is identical or similar to that of these models, without taking into account the interpretation of the relevant Parties. Indeed, 1 082 bilateral and regional agreements concluded by Asian jurisdictions (65% of the total 1 673 agreements that were reviewed) do not fully contemplate the provisions of these models which may prevent an EOI to the full extent provided by the standards (see Figure 10). When considering the impact on non-member Asian countries only, this percentage is even higher (77% of the total 277 agreements that were reviewed are not in line with the standard).

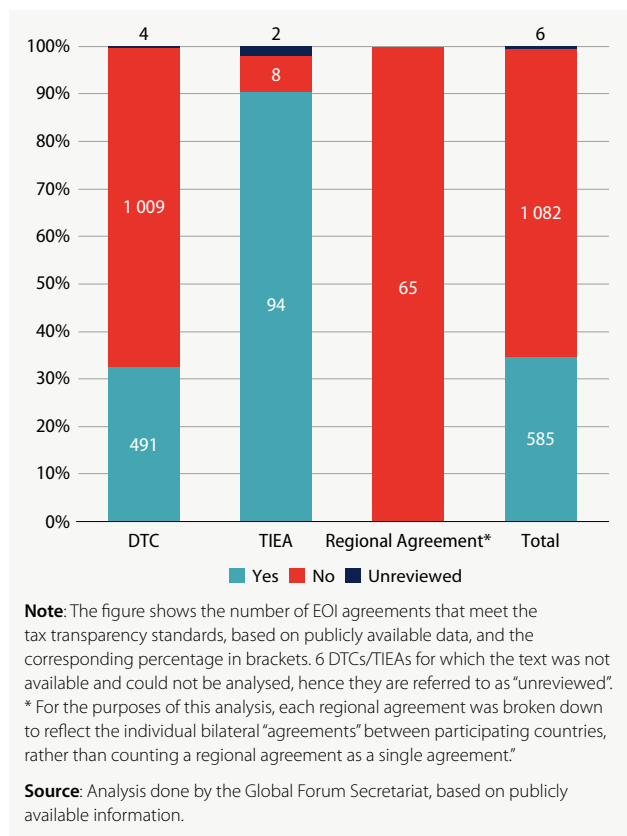
Concluding bilateral or regional agreements is usually a resource- and time-consuming process, in particular when the contemplated agreement is not limited to tax co-operation, but also includes the allocation of taxing rights (e.g. DTCs and some regional agreements). Therefore, this approach is not the easiest route to develop quickly and cost-efficiently a broad network of EOI relationships.

The MAAC, as the largest multilateral instrument, allows jurisdictions to rapidly expand their EOI network by establishing EOI relationships with over 140 exchange partners and to save valuable resources. This is the most powerful tax co-operation instrument which guarantees a legal basis aligned with the tax transparency standard and allows for all forms of administrative assistance between tax authorities, including EOI on request, spontaneous and automatic. Therefore, since 2011, the

7. UN (2021), *Model Tax Convention between Developed and Developing Countries*, UN, New York, https://financing.desa.un.org/sites/default/files/2023-05/UN%20Model_2021.pdf.

8. OECD (2002), *Agreement on Exchange of Information in Tax Matters*, OECD Publishing, Paris, <https://doi.org/10.1787/9789264034853-en>.

FIGURE 10. Share of bilateral/regional agreements for exchange of information meeting the standard in Asia



Global Forum Secretariat has been providing technical assistance to interested jurisdictions to help them in all steps of the process of joining the MAAC. Guidance is provided at all stages of the process: preparation of the application to be invited to sign the MAAC, along with the confidentiality questionnaire, assistance in answering the additional questions raised by the members of the body co-ordinating all matters relating to the MAAC, guidance for the signing of the MAAC and support with the submission of the instrument of ratification and the related declarations and notifications.

Through these technical assistance efforts, the MAAC has become the widest-reaching multilateral EOI instrument. Overall, as of end of 2024, the MAAC counted 149 participating jurisdictions⁹, out of which 141 had it in force.¹⁰ It includes 20 Asian jurisdictions all Global Forum members, of which 19 had it in force (see Table 4).

TABLE 4. Participation of Asian members of the Global Forum in the Convention on Mutual Administrative Assistance in Tax Matters, as of 31 December 2024

Jurisdiction	Status
Armenia	In force (2020)
Azerbaijan	In force (2015)
Brunei Darussalam	In force (2019)
Cambodia	Not participating
China (People’s Republic of)	In force (2016)
Georgia	In force (2011)
Hong Kong (China)	In force (2018)
India	In force (2012)
Indonesia	In force (2015)
Japan	In force (2013)
Kazakhstan	In force (2015)
Korea	In force (2012)
Macau (China)	In force (2018)
Malaysia	In force (2017)
Maldives	In force (2022)
Mongolia	In force (2020)
Pakistan	In force (2017)
Philippines	Signed (2014)*
Singapore	In force (2016)
Thailand	In force (2022)
Uzbekistan	Not participating
Viet Nam	In force (2023)

Note: * The Philippines ratified the MAAC domestically in 2024 and deposited their instrument of ratification with the OECD on 7 January 2025. The MAAC will enter into force as of 1 May 2025.

Source: Jurisdictions participating in the MAAC – https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/convention-on-mutual-administrative-assistance-in-tax-matters/status_of_convention.pdf.

In 2024, the Philippines completed its domestic ratification of the MAAC almost a decade after signature, with the support of the Global Forum Secretariat throughout the process. This milestone clears the path for all types of exchange of information and

9. In April 2025, Côte d’Ivoire signed the MAAC bringing to 150 the number of participating jurisdictions.

10. More information on the jurisdictions participating in the MAAC is available at https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/convention-on-mutual-administrative-assistance-in-tax-matters/status_of_convention.pdf.

Translating political commitment into effective implementation in Asia

“The Philippines has long recognised the transformative potential of tax transparency and the exchange of information (EOI) in promoting fairness, curbing tax evasion, and enhancing our tax system. On 1 May 2025, we will finally see the coming into force of the Convention on Mutual Administrative Assistance in Tax Matters (MAAC) in the Philippines. This achievement grants us access to an extensive network of over 140 partner jurisdictions, substantially boosting our ability to tackle cross-border tax evasion. The MAAC represents a transformative opportunity for the Philippines to enhance co-operation, strengthen transparency, and recover revenues lost to international tax evasion. The invaluable support of the Global Forum Secretariat, which engaged with our Senators and policymakers, immensely contributed to securing the Philippine Senate’s concurrence. We are deeply grateful for their assistance.”

Mr Ralph G. Recto, Secretary of the Department of Finance, Philippines



administrative assistance. Another member received technical assistance in completing the confidentiality questionnaire, which is a prerequisite for countries requesting to become a Party to the MAAC.

Thanks to the MAAC, Asian jurisdictions’ EOI network is twice larger than their network established solely through bilateral and regional agreements. Indeed, Asian jurisdictions count 3 243 EOI relationships in force overall (i.e. created through the MAAC and/or bilateral and regional agreements):

- 2 660 bilateral relationships (82%) are covered by the MAAC: 1 632 new EOI relationships (more than 50%) are created by the MAAC only, while 1 028 EOI agreements (close to 32%) are complemented by the MAAC.
- 583 EOI relationships (18%) are only covered by bilateral and regional agreements.

Out of all 3 243 EOI relationships currently in force, 2 988 (92%) relate to Asian members, while only 255 (8%) relate to non-member Asian countries (see Figure 11).

A focus on the specific situation of Asian members shows that, without the MAAC, they would only have 1 356 bilateral/regional relationships, therefore covering a narrower range of partners.

Asian jurisdictions have more EOI relationships with jurisdictions outside the region (extra-Asian EOI relationships) than within Asia itself (intra-Asian

EOI relationships). The MAAC has been instrumental for creating a solid extra-Asian network, with over 57% of this relationship only covered by it. This gives to MAAC participating jurisdictions in Asia access to information maintained in jurisdictions outside Asia where taxpayers may invest or have business relationships.

The MAAC has also contributed to expanding more than 20% the total intra-Asian EOI relationships. While 43% of the intra-Asian EOI relationships are based exclusively on bilateral or regional agreements, most of which do not fully align with international standards, the remaining 37% are created by both bilateral or regional agreements and the MAAC. Given the limitations of most of these agreements compared to the standard, the MAAC ensures that at least one effective EOI instrument allows for an EOI relationship in line with the standard is available (see Figure 12).

Despite the MAAC’s benefits, two Asian Global Forum member jurisdictions are not yet signatories of it, both of which are not Asia Initiative members. Generally, Asian members have a wide EOI network as they recognise the importance of a broad array of EOI partners and receive support from the Secretariat to join the MAAC (see Figure 11 and Table 12). While the political engagement formalised through the signature of the MAAC is crucial, only the ratification can bring the MAAC into force. Technical support is available to Asian jurisdictions that have not yet signed the MAAC or face challenges in ratifying it.

FIGURE 11. Asian jurisdictions' exchange of information relationships in force

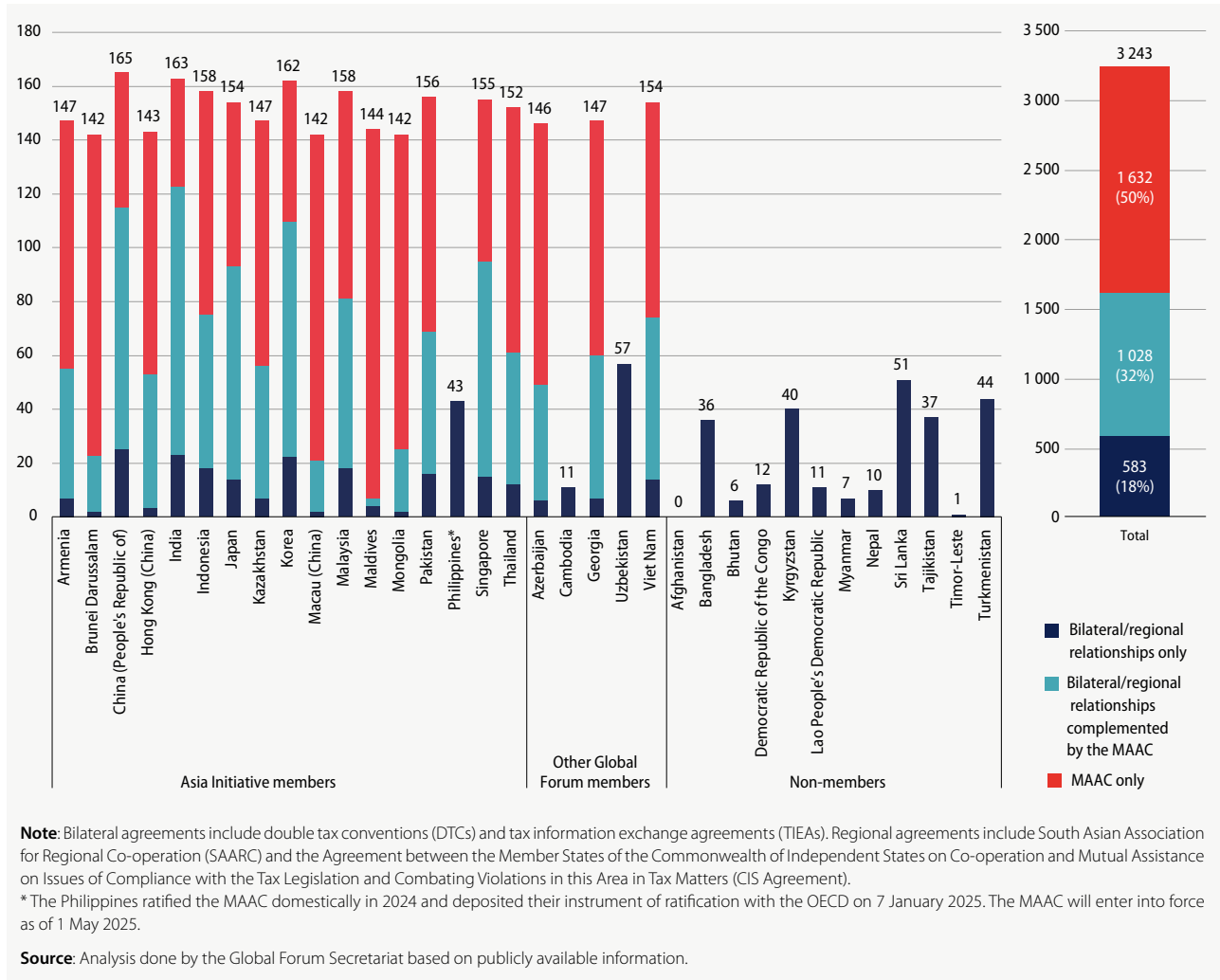
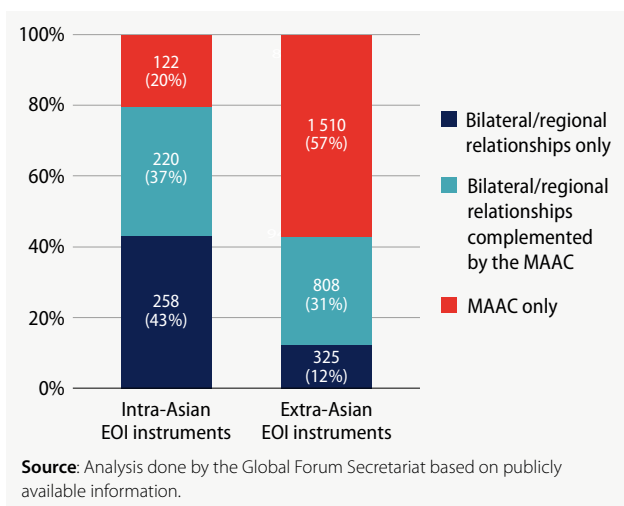


FIGURE 12. Intra-Asian and extra-Asian exchange of information relationships in force



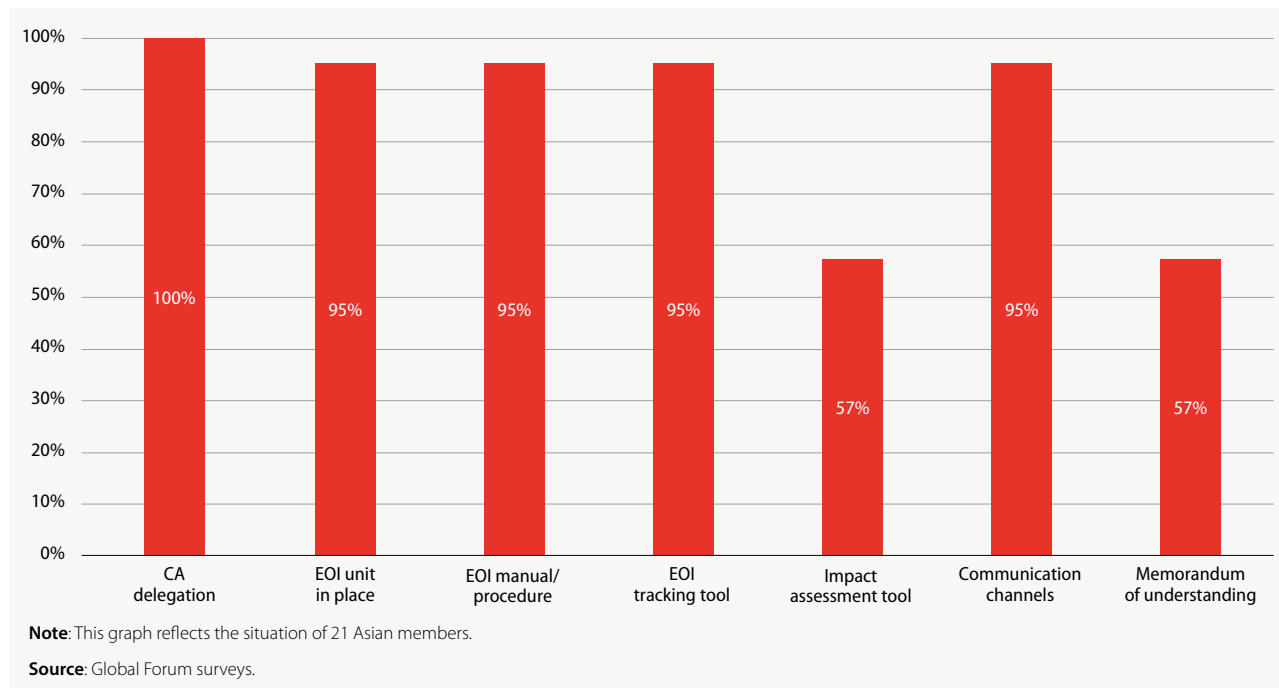
Driving exchange of information through a well-resourced operational unit

Some of the key components of a solid EOI infrastructure have been established by virtually all Asian members. These efforts reflect their continuous commitment to tax co-operation and the growing interest in effectively using exchanged data in their tax activities. Yet, more progress is needed in implementing proper tools to measure the impact of the use of EOI and developing more inter-governmental authorities' relationships to facilitate access to information.

A well-functioning operational framework is key to ensure timely and high-quality EOI processes, as required by the tax transparency standards. An effective operational EOI framework includes:

Translating political commitment into effective implementation in Asia

FIGURE 13. Asian members' exchange of information infrastructure



- delegating the competent authority powers for EOI, which is generally conferred by the minister of finance to a designated individual at the appropriate operational level within the tax authority, to increase operational efficiency
- establishing a dedicated EOI function that manages day-to-day EOI processes
- documenting procedures and processes (e.g. through an EOI manual) that ensure alignment with the standards and the confidentiality of the information received from treaty partners
- developing a tracking tool that monitors the handling of inbound and outbound requests and an impact assessment tool that measures the impact of EOI on DRM
- establishing communication channels between the EOI unit and tax auditors, as well as other relevant functions of the tax authority, to facilitate the handling of inbound and outbound EOI requests
- concluding a memorandum of understanding (MoU) with other domestic authorities to facilitate and secure information gathering

- adequately resourcing the EOI function and ensuring EOI officials are appropriately trained.

Overall, Asian members demonstrate a high level of maturity with regard to implementing key components of the EOI infrastructure (see Figure 13). All of them have delegated the competent authority powers to an operational level, and almost all of them have established an EOI unit equipped with an EOI manual and a tracking tool. This positive snapshot is the result of several years of technical support to help jurisdictions design and implement a suitable EOI framework.

However, areas in need of improvement remain (see Figure 13). Only slightly over half of the Asian members, 12 of them, reported to have an impact assessment tool in place. Yet, measuring the impact of EOI is crucial to increase accountability to key stakeholders, such as the Parliament and the general public, by demonstrating its practical role in DRM but also to enhance tax morale and compliance.

Similarly, 12 Asian members have concluded one or more MoUs to formalise their relationship with other domestic authorities. While this may not be needed where there are automated systems with direct access

BOX 8. MONGOLIA – Strengthening the infrastructure supporting effective exchange of information



Mongolia has made significant strides in strengthening its infrastructure for exchange of information (EOI) to fully benefit from cross-border information sharing and to prepare for its peer review against the Standard on Transparency and Exchange of Information on Request (EOIR). The first phase of this review, which focuses on assessing the legal framework, was initiated in 2024.

The competent authority function at the operational level has been delegated to the International Taxation Department within the General Department of Taxation of the Mongolian Tax Administration, which is responsible for handling incoming and outgoing requests for information.

Mongolia has greatly benefited from the close support of the Global Forum Secretariat in the implementation of the EOIR standard. The mock onsite visit in August 2022, along with multiple technical assistance reports and meetings addressing necessary enhancements to our legal and regulatory frameworks, has played a pivotal role in preparing for our peer review. Additional support was provided to refine our EOI manual, ensuring that our procedures align with the EOIR standard while improving the quality and timeliness of our requests. Moreover, the introduction of a tracking tool has streamlined the process

by ensuring all aspects of requests, including their status, are effectively monitored and followed up.

Mongolia has also signed 56 memoranda of understanding with domestic government agencies, including the General Authority of State Registration, the General Customs Office and the General Authority for Intellectual Property and State Registration, for real time access to relevant information.

Through these continuous efforts and sustained technical support, Mongolia has sent more than 80 requests for information to its partner jurisdictions since 2022, resulting in the identification of additional revenue. Looking ahead, Mongolia is determined to harness its enhanced infrastructure to generate high-quality requests, further unlocking the potential for additional revenue gains.

Sadly, 2024 was marked by the sudden loss of Mr Buyandelger Dagvasumberel. His dedication and exceptional efforts to advancing Mongolia's journey toward meaningful and effective international tax co-operation were invaluable. His contributions will always be remembered with deep gratitude.

Source: Provided by the General Department of Taxation of Mongolia.

or where regular and smooth relationships already exist between the different authorities, concluding an MoU may be considered because it helps (i) enhance the competent authority's access powers, expediting information exchange with foreign counterparts, and (ii) maximise the use of data received (e.g. enabling access to non-tax databases for CRS data matching).

In 2024, the Global Forum Secretariat supported two Asian members in strengthening their EOI infrastructure and will continue to do so to ensure Asian jurisdictions have all the fundamentals elements in place to reap the benefits of tax transparency (see Box 8).

A well-functioning operational EOI framework needs to be used to produce the desired impact. It entails that EOI officers are trained on the key components of EOI and that tax auditors and more generally

tax officials are aware of tax co-operation tools and trained on how to use them. Therefore, the first critical consideration is to ensure effective communication between the different functions of the tax authority. As of end 2024, 95% of the Asian members reported having communication channels in place between the competent authority and tax officers. Such channels are needed as tax officers are the primary source of EOI requests while the competent authority's role is to communicate with foreign counterparts to obtain the requested information.

Finally, successful EOI in practice depends on skilled and proactive tax auditors, who initiate most EOI requests. Tax authorities must therefore raise awareness among tax auditors and other officials about the benefits of EOI and its role in audits and other compliance activities, such as transfer pricing or high-net-worth individuals

Translating political commitment into effective implementation in Asia

audits. Since 2021, Asian members have organised over 650 local training sessions, with 22 490 officials trained (see Table 5). In 2024, 7 765 Asian tax officials attended over 200 training events. The Train the Trainer programme has had a noteworthy impact, as reflected in the growing number of officials trained since the first cohort in 2022.

The strong investment in building EOI capacities since 2022 reflects the particular importance given to addressing cross-border tax evasion and to maintain qualified staff over time despite the high-level rotation that usually occurs in Asian jurisdictions. In this context, the Global Forum's Train the Trainer programme is providing a growing contribution to these

efforts. Combined with the various tools provided by the Global Forum to further support the development of sustainable EOI knowledge within tax authorities, the increased awareness and understanding of EOI among tax auditors have already translated into tangible results. Exposed tax auditors are more apt to detect cases relevant for EOI, and benefit from the powerful deterrent impact on taxpayers (see Box 9).

As several Asian members still underuse EOIR, despite having the organisational process in place to effectively send requests, the Asia Initiative intends to initiate work to better understand the root causes and identify suitable approaches.

BOX 9. Interviews with tax auditors on the impact of exchange of information on request on their work

How has the exchange of information supported your audit and investigation activities, and how would you describe the impact of international co-operation on their outcomes?

Mr Grigor Abrahamyan

Chief Tax Inspector, Comprehensive Tax Audit Department, State Revenue Committee, Armenia



Since Armenia joined the Multilateral Convention on Mutual Administrative Assistance in Tax Matters (MAAC), the risk of being unable to access information held in other jurisdictions has been drastically reduced. In my own experience, I have been able to send requests for information to the relevant jurisdictions in nearly all cases requiring international co-operation, with minimal obstacles.

Beyond its practical application, exchange of information (EOI) also plays a strategic role in influencing taxpayer behaviour. In several cases, the mere indication of an impending EOI request has led taxpayers to voluntarily disclose previously undeclared foreign income or assets. This deterrent effect contributes to greater voluntary compliance and reduces audit resistance.

But it is not always the case, and in one of my recent cases, EOI was decisive. We initiated an audit based on domestic discrepancies and suspicions of undeclared foreign assets. Through a targeted EOI request, we obtained confirmation of substantial offshore holdings. This resulted in the recovery of significant additional taxes and penalties – an outcome that would have been impossible without international co-operation.

In conclusion, I think that EOI has improved not only the results of our audits but also the precision and efficiency with which we carry them out. As I continue to gain experience in using the tool, I see that our requests to partner jurisdictions are becoming increasingly focused and effective. Personally, my ability to effectively apply EOI has been significantly strengthened and I have developed an ability to detect red flags in audit cases that warrant international EOI requests. The diverse trainings I attended have enabled me to draft more precise and foreseeably relevant requests, significantly improving our success rate in obtaining foreign-held data.

The targeted trainings I was able to participate in have had a very positive impact for me. I had the opportunity to join a Global Forum workshop held in Yerevan, which provided practical strategies for identifying potential EOI cases and enhancing the quality of our requests as well as a workshop in India on tackling cross-border tax evasion through EOI, on request and automatic.

I strongly encourage my fellow auditors to proactively utilise EOI tool, which is proving indispensable in a modern tax administration.

TABLE 5. Domestic capacity building on exchange of information in Asia

Number of events/staffs trained	2021	2022	2023	2024	Total
Number of training events held for tax auditors/EOI staff (of which local trainings under the <i>Train the Trainer Programme</i>)	92	132 (16)	222 (17)	206 (9)	652 (42)
Number of tax auditors/EOI staff trained (of which officials trained under the <i>Train the Trainer Programme</i>)	1 052	5 941 (871)	7 733 (613)	7 765 (1 228)	22 490 (2 712)

Note: Response from 18 Asian members of the Global Forum.

Source: Global Forum surveys.

Ms Maneenate Lasudee

Tax audit officer, Revenue Department, Ministry of Finance, Thailand



Despite some challenges in practice, exchange of information (EOI) framework has become a key tool that supports tax audits and enforcement in Thailand. For tax auditors, EOI is especially useful when dealing with individuals or companies that have transactions, assets, or even residency outside the country. It allows us to request specific information from foreign tax authorities that we cannot access within Thailand. This helps us verify offshore income or ownership, detect non-compliance, and strengthen our audit findings – particularly in complex or cross-border cases.

In many situations, just knowing that we have access to international information makes taxpayers more likely to cooperate.

Overall, EOI has improved the fairness and effectiveness of tax collection and is now an essential part of modern audit strategies in Thailand.

Thanks to the training seminar for tax auditors and EOI officials I was able to attend in India, I was provided with valuable insights into international audit standards, risk-based approaches, and practical technics for identifying red flags related to offshore activities. I feel better equipped to integrate EOI into broader audit strategies and I am convinced of the importance of international co-operation in strengthening audit outcomes.

Ms Bhavika Maal

Deputy Commissioner of Income Tax, Revenue Department, Ministry of Finance, India



India has one of largest treaty networks for information exchange and EOI requests are increasing, becoming an important audit tool for us in cross-border transactions. It may be relevant to share that in one of the cases I was auditing, the taxpayer did not provide some information that it claimed was in the possession of its related party in another jurisdiction. Such information was crucial in determining its taxable income. Therefore, I had to send an EOI request to gather the said information. As the limitation date got extended due to such request, the taxpayer became compliant and provided some information that it had refused to provide earlier.

I attended the Asia Initiative EOI seminar in 2024. Though I had sent EOI requests in past, the seminar provided a broader understanding of the nuances of the EOI framework. I am now able to better appreciate that the drafting of an EOI request must take into consideration the requirements of the other jurisdiction for facilitating information. This has helped me draft the requests better and I anticipate that it will help get a faster response for my requests.

Source: Provided by the State Revenue Committee of Armenia, the Ministry of Finance of Thailand and the Ministry of Finance of India.

ADVANCING IMPLEMENTATION OF THE STANDARDS ON TRANSPARENCY AND EXCHANGE OF INFORMATION

The vast majority of Asian members have satisfactorily implemented the tax transparency standards. Although some areas are less mature, progress continues to be achieved in the region.

This progress is measured through the outcomes of the peer review and monitoring processes established by the Global Forum. These processes aim to ensure the widespread and effective implementation of the tax transparency standards to support active co-operation and a level playing field.

The monitoring and peer review processes provide assurance to Global Forum members that all member jurisdictions, as well as relevant non-member jurisdictions, are properly implementing these standards and therefore are able to exchange relevant information with their peers. These processes highlight areas where gaps or deficiencies are identified and provide recommendations to meet the tax transparency standards.

To support the effective implementation of the tax transparency standards, building capacities is critical. Through the development of knowledge tools, the delivery of workshops and trainings and the provision of bilateral technical assistance, the Global Forum Secretariat and other development partners are facilitating the full implementation of these standards and setting the foundation for their effective use to fighting tax evasion and mobilising revenue.

Steady progress in implementing the Standard on Transparency and Exchange of Information on Request

All members of the Global Forum are committed to implement the EOIR standard and to be monitored and peer reviewed. The EOIR peer review consists of a detailed assessment of the jurisdiction's legal and

regulatory framework and the effectiveness of its practical implementation to ensure that the jurisdiction fulfils the requirements of the EOIR standard.¹¹ Non-members of the Global Forum may also be subject to the EOIR peer review when they are identified as being relevant to the implementation of the standard, i.e. where they pose a risk to the level playing field.

Over 70% of Asian members have undergone a full EOIR peer review, with all but one obtaining a satisfactory result. Nonetheless, areas for improvement remain, particularly with regard to ensuring the availability of beneficial ownership information.

A satisfactory implementation of the Standard on Transparency and Exchange of Information on Request in virtually all Asian members

The Global Forum's EOIR peer review process is now in its Second Round (Round 2). The First Round of reviews (Round 1) was conducted against the Terms of Reference (ToR) adopted in 2010. The ongoing Second Round of reviews are conducted against ToR that were revised and enhanced in 2016 with the introduction of several changes, including the requirement for jurisdictions to ensure the availability of beneficial ownership information of legal persons and arrangements, and of bank accounts¹².

In 2024, Azerbaijan and Georgia concluded their combined peer reviews. Azerbaijan obtained a Compliant rating and Georgia a Largely Compliant rating. In addition, Armenia's Phase 1 report was adopted with an overall rating to be issued at the conclusion of the Phase 2 review launched in the second quarter of 2024. Both Armenia¹³ and Georgia have received technical assistance on EOIR provided by the Global Forum Secretariat in previous years to address shortcoming and support their EOIR implementation (see Box 10).

11. In the Second Round of Reviews, which started in 2026 for all Global Forum members, the peer review takes the form of a combined review or a phased review. A combined review, which is the default option, is a simultaneous review of both the legal and regulatory framework and the practical implementation of this framework by the jurisdiction. It implies the organisation of an onsite visit. A phased review is a peer review in two phases: the first phase aims at assessing the legal and regulatory framework (Phase 1), and the second phase aims at assessing the implementation of the legal and regulatory framework in practice (Phase 2). In the context of a phased review, the onsite visit is organised only during the Phase 2 of the review, which may take place a few years after the Phase 1 review is concluded.

12. OECD (2023), *Handbook for Peer Reviews on Transparency and Exchange of Information on Request: Second Round*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, available at: <https://www.oecd.org/tax/transparency/documents/handbook-for-peer-reviews-on-transparency-and-exchange-of-information-on-request.pdf>.

13. Armenia's Phase 2 review was adopted in March 2025 with a satisfactory rating of Largely Compliant.

“Azerbaijan’s 2024 Compliant rating under the peer review on transparency and exchange of information on request testifies to our firm commitment to strengthening tax transparency and international co-operation in tax matters. This recognition reflects our unwavering adherence to international tax transparency standards and our contribution to the global fight against cross-border tax evasion, including through the automatic exchange of financial account information since 2018 and our resolution to starting automatic exchange of information on crypto-asset transactions in 2027.”



Mr Orkhan Nazarli, Head of the State Tax Service, Ministry of Economy, Azerbaijan

BOX 10. GEORGIA – A successful exchange of information on request journey



Georgia completed its Second Round of Exchange of Information upon Request (EOIR) review in 2024 and obtained an overall satisfactory rating. This outcome not only reflects Georgia’s sustained commitment, but also the strong political-will, a dedicated team, and a consistent support from the Global Forum Secretariat.

Following recommendations from its First Round of EOIR peer reviews, Georgia initiated major reforms from 2014 to 2023, notably enhancing access to banking information by amending its Tax Code to empower the tax authority to access this information for EOI purposes. With the support received for the Second Round of Review process, Georgia improved its responses to the EOIR questionnaire and successfully addressed issues highlighted in its first review, such as availability of ownership information for foreign entities and partnerships which now must be filed with the Revenue Service. In-depth assistance from the Global Forum Secretariat and the Asian Development Bank also helped Georgia apprehend the expectations of the assessment team on the new beneficial ownership requirements. The detailed technical assistance report received on this was very helpful in the communication with key governmental

authorities involved in the process and having a leading role on this specific component of the Standard.

Peer reviews have not only helped Georgia reinforce its legal framework and oversight of information holders, they also enabled some enhancements of the organisational process. At the end of the chain, the Competent Authority’s performance is essential for a well-functioning EOIR. In the Second Round review, which was launched in 2023, Georgia faced some decline in the timeliness of responses to requests. While this was partly caused by the impact of the Covid-19 Pandemic disruptions, Georgia revamped the operations of the Competent Authority office by hiring new staff and updating the process.

These improvements have yielded positive results, and Georgia remains confident in the robust foundations it has established for the effective exchange of information and remains dedicated to supporting the Global Forum in fostering a more transparent environment.

Source: As a member of Asian Development Bank, Georgia (Revenue Service) agreed to share its tax transparency journey.

Table 6 provides a summary of the position of Asian members with respect to their EOIR peer review at the end of 2024. Overall, 16 out of the 22 Asian members (i.e. 73%) have undergone their full Round 2 of EOIR peer review, including some that were not assessed in Round 1. Out of these Asian members, all but Kazakhstan received a satisfactory rating, i.e. Compliant or Largely Compliant (see Figure 14). Kazakhstan,

which obtained a Partially Compliant rating, is closely working with the Global Forum Secretariat to address the deficiencies identified so that it can request a reassessment to have the progress achieved reflected in its rating.

In addition to the 16 Asian members fully reviewed in the Round 2:

Translating political commitment into effective implementation in Asia

- 2 jurisdictions have been subject to a review of only their legal and regulatory framework (Phase 1), which was found in general in place although some improvements are needed.¹⁴
- the evaluations of the remaining 4 jurisdictions are on-going (3) or will be launched in 2025 (1).

The main deficiency identified among Asian members pertains to ensuring the availability of ownership and identity information in practice, particularly due to a lack of adequate supervisory and monitoring mechanisms. Improvements are also needed to ensure the availability of accounting and banking information in practice due to some gaps in the supervision of

14. Armenia's Phase 2 review was adopted in March 2025 with a satisfactory rating of Largely Compliant.

TABLE 6. **Asian members' compliance ratings against the Standard on Transparency and Exchange of Information on Request**

Jurisdiction	First Round	Second Round
Armenia	Not reviewed	Phase 1 only (2024) Phase 2 launched in Q2 2024 ⁽²⁾
Azerbaijan	Largely Compliant	Compliant (2024)
Brunei Darussalam	Largely Compliant	Largely Compliant (2020)
Cambodia	Not reviewed	Launched in Q4 2024
China (People's Republic of)	Compliant	Largely Compliant (2020)
Georgia	Largely Compliant	Largely Compliant (2024)
Hong Kong (China)	Largely Compliant	Largely Compliant (2019)
India	Compliant	Largely Compliant (2017)
Indonesia	Partially Compliant	Largely Compliant (2018)
Japan	Compliant	Largely Compliant (2018)
Kazakhstan	Not reviewed	Partially Compliant (2018)
Korea	Compliant	Largely Compliant (2020)
Macau (China)	Largely Compliant	Largely Compliant (2020)
Malaysia	Largely Compliant	Largely Compliant (2019)
Maldives	Not reviewed	Phase 1 only (2022) Launch of Phase 2 scheduled in Q4 2025
Mongolia	Not reviewed	Phase 1 launched in Q1 2024
Pakistan	Largely Compliant	Largely Compliant (2023)
Philippines	Largely Compliant	Largely Compliant (2018)
Singapore	Largely Compliant	Compliant (2018)
Thailand	Not reviewed	Largely Compliant (2023)
Uzbekistan	Not reviewed	Launch scheduled in Q3 2025
Viet Nam	Not reviewed	Launched in Q2 2024

Note 1: The four possible ratings allocated after a full peer review are as follows, ranked in increasing level of compliance: Non-Compliant, Partially Compliant, Largely Compliant, Compliant.

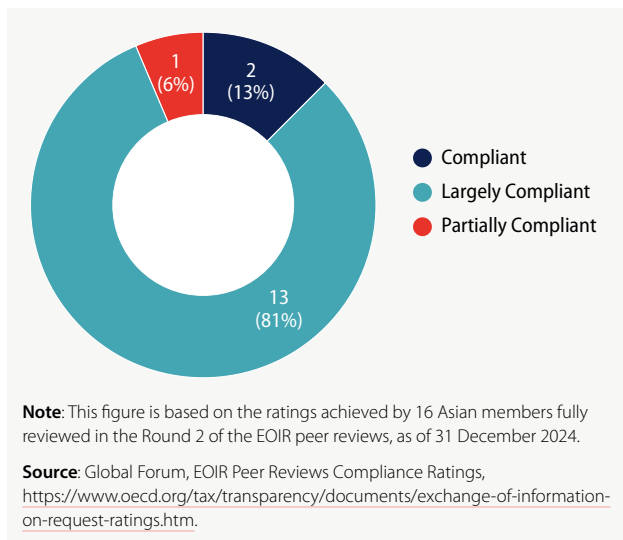
Note 2: The Phase 2 report of Armenia was adopted in 2025 with a Largely Compliant rating.

Source: Global Forum, EDIRC Peer Reviews Compliance Ratings, <https://www.oecd.org/tax/transparency/documents/exchange-of-information-on-request-ratings.htm>.

the taxpayers and banks' compliance with their legal obligations. The quality and timeliness of responses to information requests is also an area where improvement is required.

The Global Forum Secretariat supports its members in implementing and using effectively the EOIR standard.

FIGURE 14. Ratings obtained by Asian members in the Round 2 of peer reviews on Transparency and Exchange of Information on Request



In 2024, five Asian members benefitted from bilateral technical support from the Global Forum Secretariat. Technical assistance is available to all members in advance of their peer review or to help them address the deficiencies identified in their previous peer review report and thus improve their compliance rating. This assistance includes:

- raising awareness at the decision-making on the EOIR standard and its peer review process
- identifying legal, organisational or operational gaps with respect to the requirements of the EOIR standard
- providing legal, organisational or operational guidance or support to address the gaps identified
- preparing the peer review with guidance on the co-ordination of the preparatory work and on the process and steps involved, assistance in answering the questionnaire used for the assessment and simulation of the onsite visit of an assessment team
- providing guidance and support to the jurisdiction after the adoption of the peer review report to address recommendations, as well as to prepare for its bi-annual enhanced monitoring.



Regional Practical Workshop on Common Reporting Standard Compliance Audits, 16-18 July, Singapore.

Translating political commitment into effective implementation in Asia

A maturing beneficial ownership transparency in Asia

Transparency of beneficial ownership information is getting more mature in Asia, although the progress made on the legal and regulatory framework still needs additional efforts on the monitoring and supervisory side.

Since 2016, the EOIR standard requires every jurisdiction to ensure the availability of adequate, accurate and up-to-date information on both the legal owners and the beneficial owners of relevant legal entities and arrangements (Element A.1 of the ToR) and bank accounts (Element A.3 of the ToR) and to ensure that tax authorities are able to obtain this information.

Beneficial ownership plays a key role in curbing tax evasion and other IFFs. Taxpayers can try to hide their

revenues and assets by using complex structures across different jurisdictions, as well as instruments, such as nominee arrangements and bearer shares.

While such strategies make the work of the tax authorities more challenging, the establishment of solid framework ensuring the identification of the beneficial owners, i.e. the natural persons who ultimately owns or controls a legal person or arrangement, provides them with an effective tool to connect undeclared revenue and assets to the concerned taxpayer and apply the tax laws.

Table 7 provides a summary of the determinations and ratings received by Asian members on Elements A.1 and A.3 in the Round 2 of EOIR peer reviews.

TABLE 7. **Asian members determinations and ratings on the availability of beneficial ownership information as of 31 December 2024**

Jurisdiction	Beneficial ownership information on all legal persons and arrangements (Element A.1)		Beneficial ownership information on bank accounts (Element A.3)	
	Legal framework determination	Practical implementation rating	Legal framework determination	Practical implementation rating
Armenia	In Place But Needs Improvement	Not yet reviewed*	In Place But Needs Improvement	Not yet reviewed*
Azerbaijan	In Place But Needs Improvement	Largely Compliant	In Place	Compliant
Brunei Darussalam	In Place But Needs Improvement	Partially Compliant	In Place But Needs Improvement	Partially Compliant
Cambodia	Not yet reviewed	Not yet reviewed	Not yet reviewed	Not yet reviewed
China (People's Republic of)	In Place But Needs Improvement	Largely Compliant	In Place But Needs Improvement	Largely Compliant
Georgia	In Place But Needs Improvement	Largely Compliant	In Place	Compliant
Hong Kong (China)	In Place But Needs Improvement	Partially Compliant	In Place But Needs Improvement	Largely Compliant
India	In Place	Largely Compliant	In Place	Compliant
Indonesia	In Place But Needs Improvement	Partially Compliant	In Place	Largely Compliant
Japan	In Place But Needs Improvement	Partially Compliant	In Place	Largely Compliant
Kazakhstan	In Place But Needs Improvement	Partially Compliant	In Place But Needs Improvement	Largely Compliant
Korea	In Place But Needs Improvement	Partially Compliant	In Place But Needs Improvement	Largely Compliant



Comprehensive Workshop on the Common Reporting Standard, 4-7 November 2024, Yangzhou, People's Republic of China.

Jurisdiction	Beneficial ownership information on all legal persons and arrangements (Element A.1)		Beneficial ownership information on bank accounts (Element A.3)	
	Legal framework determination	Practical implementation rating	Legal framework determination	Practical implementation rating
Macau (China)	In Place But Needs Improvement	Partially Compliant	In Place	Compliant
Malaysia	In Place But Needs Improvement	Largely Compliant	In Place	Compliant
Maldives	In Place But Needs Improvement	Not yet reviewed	In Place But Needs Improvement	Not yet reviewed
Mongolia	Not yet reviewed	Not yet reviewed	Not yet reviewed	Not yet reviewed
Pakistan	In Place But Needs Improvement	Partially Compliant	In Place	Compliant
Philippines	In Place But Needs Improvement	Partially Compliant	In Place	Compliant
Singapore	In Place	Largely Compliant	In Place	Compliant
Thailand	In Place But Needs Improvement	Partially Compliant	In Place But Needs Improvement	Largely Compliant
Uzbekistan	Not yet reviewed	Not yet reviewed	Not yet reviewed	Not yet reviewed
Viet Nam	Not yet reviewed	Not yet reviewed	Not yet reviewed	Not yet reviewed

Note: This table takes into account the 16 Asian members, which have been fully reviewed by the Global Forum in the Round 2 of EOIR peer reviews, and the 2 Asian members that have only undergone a Phase 1 review in the Round 2 of EOIR peer reviews as of 31 December 2024.

* The Phase 2 report of Armenia was adopted in 2025 and concluded with a Largely Compliant rating for Elements A.1 and A.3.

** Determinations are issued following an assessment of the legal and regulatory framework. The structure of the determinations is as follows, ranked in decreasing alignment with the standard's requirements: In Place, In Place But Needs Improvement and Not In Place.

*** Ratings are issued following an assessment of the practical implementation of the legal and regulatory framework. The structure of the ratings is as follows, ranked in decreasing alignment with the standard's requirements: Compliant, Largely Compliant, Partially Compliant and Non-Compliant.

Source: Global Forum, EOIR Peer Reviews Compliance Ratings, <https://www.oecd.org/tax/transparency/documents/exchange-of-information-on-request-ratings.htm>

Translating political commitment into effective implementation in Asia

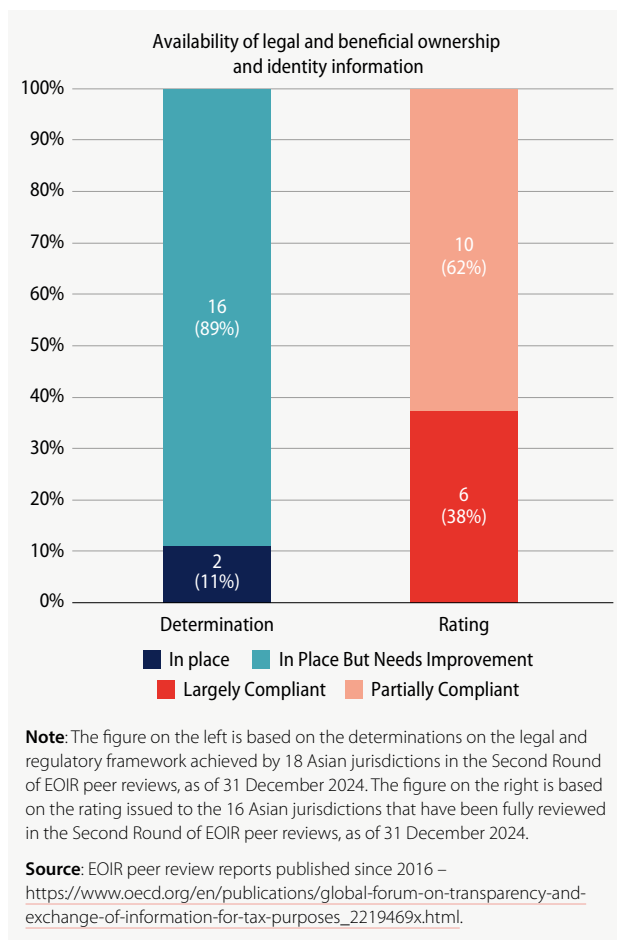
While Element A.1 also requires the availability of legal ownership information of legal persons and arrangements, most of the deficiencies identified in the Round 2 relate to the availability of beneficial ownership information of legal entities and arrangements. Table 7 shows the results of the determinations and compliance ratings obtained by Asian members for Element A1 over the period 2016 to 2024, while Figure 15 provides an overview of the same.

- The legal framework was generally in place for the majority of the 16 assessed Asian members (89%), though some improvements were needed. The remaining two Asian members had a fully established legal framework, with no deficiencies identified.

The main deficiencies identified include:

- the definition of beneficial owner not fully aligned with the standard for all types of relevant entities (i.e. companies, partnerships, legal arrangements)
 - beneficial ownership information only available to the extent that there is an ongoing relationship with a person subject to anti-money laundering and counter-financing of terrorism (AML/CFT) requirements
 - lack of mandatory updates to beneficial ownership information to ensure accuracy
 - limited or insufficient guidance on the methodology for identifying beneficial owners
 - inadequate provisions for the retention and accessibility of beneficial ownership information
 - weak or absent obligations to disclose nominee status.
- Significant challenges have been identified in the practical implementation of the legal framework in 10 Asian jurisdictions (63%). These issues primarily pertain to insufficient supervision and enforcement of beneficial ownership obligation affecting both the availability and accuracy of such information. Additionally, the high number of inactive entities identified in some of these jurisdictions affects their ability to ensure the availability of beneficial ownership information. In the remaining six Asian members, the oversight was incipient due to recent legislative and regulatory reforms, leading to a Largely Compliant (33%).

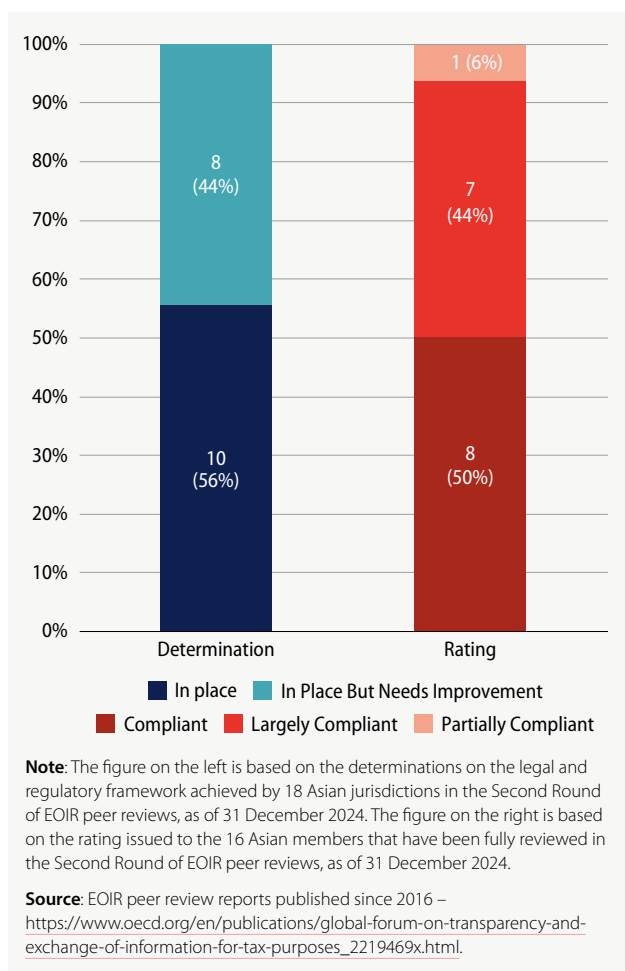
FIGURE 15. **Element A.1: Determinations and compliance ratings of Asian members in Round 2 peer reviews on Transparency and Exchange of Information on Request**



With respect to Element A.3, the outcomes of the peer reviews are even more positive (see Figure 16):

- The legal framework of the majority of the peer-reviewed Asian members (10 members, representing 56%) was fully established. For the remaining eight Asian members (44%), while most key components of a robust legal system were in place, some deficiencies were identified requiring improvement. These gaps primarily concern: (i) inadequate requirements for retaining information on account holders and beneficial owners in case of bank closures or mergers, and (ii) the lack of obligations to update beneficial ownership information at regular intervals.
- All but one of the assessed Asian members received a satisfactory rating for ensuring the availability

FIGURE 16. **Element A.3: Determinations and compliance ratings of Asian members in the Round 2 peer reviews on Transparency and Exchange of Information on Request**



of banking information, including beneficial ownership, in practice. Only one jurisdiction was rated Partially Compliant primarily due to insufficient supervision and compliance activities to ensure the availability beneficial ownership information.

While the EOIR standard requires that jurisdictions have in place a framework that ensures the availability of beneficial ownership information, it is not prescriptive on the path to guarantee the availability of this information. Jurisdictions usually use one or more of the following four main policy approaches:

- **AML/CFT approach:** relying on information already collected by persons subject to AML/CFT legislation and its related customer due diligence or know your customer obligations.
- **Entity approach:** requiring the legal persons and legal arrangements (such as companies, partnerships and trusts) to identify their beneficial owners and maintain their own records of accurate and up-to-date information on their beneficial owners.
- **Central register approach:** an extension of the entity approach which requires all legal persons and arrangements to identify their beneficial owners and to provide that information to a central register supervised by a designated authority. The information should be filed with the register upon creation, periodically and every time there is a change.
- **Tax authority approach:** a variation of the central register approach that requires legal persons and arrangements to identify their beneficial owners and to provide that information to the tax authority. The information should be filed with the tax authority upon creation, periodically and every time there is a change.

A multipronged approach comprises two or more of these four options. The International Recommendations on Combating Money Laundering and the Financing of Terrorism & Proliferation established by the Financial Action Task Force (FATF) requires that a multi-pronged approach is followed for the identification of the beneficial owners of legal persons (see Table 8) and recommends such an approach with respect to legal arrangements.¹⁵

In 2024, while five Asian members indicate to rely on their AML/CFT framework exclusively, the vast majority of them (73%) now reports that they use a multi-pronged approach for beneficial ownership information. However, in many instances, Asian members made the most recent changes to their beneficial ownership framework after their peer review, and therefore these improvements have not been assessed. Nevertheless, based on the peer review findings, adopting a multi-pronged approach

15. FATF (2012-2023), *International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation*, FATF, Paris, France, www.fatf-gafi.org/en/publications/Fatfrecommendations/Fatf-recommendations.html; FATF (2023), *Guidance on Beneficial Ownership for Legal Persons*, FATF, Paris, <http://www.fatf-gafi.org/publications/FATFrecommendations/guidance-beneficial-ownership-legalpersons.html>; FATF (2024), *Guidance on Beneficial Ownership and Transparency of Legal Arrangements*, FATF, Paris, <https://www.fatf-gafi.org/content/fatf-gafi/en/publications/Fatfrecommendations/Guidance-BeneficialOwnership-Transparency-Legal-Arrangements.html>.

Translating political commitment into effective implementation in Asia

TABLE 8. **Multi-pronged approach to beneficial ownership for legal persons under the Recommendations of the Financial Action Task Force**

Mandatory entity approach	Mandatory register approach or alternative mechanism	Mandatory additional supplementary measures
<p>Obligation for legal persons to hold beneficial ownership information.</p> <p>It cannot be a standalone mechanism and must be accompanied by a register approach or an alternative mechanism.</p>	<p>One or more register(s) held by one or more public authority(ies) or body(ies), or a private body entrusted by a public authority.</p> <p>In lieu of a register, an alternative mechanism can be used for collecting beneficial ownership information, as long as this gives authorities efficient access to the information.</p>	<p>Obligation to use any additional supplementary measures that are necessary to ensure that the beneficial ownership information of companies can be determined.</p> <p>Examples: Information held by regulators or stock exchanges or obtained by Financial Institutions and/or Designated Non-Financial Businesses and Professions under their customer due diligence requirements.</p>

Note: The Interpretative Note to Recommendation 24 of the FATF Recommendations.

Source: OECD and IDB (2024), *Building Effective Beneficial Ownership Frameworks: A joint Global Forum and IDB Toolkit – Second edition*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, <https://www.oecd.org/tax/transparency/documents/effective-beneficial-ownership-frameworks-toolkit-second-edition-2024.pdf>.

has generally resulted in better outcomes regarding the availability of beneficial ownership information of legal persons and arrangements. Out of the 126 Global Forum members which have completed their Round 2 peer review 77% have adopted a multipronged approach and 57% obtained a satisfactory rating on the Element A.1. The different approaches complement each other, allowing one approach to offset gaps in another, ensuring a more comprehensive and effective framework. Regardless of the approach(es) adopted, comprehensive supervisory and compliance activities remain key to ensure their effectiveness in practice. In the context of a multi-pronged approach, an effective communication between key stakeholders, such as the AML/CFT obliged persons and the Registrar, contribute to complement and cross-check information and correct possible discrepancies.

The Global Forum Secretariat provides capacity building to its members to develop or strengthen their beneficial ownership frameworks to ensure availability and access to this critical information for tax authorities. Through the support, members are able to close the gaps identified during their EOIR peer review. This assistance includes:

- raising awareness at the decision-making level on the importance of ensuring beneficial ownership transparency

- assisting members in developing or amending the necessary legal frameworks for beneficial ownership to meet the tax transparency standards
- supporting the implementation of the beneficial ownership framework, including raising awareness amongst relevant stakeholders that are obliged to identify, verify and maintain beneficial ownership information within the jurisdiction, the setup of beneficial ownership registers, as well as the training of relevant officials supervising the compliance with the domestic requirements on beneficial ownership as well as tax officials using beneficial ownership information in tax audits or investigations
- helping jurisdictions design effective supervision and enforcement activities to ensure compliance with the requirements of the domestic legal framework.

In 2024, the Global Forum Secretariat supported four Asian members in improving their beneficial ownership framework, covering legal and regulatory aspects, as well as organisational, monitoring and supervision matters. In addition, taking advantage of the publication of an updated version of the toolkit on beneficial ownership¹⁶, the Global Forum Secretariat has organised with the ADB an in-person regional workshop to open up the dialogue on beneficial ownership

16. OECD and IDB (2024), *Building Effective Beneficial Ownership Frameworks: A joint Global Forum and IDB Toolkit – Second edition*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, <https://www.oecd.org/tax/transparency/documents/effective-beneficial-ownership-frameworks-toolkit-second-edition-2024.pdf>.

BOX 11. A comprehensive and multistakeholder workshop on beneficial ownership transparency to tackle illicit financial flows

From 3 to 5 July 2024, the Asian Development Bank in collaboration with the Global Forum on Transparency and Exchange of Information for Tax Purposes, hosted a comprehensive regional workshop focused on beneficial ownership to tackle illicit financial flows (IFFs). Over 60 participants from 28 countries across Asia and the Pacific, including 48 Asian participants from 21 Asian countries, engaged on discussions on the complexities of beneficial ownership from a tax and anti-money laundering perspectives. Among the participants were tax and anti-money laundering officials, together with representatives from civil society, non-profit organisations, such as Open Ownership or Tax Justice Network, as well as Financial Action Task Force (FATF)-style regional bodies, i.e. the Asia/Pacific Group on Money Laundering and the Eurasian Group.

The training's objective was to deepen participants' understanding of beneficial ownership and its role in combating IFFs. Discussions centred on the importance of accurate and accessible beneficial ownership information, the alignment of tax transparency frameworks with the recently enhanced FATF Recommendations, and the implementation of a holistic government approach to improve coordination on a national level across relevant agencies.

Andres Knobel, Lead Beneficial Ownership Researcher at the Tax Justice Network,

concluded *"We have learnt so much from hearing about different cases and listening to experts' experiences. Asia is a very diversified region, so coming here and learning from countries with diverse dynamics, both on their successes and challenges, has been extremely enriching. It helps us understand what is happening in the world, what countries actually need, and how to go from policies and ideas to implementation in practice. It also teaches us what has and what has not worked in practice."*



This event brought together a diverse range of stakeholders, each offering a unique perspective, which ensures the sharing of various experiences and results in well-rounded and balanced approaches to tackle IFFs by enhancing beneficial ownership transparency.

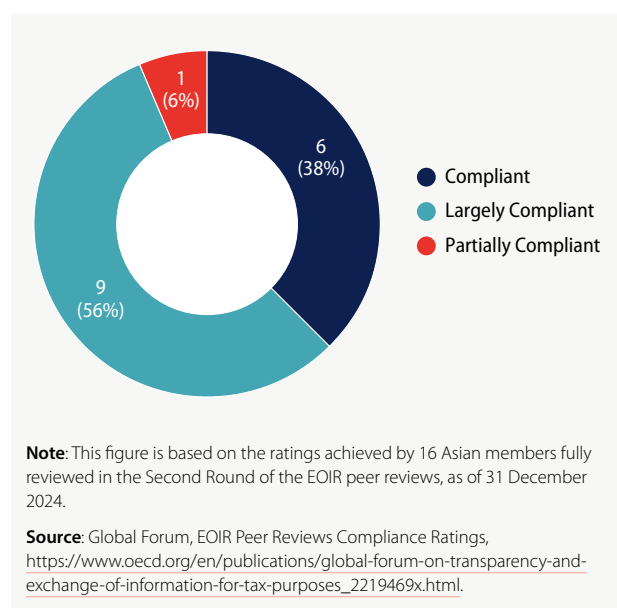
Source: Global Forum Secretariat.

transparency between the different global, regional and local stakeholders and discuss concrete actions to enhance Asian jurisdictions' beneficial ownership framework taking into consideration the latest development in this area (see Box 11).

An effective practice of exchange of information on request

All but one Asian member that underwent a full review in Round 2 received a satisfactory rating for the quality and timeliness of their EOIR responses (see Figure 17). Despite these positive outcomes, Asian members still encounter some challenges, such as instances of delayed responses, failures to provide status updates within 90 days and untested internal procedures. The Global Forum Secretariat continues to support its members in improving their organisational processes to ensure timely and high-quality EOI responses (see Box 8). In 2024, three Asian members received technical assistance aimed at improving their EOI process.

FIGURE 17. **Quality and timeliness of responses to requests for information (Element C.5)**



Translating political commitment into effective implementation in Asia

Advancing the implementation of the Common Reporting Standard

Over the years more and more Asian members have implemented or taken steps to implement automatic exchange of financial account information by a specific date. The substantial additional revenues identified by early adopters as well as the successful implementation by less advanced jurisdictions have driven new commitments. The vast majority of Asian members are already implementing the CRS, and some of the efforts are now to raise awareness of those jurisdictions that are not yet participating in CRS exchanges. The objective is to inform their decision and avoid that, due to a lack of understanding, they miss opportunities to mobilise revenues.

With the widespread adoption of the CRS by Asian members, there is also a substantial need for capacity building to ensure that the implementation is smooth and effective but also to maximise the use of the data received for compliance activities. While most of Asian members have successfully passed their peer reviews, there is room for improvements for many of them, and a strong need for support for those which were less successful. In addition, all CRS-committed members will have to take steps to implement the recent amendments brought to the CRS in 2023.

Expanding the effective participation of Asian members in the Common Reporting Standard

All members of the Global Forum are committed to implement the CRS but developing countries that do

not host a financial centre were not required to start CRS exchanges by a defined date in recognition of their unique challenges and the lower risk they pose to the level playing field. These countries can implement the CRS under a practical timeline adequate to their circumstances and with the technical support of the Global Forum Secretariat.

Since the start of CRS exchanges in 2017 until 2024, 16 out of the 18 CRS committed Asian members have already exchanged financial account information automatically, with Georgia exchanging for the first time in 2024. The remaining two countries, Armenia and Mongolia, are expected to start their first exchanges in 2025 and 2027 respectively. They are taking steps to implement the CRS building blocks with the support of the Global Forum Secretariat. For instance, Armenia signed the Multilateral Competent Authority Agreement on Automatic Exchange of Financial Account Information (CRS-MCAA) in 2024.

Table 9 illustrates the growing participation and commitment of Asian members to the CRS to which the dedicated capacity-building strategy put in place in 2021 by the Global Forum Secretariat has largely contributed¹⁷. Despite the significant progress, four Asian members¹⁸ have yet to define a date for their first automatic exchanges. Key reported obstacles preventing commitment include: (i) a lack of the requisite international and domestic legal framework, and (ii) insufficient capacity and resources.

17. OECD (2021), *Unleashing the potential of automatic exchange of information for developing countries*, Global Forum on Transparency and Exchange of Information for Tax Purposes, <https://www.oecd.org/tax/transparency/documents/aeoi-strategy-developing-countries.pdf>.

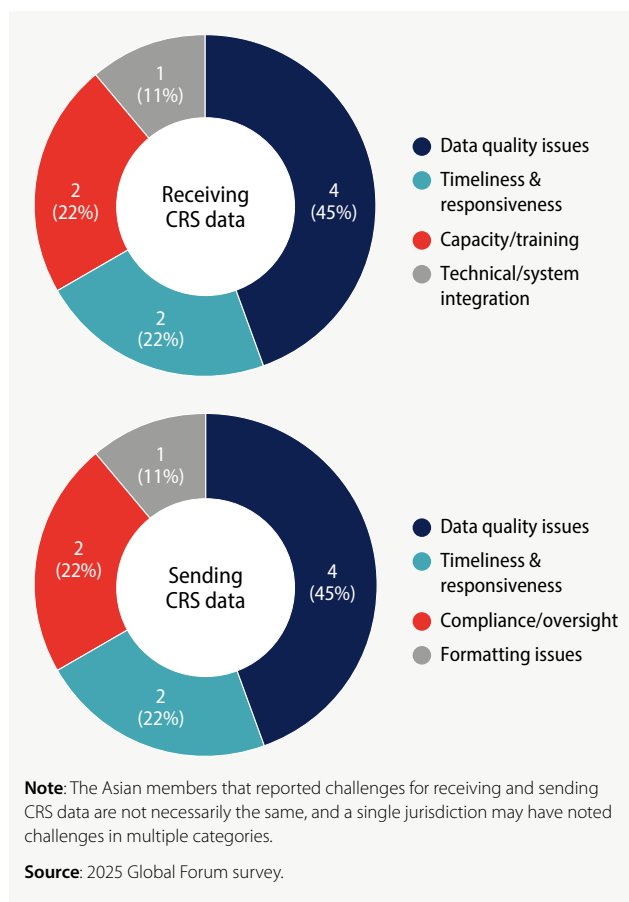
18. Cambodia, the Philippines, Uzbekistan, Viet Nam.

TABLE 9. **Timeline of Asian members' participation in automatic exchange of financial account information**

India Korea	Azerbaijan Brunei Darussalam China (People's Rep. of) Hong Kong (China) Indonesia Japan Macau (China) Malaysia Pakistan Singapore	Kazakhstan	Maldives	Thailand	Georgia	Armenia	Mongolia
2017	2018	2021	2022	2023	2024	Expected 2025	Expected 2027

Source: Global Forum, Automatic Exchange of Information (AEOI): Status of Commitments <https://www.oecd.org/tax/transparency/AEOI-commitments.pdf>.

FIGURE 18. Challenges reported by Asian members when receiving and sending CRS data



The main challenges reported by Asian members already exchanging information automatically are similar, both on the sending and receiving side (see Figure 18). They can hinder the usability of the CRS data received and slow down tax enforcement efforts:

- The most common concern is data quality, particularly due to incomplete or inaccurate account information, such as tax identification numbers, dates of birth, and addresses. Another recurring challenge is timeliness, whether it is delays in receiving data or in getting timely feedback, including status messages for corrected files, from partner jurisdictions.
- Despite these shared concerns, jurisdictions experience unique challenges. On the receiving side, Asian members have identified a need to strengthen

internal capacity by providing specialised training to tax officials, enabling them to interpret and maximise the use of CRS data. In contrast, on the sending side, Asian members often struggle with ensuring reporting financial institutions compliance with due diligence and reporting obligations.

- Finally, technical hurdles remain, ranging from ensuring that CRS data conforms to proper formatting standards on the sending side to integrating CRS data seamlessly with existing tax systems and databases on the receiving end.

The Global Forum Secretariat provides technical support to both member jurisdictions not yet committed to start CRS exchanges by a specific date, helping them benefit from this form of co-operation soon, and to those already committed to it, ensuring a smooth implementation. This assistance includes:

- raising awareness of CRS potential through consultations with key decision-makers, including finance ministers and head of tax administrations
- assessing the maturity of Information Security Management (ISM) frameworks to determine a practical timeline for first exchanges
- drafting or refining CRS domestic legal frameworks
- establishing international legal gateways by joining the MAAC and signing/activating the CRS-MCAA to exchange information with partner jurisdictions
- guiding jurisdictions in developing AEOI portals and enrolling in the Common Transmission System (CTS)¹⁹
- formulating and implementing a strategy to ensure financial institutions comply with due diligence and reporting obligations
- making effective use of CRS data received.

In 2024, 17 Asian members benefitted from this bilateral technical assistance. In addition, over 674 officials from

19. The CTS facilitates the secure exchange of tax information amongst tax authorities, covering 25 different types of tax information. All competent authorities are using the CTS for transmissions of CRS data. Several tax administrations are also using the CTS to exchange other types of tax information, such as EOIR. The guidance on developing the AEOI Portal and enrolment into the CTS is available to member jurisdictions on demand.

Translating political commitment into effective implementation in Asia

“Singapore has reaffirmed its strong commitment to global tax transparency by taking concrete steps to advance the implementation of the International Standards for Automatic Exchange of Information in Tax Matters. Singapore has actively participated in the automatic exchange of financial account information since 2018. Building on this foundation, Singapore committed in 2024 to implement the automatic exchange of information on crypto-asset transactions and to implement amendments to financial account information exchanges. Signing the Multilateral Competent Authority Agreement on Automatic Exchange of Information pursuant to the Crypto-Asset Reporting Framework and the Addendum to the Multilateral Competent Authority Agreement on Automatic Exchange of Financial Account Information during the 17th Global Forum Plenary Meeting held in November 2024 in Paraguay reflects Singapore’s proactive approach and dedication to enhancing global tax co-operation. Doing so, Singapore reaffirms its dedication to multilateral efforts aimed at combating tax evasion and enabling tax authorities to adapt to new financial products and technologies.”



Mr Ow Fook Chuen, Commissioner of the Inland Revenue Authority of Singapore

20 Asian members attended 15 training and sharing-experience events related to CRS implementation (see Table 13). The Global Forum Secretariat will continue providing support to interested jurisdictions.

Following the amendments brought to CRS in 2023²⁰ to broaden its scope and enhance the usability of the data exchanged as a tool to tackle tax evasion, the Global Forum agreed to start the first automatic exchanges under the amended CRS in 2027. While there is a possibility for a transitional period for the implementation of the domestic legal changes until 2030 at the latest, where it is needed, the technical changes made to the schema used for the exchanges must be implemented for the 2027 exchanges. Therefore, Asian members participating to CRS exchanges have to take steps to:

- sign the Addendum to the CRS-MCAA which amends the current international legal basis for CRS exchanges to introduce the new obligations
- adapt their domestic legal framework to bring new financial assets, such as e-money products, within

the scope of the CRS, strengthen due diligence procedures, avoid double reporting in case of the implementation of the CARF and improve the quality of the information reported

- adopt the new CRS schema for exchanges and implement the related validations to ensure effective exchanges.

The Global Forum Secretariat will support interested members in implementing all these critical components. As of 31 December 2024, five Asian members have taken one of the first implementation steps by signing the Addendum to the CRS-MCAA.²¹

Broad network of exchange partners for automatic exchange of financial account information

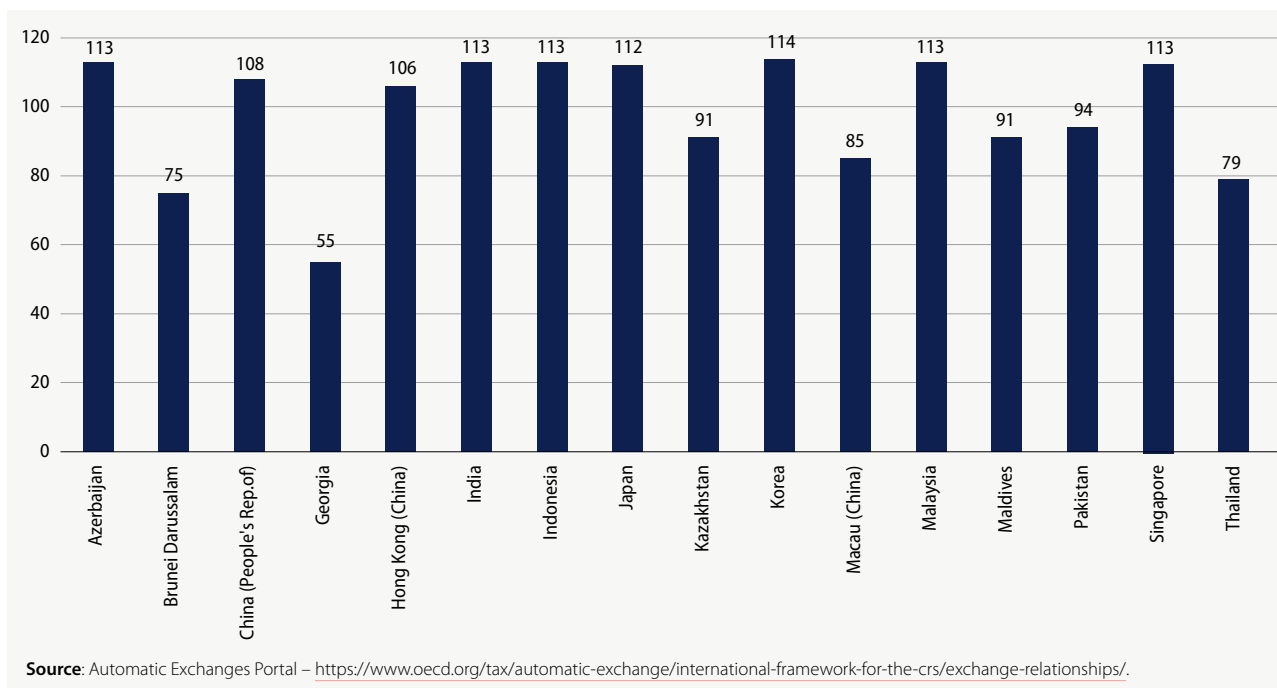
To receive the relevant information on the offshore financial accounts held by its residents, a jurisdiction needs a broad network of exchange partners. Virtually all jurisdictions participating to CRS exchanges are performing their exchanges under the MAAC and the CRS-MCAA,²² which operationalises automatic exchanges of financial account information.

20. OECD (2023), *International Standards for Automatic Exchange of Information in Tax Matters: Crypto-Asset Reporting Framework and 2023 update to the Common Reporting Standard*, OECD Publishing, Paris, <https://doi.org/10.1787/896d79d1-en>.

21. Indonesia, Japan, Korea, Malaysia and Singapore. In addition, Mongolia signed the addendum to the CRS-MCAA in March 2025.

22. The text of the CRS MCAA is available at <https://www.oecd.org/content/dam/oecd/en/topics/policy-issues/tax-transparency-and-international-co-operation/multilateral-competent-authority-agreement.pdf>.

FIGURE 19. Number of activated automatic exchange relationships by Asian members



The 16 Asian members that exchange financial account information automatically have 1 575 relationships activated under the CRS-MCAA as of December 2024 (see Figure 19). This represents an 11% increase compared to 2023. Moreover, five additional jurisdictions²³ signed the CRS-MCAA in 2024. It is expected that this figure will further increase with other countries in the region due to start exchanging CRS data in the coming years.

A satisfactory implementation of the Common Reporting Standard in Asia

Most of the Asian members who are exchanging automatically financial account information have satisfactorily implemented the Common Reporting Standard.

CRS implementing jurisdictions are subject to the Global Forum’s peer review and monitoring process to ensure an effective implementation of the standard. The peer review takes place on a staged basis and assesses the legal and regulatory frameworks and the effectiveness of their implementation in practice. The latter assessment is done through an initial desk-based effectiveness review, which is followed later by a deeper effectiveness review that involves an onsite visit by an assessment

team, the outcome of which, for the jurisdictions that started CRS exchanges by 2028, will be published in 2026.

Table 10 presents the results of the CRS reviews of Asian jurisdictions’ legal and regulatory frameworks and, where available, of their initial effectiveness in practice.

As of December 2024, 15 Asian members were assessed on their legal and regulatory frameworks. Most of these members have a legislation enabling CRS exchanges, with nine jurisdictions (60%) presenting a legislation fully in place and four (27%) with a legislation in general in place although some improvements are needed. However, the legal and regulatory framework set by two jurisdictions (13%) is not in place due to fundamental deficiencies. The main deficiencies identified among Asian members include a limited scope of reporting financial institutions and financial accounts to be reported, incomplete due diligence obligations, inadequate enforcement mechanisms and a lack of the legal definition of controlling persons. The Global Forum is working closely with several Asian members to resolve identified deficiencies and strengthen their legal and regulatory systems for effective CRS implementation.

23. Armenia, Cameroon, Papua New Guinea, Senegal and Trinidad and Tobago.

Translating political commitment into effective implementation in Asia

TABLE 10. Results of peer reviews on automatic exchange of financial account information in Asia

Jurisdiction	Legal framework review			Initial effectiveness review		
	CR1 Domestic legal framework	CR2 International legal framework	Overall determination	CR1 Domestic information collection and reporting	CR2 International information exchange	Overall rating
Armenia	Not yet reviewed			Not yet reviewed		
Azerbaijan	In Place But Needs Improvement	In Place	In Place But Needs Improvement	On Track	On Track	On Track
Brunei Darussalam	In Place But Needs Improvement	In Place	In Place But Needs Improvement	Partially Compliant	On Track	Partially Compliant
China (People's Republic of)	In Place	In Place	In Place	On Track	On Track	On Track
Georgia	Not yet reviewed			Not yet reviewed		
Hong Kong (China)	In Place	In Place	In Place	On Track	On Track	On Track
Kazakhstan	Not In Place	In Place	Not In Place	Not yet reviewed		
Korea	In Place	In Place	In Place	On Track	On Track	On Track
India	In Place	In Place	In Place	On Track	On Track	On Track
Indonesia	In Place	In Place	In Place	On Track	On Track	On Track
Japan	In Place But Needs Improvement	In Place	In Place But Needs Improvement	On Track	On Track	On Track
Macau (China)	In Place	In Place	In Place	On Track	On Track	On Track
Malaysia	In Place	In Place	In Place	On Track	On Track	On Track
Maldives	Not in Place	In Place	Not in Place	Not yet reviewed		
Mongolia	Not yet reviewed			Not yet reviewed		
Pakistan	In Place	In Place	In Place	Partially Compliant	Partially Compliant	Partially Compliant
Singapore	In Place	In Place	In Place	On Track	On Track	On Track
Thailand	In Place But Needs Improvement	In Place	In Place But Needs Improvement	Not yet reviewed		

Notes:

**The structure of the determinations on the legal framework is as follows, ranked in decreasing alignment with the standard's requirements: In Place, In Place But Needs Improvement and Not In Place.

**The structure of the ratings for the first reviews of effective implementation is as follows, in decreasing alignment with the standard's requirements: On Track, Partially Compliant and Non-Compliant.

Source: OECD (2024), Peer Review of the Automatic Exchange of Financial Account Information 2024 Update, OECD Publishing, Paris, <https://doi.org/10.1787/1aa02413-en>

Each year, they have the opportunity to request a reassessment to ensure their progress is acknowledged. The legal framework assessment for Georgia, Armenia and Mongolia is planned to be conducted over the next few years.

In addition, 12 Asian members underwent an initial effectiveness review, which assesses if jurisdictions effectively oversee financial institutions' compliance with due diligence, reporting, and record-keeping obligations and take appropriate enforcement measures in case of non-compliance. For 83% of the assessed Asian members (10), their implementation of the CRS in practice has been found "On Track" as they have set up administrative compliance frameworks that are in principle effective in ensuring compliance by financial institutions and ensured the smooth operation of the exchanges with their foreign partners. However, two countries (17%) partially comply with the CRS requirements. While these countries had credible frameworks and plans in place to ensure compliance, some deficiencies that are significant to the proper functioning of the CRS were identified, including a compliance strategy that lacks sufficient comprehensiveness and/or compliance activities that remain in their early stages or lack depth. The initial effectiveness review of the remaining Asian members participating in CRS is scheduled over the next few years.

The initial effectiveness reviews revealed that multiple jurisdictions across different regions faced challenges to design and implement an effective administrative compliance framework. To help member jurisdictions prepare for their initial reviews and support those members which would undergo their Second Round

effectiveness reviews, the Secretariat developed a comprehensive technical assistance package: the Administrative Compliance Strategy (ACS) Programme, which has been implemented since 2022.²⁴ The ACS Programme includes:

- the development of knowledge tools available to members on request,²⁵ with a Model Manual for CRS Compliance Audits²⁶ released in 2024, which provides detailed guidance for officials conducting CRS compliance inspections of financial institutions
- bilateral technical support to help jurisdictions develop a comprehensive compliance framework and implement compliance activities
- a series of workshop to facilitate implementation in practice of the compliance activities.

In 2024, 15 Asian members participated in 4 of these workshops, with over 110 officials trained in the region. The Secretariat also provided tailored technical assistance to three Asian members: one of these programmes was completed with the jurisdiction designing its own comprehensive compliance strategy, while the two others were progressing. Following previous technical assistance support, three Asian members made significant legal or regulatory changes to strengthen their implementation of the standard.

Capacity building will remain available to support the six Asian members which will be subject to their initial review in the coming years and for the 12 other Asian members which are currently undergoing their Second Round effectiveness reviews, with results due to be published by 2026 (see Box 12).

24. OECD (2024), *Administrative Compliance Strategy Programme: Enhancing the Effectiveness of the Implementation of the Standard on Automatic Exchange of Financial Account Information – 2023/2024 Interim Report*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, <https://www.oecd.org/tax/transparency/documents/administrative-compliance-strategy-programme-automatic-exchange-of-information-interim-report-2023-2024.pdf>.

25. These tools include:

OECD (2022), *Model Administrative Compliance Strategy*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, available to tax authorities upon request in English, French and Spanish.

OECD (2022), *CRS Notifications Tracking tool and its glossary*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, available to tax authorities upon request in English, French and Spanish.

OECD (2023), *Methodology for the implementation of the risk-based approach to administrative compliance and its Risk matrix*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, available to tax authorities upon request in English, French and Spanish.

26. OECD (2024), *Model Manual for CRS Compliance Audits*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, available to tax authorities on request in English, French and Spanish.

BOX 12. JAPAN – Preparation for the Second Round of effectiveness review of the Common Reporting Standard

Japan approached the Second Round of effectiveness reviews on automatic exchange of financial account information with thorough preparation and a strong commitment to tax transparency. The National Tax Agency (NTA) established a robust compliance strategy built on internal trainings, data analysis, and collaboration with the financial industry. Ahead of the review, the NTA strengthened its risk assessment framework and expanded its communication channels with financial institutions, ensuring that due diligence and reporting procedures were well understood and properly implemented.

The on-site visit was a valuable opportunity to showcase Japan's multi-layered approach, involving both central and local offices, with clear responsibilities and consistent training. Our verification activities, including both desk-based reviews and onsite audits, helped ensure the completeness and accuracy of the data exchanged.

We were also proud to show how Japan leverages IT tools to monitor data quality and reduce undocumented accounts—which in 2024 were more than eight times less than in 2021. This reflected not only regulatory oversight but the financial sector's genuine engagement.

We welcomed the preliminary recommendations that were made as a way to further strengthen our system. Overall, Japan values this peer review process as a catalyst for continuous improvement and remains committed to upholding high standards in tax transparency.

Source: Provided by the National Tax Agency of Japan.



Laying the foundations for the implementation of the Crypto-Asset Reporting Framework

In response to the rapid development and growth of the crypto-asset market, the international community has sought to ensure that recent gains in global tax transparency brought about by the CRS will not be eroded. In light of the specific features of the crypto-asset markets, the OECD, working with G-20 countries, developed the CARF²⁷, which is a global tax transparency framework providing for the automatic exchange of information on transactions involving crypto-assets in a standardised manner and on an annual basis.

In October 2022, the G20 called on the Global Forum to take forward work on the CARF's implementation and to build upon its commitment and monitoring processes to ensure the widespread implementation of the CARF by relevant jurisdictions.²⁸ During its 2024 Plenary meeting, the Global Forum welcomed the delivery of the Global

Forum's CARF commitment process and the political commitments made by over 60 Global Forum members to take the appropriate steps to implement the CARF in time to commence exchanges in either 2027 or 2028 at the latest. This includes putting in place the appropriate domestic and international legal frameworks to implement the CARF, as well as the technical solutions for the exchanges.

In 2024, nine jurisdictions in Asia committed to start their first CARF exchanges in 2027 or 2028.²⁹ In this context, four Asian members have already signed the Multilateral Competent Authority Agreement on Automatic Exchange of Information pursuant to the Crypto-Asset Reporting Framework (CARF-MCAA), which is providing for the international legal basis for CARF exchanges (see Table 11). More Asian jurisdictions are likely to want to implement it as they are quite exposed to the use of offshore crypto-asset providers.

27. OECD (2023), *International Standards for Automatic Exchange of Information in Tax Matters: Crypto-Asset Reporting Framework and 2023 update to the Common Reporting Standard*, OECD Publishing, Paris, <https://doi.org/10.1787/896d79d1-en>.

28. G20 Chair's Summary, Fourth G20 Finance Ministers and Central Bank Governors Meeting Washington DC, 12-13 October 2022, paragraph 6: <https://www.bi.go.id/en/publikasi/ruang-media/news-release/Documents/G20-Chairs-Summary-4th-FMCBG-12-13-Oct-2022.pdf>.

29. Early 2025, Kazakhstan committed to implement the CARF by 2027, bringing to 10 the number of Asian committed jurisdictions.

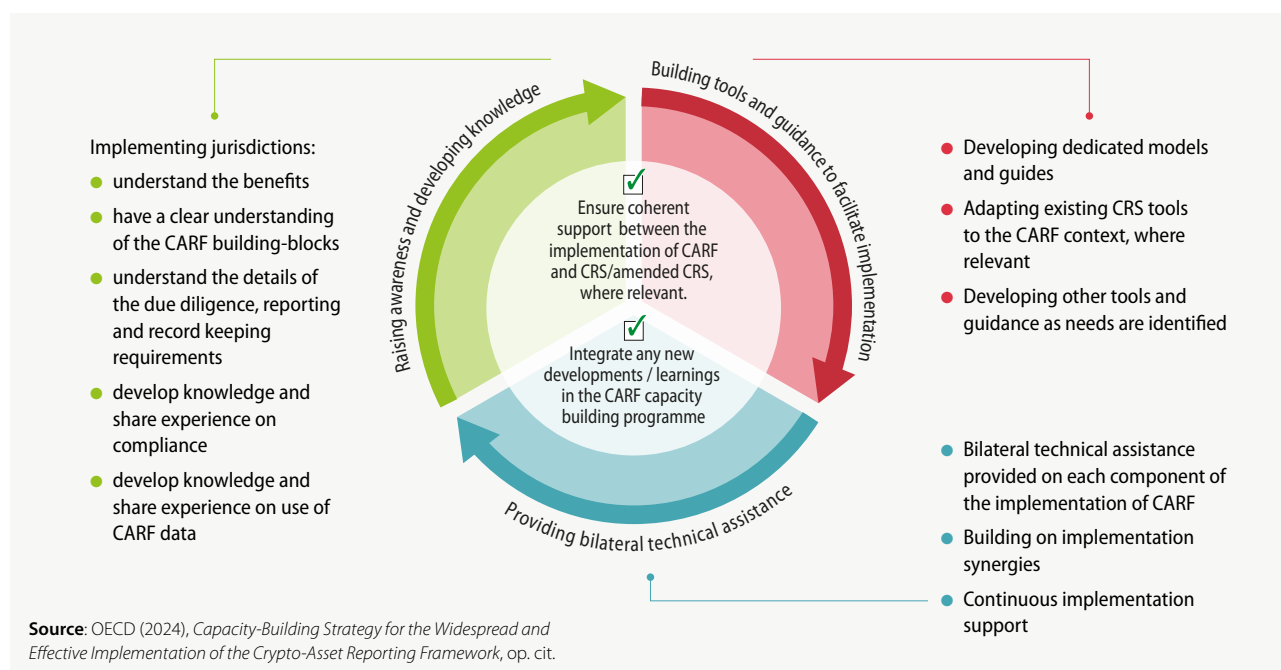
“Recognising the growing importance of transparency in emerging financial sectors, Thailand has committed to implementing the Crypto-Asset Reporting Framework (CARF) by 2028. This commitment underscores Thailand’s resolve to promote a level playing field and address risks of tax evasion in the digital economy. By joining global efforts to close transparency gaps created by crypto-assets and related service providers that fall outside existing frameworks, Thailand aims to ensure its tax administration is well-equipped to tackle new compliance challenges and uphold the integrity of its tax system.



Thailand’s participation in the CARF also reflects its strong dedication to upholding and advancing international standards for the automatic exchange of information in tax matters. This important step helps strengthen a fair, adaptable, and forward-looking global transparency framework capable of evolving with the changing financial landscape.”

Mr Pinsai Suraswadi, Director-General of the Revenue Department, Thailand

FIGURE 20. The three axes of the Crypto-Asset Reporting Framework capacity-building programme



To support the widespread implementation of the CARF, the Global Forum Secretariat released in 2024 a specific capacity-building strategy³⁰ built on three main axes (see Figure 20):

- raising awareness and developing knowledge
- developing tools and guidance to facilitate the implementation

- providing bilateral technical assistance.

To deliver the appropriate support to CARF implementing jurisdictions, the Global Forum Secretariat will build on the lessons learned from the modular approach followed to support CRS implementation, as well as the synergies between the CRS and the CARF (see Box 13).

30. OECD (2024), *Capacity-Building Strategy for the Widespread and Effective Implementation of the Crypto-Asset Reporting Framework*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, <https://www.oecd.org/tax/transparency/documents/capacity-building-strategy-implementation-crypto-asset-reporting-framework.pdf>.



17th Global Forum plenary meeting, 26-28 November 2024, Asunción, Paraguay.

TABLE 11. **Status of the commitment to the Crypto-Asset Reporting Framework and the signing of the related Multilateral Competent Authority Agreement in Asia**

Jurisdiction	CARF commitment		CARF-MCAA
	Year of the commitment	Year of the first exchanges	
Azerbaijan	2024	2027	Not yet signed
Hong Kong (China)	2024	2028	Not yet signed
India	Jurisdiction of relevance not committed (*)	Not yet set	Not yet signed
Indonesia	2024	2027	Signed in 2024
Japan	2024	2027	Signed in 2024
Kazakhstan	2025	2027	Not yet signed
Korea	2024	2027	Signed in 2024
Malaysia	2024	2028	Not yet signed
Mongolia	2024	2028	Not yet signed
Philippines	Jurisdiction of relevance not committed (*)	Not yet set	Not yet signed
Singapore	2024	2028	Signed in 2024
Thailand	2024	2028	Not yet signed
Viet Nam	Jurisdiction of relevance not committed	Not yet set	Not yet signed

Note: This table presents the status of the commitments regarding the implementation of the Crypto-Asset Reporting Framework (CARF). It includes the jurisdictions identified as relevant to the implementation of the CARF because they host or seek to host a relevant crypto-asset sector and therefore pose a risk to the level playing field. These jurisdictions are required to implement the CARF in time to commence exchanges in 2027 or 2028 as part of the Global Forum's CARF commitment process.

(*) India and the Philippines are in the process of making a political commitment to implement the CARF as part of the Global Forum's CARF commitment process and they expect to make the commitment in due course.

Source: For the status of the CARF commitments see <https://www.oecd.org/tax/transparency/documents/commitments-carf.pdf> and for the signatories of the CARF-MCAA see <https://www.oecd.org/content/dam/oecd/en/topics/policy-issues/tax-transparency-and-international-co-operation/carf-mcaa-signatories.pdf>.

BOX 13. Implementation strategy for the Crypto-Asset Reporting Framework

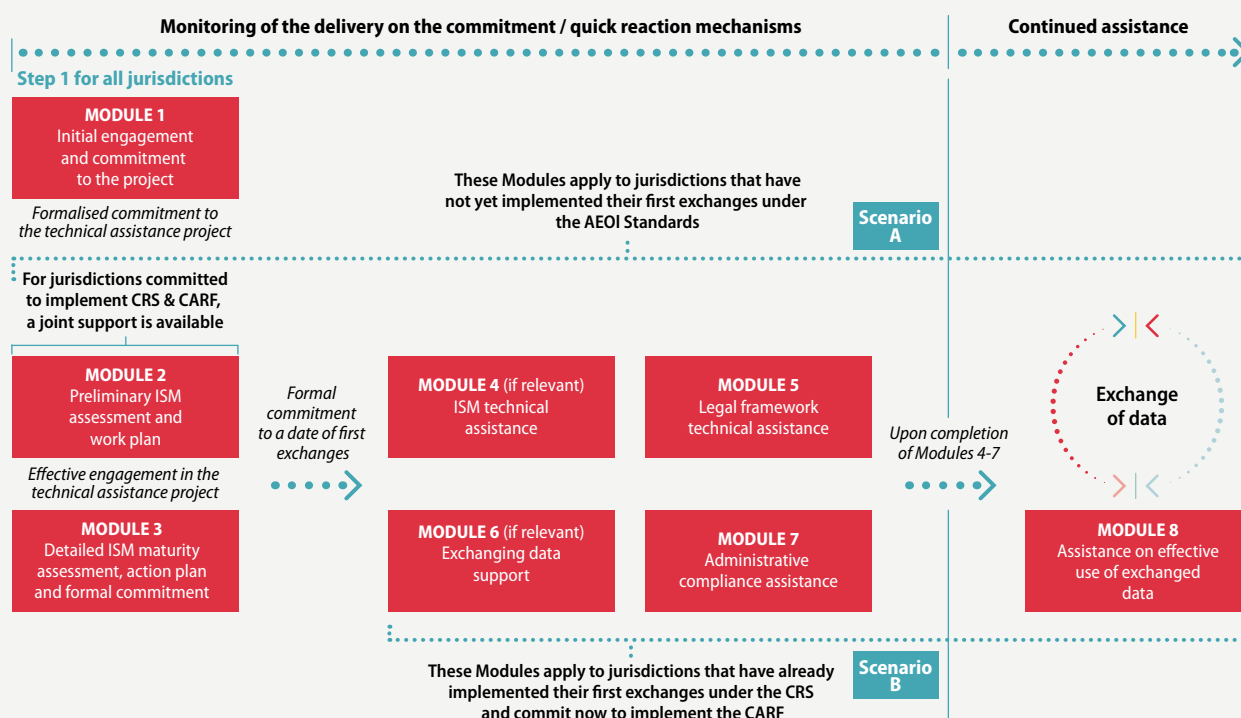
In November 2024, the Global Forum Secretariat presented its *Capacity-Building Strategy for the Widespread and Effective Implementation of the Crypto-Asset Reporting Framework*. The Strategy is based on a modular approach that divides technical assistance programmes into several coherent and logical modules with specific targets to be achieved in order to move from one module to another. In line with the Global Forum’s broader 2020 Capacity-Building Strategy^(a), the modular approach is implemented to ensure a better allocation of resources and improved monitoring. Following its successful deployment to support the implementation of the Common Reporting Standard (CRS)^(b), this approach is transposed to the Crypto-Asset Reporting Framework (CARF) context, with relevant adaptations.

The Strategy is flexible and covers two main scenarios: jurisdictions that have not yet implemented any standards on automatic exchange of information (AEOI) may benefit

from the assistance covered by all the modules, while jurisdictions already participating in AEOI may only need support in some of the modules.

While modules 1 to 3 take place successively (where relevant for the jurisdiction), modules 4 to 7 can be initiated simultaneously or consecutively, and in the relevant order, based on the circumstances of the jurisdiction. As for module 8 on assistance on effective use of exchanged data, it is considered as a continued assistance and starts in advance of an assisted jurisdiction’s first data exchange.

Given the synergies between the CRS and the CARF, jurisdictions planning to implement one of these standards from 2027 or later may consider implementing both simultaneously as a joint implementation package to reduce the implementation costs and legislative burden as much as possible, while taking into account the existing differences between the CRS and the CARF.



Notes: (a) OECD (2020), *Capacity Building, A new strategy for the widest impact*, Global Forum on Transparency and Exchange of information for Tax Purposes, <https://www.oecd.org/tax/transparency/what-we-do/technical-assistance/Capacity-Building-Strategy.pdf>.

(b) OECD (2021), *Unleashing the potential of automatic exchange of information for developing countries, 2021 Strategy*, Global Forum on Transparency and Exchange of information for Tax Purposes, <https://www.oecd.org/tax/transparency/documents/aeoi-strategy-developing-countries.pdf>; OECD (2023), *Update on the Implementation of the 2021 Strategy on Unleashing the Potential of Automatic Exchange of Information for Developing Countries*, OECD Publishing, Paris, <https://doi.org/10.1787/f939b5b6-en>.

Source: OECD (2024), *Capacity-Building Strategy for the Widespread and Effective Implementation of the Crypto-Asset Reporting Framework*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, <https://www.oecd.org/tax/transparency/documents/capacity-building-strategy-implementation-crypto-asset-reporting-framework.pdf>



Training Seminar, 21-23 August 2024, Yerevan, Armenia.

Ensuring confidentiality and data safeguards: a prerequisite for the automatic exchange of information

Ensuring the confidentiality of the information exchanged between tax authorities and protecting that information as required by the international legal instrument under which it is exchanged is a fundamental requirement of the tax transparency standards. The information exchanged shall only be used for the purposes and disclosed to the persons defined by the underlying international legal instrument.

With the development of global automatic exchanges of information between tax authorities, there was a necessity to build confidence between participating jurisdictions that the data exchanged automatically would be subject to an appropriate level of confidentiality and data safeguards (CDS) in the receiving jurisdiction. To that end, CDS requirements are part of the AEOI standards

and a CDS peer review process was established to assess the appropriateness of the CDS framework of participating jurisdictions. The CDS peer review is conducted prior to the first exchange and regularly after the exchanges have taken place to continuously ensure the information received is protected and used appropriately. Where critical weaknesses are identified, jurisdictions are required to make improvements before a satisfactory assessment is concluded and information can be received. The CDS peer review process helps Global Forum members establish solid information security management (ISM) framework and be ready to tackle the ever-evolving cyber-risks to which they are exposed.

In 2024, four Asian members successfully passed their pre-exchange CDS peer review and were cleared for reciprocal AEOI exchanges,³¹ while four other members achieved success in their post-exchange reciprocal

31. A reciprocal jurisdiction sends and receives data under the CRS, while a non-reciprocal jurisdiction only sends data but does not receive it.

assessments. Two more passed their post-exchange assessment for non-reciprocal exchanges.

Building capacities and assisting member jurisdictions in implementing and continuously improving their CDS framework is a core component of the support provided by the Global Forum Secretariat. The support provided helps members improve their framework and prepare their pre- and post-exchange assessments. It covers:

- the ISM framework, which includes a set of governance arrangements, policies, procedures, risk management and business continuity
- human resources controls with a focus on ensuring human resources respect and protect the confidentiality of tax information
- IT system security to protect the infrastructure in which information is stored, and through which it is employed and used

- information protection to safeguard paper and digital data handled by tax administrations
- access controls, including physical and logical access to ensure that only those users that have legitimate business reason to access information are allowed to do so
- operations management in place to verify that the ISM system and its controls are working effectively.

In 2024, five Asian members received bilateral technical assistance for the implementation of a satisfactory ISM framework and to prepare their CDS peer reviews. In addition, over 100 officials from 17 Asian members have participated in the 4 sharing-experience events on ISM organised by the Global Forum Secretariat. A specific workshop was also organised to support the setup of an AEOI portal by one member country who benefited from first hand advice from peers in the region and beyond (see Box 14). Asian members are also benefitting from the knowledge tools, such as toolkits, guidance

BOX 14. ARMENIA – Comprehensive and impactful technical assistance on information security management



From the very beginning of Armenia's engagement in its journey to implement automatic exchange of information (AEOI), the Armenian State Revenue Committee (SRC) has received significant assistance from the Global Forum Secretariat. Despite the numerous formal steps required to achieve the final goal, there have been helpful and thoughtful recommendations, both written and shared during online meetings, which enriched this journey and made it possible.

This was the case starting from the preparation of the answers to the questionnaire used for the confidentiality and data safeguards (CDS) assessment, whose first version provided to the technical assistance team in the Secretariat was very far from it should have then been in the reality. Improvement came thanks to the thorough review from the technical assistance team and a few rounds of patient exchanges to give the answers to the questionnaire their final shape.

The SRC also benefitted greatly from the mock on-site visit and the technical assistance reports prepared by the

Secretariat thereafter. These reports were in fact formal but remained user-friendly, as they contained valuable information and outlined the priorities on which additional work was necessary. This reflected in the positive outcome of Armenia's CDS peer review.

The SRC also requested assistance from the Secretariat to support in-house technical specialists to evaluate the needs and tasks required to develop the AEOI portal. Dedicated online meetings with the technical assistance team were organised, as well as two workshops which involved participants from countries with different level of experience (Albania, Maldives, Georgia, Thailand) who shared their expertise in information security management (ISM) and their approach in setting up their AEOI portal. The programming for the AEOI portal is expected to be completed by February 2025. The SRC is thankful for the concrete support received so far.

Source: Provided by the State Revenue Committee of Armenia.

Translating political commitment into effective implementation in Asia

and e-learning courses, developed by the Global Forum Secretariat to support their implementation efforts.

Assisting member jurisdictions in their ISM framework implementation remains a key priority. During the December 2023 Global Forum Plenary meeting, the Global Forum Secretariat launched the Preliminary Maturity Assessment on Information Security Management programme and offered it to three Asian members, which had not yet engaged in ISM technical

assistance. The objective of this programme was to provide beneficiary jurisdictions, with a high-level appraisal of their current ISM framework to inform their decision to implement AEOI and of a realistic action plan to put in place the necessary building blocks. Two Asian members participated in the programme, which were all considered as good candidates for setting their commencement year as 2027 with the appropriate technical support and political backup (see Box 15)³².

32. OECD (2024), *Preliminary Maturity Assessments: A 2024 Initiative to Catalyse Developing Countries' Participation in Automatic Exchange of Information*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, <https://www.oecd.org/tax/transparency/documents/preliminary-maturity-assessments-developing-countries-automatic-exchange-of-information.pdf>.

BOX 15. THE PHILIPPINES – Benefiting from the Preliminary Maturity Assessment Initiative



In 2024 you were one of the first countries to get involved in the Preliminary Maturity Assessment Initiative, an initiative aimed at supporting jurisdictions to estimate their readiness for the Automatic Exchange of Information (AEOI) from the perspective of their information security arrangements and to be able to define a feasible date for start of the exchanges. How was your experience with that?

In 2024, the Philippines, through the Bureau of Internal Revenue (BIR), was among the first jurisdictions to participate in the Preliminary Maturity Initiative led by the Global Forum Secretariat. The initiative proved instrumental in helping us assess our preparedness for the AEOI, specifically in terms of information security and confidentiality standards.

The Preliminary Maturity Assessment (PMA) conducted in March 2024 provided a comprehensive review of our Information Security Management (ISM) arrangements. It not only assessed the effectiveness of existing controls but also clearly identified the improvements needed to meet the Confidentiality and Data Safeguards (CDS) requirements essential for AEOI. The resulting report served as a roadmap for addressing policy and operational gaps within our current framework.

The initiative also fostered strong interdepartmental collaboration within the BIR. It emphasised that safeguarding information is a shared institutional responsibility—not just of the IT department and

encouraged broader organisational participation. The assessment process served as a valuable learning experience for our teams, providing visibility into international best practices and benchmarks that we aspire to achieve.

Building on this foundation, we proceeded with a more detailed maturity assessment in September 2024, which involved in-depth discussions on key ISM domains, including human resource security, physical and logical access controls, IT governance, operational procedures, legal frameworks, and AEOI data processing arrangements. We also submitted the CDS Assessment Questionnaire, along with supplementary documentation, outlining our current IT security posture.

We greatly appreciated the follow-up technical assistance sessions provided by the Global Forum Secretariat, which helped us unpack the specific requirements and compare them with our existing practices. These engagements have significantly enhanced our understanding and strategic planning for AEOI readiness.

Looking ahead, we are eager to continue working with the Secretariat as we implement the recommended improvements and move towards establishing a feasible timeline for the actual start of exchanges. The support received thus far has been both constructive and catalytic in advancing the Philippines' path to AEOI compliance.

Source: Provided by the Department of Finance and the Bureau of Internal Revenue of the Philippines.

4

Strengthening regional ownership and collaboration in Asia

Since its inception in 2011, the capacity-building programme spearheaded by the Global Forum Secretariat in collaboration with its partners has been decisive in the progress that Asian jurisdictions made in implementing and benefitting from the tax transparency standards. To remain relevant, the programme is in constant evolution. Initially focusing on EOIR, it progressively encompassed the implementation of AEOI (CRS and CARF), including its intricate ISM component. The effective use of the standards and of the different forms of administrative co-operation offered by the MAAC more generally is essential to further advance the fight against tax evasion and other IFFs. These efforts contribute to a sustained mobilisation of domestic revenues and to strengthening tax morale and voluntary compliance, which are at the core of capacity-building efforts. In Asia, the capacity-building activities have been carried out in accordance with the Asia Initiative's work plan (see Chapter 2), enabling a more customised approach that better aligns with the region's realities and specific needs.

Strengthening regional ownership and collaboration in Asia

BILATERAL TECHNICAL ASSISTANCE TO ASIAN JURISDICTIONS

Overall, in 2024, technical assistance was provided to 17 Asian jurisdictions to support them in developing a solid EOI infrastructure, implementing the tax transparency standards and using them to tackle tax evasion and other IFFs.

The Global Forum Secretariat provides technical assistance to member jurisdictions and to other jurisdictions considering joining the Global Forum. For the members, the assistance is provided in the form of a comprehensive long-term Induction Programme for jurisdictions that have joined the Global Forum after 2015 and as tailored assistance in response to specific needs for other member jurisdictions. In addition, pre-membership assistance is provided to non-member jurisdictions to help them make an informed decision when joining the Global Forum. The ADB has also partnered with the Global Forum Secretariat in some technical assistance programmes, bringing value to the support provided.

In 2024, the seven Induction Programmes in Asia made notable progress, and seven other members received tailored technical support. Additionally, three non-

member Asian countries were offered pre-membership support, which included awareness-raising activities, highlighting the advantages of implementing the tax transparency standards, as well as the commitments made when joining the Global Forum.

Table 12 summarises the bilateral technical support provided in 2024 in Asia.

TRAINING AND WORKSHOPS FOR ASIAN OFFICIALS

In 2024, over 1 200 officials from 32 Asian jurisdictions have attended 33 trainings and experience-sharing events focused on various areas of tax transparency (see Table 13). This includes 11 non-member Asian countries.

These events included 12 dedicated Asia Initiative events, which significantly contributed to enhancing participants' understanding of EOI, and other events open to all regions, to which tax officials of Asian jurisdictions participated.

Overall, 22 events were held in a virtual format to facilitate broad participation, while 11 trainings were held in-person to foster technical discussions, including around advanced case studies and working groups (see Table 14).

“The Inland Revenue Authority of Singapore (IRAS) was honoured to host a three-day practical workshop on Common Reporting Standard (CRS) Compliance Audits with the Global Forum Secretariat in July 2024. We were delighted to welcome 32 tax officials from across Asia who are directly involved in conducting compliance and enforcement activities under the CRS.

The workshop aimed to enhance practical capacity in verifying whether financial institutions meet their reporting, due diligence, and record-keeping responsibilities. Through interactive case studies and group exercises, participants examined real-life scenarios to deepen their understanding of audit methodologies and risk assessment strategies. This hands-on approach fostered peer exchange and created a collaborative learning environment.

IRAS was also pleased to share its own compliance experiences. We believe that facilitating such regional training plays a critical role in promoting consistent and effective CRS implementation.

Singapore remains dedicated to advancing regional co-operation and building sustainable capacities among tax authorities in Asia in its ongoing commitment to promoting global tax transparency.”

Ms Angela Ang, Assistant Commissioner (International Tax and Relations), Inland Revenue Authority of Singapore.



TABLE 12. **Bilateral technical assistance in Asia in 2024**

Area	Topic and description	No. of jurisdictions supported
Transparency and exchange of information on request (EOIR)	Improving the legal and regulatory framework for EOIR: assistance to improve the EOIR legal and regulatory framework, which included in-depth analysis of the maturity of the legal and regulatory framework to identify gaps with the EOIR standard, review of proposed legislation to ensure it meets the requirements of the EOIR standard, and proposal of amendments to address identified gaps	5
	Practical implementation of the legal and regulatory framework for EOIR: assistance aimed at improving the practical implementation of the legal and regulatory frameworks for EOIR.	4
	Improving beneficial ownership transparency: assistance to improve beneficial ownership transparency frameworks, including legal and regulatory aspects and effective implementation in practice.	4
	Improving the organisation of tax administrations and setting up EOI units with appropriate tools: assistance on establishing or improving EOI units (including assistance to ensure that competent authority powers are delegated to the appropriate levels and to develop EOI tools (e.g. manual, tracking tool, impact assessment tool)).	3
	Broadening EOI networks through joining the Convention on Mutual Administrative Assistance in Tax Matters (MAAC): support at different steps of the MAAC process, i.e. the submission of the request to be invited to sign the MAAC, including the related confidentiality questionnaire, the signing of the MAAC, and the deposit of instrument of ratification.	2
Common Reporting Standard for automatic exchange of financial account information (CRS)	Establishing the international legal framework: assistance in joining and activating the Multilateral Competent Authority Agreement on Automatic Exchange of Financial Account Information.	3
	Establishing an appropriate domestic legal framework: assistance to incorporate the requirements of the CRS into domestic law.	7
	Establishing an administrative compliance strategy: assistance to develop and implement an administrative compliance strategy for effective implementation of the AEOI standard.	3
	Making effective use of CRS data: assistance provided to put in place an appropriate framework for matching the data received with domestic database to make it more useful for tax compliance activities.	2
Information Security Management (ISM)	Establishing an appropriate information security management framework: assistance to establish or improve the ISM framework for automatic exchange of information and to prepare for pre- and post-exchange confidentiality and data safeguards assessments.	5
Common Transmission System (CTS)	Establishing a secure channel of transmission of data between jurisdictions: assistance in joining the CTS, which provides a secure channel of transmission of data between jurisdictions, allowing them to carry out 25 forms of exchanges, including EOIR, CRS and CARF exchanges.	1
Portal for automatic exchange of information (AEOI)	Setting up a portal to collect data from reporting persons: guidance provided to support the strategic decision of the jurisdiction regarding the solution (off-the-shelf or customised) aimed at collecting the required information from reporting persons (i.e. financial institutions, crypto-asset service providers), including key requirements.	2

Source: Global Forum Secretariat.

Strengthening regional ownership and collaboration in Asia

TABLE 13. **Number of events and Asian participants per topics in 2024**

Topics	Number of events	Number of Asian participants	Number of Asian Jurisdictions
Common Reporting Standard (incl. compliance)	11	573	16
Crypto-Asset Reporting Framework	2	110	20
Confidentiality and data safeguards (incl. information security management)	4	101	18
Cross-border assistance in the recovery of tax claims	3	102	12
Effective use of exchange of information (incl. advanced forms such as tax examination abroad and simultaneous tax examination)	5	105	12
Exchange of Information on Request (incl. beneficial ownership)	3	109	26
Joint Exchange of Information on Request and Automatic Exchange of Information	5	142	20
Total	33	1 242	32

Source: Global Forum Secretariat.

TABLE 14. **In-person training and experience-sharing events in Asia in 2024**

Event	Number of Asian participants	Number of Asian Jurisdictions	Host
Workshop on beneficial ownership to tackle illicit financial flows	48	21	ADB
Regional practical workshop on CRS compliance audits for Asia and the Pacific	24	12	Singapore
Training seminar on strategies to identify the potential EOI cases and enhancing EOI requests	21	4	Armenia
Regional training on foreseeable relevance and effective use of CRS data	43	7	India
First regional comprehensive CRS training	98	10	China (People's Republic of)
Total	234	26	–

Source: Global Forum Secretariat.

This reflects the expansion of the Global Forum's capacity-building programme over the past 15 years to address the evolving challenges in global tax transparency. It also shows the hybrid approach followed that combines tailored activities for specific regions or jurisdictions and broader initiatives that meet the collective needs of all members.

Some of these events were delivered with partner organisations. In particular, the ADB played a pivotal role in hosting a regional in-person workshop on beneficial ownership transparency in 2024. The event gathered 46 participants from 22 jurisdictions across

Asia, including 8 participants from jurisdictions that are not yet members of the Global Forum. It allowed participants to discuss in depth the implementation of sound framework to ensure transparency of beneficial ownership information and to develop country-specific action plan (see Box 11). Across 2024, the ADB also facilitated the participation of several Asian developing countries, including non-Global Forum members to critical workshops and experience-sharing events organised in Asia and in other regions, allowing them to attend high-quality in-person events and bringing back to their jurisdiction a wealth of knowledge and material.

“The State Taxation Administration was pleased to host the first four-day comprehensive training on the Common Reporting Standard (CRS) in its National Tax Institute in November 2024. We were glad to welcome over 90 participants from 10 Asian members of the Global Forum, offering a valuable opportunity for regional experience and knowledge sharing.

The training covered core CRS concepts and practical case studies providing participants with hands-on insights into supervisory practices, successfully bridging theoretical concepts with practical implementation.

Our administration was delighted to work with the Global Forum Secretariat and very pleased to contribute both logistically and technically by sharing our own experience. Hosting this event further strengthened our capacity and reaffirmed our commitment to enhancing global tax transparency.

As a jurisdiction exchanging CRS data since 2018, the People’s Republic of China is resolved to support capacity-building initiatives in Asia and hopes to encourage other Asian jurisdictions to host similar events that help build local expertise and encourage regional collaboration.”

Mr Suhua Huang, Deputy Director-General of the International Taxation Department, State Taxation Administration, People’s Republic of China



In addition to support from partner organisations, several Asia Initiative members also contributed to the regional capacity-building programme by hosting in-person events (see Table 14).

- With the support of Singapore, a successful workshop on CRS compliance audits, took place in July 2024.
- Armenia hosted a training seminar in August 2024 focusing on identifying potential EOI cases and improving the quality of EOI requests.
- India organised a regional event in September 2024, which covered topics such as foreseeable relevance, the use of CRS data, and enhanced international tax co-operation.
- People’s Republic of China also hosted the first regional comprehensive CRS training in November 2024, bringing together participants from across the region to strengthen their technical understanding and share experiences.

These contributions reflect the strong ownership and commitment of Asia Initiative members to advancing tax transparency through peer learning and regional co-operation.

Promoting gender equality has also been a strategic aspect of the capacity-building activities. In addition to the Women Leaders in Tax Transparency programme, various actions have been implemented to enhance women’s participation in capacity-building events and ensure broader access to training and knowledge development tools for Global Forum member officials. In 2024, 57% of participants from Asian jurisdictions in capacity-building activities were female officials.

ADVANCING KNOWLEDGE SHARING THROUGH PRACTICAL TOOLS

The development of e-learning courses and practical toolkits are valuable instruments. They facilitate the proper implementation of the standards and the sharing of knowledge with officials from Global Forum members and other stakeholders, and stimulate an effective engagement in tax transparency and administrative co-operation.

While the e-learning courses, webinars and toolkits target broader needs identified across multiple member jurisdictions, they have also greatly benefitted Asia. In addition, they have been used to facilitate the bilateral technical support by enhancing understanding and knowledge from recipient officials and domestic implementers in Asia.



Supporting implementation through toolkits and practical resources

In 2024, several toolkits were released to provide practical guidance on the implementation of the tax transparency standards:

- The Global Forum Secretariat has updated the toolkit *Building Effective Beneficial Ownership Frameworks* developed in co-operation with the Interamerican Development Bank¹. This second edition encompasses the recent revisions brought to the FATF Recommendations, as well as the latest lessons learned from the EOIR peer review process. This updated toolkit presents the various policy approaches to ensure the availability of beneficial ownership information.
- In addition, the Secretariat has contributed to the *Exchange of Information Handbook* published by ADB.² This handbook has been designed to assist ADB's

developing country members in understanding the benefits and fundamental concepts behind the exchange of tax-related information.

- Finally, a *Model Manual on Cross-border Assistance in the Recovery of Tax Claims*, developed under the Africa Initiative, was released in November.³

These toolkits complete the already comprehensive list of knowledge tools publicly available in several languages.⁴

In addition, several guidance and other tools have been delivered to supplement and leverage the technical assistance work:

- a *Model Manual for CRS Compliance Audits*⁵ that jurisdictions can refer to when developing, improving or implementing their own procedures and methodologies for conducting CRS compliance audits

1. OECD and IDB (2024), *Building Effective Beneficial Ownership Frameworks: A joint Global Forum and IDB Toolkit - Second edition*, op. cit. The toolkit is available in English, French and Spanish.

2. ADB (2024), *Exchange of Information Handbook*, available in English at <https://www.adb.org/sites/default/files/publication/987206/exchange-information-handbook.pdf>.

3. OECD (2024), *Model Manual on Cross-Border Assistance in the Recovery of Tax Claims*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, available in English at <https://www.oecd.org/tax/transparency/documents/model-manual-cross-border-assistance-recovery-tax-claims.pdf>.

4. All the Global Forum's toolkits are available at <https://www.oecd.org/tax/transparency/resources/key-publications-and-documents.htm>.

5. OECD (2024), *Model Manual for CRS Compliance Audits*, op. cit.



Regional Practical Workshop on Common Reporting Standard Compliance Audits, 16-18 July, Singapore.

- a *Voluntary Disclosure Programme Toolkit*⁶, which includes a model law, accompanied by a detailed explanation of policy choices and practical arrangements to be made when designing a regulatory and organisational framework for implementing a Voluntary Disclosure Programme prior to significant changes related to increased tax transparency, such as the entry into force of the MAAC or the commencement of CRS exchanges
- a *Guidance on Secure Use of Cloud Services*⁷, which provides guidance to tax authorities on leveraging the benefits of cloud computing, while ensuring adequate protection of the data processed in light of the risks to their IT environment. The use of cloud services could be of particular interest to developing countries, as it is a used method for harnessing the benefits of new technology to bolster security and digitally transform their business processes.

These guidance documents are part of the Global Forum’s catalogue of tools that are available only upon request from tax authorities.⁸

In 2024, 16 Asian members have requested at least one of the 22 tools available upon request developed by the Global Forum Secretariat.

Expanding access through e-learning and virtual training

Since 2019, several e-learning courses have been developed to give opportunities to tax officials around the world to access quality training on relevant areas of the tax transparency standards.⁹ These courses are available on the Knowledge Sharing Platform for Tax Administrations (KSP_{TA})¹⁰ and are free of charge for the participants, removing an access barrier in addition to providing flexibility in the pace of which the course can be completed. In addition, e-learning courses are

6. OECD (2024), *Voluntary Disclosure Programme: A Model Law and Guidance*, Global Forum on Transparency and Exchange of Information for Tax Purposes, available to tax authorities upon request in English, French and Spanish.

7. OECD (2024), *Guidance on secure use of cloud services*, Global Forum on Transparency and Exchange of Information for Tax Purposes, available to tax authorities upon request in English. French and Spanish versions will be available in 2025.

8. All the Global Forum’s tools available to tax authorities on request are available at <https://www.oecd.org/tax/transparency/documents/documents-available-to-tax-authorities-upon-request.htm>.

9. All the Global Forum e-learning courses and virtual classes are referenced at <https://www.oecd.org/tax/transparency/resources/global-forum-e-learning.htm>.

10. The KSPTA is a global online resource for sharing tax knowledge and expertise developed by the Canada Revenue Agency and generously made available to Global Forum members, to help manage learning events and foster digital collaboration with our members: <https://ksp-ta.org>.



Training seminar, 21-23 August 2024, Yerevan, Armenia.



Second Train the Trainer Network Meeting, 16-17 December 2024, Paris.

blended into the Global Forum's dedicated programmes, such as Women Leaders in Tax Transparency and Train the Trainer, as the participants are required to take them in advance of the sessions. They are also integrated as a preliminary tool to technical assistance with relevant officials encouraged to take them before technical meetings, so they have a broad understanding of the related concepts and requirements. This ensures a greater interactivity and involvement based on the acquired knowledge.

In 2024, the French and Spanish versions of the e-learning course "Understanding ISM Framework" have been released. The Secretariat now offers nine e-learning courses, which have been well used by Asia tax officials (see Table 15).

"The Secretariat of the Global Forum contributes substantially to the content of the Knowledge Sharing Platform for Tax Administrations by enriching the learning catalogue and organising events. In 2024, the "CRS Administrative Compliance Strategy: Model Manual on CRS Compliance Audits" was our top viewed item with users accessing this content in English, French and Spanish."

Knowledge Sharing Platform for Tax Administrations – Canada Revenue Agency

Finally, two successful webinars were recorded and made available on the KSP_{TA} in 2024. Attended initially by 140 officials from Asia, the 2024 ISM Days and the experience-sharing event on CRS Compliance Audits were followed afterward by several additional Asian officials.

Asian officials can access eight webinars and other events made available since 2021 on the KSP_{TA} covering key issues related to the implementation and the use of the tax transparency standards, including matters related to ISM.

BUILDING SUSTAINABLE CAPACITY FOR THE FUTURE

In the last few years, innovative capacity-building programmes were developed to ensure that sustainable and inclusive capacities are built in beneficiary jurisdictions. A new format of capacity-building has been developed around a network model to strengthen ownership and engagement of jurisdictions in their capacity-building programme. This format aims at developing knowledge and skills, while promoting inclusivity and gender equality, and at facilitating effective appropriation of administrative co-operation mechanisms and their use to support jurisdictions' development strategy.

"The Global Forum's toolkits and e-learning courses have proven to be invaluable resources for our tax administration, enabling us to build capacity at our own pace while preserving technical expertise within our organisation. Coupled with the training events organised under the Asia Initiative, we have utilised the full spectrum of support available, which has been instrumental in enhancing our ability to implement international tax transparency standards. We greatly value the Global Forum's ongoing support in fostering knowledge-sharing and sustainable capacity-building across jurisdictions, in particular in Asia."

Ms Dk Masleda binti Pg Daud, Acting Director of Revenue Division, Ministry of Finance and Economy, Brunei Darussalam



TABLE 15. **Global Forum’s e-learning courses and Asian participation**

E-learning course	Launched date	Languages available 2024	Number of Asian participants		Number of Asian Jurisdictions
			2024	Overall	
Global Forum: Exchange of Information as a Tool to Combat Tax Evasion	2019	English, French, Spanish	107	1 286	30
Beneficial Ownership (with the Asian Development Bank)	2020	English, French, Spanish	65	505	29
Exchange of Information on Request	2020	English, French, Spanish	53	762	29
Confidentiality and Data Safeguards Assessment Process	2021	English, French, Spanish	10	54	20
Confidentiality and Data Safeguards Requirements	2021	English, French, Spanish	11	42	18
Automatic Exchange of Information	2022	English, French, Spanish	49	328	34
Understanding Information Security Management Framework	2022	English, French, Spanish	10	22	10
Understanding Information Security Management Documentation	2023	English, French, Spanish	14	23	11
Introduction to the Common Transmission System (CTS)	2023	English, French, Spanish	26	46	13
Total	9	–	345	3 068	34

Source: Global Forum Secretariat.

These new generations of capacity-building programmes have been extremely well received by Asian members, which have been actively participating in the related activities.

Empowering Asian tax authorities through the Train the Trainer Programme

The Train the Trainer programme has been transformative in Asia, with an impressive impact on the local development of EOI skills and the improvement of the quality and quantity of the EOI requests sent by Asian jurisdictions.

Launched in 2022 for tax officials, the Train the Trainer programme¹¹ intends to instruct and coach local experts in EOI so that they can easily, rapidly and sustainably spread the strong EOI knowledge acquired across their own tax authorities. Instead of delivering a limited number of trainings in member jurisdictions, due to

resource constraints, and to ensure the ownership of the development of local skills and expertise, the approach taken is to develop a sustainable local training capacity.

The programme lasts nine months and is designed to ensure that quality trainings are delivered frequently by knowledgeable officials. Participants face strong requirements as they must enhance their understanding of EOI, develop training materials, and improve their soft skills to successfully conduct at least two training sessions by the programme’s conclusion. The Secretariat supports participants throughout the entire process by delivering training, preparing and reviewing materials, providing constructive feedback during group mock training sessions, and participating in the first training sessions organised by the future trainers. Only those participants who complete all phases of the programme and conduct the two local training sessions are awarded certificates and can join the network of trainers.

11. More information on the Train the Trainer Programme is available at <https://www.oecd.org/tax/transparency/what-we-do/technical-assistance/train-the-trainer>.

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TABLE 16. **Local trainings delivered by certified trainers under the Train the Trainer programme for Asia**

Local training sessions	2022	2023	2024	Total
Number of training sessions delivered	16	17	9	42
Number of officials trained	871	613	1 228	2 712
Female participation in local trainings (%)	44	44	35	40

Source: Global Forum Secretariat.

Since 2022, 38 officials from Asia (including 72% of female trainers) have completed the programme and have delivered 42 local training attended by 2 656 officials (including 40% of female participants) as of 2024 (see Table 16).

After two successful editions of the initial programme in 2022 and 2023, an advanced programme was organised in 2024 to support the network of certified trainers. The focus of the advanced programme was to enhance the knowledge and skills of the existing trainers and to ensure that they continue to deliver quality local trainings. Through four online thematic sessions, the network of trainers from the previous editions developed advanced knowledge on specific areas of the standards:

- foreseeable relevance
- using EOIR for transfer pricing audits
- beneficial ownership and tax audits
- use of EOI in value added tax/goods and service tax related cases.

After the thematic sessions, new training materials were shared with the trainers so they can develop further and customise their own presentations and thus provide enhanced trainings adapted to the participants' profile and the need of their respective tax authorities.

In the Asia region, 20 officials from 9 jurisdictions participated in this advanced programme.

Despite the pause in new trainer certifications in 2024, local training sessions continued to increase, reaching an all-time high. This demonstrates the unwavering commitment and dedication of the earlier cohorts, who have ensured the programme in the Asia region remains active and continues to expand.

The 38 certified trainers representing 14 Asian members participate in the Train the Trainer Network made up of 200 trainers from 67 member jurisdictions around the world. The Network aims at fostering a spirit of co-operation and developing communication channels between the participants. It allows certified trainers to share material, participate to cross-jurisdiction trainings, discuss substance issues or organisational challenges to continue deliver high-quality training.

The second in-person Network meeting was held in December 2024, in Paris, France, and gathered 40 participants from the various editions, representing 22 jurisdictions, among which 8 participants from 4 jurisdictions from the Asian programme. The event was an invaluable opportunity to establish important connections among EOI trainers from the five regions¹². The meeting also allowed the trainers to discuss their jurisdictions' EOI training needs and challenges, as well as the solutions to overcome them, including the use of technology and the integration of trainings in the tax authorities' strategies to tackle tax evasion through EOI. Finally, the trainers were equipped with a new EOI training curriculum, tailored for new recruits of tax authorities and prepared to assist the trainers with the awareness building modules on EOI needed to onboard new staff.

Fostering Sustainable Leadership through the Women Leaders in Tax Transparency Programme

For the third consecutive year, the Secretariat embarked on a new edition of the Women Leaders in Tax Transparency Programme. In 2024, 5 women from 5 developing countries in Asia out of the 28 participants benefitted from this programme (see Box 16). This participation is a reflection of the great diversity of the Global Forum membership and the importance

12. Since its launch as a pilot in Africa in 2021, the Train the Trainer programme has been implemented in other geographical areas (Asia, Latin America, and Central, Eastern Europe / the Middle East and the Caribbean).



Train the Trainer Award for the Most Active Trainers in 2024

“The Maldives’ team participation in the advanced Train the Trainer 2024 programme was an immensely rewarding experience. It not only broadened our technical knowledge on exchange of information (EOI) but also offered a valuable opportunity to delve deeper into its practical application through detailed case studies and interactive exercises. This experience reinforced our expertise and bolstered our confidence in delivering local trainings to translate our tax transparency commitments into sustainable domestic resources.

A key objective of our local trainings has been to raise awareness among auditors about the relevance of EOI in their daily work. By sharing concrete cases based on real tax audits, we have illustrated how EOI can directly support their efforts. We have received encouraging feedback from auditors who highlighted that the case studies have significantly enhanced their comprehension of EOI, particularly in drafting EOI requests in practical situations.

Moving forward, we continue to actively encourage tax auditors to identify scenarios where information from foreign jurisdictions could strengthen their audits and enhance their effectiveness. A mindset shift is essential – EOI should not be seen as a barrier but as an opportunity for domestic resource mobilisation, beginning at the tax auditor’s level. Since delivering the local trainings, we have noticed an increase in inquiries from auditors regarding the applicability of the foreseeable relevance standard in various situations and a marked improvement in the quality of EOI requests, underscoring the positive impact of our capacity-building efforts.

Receiving the award for “most active trainer” was an incredible honour and deeply rewarding. It has further motivated us to sustain our efforts in building knowledge within our tax administration.”

Ms Sausan Saeed and Ms Mariyam Ibha Jaleel (2023 cohort), **Ms Mariyam Himmath Hassan and Ms Shifa Thaufeeq** (2022 cohort) from the Maldives Inland Revenue Authority

of continuing the promotion of gender balance and women’s participation in the Global Forum’s activities. For nine months, the participants were required to prepare in advance of all the technical sessions through the reading of relevant material, attending e-learning modules and preparing documents to support discussions and experience sharing. Six sessions were organised in 2024 focusing on central aspects of tax transparency, such as the standards and the broader international tax agenda, as well as leadership trainings and mentoring sessions delivered by experienced women in the tax transparency field.

Since its launch in 2022, this programme has enabled establishing a Network of Women Leaders in Tax Transparency. The Network currently encompasses 70 women from 44 developing countries, including 10 officials from 8 Asian jurisdictions¹³ and meets virtually once a year. It serves as a platform for experience sharing on both personal and technical matters and stimulate discussions on critical topics on EOI. It contributes to the growth of every woman member of the Network in either taking leader roles on tax transparency or embracing role model in their tax administrations or ministries of finance. During

13. Armenia, Cambodia, India, Maldives and Philippines.

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"I am proud to have contributed to the Women Leaders in Tax Transparency Programme. It is a milestone for the promotion of gender equality in tax transparency, empowering women to build their professional skills, advance their careers and make purposeful and strategic choices to achieve their goals. The rapidly growing Network reflects women in tax transparency's appetite to succeed together, and I am delighted to be involved in such an important and effective programme with such a skilled group of current and future leaders."

Ms Manal Corwin, Patron of the Women Leaders in Tax Transparency (2024),
Director of the Centre for Tax Policy and Administration, OECD



the in-person meeting of the Network in the margin of the Plenary meeting in Asuncion, Paraguay, 15 women (including 3 Asian officials) from previous editions mingled and shared their experience since their participation in the programme.

Strengthening Information Security through the Management Network

The ISM Network, launched at the 2021 Global Forum Plenary meeting, is a discussion forum that encourages

Global Forum members to share best practices and experiences in this very specialised and technical domain, critical to the implementation of AEOI. The ISM Network gathers more than 342 nominated representatives and experts from 88 jurisdictions. In Asia, 31 officials from 9 jurisdictions participate in this network.

The ISM Network is a framework within which security experts from tax authorities or ministries of finance

BOX 16. Interview of two participants in the 2024 Women Leaders in Tax Transparency Programme

You have participated in the Women Leaders in Tax Transparency Programme in 2024. If you had to share the aspects of your professional and personal lives that were the most impacted by the Programme, what would it be?

Ms Han Sopagna, Deputy of Exchange of Information Bureau, Department of Law, Tax Policy and International Tax Co-operation of General Department of Taxation, Cambodia



"The Women Leaders in Tax Transparency Programme has profoundly influenced both my professional growth and personal development. The mentoring sessions in particular played a pivotal role in boosting my confidence. They empowered me to articulate my ideas more clearly, and I was pleased to see my opinions increasingly valued by my supervisors."

Engaging with other participants and senior women leaders in tax authorities was equally inspiring. Their shared experiences encouraged and strengthened me, motivating me to take an active role in advancing tax transparency. I eagerly shared my learnings with Cambodian colleagues, which has greatly enhanced teamwork and collaboration within our office."

I am excited about continuing to hear the inspirational stories of my fellow women leaders in the Network, and I look forward to the journey ahead."

Ms Smriti Krishnia, Under Secretary [Foreign Tax and Tax Research-IV(1)], Central Board of Direct Taxes, Government of India



"Participation in the WLITT programme has helped enhance my leadership skills and overall professional growth. It has also helped me in gaining more confidence in articulating my views and opinions clearly, which in turn has been invaluable in my day-to-day work. The Programme deepened my understanding of key issues in tax transparency and international taxation, thereby enabling me in engaging more effectively in technical discussions. During the Programme, I stepped into a new role as one of India's delegates to the Global Forum PRMG, where these skills have proven to be especially useful."

Source: Provided by the General Department of Taxation of Cambodia and the Department of Revenue of the Ministry of Finance of India.

can share materials and experiences, and exchange on topical issues. The “ISM Network Live Hour” is the flagship quarterly event to discuss key ISM topics proposed by the Network’s experts. Ten sessions have already taken place since the first one in December 2021. In 2024, the Live Hours were attended by six ISM experts from Asia and covered the following topics:

- risk management
- access management
- brainstorming on secure use of cloud services.

In addition to the Live Hours, and to mark October as the global cyber-security month, a virtual annual event is held in October – the “ISM Days” – covering various key ISM topics, with presentations and discussions among country-experts. Based on the big success of the ISM Day in 2023, the Secretariat held on 8 and 9 October 2024 its 2024 ISM Days attended by 60 tax officials from 14 Asian jurisdictions. The event covered the secure use of cloud services, privileged access management, IT asset management and the prevention of data exfiltration. During the two days, 370 other experts from 92 member jurisdictions discussed in depth these important topics and shared their valuable experiences, through interactive sessions and instant surveys.

The ISM Network has become a central component of the capacity-building programme. It helps identify and address the issues proposed by member jurisdiction experts and allows cross-sharing of experiences and the joint exploration of practical solutions between developing and developed countries, small and large jurisdictions, thereby reinforcing overall ISM capacities to tackle emerging cyber-threats.

“Adhering to international good practices in information security management is critical to securing our information and communication technology assets, thereby supporting the core functions of the Directorate General of Taxes. We greatly value the Global Forum’s experience-sharing initiatives which enable us to benchmark our practices and continuously adapt to the challenges posed by fast-evolving cyber-security threats. The Information Security Management Days provide an invaluable opportunity for our security experts to develop their knowledge and share their experience to ensure the ongoing safeguarding of our taxpayer data.”

Mr Suryo Utomo, Co-Chair of the Asia Initiative (2022-2023), Director General, Directorate General of Taxes, Ministry of Finance, Indonesia



A STRONG REGIONAL FOCUS ON THE EFFICIENT USE OF THE EXCHANGE OF INFORMATION TOOLS

Through the implementation of the high-level work plan agreed on in 2022, the Asia Initiative has been developing as a hub for meaningful, demand-driven co-operation. Recognising that jurisdictions are at different stages in their journey toward full implementation of tax transparency standards, the Initiative focused on ensuring that each activity provides practical value, encourage peer learning and support long-term capability development.

A key highlight of the 2024 efforts was the Working Group on the effective use of CRS data, established in 2023 and composed of officials from 14 Asia Initiative jurisdictions. Throughout the year, the group collaborated to identify common challenges and develop practical solutions, resulting in two significant outputs.

- The Step-by-Step Guide for Cleansing and Matching CRS Data provides a clear, user-friendly methodology for converting, cleaning and linking data to domestic records, while addressing key operational issues, such as transliteration and address standardisation.
- The Guide on Tax Adjustments Based on CRS Data presents anonymised case examples that illustrate how jurisdictions can use CRS data to detect undeclared income and hidden assets, supporting both territorial and worldwide tax systems.

These tools were approved by Asia Initiative members during their meeting on 25 November in Asunción, Paraguay, marking a milestone in the region’s collective

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efforts to move from data collection to data use. Members praised the Working Group for fostering a spirit of collaboration between more and less experienced jurisdictions and strongly supported its continuation into 2025 to deepen this momentum. They also agreed to share these tools with the other regional initiatives in Africa and Latin America to foster synergies and co-operation.

Complementing this work, the Asia Initiative delivered four targeted workshops and experience-sharing events throughout the year to support regional efforts in efficiently using the variety of EOI tools and forms of co-operation offered by the MAAC.

- A virtual cross-regional experience-sharing event took place on 29 February 2024 in collaboration with the Africa and Latin America Initiatives. This event focused on two themes: cross-border assistance in the recovery of tax claims and the wider use of treaty-exchanged information. The objective was to share the work carried out in these regional initiatives and raise awareness on these forms of co-operation. Participants appreciated the comparative insights and saw clear opportunities to adapt lessons learned from other continents to their local contexts.
- Cross-border assistance in the recovery of tax claims is an area of interest for several Asia Initiative members. To build capacities, a two-day virtual workshop brought together 60 participants for in-depth training on cross-border assistance in the recovery of tax claims on 16–17 May. The event offered a structured learning path, from understanding international legal frameworks and domestic enabling laws to establishing operational structures and managing requests efficiently. An array of practical guidance was reinforced by real-world case studies shared by

Japan and Belgium, showcasing how jurisdictions have successfully recovered tax claims across borders.

- On 30 April 2024, 30 participants attended a virtual workshop dedicated to advanced forms of administrative assistance available under the MAAC. This session provided practical insights into simultaneous tax examinations and tax examinations abroad, drawing on the experience of the European Union, with a presentation by the Chair of the European Union Advanced International Administrative Cooperation Community and an expert from the French tax authority. The workshop sparked great interest among Asia Initiative members in exploring these tools further, highlighting the potential to expand their co-operative capacity.
- Finally, on 18 July 2024, 106 participants from across the region took part in a virtual meeting on the use of EOI for Value Added Tax – Goods and Services Tax (VAT/GST) purposes. The session provided a timely opportunity to discuss the growing interest in leveraging EOI beyond income tax and to address legal, organisational and operational challenges. Members exchanged experiences and identified actionable steps to overcome barriers such as lack of legal basis, insufficient access to VAT/GST data and gaps in operational guidance. The session demonstrated the Initiative’s responsiveness to emerging needs and its role as a trusted space for peer engagement.

Altogether, the Asia Initiative’s 2024 capacity-building programme was not only ambitious in scope but also remarkably well aligned with member needs. It offered a mix of technical guidance, peer exchange and practical case studies, allowing participants to both learn and contribute.

“Japan has been an active member of the Asia Initiative Working Group on the effective use of automatically exchanged financial account data since its launch. The Working Group serves as a valuable platform for Asian jurisdictions to exchange practical experiences and address common challenges in using this data for compliance activities.”

Japan values the collaborative nature of the Asia Initiative and believes continued dialogue will remain key to advancing co-operation in the region and globally for the benefit of Asian people.”

Mr Minoru Nakamura, Deputy Commissioner (International Affairs), National Tax Agency, Japan





5

Looking ahead

Building on the strong momentum achieved in recent years, the Asia Initiative is entering a new phase of action and consolidation in 2025. The unwavering commitment to the Bali Declaration continues to drive regional efforts to enhance tax transparency, strengthen DRM, and combat tax evasion and other IFFs.

Looking ahead

The undeniable success of this regional approach has led to tangible benefits for its members. The strategic allocation of time, expertise and resources to these shared efforts is proving worthwhile, demonstrating that fostering collaboration and sharing experiences under a co-operative environment yields significant advantages for all participants. This has been widely acknowledged by the members of the Asia Initiative, who continue to reaffirm their commitment, having experienced firsthand the positive impact of this approach.

As the global tax transparency landscape evolves, adaptability and determination will be essential for sustained progress. Capacity building will remain a cornerstone of the Initiative's strategy, supporting members in preparing for either the conclusion of their Second Round of EOIR Peer Review or their enhanced monitoring process. Technical assistance will be crucial to address gaps, avoid backsliding and advance further compliance with the EOIR standard.

On the AEOI side, bilateral support will continue to be extended to Asian members undergoing their second round of CRS effectiveness reviews, due for completion by 2026, as well as to those members facing their initial or deeper reviews in the coming years. The AEOI landscape continues evolving, with the first exchanges under the CARF and Amended CRS expected in 2027. Some Asian members have already committed to implementing these frameworks, while others are aligning domestic legislation, strengthening data confidentiality and security measures, and enhancing technical and operational preparedness. In 2025, efforts will intensify to support Asian members implementing or considering the AEOI standards, whether the CRS or the CARF, ensuring they are fully equipped to meet their objectives.

Additionally, Asian members will continue to benefit from the ISM technical support to prepare their CDS peer reviews. To expand further the adoption of AEOI in the region, preliminary maturity assessment of the ISM framework will be offered to inform implementation decision.

To strengthen DRM and compliance efforts, the efficient use of EOI tools will remain a key priority and critical area for capacity building. The Working Group on the effective use of CRS data will play a central role. Building

on the deliverables shared in 2024, members will sustain momentum by exchanging experiences, addressing practical challenges, and refining best practices to maximise CRS data utility. The growing interest among several members in adopting or refining additional forms of co-operation under the MAAC will be supported through experience-sharing and focused training events. These sessions will focus in particular on EOI for VAT/GST purposes and cross-border assistance in tax collection, enabling interested members to strengthen their capabilities and enhance international collaboration in tax transparency.

Flagship programmes such as Train the Trainer and Women Leaders in Tax Transparency will progress into new phases, consolidating previous achievements and addressing emerging needs. Efforts will also focus on expanding access to knowledge tools, enhancing e-learning opportunities, and guiding jurisdictions in designing or operationalising EOI related strategies. Collaboration with development and technical partners will continue to be critical to the Asia Initiative's success. These partnerships contributed to scaling up technical assistance, developing practical resources, and fostering a dynamic regional community of tax transparency experts. Going forward, close collaboration with partners will remain essential to addressing the diverse and evolving needs of Asian jurisdictions and to sustaining the region's momentum.

Finally, the Asia Initiative will continue to promote Asia's active role in shaping the global tax transparency agenda. Active participation in Global Forum bodies, sharing regional experiences, and engaging in dialogue with other regions will further enhance Asia's voice in the global tax transparency movement and reinforce collective efforts towards achieving the Sustainable Development Goals.

With determination, co-operation, and the steadfast commitment of its members and partners, the Asia Initiative is well positioned to overcome future challenges and seize new opportunities, further advancing tax transparency, equity, and sustainable growth across Asia.



6

Annexes

Annex A. Bali Declaration

Annex B. Snapshot of Asian members' progress
on tax transparency

Annex C. Donors of the Global Forum

Annex A

Bali Declaration

A CALL TO ENHANCE THE USE OF TAX TRANSPARENCY FOR A SUSTAINABLE MOBILISATION OF DOMESTIC RESOURCES

We, the undersigned Ministers of Asian members of the Global Forum on Transparency and Exchange of Information for Tax Purposes (Global Forum),

Recognising that the world has gone through an unprecedented crisis resulting from the COVID-19 pandemic which has put a spotlight on equity challenges that existed well before the pandemic and hence intensified the public perception that tax evasion and other illicit financial flows are no longer acceptable;

Acknowledging that tax evasion and other illicit financial flows continue to plague governments worldwide and to hinder the financing of public goods and services as well as the sustainable and fair development;

Recalling the commitment of the Addis Ababa Action Agenda to redouble efforts to substantially reduce illicit financial flows by 2030, with a view to eventually eliminating them, including by combating tax evasion through strengthened national regulation and by scaling up international tax co-operation,

including to support access to beneficial ownership information for competent authorities and progressively advance towards automatic exchange of tax information among tax authorities as appropriate;

Reaffirming the importance of strengthening domestic tax policy and administration for the benefit of the citizens by supplying governments with much needed resources and instruments for pursuing their respective development goals and sustaining economic growth to achieve the Sustainable Development Goals;

Emphasising the unprecedented efforts made by the international community to improve transparency and exchange of information for tax purposes through the internationally agreed standards of the Global Forum (tax transparency standards) which are a prerequisite for effectively tackling tax evasion and other illicit financial flows;

Recognising that the Convention on Mutual Administrative Assistance in Tax Matters is the most comprehensive



multilateral instrument available for administrative co-operation offering a wide range of possibilities for mutual assistance;

Underlining that regional initiatives on tax transparency have demonstrated their efficiency in promoting and advancing the tax transparency agenda locally taking into account the specific circumstances and needs of the jurisdictions in those regions; and Stressing that these initiatives create an invaluable regional dynamic and bring concrete and measurable progress while allowing their members to adopt flexible approaches to meet the tax transparency standards and the development goals;

Noting that participation of the Asian region needs improvement in implementing the tax transparency standards, while Acknowledging that for Asian jurisdictions to benefit from these standards, raising awareness, building knowledge and skills, and supporting the implementation and effective use of the tax transparency standards are critical;



We, the undersigned Ministers of Asian members of the Global Forum, declare that:

1. We reaffirm the important role of the Global Forum in bringing about tax transparency and in assisting jurisdictions, in particular developing jurisdictions, in the implementation of the tax transparency standards and the use of the administrative co-operation instruments in their domestic resource mobilisation strategy.
2. We reiterate our commitment to fully and effectively implement the internationally agreed tax transparency standards of the Global Forum (tax transparency standards);
3. We welcome and join the Global Forum's Asia Initiative to facilitate the implementation of the tax transparency standards, maximise their effective use to tackle tax evasion and other illicit financial flows, and increase tax co-operation among Asian members;
4. We encourage Asian jurisdictions to join the Global Forum and its Asia Initiative, and to become party to the Convention on Mutual Administrative Assistance in Tax Matters to rapidly implement and fully benefit from tax transparency standards to support the fairness of their tax system and their domestic resource mobilisation strategy;
5. We invite all global and regional development partners and technical partners to participate and contribute in the Asia Initiative and its capacity-building activities to promote tax transparency and support effective use of administrative cooperation instruments;
6. We resolve to lead by example in effectively using the powerful global infrastructure which has been built in the past decade and to continuously improve our co-operation, both at the global and regional levels;
7. We commit to explore the full range of possibilities for co-operation provided by the Convention on Mutual Administrative Assistance in Tax Matters, including, where relevant, through enhanced co-operation between interested Asia Initiative members.

Annex B

Snapshot of Asian members' progress on tax transparency

Jurisdiction	Global Forum membership	Signatory of the Bali declaration	EOI network and MAAC status ¹	EOI infrastructure ²	Implementation of the EOIR standard ³	Effective use of EOIR over the last three years ⁴
Armenia	2015	2022	Very wide MAAC in force since 2020	Functional	R1 - Not reviewed R2 – Phase 1 completed in 2024 and Phase 2 launched in Q2 2024 ⁵	Very High
Azerbaijan	2013	–	Very wide MAAC in force since 2015	Enhanced	R1 - LC R2 - C	Very High
Brunei Darussalam	2010	2022	Very wide MAAC in force since 2019	Functional	R1 - LC R2 - LC	None
Cambodia	2017	–	Narrow MAAC not signed	Functional	R1 - Not reviewed R2 – Launched in Q4 2024	Low
China (People's Republic of)	2009	2022	Very wide MAAC in force since 2016	Enhanced	R1 - C R2 - LC	Very High
Georgia⁶	2011	–	Very wide MAAC in force since 2011	Functional	R1 - LC R2 - LC	Medium
Hong Kong (China)	2009	2022	Very wide MAAC in force since 2018	Enhanced	R1 - LC R2 - LC	Medium
India	2009	2022	Very wide MAAC in force since 2012	Enhanced	R1 - C R2 - LC	Very High
Indonesia	2009	2022	Very wide MAAC in force since 2015	Enhanced	R1 - PC R2 - LC	Very High
Japan	2009	2022	Very wide MAAC in force since 2013	Enhanced	R1 - C R2 - LC	Very High

1. The classification is based on the number of EOI partners of a jurisdiction: Very narrow < 10; Narrow < 50; Wide < 100; Very wide > 100.

2. A minimum infrastructure means that a jurisdiction has most of the following components in place: a designated Competent Authority, an EOI Unit, and the necessary EOI resources and tools, including to track requests. A functional infrastructure means that a jurisdiction has all these components in place. An enhanced infrastructure implies that, in addition to these components, the jurisdiction has tools in place track the revenue identified through the use of EOI.

3. The following abbreviations are used: R for Round; Q for Quarter; C for Compliant; LC for Largely Compliant; PC for Partially Compliant; NC for Non-Compliant.

4. The following classification is based by the number of EOI requests sent by ascending order: None; Low < 10; Medium < 50; High < 100; Very High > 100. Due to its specific taxation rules and circumstances, a jurisdiction may either not need to send any EOI request or send them less frequently than other jurisdictions.

5. In February 2025, Armenia received a Largely Compliant rating in its Second Round EOIR peer review.

6. As a member of the Asian Development Bank, Georgia agreed to share its tax transparency journey in this report.

Implementation of the AEOI standards							Revenue gains reported ⁷
CRS				CARF		AEOI exchanges	
CRS commitment	CRS-MCAA	Legal framework review	Effectiveness in practice review	CARF commitment	CARF-MCAA		
Yes Intended date: 2025	Signed 2024	–	–	No	Not signed	Reciprocal exchanges	Yes
Yes First exchange: 2018	Signed 2017	In place but needs improvement	On Track	Yes Intended date: 2027	Not signed	Reciprocal exchanges	Yes
Yes First exchange: 2018	Signed 2019	In place but needs improvement	Partially Compliant	No	Not signed	Non-reciprocal exchanges	No
No	–	–	–	No	Not signed	–	No
Yes First exchange: 2018	Signed 2015	In place	On Track	No	Not signed	Reciprocal exchanges	Yes
Yes First exchange: 2024	Signed 2022	–	–	No	Not signed	Reciprocal exchange	Yes
Yes First exchange: 2018	Signed 2018	In place	On Track	Yes Intended date: 2028	Not signed	Reciprocal exchanges	No
Yes First exchange: 2017	Signed 2015	In place	On Track	No but identified as jurisdiction of relevance ⁸	Not signed	Reciprocal exchanges	Yes
Yes First exchange: 2018	Signed 2015	In place	On Track	Yes Intended date: 2027	Signed 2024	Reciprocal exchanges	Yes
Yes First exchange: 2018	Signed 2015	In place but needs improvement	On Track	Yes Intended date: 2027	Signed 2024	Reciprocal exchanges	Yes

7. This column indicates the jurisdictions that reported additional revenue identified in the context of the implementation or the use of EOI in the 2025 Global Forum Survey. It may not reflect the whole impact of EOI on additional revenue gain, as identifying this data in all cases may be challenging. Additionally, some jurisdictions may not have reported additional revenue due to various reasons, including the inability to systematically monitor the impact of EOI on tax investigations, the absence of EOI requests sent or CRS data received, the lack of identified additional revenue, or restrictions on disclosing such information.

8. India is in the process of making a political commitment to implement the CARF as part of the Global Forum's CARF commitment process and it expects to make the commitment in due course.

Annex B

ANNEX A. SUMMARY OF THE TAX TRANSPARENCY PROGRESS IN 2024 BY ASIAN MEMBER

Jurisdiction	Global Forum membership	Signatory of the Bali declaration	EOI network and MAAC status ¹	EOI infrastructure ²	Implementation of the EOIR standard ³	Effective use of EOIR over the last three years ⁴
Kazakhstan	2012	2022	Very wide MAAC in force since 2015	Minimum	R1 -Phase 1 completed R2 - PC	High
Korea	2009	2022	Very wide MAAC in force since 2012	Enhanced	R1 - C R2 - LC	Very High
Macau (China)	2009	2022	Very wide MAAC in force since 2018	Enhanced	R1 - LC R2 - LC	Low
Malaysia	2009	2022	Very wide MAAC in force since 2017	Enhanced	R1 - LC R2 - LC	Medium
Maldives	2016	2022	Very wide MAAC in force since 2022	Functional	R1 - Not reviewed R2 – Launched in Q4 2025	Low
Mongolia	2018	2022	Very wide MAAC in force since 2020	Enhanced	R1 - Not reviewed R2- Launched in Q1 2024	High
Pakistan	2012	2022	Very wide MAAC in force since 2017	Minimum	R1 - LC R2- LC	High
Philippines	2009	2023	Narrow ⁹ MAAC not in force	Functional	R1 - LC R2- LC	High
Singapore	2009	2022	Very wide MAAC in force since 2016	Functional	R1 - LC R2- C	Medium
Thailand	2017	2022	Very wide MAAC in force since 2022	Enhanced	R1 - Not reviewed R2- LC	Medium
Uzbekistan	2022	–	Wide MAAC not signed	Minimum	R1 - Not reviewed R2 – Scheduled to be launched in Q3 2025	Very High
Viet Nam	2020	–	Very wide MAAC in force since 2023	Minimum	R1 - Not reviewed R2 -Launched in Q2 2024	Very High

9. The Philippines ratified the MAAC in 2024 and deposited their instrument of ratification on 7 January 2025. The MAAC will enter into force as of 1 May 2025.

Implementation of the AEOI standards							Revenue gains reported ⁷
CRS				CARF		AEOI exchanges	
CRS commitment	CRS-MCAA	Legal framework review	Effectiveness in practice review	CARF commitment	CARF-MCAA		
Yes First exchange: 2021	Signed 2018	Not in place	–	Yes Intended date: 2027	Not signed	Reciprocal exchanges	No
Yes First exchange: 2017	Signed 2014	In place	On Track	Yes Intended date: 2027	Signed 2024	Reciprocal exchanges	No
Yes First exchange: 2018	Signed 2018	In place	On Track	No	Not signed	Non-reciprocal exchanges	No
Yes First exchange: 2018	Signed 2016	In place	On Track	Yes Intended date: 2028	Not signed	Reciprocal exchanges	Yes
Yes First exchange: 2022	Signed 2021	Not in place	–	No	Not signed	Reciprocal exchanges	No
Yes Intended date: 2026	Signed 2025	–	–	Yes Intended date: 2028	Not signed	–	No
Yes First exchange: 2018	Signed 2017	In place	Partially Compliant	No	Not signed	Reciprocal exchanges	No
No	–	–	–	No but identified as jurisdiction of relevance ¹⁰	Not signed	–	No
Yes First exchange: 2018	Signed 2017	In place	On Track	Yes Intended date: 2028	Signed 2024	Reciprocal exchanges	No
Yes First exchange: 2023	Signed 2022	In place but needs improvement	–	Yes Intended date: 2028	Not signed	Reciprocal exchanges	No
No	–	–	–	No	Not signed	–	No
No	–	–	–	No but identified as jurisdiction of relevance	Not signed	–	No

10. The Philippines is in the process of making a political commitment to implement the CARF as part of the Global Forum's CARF commitment process and it expects to make the commitment in due course.

Annex C

Donors of the Global Forum

Since 2011, the Global Forum has delivered capacity building to support the implementation and effective use of the two global standards on transparency and exchange of information by its member jurisdictions, in particular developing countries. These activities are empowering jurisdictions in their fight against tax evasion and other illicit financial flows, and ultimately helping them increase their domestic resource mobilisation.

The Global Forum's capacity-building programme has developed and expanded over the years. Today, more than half of the Global Forum members are developing countries. The programme aims to ensure that developing jurisdictions are not left behind, and fully benefit from the remarkable progress achieved in transparency and administrative co-operation in the past decades.

Through awareness raising at political level, training of thousands of officials, the development of tools (e.g. toolkits, e-learning) and high-standard technical assistance, the dynamic of change is progressing, and more member jurisdictions are reaping the benefits of a more transparent tax world.

The delivery of the Global Forum's capacity-building programme is only made possible thanks to the financial support and the trust of donor partners.

In 2024, the generous contribution of Japan to the funding of the Asia Initiative specifically, and of other donors who have supported more broadly the Global Forum's capacity-building programme which benefited Asian countries should be acknowledged and celebrated.

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