

WELCOME TO

Major regulatory & tax reporting changes in 2026.



With Fiona Jelly
CEO, Complyfirst



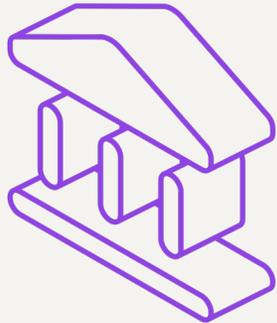
Fiona Jelly

-  **Founder & CEO of Complyfirst**, a compliance workflow automation platform for PIs, EMI's, and banks.
-  **Brings 12+ years of compliance experience** from Goldman, Citi, and fintech start-ups.
-  **Fiona is a Barrister in England & Wales and Certified Anti-Money Laundering Specialist.**



Today's snapshot session

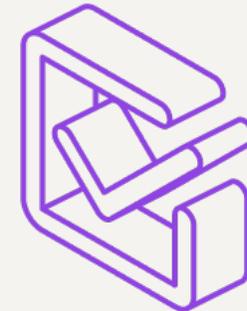
Covering: Model 170/196, IPR, CRS2, DAC8



**Understand the scope
of each requirement**



**Clarify key data inputs
needed to report**



**Outline next steps
to get ready for submission**



What's coming up for EU reporting teams





LET'S POLL:

**Which report(s) do you feel
most unsure about?**



Spanish Tax Agency Models 170 + 196 Snapshot

(Monthly + expanded ID data)



Legal Basis

Royal Decree 253/2025 (1 Apr 2025) amending the RGAT



Objective

To close information gaps created by modern payment models, so the tax authority can better detect undeclared income, hidden transactions, and tax fraud.



Description

Two new monthly declarations provide a detailed picture of payment activity connected to Spain:

- **Model 196:** Covers accounts & wallets (containers of money)
- **Model 170:** Covers card & mobile payments (movement of money)



Scope

- **Entity:** Banks, PI's and EMI's connected to Spain (including branches and firms operating in Spain under passporting)
- **Nexus:**
 - 196: Customers with Spanish tax residency or Spanish permanent establishment.
 - 170: Merchant/professional activity connected to Spain.
- **Activity:** Managing accounts/wallets (196) and collecting merchant payments via card/mobile/POS (170)



Submission

The XML must align with the XSD schema, pass validation checks, and be split into files of max 10,000 records before submitting to the AEAT.



Considerations

Model 196 heavy December filing: Includes YE balance, average Q4 balance, and annual totals in addition to the usual monthly data.

Model 170: €3k threshold removed- all in-scope merchant payments reportable



Data fields needed

Model 196

- **Accounts:** Account ID/ref, type, open/close date and reportable balances
- **Individuals:** Name, TIN (or passport/ID and issuing country if none), residence, DOB.
- **Corporates:** Entity name, TIN (or registration/ID and issuing country if none), plus UBO details (same fields as individuals).

Model 170

- **Payments:** Type (card/mobile), date/period, transaction count and total amounts.
- **Merchants:** Merchant name and ID, TIN (or registration/ID and issuing country if none), settlement account/IBAN.
- **Channel:** POS/terminal ID (if applicable) and payment instrument ref (card/payment ID).



Next steps

- **Tag in-scope:** Add "Spain reportable" tag in your customer records to drive monthly extracts.
- **Check tax residency vs KYC:** Cross-check TIN/VAT, address, declared residency vs KYC and fix gaps.
- **Submission-ready:** Pick a vendor to generate, validate, batch and submit the monthly XML for you.



DEADLINE

First deadline is end of Feb 2026 (with Jan data)

FREQUENCY

Monthly

FILE FORMAT

XML



Instant Payments Report Snapshot

(Annual + retrospective requirement of 4 years)



Legal Basis

Art. 15(3) (SEPA Regulation (EU) No 260/2012), with ITS under Art. 15(5), as amended by the EU Instant Payments Regulation (EU) 2024/886.

Objective

Give regulators a clear view of instant payments pricing and sanctions-related rejects/freezes. Regulators will benchmark PSPs across the EU for pricing consistency and sanctions screening performance.

Description

Annual instant payments report on
(1) **Charges** for credit transfers (both instant and non-instant), payment account charges, and;
(2) **Rejection/freeze rates** due to EU sanctions or targeted financial restrictive measures (TFRMs).

Scope

- **Entity:** PSPs in euro member states and PSPs in non-euro member states where they offer euro credit transfers (e.g. a Polish PSP providing EUR SEPA credit transfers).
- **Activity/Nexus:** Provision of SEPA credit transfers (SCT) and/or SEPA instant credit transfers (SCT Inst)

Submission

Generate the XBRL using the EBA templates, taxonomy and validation rules, then submit to your national competent authority.

Considerations

- **Backfill year 1:** Four reports (2022 partial: 26 Oct–31 Dec, then full years 2023–2025).
- **Cross-check:** Totals for transfers and accounts should align with other returns (e.g. Payment Statistics)

Data fields needed

There are 4 core templates (6 if you include non-euro member state firms):

- **Template 1.1 (Volumes):** SCT + SCT Inst transfers sent/received, transaction counts and total values, split by national vs cross-border
- **Template 2.1 (Charges):** fees charged for SCT + SCT Inst sent/received, split by national vs cross-border
- **Template 3 (Accounts):** total number of payment accounts and total account charges (incl. maintenance fees)
- **Template 4 (Sanctions):** Number and % of SCT Inst rejected/frozen due to sanctions screening, split national vs cross-border

Note: Templates are linked – totals and splits should reconcile across them.

Next steps

- **Map ownership:** Map which licensed entities/branches report to which CA (home vs host)
- **Separate sanctions:** Tag/extract “rejected/frozen” due to sanctions vs other fail reasons
- **Dry-run backfill:** Produce 2022 (partial), 2023, 2024 and 2025 early

DEADLINE

First submission 9 Apr 2026

FREQUENCY

Annual

FILE FORMAT

XBRL



Common Reporting Standard 2 (CRS2) Snapshot

Legal Basis

OECD Common Reporting Standard (as amended "CRS 2") implemented in the EU via DAC2 and updated via DAC8.



Objective

Expand tax transparency by ensuring Financial Institutions report all relevant financial accounts (including newly in-scope e-money/digital products) with stronger due diligence and complete tax residency data.



Description

An annual return requiring FIs to capture and validate customer tax residency at onboarding, monitor changes in circumstances, and file reportable account data via CRS 2 XML each year.



Scope

- **Entity:** Reporting financial institutions under CRS include banks, PI's and EMI's where product meets CRS "financial account" test.
- **Activity:** Offering CRS financial accounts (if customers can hold stored value like an account assume it's reportable)
- **Nexus:** Account holder tax residency (global) – you may need to report non-EU tax residents too, because CRS is a global AEOI standard (e.g. an Irish EMI may report Canadian tax resident customer under CRS.)



Submission

Generate XML using the OECD schema and submit it to your local EU member state tax authority.



Considerations

- 2026 is the "data year": Firms must collect customer and account data in line with CRS2. You may need to update onboarding forms and expand data capture.
- 2027 is the "reporting year": Firms must report using the new CRS2 standards, relying on the data collected in 2026.



Data fields needed

Accounts: Account ID/ref, product type, open/close status, reportable balance/value (year-end) and reportable income (where applicable)

Individuals: Name, address, DOB (and POB where required), tax self-cert, all tax residences + TIN per country (or reason if unavailable)

Corporates: Entity name, address, tax self-cert + entity CRS classification, plus controlling persons (name, address, DOB, tax residences + TINs) where required



Next steps

1. **Confirm scope:** Classify accounts/wallets to identify which are CRS-reportable accounts
2. **Fix onboarding:** Capture all tax residences + self-cert + TIN per country (or reason if missing) from day one
3. **Ongoing monitoring:** Cross-check tax data vs KYC and track changes in circumstances that might prompt you to ask the customer to refresh their tax info.



DEADLINE

Collect data from 1 Jan 2026. Submit in 2027 (exact deadline set by each member state)

FREQUENCY

Annual

FILE FORMAT

XML



EU DAC8 Crypto Asset Reporting Snapshot

(Annual + multi-tax residency)



Legal Basis

DAC8 (EU Directive 2023/2226) implementing the OECD Crypto-Asset Reporting Framework (CARF) across the EU.



Objective

Give EU tax authorities structured, automated visibility into crypto-asset activity involving EU tax residents, enabling stronger tax compliance.



Description

An annual tax return requiring crypto platforms to identify reportable EU users, apply tax due diligence (residency + TINs), and report crypto transactions and holdings activity in a standard format.



Scope

- **Entity:** Any Reporting Crypto Asset Service Provider (RCASP) including MiCA authorised CASPs and non-MiCA / non-EU operators where they have EU tax resident users.
- **Nexus:** EU tax-resident users (reporting is triggered by the users EU tax residency, not where the platform is headquartered).
- **Activity:** Facilitating reportable crypto transactions (e.g. crypto-to-fiat, crypto-to-crypto, transfers and certain in-scope payment transactions under the framework)



Submission

Generate XML using the DAC8 schema and submit it to the tax authority in the EU member state where you're registered.



Considerations

- **PI's/EMI's:** Are directly in scope if they are the customer-facing entity providing the crypto service, either under their own crypto licence/registration or via a group crypto entity they contract with.
- **Non-EU firms:** Will need to register in an EU member state for DAC8 reporting.



Data fields needed

- **Accounts/wallets:** Account ID/ref + wallet address/ID for reportable crypto activity
- **Individuals:** Name, address, DOB, all EU tax residences, TIN per country (or valid reason code where not available)
- **Corporates:** Entity name, address, tax residence + TIN(s), plus controlling persons (same fields as for individuals)
- **Transactions:** Crypto-asset type, transaction category (buy/sell/exchange/transfer/payment) and annual totals.



Next steps

1. **Fix onboarding:** Capture EU tax residence, TINs (and any missing reason codes) from day one.
2. **Tag EU customers:** Add an "EU" tag for DAC8 ensuring it's based on tax residency (not nationality)
3. **Tag transactions:** Add transaction type tags (mentioned above) to every crypto event so totals can be extracted reliably.



DEADLINE

Collect data from 1 Jan 2026. Submit in 2027 (exact deadline set by each member state)

FREQUENCY

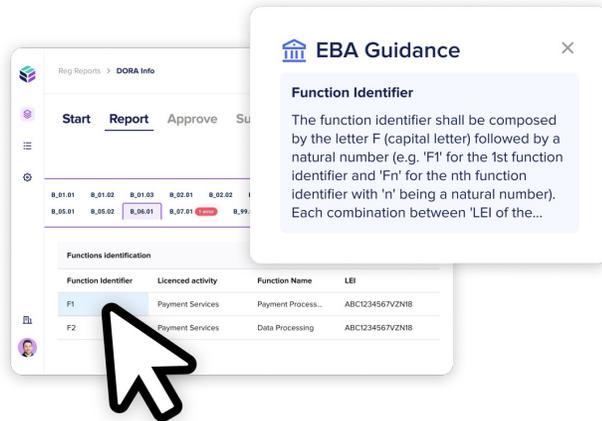
Annual

FILE FORMAT

XML

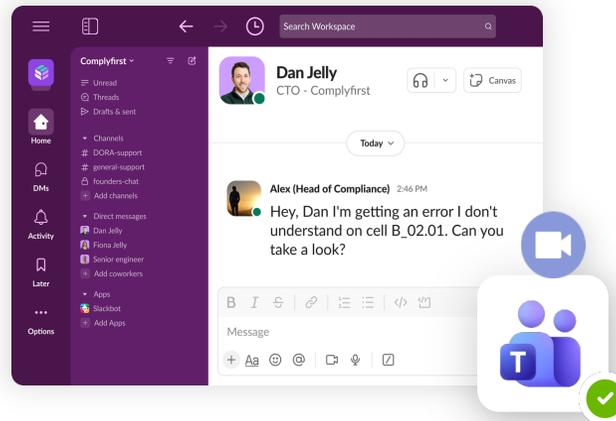
Complyfirst can help 🙌

(with tech + support that's different from what you're used to)



Not just a "template converter"

Automate data collection, get built-in regulator guidance, and validate data in real time.



Fast 1:1 support

Message us for fast help with preparation and submission, even *on deadline day*.

Multi-jurisdiction coverage

We cover reporting across jurisdictions. No need for your teams to interpret schemas and rules from scratch.



ES



IE



PL



LT



FR



DE

Your first report is *on us!* 🚀



**Pick a report and we'll help you
get it submitted (*at no cost*)**

fiona@complyfirst.co | dan@complyfirst.co



**Do you want us to reach
out to help you with one of
these reports?**

Questions?

Thank you

Let's stay in touch

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Spain FAQs

Q: Isn't this more classic tax reporting?

Not really. Model 196 and 170 are monthly informative reports and apply regardless of whether accounts generate interest or withholding tax. Scope is driven by your customer's Spanish tax residency/establishment.

Q: How do I submit my return?

You submit your XML file via AEAT web services interface. Files must align with the XSD schema, pass validations, and be batched to max 10,000 records per file.

Q: Are all data fields mandatory?

No, some fields are mandatory, conditional if, and optional. Need help figuring out which is which? Email me fiona@complyfirst.co for our Excel template which explains it all.



IPR FAQs

Q: We're a PI/EMI and our partner bank settles the credit transfers, are we in-scope?

Yes. If you offer SCT/SCT Inst to customers, you're in scope and must report even if settlement is done via a partner bank.

Q: Is this EBA report inter-linked like the DORA return?

Yes, the four templates are interlinked, but a bit lighter than DORA. Templates reconcile on totals (SCT vs SCT Inst) and splits (national vs cross-border), but it's not a beast like DORA (15 interlinking tables!).

Q: What will regulators actually use this data for?

Regulators will use it to spot hidden instant-payment charges and/or abnormally high sanctions rejects/freezes, then benchmark you against peers and challenge outliers.



CRS FAQs

Q: What are the penalties for misreporting or missing CRS controls?

Penalties vary by country but can scale quickly. Example (UK): penalties include £300 compliance failure penalties (e.g. missing self-cert), daily penalties up to £60/day, and up to £3,000 for inaccuracies. Penalties can run into six figures if a large volume of accounts are affected.

Q: How do you handle “change in circumstances”?

Regulators expect monitoring triggers (e.g. address change, new phone/country signals) and a workflow to refresh self-certs and tax data when those triggers fire.

Q: How do you know which account/wallet products are CRS reportable?

You should have a formal product classification doc showing which are deemed “financial accounts” and why. (Practical test: if customers can hold stored value like an account, treat it as CRS in scope)



DAC8 FAQs

Q: Are non-EU crypto firms in-scope?

Yes. If you serve EU tax-resident users, you typically need to register in one EU Member State and file DAC8 there.

Q: Do we file in every EU country where we have users?

No. You file once to the tax authority in the EU member state where you're registered and they handle onward exchange across the EU.

Q: What transactions are reportable under DAC8?

Most crypto activity is reportable. The only threshold applies to retail payments for goods or services where only payments over USD \$50,000 (or equivalent) are reportable.