



STATUTORY INSTRUMENTS.

S.I. No. 665 of 2025

MANDATORY AUTOMATIC EXCHANGE OF INFORMATION IN THE
FIELD OF TAXATION (AMENDMENT) REGULATIONS 2025

MANDATORY AUTOMATIC EXCHANGE OF INFORMATION IN THE
FIELD OF TAXATION (AMENDMENT) REGULATIONS 2025

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The Revenue Commissioners, in exercise of the powers conferred on them by section 891G (inserted by section 74 of the Finance Act 2015 (No. 52 of 2015)) of the Taxes Consolidation Act 1997 (No. 39 of 1997), with the consent of the Minister for Finance, hereby make following Regulations:

Citation and Commencement

1. (1) These Regulations may be cited as the Mandatory Automatic Exchange of Information in the Field of Taxation (Amendment) Regulations 2025.
- (2) These Regulations come into operation on 1 January 2026.

Amendment to the Mandatory Automatic Exchange of Information in the Field of Taxation Regulations 2015

2. The Mandatory Automatic Exchange of Information in the Field of Taxation Regulations 2015 (S.I. No. 609 of 2015) are amended –
 - (a) in Regulation 2(1) –
 - (i) by the substitution of the following definition for the definition of “Directive” –

“ ‘Directive’ means Council Directive 2011/16/EU of 15 February 2011¹ on administrative cooperation in the field of taxation and repealing Directive 77/799/EEC, as amended by Council Directive 2014/107/EU of 9 December 2014², Council Directive (EU) 2015/2376 of 8 December 2015³, Council Directive (EU) 2016/881 of 25 May 2016⁴, Council Directive (EU) 2016/2258 of 6 December 2016⁵, Council Directive (EU) 2018/822 of 25 May 2018⁶, Council Directive (EU) 2020/876 of 24 June 2020⁷, Council Directive (EU) 2021/514 of 22 March 2021⁸, Council Directive (EU) 2023/2226 of 17 October 2023⁹ and Council Directive (EU) 2025/872 of 14 April 2025¹⁰;”, and

¹ OJ No. L 64, 11.03.2011, p. 1

² OJ No. L 359, 16.12.2014, p. 1

³ OJ No. L 332, 18.12.2015, p. 1

⁴ OJ No. L 146, 03.06.2016, p. 8

⁵ OJ No. L 342, 16.12.2016, p. 1

⁶ OJ No. L 139, 05.06.2018, p. 1

⁷ OJ No. L204, 26.06.2020, p. 46

⁸ OJ No. L104, 25.03.2021, p1

⁹ OJ No. L 24.10.2023, p.1

¹⁰ OJ No. L 6.5.2025, P.1

- (ii) by the substitution of the following paragraph for paragraph (a) in the definition of “non-reporting financial institution” –
 - “(a) a governmental entity, international organisation or central bank, other than with respect to a payment that is derived from an obligation held in connection with a commercial financial activity of a type engaged in by a specified insurance company, custodial institution, or depository institution or with respect to the activity of maintaining central bank digital currencies for account holders which are not financial institutions, government entities, international organisations or central banks”;
- (b) in Regulation 3(2) –
 - (i) by the substitution of the following subparagraph for subparagraph (a) –
 - “(a) in the case of each reportable person that is an account holder of the account and that is an individual—
 - (i) the name,
 - (ii) address,
 - (iii) Member State of residence,
 - (iv) TIN,
 - (v) date and place of birth, and
 - (vi) an indication as to whether the account holder has provided a valid self-certification, of that individual;”;
 - (ii) by the substitution of the following subparagraph for subparagraph (b)(iii) –
 - “(iii) Member State(s) of residence and, if any, other jurisdiction(s) of residence, and”;
 - (iii) by the substitution of the following subparagraph for subparagraph (b)(v) –
 - “(v) where that account holder has been identified, pursuant to Regulation 6, as having one or more controlling persons that is a reportable person, the information specified in clauses (i) to (iv) with respect to each such reportable person, and
 - (I) the date and place of birth of each such reportable person,
 - (II) the role or roles by virtue of which each reportable person is a controlling person, and

- (III) an indication as to whether a valid self-certification has been provided for each reportable person;”;
- (iv) by the insertion of the following subparagraph after subparagraph (b) –
 - “(ba) an indication as to whether the account is a joint account and if so the number of joint account holders;”;
- (v) by the substitution of the following subparagraph for subparagraph (c) –
 - “(c) the account number or, in the absence of an account number, the functional equivalent, the type of account and an indication of whether the account is a pre-existing account or new account;”;
- (vi) in subparagraph (f) –
 - (I) in clause (i), by the substitution of “year,” for “year, and”;
 - (II) in clause (ii), by the substitution of “holder, and” for “holder;” and
 - (III) by the insertion of the following clause after clause (ii) -
 - “(iii) Notwithstanding clause (ii) and unless the Reporting Financial Institution elects otherwise with respect to any clearly identified group of accounts, the gross proceeds from the sale or redemption of a Financial Asset are not required to be reported to the extent such gross proceeds from the sale or redemption of such Financial Asset are reported by the Reporting Financial Institution under section 891M;”;
- (vii) by the substitution of the following subparagraph for subparagraph (g) –
 - “(g) where the account is a depository account, the total gross amount of interest paid or credited to the account during the calendar year or other appropriate reporting period;”;
- (viii) in subparagraph (i), by the substitution of “denominated;” for “denominated.”, and
- (ix) by the insertion of the following subparagraph after subparagraph (i) –
 - “(j) in the case of any equity interest held in an investment entity that is a legal arrangement, the role or roles by virtue of which the reportable person is an equity interest holder.”, and

(c) in Regulation 6(4), by the substitution of the following subparagraph for subparagraph (b) –

“(b) Where a self-certification was not obtained by the reporting financial institution in respect of a new account in time for it to meet its due diligence and reporting obligations in respect the reporting period in which the new account was opened, the financial institution shall apply the due diligence procedures for pre-existing accounts, contained in section III and section IV of Annex I of the Directive, until such time a self-certification is obtained and validated.”.

The Minister for Finance consents to the making of these Regulations.

L.S.

GIVEN under the Official Seal of the Minister for Finance,
19 December, 2025.

SIMON HARRIS,
Minister for Finance.

GIVEN under my hand,
19 December 2025

NIALL CODY,
Revenue Commissioner.

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ARNA FHOILSIÚ AG OIFIG AN tSOLÁTHAIR
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FOILSEACHÁIN RIALTAIS,
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