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New CRS Principal Point of Contact requirement for Cayman financial institutions

SEPTEMBER 2026

As part of the Cayman Islands' implementation of the OECD's enhanced Common Reporting Standard (CRS) framework, commonly referred to as CRS Regime 2.0, the Tax Information Authority (International Tax Compliance) (Common Reporting Standard) (Amendment) Regulations, 2025 introduced a new requirement for all Cayman Financial Institutions (**FIs**) to appoint a Principal Point of Contact (**PPOC**) based in the Cayman Islands.

What has changed?

Effective from 1 January 2026, every Cayman FI must designate a PPOC who will act as the primary liaison with the Department for International Tax Cooperation (**DITC**) for all CRS-related matters.

In practice, this includes most Cayman investment funds, many investment holding structures, banks, custodians and certain insurance businesses The PPOC requirement is separate from existing registered office arrangements and AML compliance officer appointments.

Who can act as a PPOC?

A PPOC must be located in the Cayman Islands and may be either:

- an individual with a physical address in the Cayman Islands; or
- a Cayman Islands incorporated, registered or established legal entity that maintains a physical presence in the Cayman Islands.

The DITC must be provided with sufficient contact details to enable direct communication with the PPOC and to ensure timely responses to regulatory correspondence.

Who does this apply to?

The requirement applies to all Cayman entities that qualify as FIs under CRS, including:

- investment entities, including most Cayman investment funds and managed investment structures;
- depository institutions, such as banks and credit unions;
- custodial institutions, including custodians and brokers; and
- specified insurance companies.

If your entity is currently registered with the Tax Information Authority or files CRS returns, it is likely that the PPOC requirement will apply.

Key filing deadlines

Financial Institutions registered before 1 January 2026	Financial Institutions that commenced activities during 2025 but were not registered by 1 January 2026	Financial Institutions commencing activities during 2026	Changes to PPOC details
Notify the TIA of the appointed PPOC via a change form by **31 January 2027**	Register with the TIA and notify PPOC details by **30 April 2026**	Register and notify PPOC details by **31 January 2027**	Notify the TIA within **30 calendar days** of any change in circumstances

Why are these PPOC changes important?

The new requirement is intended to strengthen CRS compliance and facilitate more efficient communication between the DITC and reporting financial institutions. Failure to comply with CRS obligations may result in regulatory action, including administrative penalties.

Financial Institutions should ensure that PPOC details are submitted accurately and maintained on an ongoing basis, as incomplete or insufficient information may result in follow-up enquiries from the DITC.

How Collas Crill Corporate Services can assist

As a CIMA-licensed company manager with an established presence in the Cayman Islands, Collas Crill Corporate Services Limited is well placed to act as your appointed PPOC and support your ongoing CRS compliance obligations.

Our services include:

- PPOC appointment and designation;
- DITC portal registrations and notifications;
- assistance with CRS compliance requirements; and
- ongoing monitoring of regulatory developments and reporting obligations.

If you would like to discuss the new PPOC requirement or require assistance with your appointment and filings, please contact a member of the Collas Crill Corporate Services team listed.

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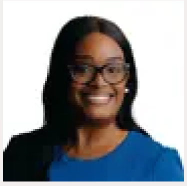

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