REPUBLIC OF ESTONIA
TAX AND CUSTOMS BOARD

Tax information exchange

Table of contents

Exchange of financial accounts information **3**

Who and when has the obligation to submit declarations **4**

Completing and submitting declarations **5**

Transition to the CRS 3.0 XML schema **7**

Advice on avoiding common mistakes made in financial accounts declarations **9**

Recommendations for correct declaration **11**

Exchange of financial accounts information

On the basis of the **Council Directive 2014/107/EU** and the OECD Convention on Mutual Administrative Assistance in Tax Matters, and the **Common Reporting Standard** multilateral agreement, **Estonian financial institutions** have the obligation to provide information on the accounts of non-residents and to submit respective declarations:

- "Collection of financial accounts information exchanged on the basis of Article 6 of the Convention on Mutual Administrative Assistance in Tax Matters" (form CRS) and
- "Collection of financial accounts information exchanged with the Member States of the European Union" (form DAC2).

Additional information

- **Form of Declaration Arising from Tax Information Exchange Act and Establishment of Procedure for Submission and Completion Thereof (in Estonian)**

  Regulation of the Minister of Finance No 16 of 19 May 2015

- **Exchange of tax information**

  Ministry of Finance web page

- **Guide "Definition of Financial Account and Financial Institution, as well as due diligence requirements (FATCA, CRS, DAC2)" (in Estonian) | 220.17 KB | pdf**

- **List of jurisdictions participating in financial information exchange (as at 15 September 2026, in Estonian) | 123.25 KB | pdf**

Checking the format and structure of a tax identification number (TIN)

- **European TIN Portal**

- European Commission portal (EU Member States)

- **Tax Identification Numbers (TINs)**

  OECD web page (EU Member States and third countries)

Help information

If you have any questions, please contact **ariklient@emta.ee** or call **+372 880 0812**.

Last updated on 09.06.2026

Who and when has the obligation to submit declarations

Who must submit declarations CRS and DAC2

Estonian financial institutions have an obligation to provide information on financial accounts held by tax residents of countries participating in the exchange of information.

If a reporting financial institution is required to provide one financial information declaration, it is generally obliged provide the other two financial information declarations as well.

To submit financial information declarations, you need the individual access permission of the e-services environment of the Estonian Tax and Customs Board named “Submitting FATCA declarations“ (code: FATCA_KOIKOIGUSED). **More about granting access permissions**

If a person has the obligation to submit a financial information declaration but does not have access to the respective application in the e-services environment of the Estonian Tax and Customs Board, the **GIIN number** must first be obtained from the U.S. tax authority and submitted to the Estonian Tax and Customs Board together with the request for access permission to the financial information declaration application. In the request, it is required to indicate the year from which the declaration obligation arose.

Virtual currency wallet service providers and virtual currency exchange service providers are not reporting financial institutions within the meaning of the current legislation.

When should declarations be submitted

CRS and DAC2 declarations with data for the previous year must be submitted by 30 June of the current year at the latest.

In the absence of information to be declared, a blank declaration must be submitted via the **e-services environment e-MTA**.

Last updated on 20.05.2026

Completing and submitting declarations

Where and how can declarations be submitted

The declarations are submitted to the Estonian Tax and Customs Board electronically via the e-services environment e-MTA by uploading an XML file.

To submit CRS and DAC2 declarations:

1. sign in to the **e-services environment e-MTA**
2. select "Reports" – "Exchange of information reports" – "Financial information declarations (FATCA/OECD/EU DAC2)"
3. on the page of list of declarations, press the button "Add new declaration"

SUBMITTING DECLARATION

To submit a full version of the declaration, select "Add declaration from file", then select "Obligation type" and "Year" and search for the file you will upload on your computer.

After pressing the button "Import", a data check (file validation) takes place.

In case of errors, information about them is displayed to the user and the declaration needs to be corrected.

If no errors are found, the declaration will appear on the list of declarations in the "Preparation" status.

After pressing the button "Confirm", the validation will be carried out again and, if passed, the declaration will be confirmed.

It is possible to delete a declaration in the "Preparation" status by selecting the corresponding icon.

CHANGING DECLARATION DATA

If some data were not declared in the form, or if a line is filled in incompletely or incorrectly, the file needs to be reloaded to change the data.

UNDOCUMENTED FINANCIAL ACCOUNT

Section III (B) 5 and Section III (C) 5 of the CRS (Common Reporting Standard) regulate the nature of an undocumented financial account and the scope of reporting obligations.

The concept of an undocumented financial account extends to existing financial accounts for the owner of which only a hold mail order (hold mail) or intermediary address (in care of) has been collected in the reporting jurisdiction, and no additional data has been collected about the owner of the account, which would, among other things, enable the person's tax residency to be determined or specified. Only when using the aforementioned data fields and the collection of additional information (as well as the implementation of due diligence measures) has been delayed, the previously described financial accounts must be reported as undocumented financial accounts.

In the event that a reporting financial institution has financial accounts that can be classified as undocumented financial accounts, please inform us about the existence of such accounts via the e-mail address **infovahetus@emta.ee**.

Filling in a declaration

The forms of declarations are established by the **regulation of the Minister of Finance**.

The technical specifications of the CRS and DAC2 files can be found on the web page "**Technical information of services**".

ADDITIONAL INFORMATION

The CRS is also available on the OECD website:

- **Common Reporting Standard (CRS)**
- **Standard for Automatic Exchange of Financial Account Information in Tax Matters**
- **Standard for Automatic Exchange of Financial Account Information in Tax Matters: Implementation Handbook**

Last updated on 08.01.2025

Transition to the CRS 3.0 XML schema

The Tax and Customs Board (ETCB) will shortly adopt the OECD's updated **CRS XML Schema Version 3.0** for the **submission of DAC2 and CRS declarations**. This change applies to the submission of both the CRS and DAC2 forms via the **e-services environment e-MTA**.

The version of the OECD's user guide for CRS 3.0 XML schema is 4.0. The new schema contains updated data elements and validation rules and supports the implementation of the revised Common Reporting Standard.

Transition schedule

The acceptance of DAC2 and CRS returns will be suspended **in December 2026** due to the development of the ETCB's information systems.

During this suspension period, the following **cannot be submitted via the e-MTA**:

- new DAC2 or CRS declarations;
- blank declarations;
- corrections to or deletions of previously submitted declarations.

The submission of declarations is expected to resume **in February 2027**. Once the service is reopened, DAC2 and CRS declarations may only be submitted in a format compliant with the CRS 3.0 XML schema.

The exact start and end dates of the submission suspension will be announced separately on the ETCB's website. Where possible, we recommend submitting any pending declarations and corrections before the suspension begins.

Declarations subject to the CRS 3.0 requirement

After the service is reopened, the CRS 3.0 format must be used for:

- submission of new DAC2 and CRS declarations;
- submission of blank declarations;
- correction of data from previous reporting periods;
- deletion of previously submitted data.

Corrections to and deletions of declarations originally submitted before the transition must also be prepared in XML format compliant with the CRS 3.0 requirements. Files prepared based on an earlier version of the schema will not be accepted after the service reopens.

Updating the legal basis

In connection with the adoption of CRS 3.0, Annexes to Regulation No. 16 of the Minister of Finance of 19 May 2025 concerning CRS and DAC2 XML/XSD will also be updated.

The amendments to the Regulation are currently undergoing public consultation. Once the consultation and regulatory process has been completed, the updated Regulation will be published in the Riigi Teataja.

Further details on the entry into force of the amendments to the Regulation and on the CRS 3.0 XML/XSD files will be published on the ETCB's website.

More information

- **The OECD's user guide for CRS 3.0 XML schema**
  Amended Common Reporting Standard XML Schema: User Guide for Tax Administrations, version 4.0

Last updated on 07.08.2026

Advice on avoiding common mistakes made in financial accounts declarations

The advice has been put together by the Estonian Tax and Customs Board based on reviews and audits of financial accounts declarations (CRS/DAC2/FATCA) and financial institutions.

1. **A financial accounts declaration must give information about the status of an account (open/closed).**

   Information that must be included in the CRS/DAC2/FATCA declaration submitted to the Estonian Tax and Customs Board has been established by the Regulation of the Minister of Finance No 16 of 19 May 2015: "**Form of Declaration Arising from Tax Information Exchange Act and Establishment of Procedure for Submission and Completion Thereof**".

   One of the mandatory data elements is information on whether a financial account is still open or has been closed in the calendar year for which the declaration has been submitted. A closed financial account does not always mean the termination of a customer relationship, as the customer of a financial institution may wish to close only one financial account. In the context of prevention of money laundering and financing of terrorism, this could also mean the termination of a single financial product agreement.

   Please note that upon termination of a customer relationship, including at the customer's own request, the declaration must contain information about the fact that the financial accounts of the reportable person have been closed in the calendar year for which the declaration has been submitted. This means that if a person's financial accounts are closed and the customer relationship is terminated in 2023, it must be reflected in the declaration for 2023 that is submitted in 2024.

2. **Taxpayer identification number (TIN) and date of birth must be correct.**

   If a financial institution has defined a non-resident customer's financial account as a reportable account, it must identify the account holder's residence for tax purposes and the data necessary for identifying the person. The confirmation of tax residency of the account holder that is a natural person and of the controlling person of the company that is a natural person must be in writing or in a format which can be reproduced in writing (**subsection 11 of § 8^5 of the Tax Information Exchange Act**). The confirmation of tax residency must include the following data:

   - tax residences;

- ✓ the identification number(s) of the taxable person;
- ✓ the date of birth;
- ✓ contact address.

The correct taxpayer identification number (TIN) must be indicated in the field for TIN. Depending on the jurisdiction, TIN is a combination of numbers that may include full points (.), hyphens (–) or other punctuation marks.

Only text (e.g. “Missing”, “None”, “SWE” etc.), a one-digit number or a person’s date of birth **cannot be indicated in the declaration** instead of a TIN.

In certain cases, the absence of a TIN or the delay in its collection is inevitable under objective circumstances. However, please note that an incorrect entry in the field for TIN significantly complicates the identification of a person in the jurisdiction in which the person is a resident for tax purposes.

We also ask you to make sure that the **correct date of birth and contact address** of a person are indicated in the systems where customer data is stored, as well as in the declarations. The date of birth of a person cannot be, for example, 01.01.1900. Also, the address of a person’s place of residence indicated must be exact, not just the county, rural municipality/city or street name.

3. **The information on the beneficial owners of the accounts of legal persons must be as detailed as in the case of the accounts of natural persons.**

   Due diligence measures and the scope of reporting are similar for both non-resident natural and legal persons. Therefore, when submitting your declarations, please note that the declaration must include the **correct TIN of the beneficial owner of an enterprise and the full and accurate contact address**, not just the county, rural municipality/city or street name.

4. **Residency data and address must correspond to each other.**

   Please make sure that there are no inconsistencies in the data provided by customers, in particular the tax residency data. A possible inconsistency is, for example, a situation where a person is identified in the declaration as a non-resident (e.g. Italian tax resident), but his or her contact address is in Estonia (e.g. Luite street, Tallinn).
   In some cases, this conflict between two jurisdictions can be explained by dual tax residency. If a person has **more than one residence for tax purposes** indicated in a financial institution’s customer data, **both must be included** in the financial accounts declaration.

5. **Non-resident’s financial account must be included in the declarations of consecutive years.**

   Please make sure that a non-resident’s financial account is included in the declarations of all consecutive years in which it is reportable. For example, there have been cases where a financial account was declared in 2018 and 2020 but not in 2019.

Recommendations for correct declaration

Here you can find the recommendations of the Estonian Tax and Customs Board to ensure compliance with the requirements arising from the tax information exchange regulations.

1. Incorrect entries in submitted declarations may make it more difficult or, in certain cases, impossible to identify the beneficial owners of financial accounts indicated in financial account declarations.

   Therefore, in order to avoid standard errors, we recommend to put in place control measures which include either a manual review of the data and/or the implementation of additional controls (including IT-based measures). This makes it possible to ensure that the declaration, including the field for TIN, does not contain incorrect numeric values, text entries or other characters/records that are not relevant.

   We recommend using **the OECD (Organisation for Economic Cooperation and Development)** or the **European Commission application** to verify the correct format of TIN.

   We recommend that you apply control measures to verify the correctness of the information indicated in the fields for customer's address and date of birth as well.

2. Provided that a financial institution as part of a group of enterprises operates in several jurisdictions where the same tax information exchange regulations apply, it may be necessary to **exchange experiences and best practices with other entities** within the same group in order to ensure uniform implementation.

3. In situations where a country other than Estonia is indicated as customer's tax residence, but the contact address is in Estonia, please further verify the correctness of the data.

   In certain cases, dual tax residency is possible and in such cases **both tax residences** of the person must be declared in the financial accounts declaration.

   The contact address is often part of the data for determining tax residence and in certain situations the contact address of a non-resident in Estonia should be interpreted as a contradiction in the tax residency data. This is particularly important in a situation where the customer has not provided a tax identification number (TIN).

4. The **"CRS-related Frequently Asked Questions"** on the OECD website contain information useful for financial institutions that are obliged to submit a CRS/DAC2/FATCA financial account declaration.

Last updated on 08.01.2025