

The Use of Exchange of Information (EOI) to Address Tax Evasion

51st SGATAR ANNUAL MEETING

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Date of Presentation: October 19, 2022



Outline

- ❑ Overview of EOI implementation
- ❑ EOIR practice
- ❑ Using AEOI-CRS information
- ❑ A success story in using EOI medium
- ❑ Conclusion

Overview of EOI implementation

❑ International legal framework

- 34 effective income tax agreements (with EOI provisions)
- Reaching AEOI-CRS consensus with Australia, Japan, and the U.K.

❑ Domestic legal framework

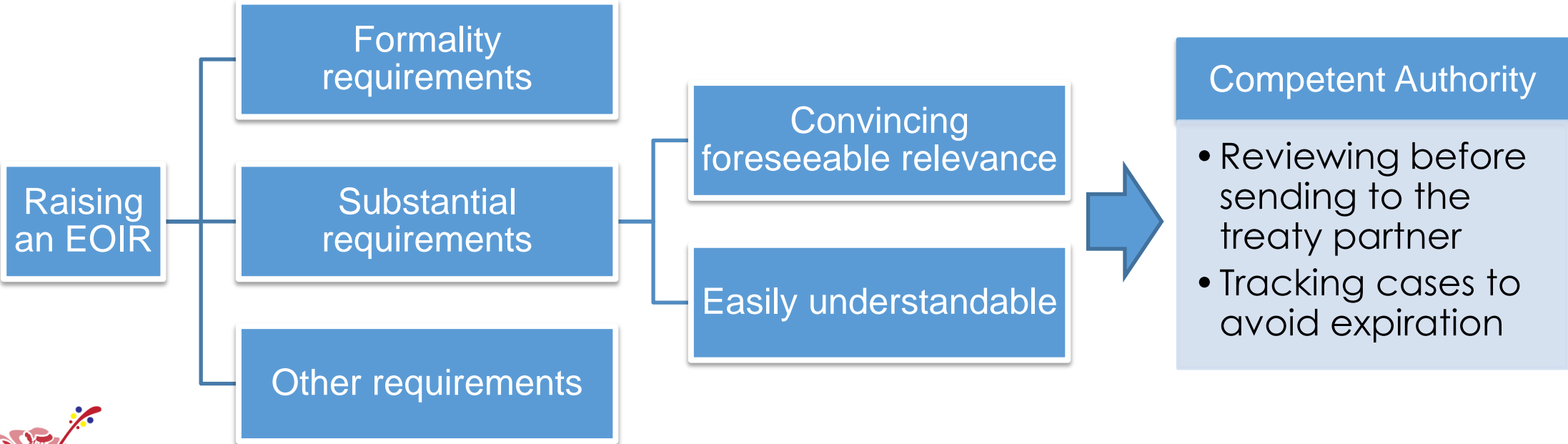
- Tax Collection Act
- CRS Regulations
- EOI Regulations

Overview of EOI implementation

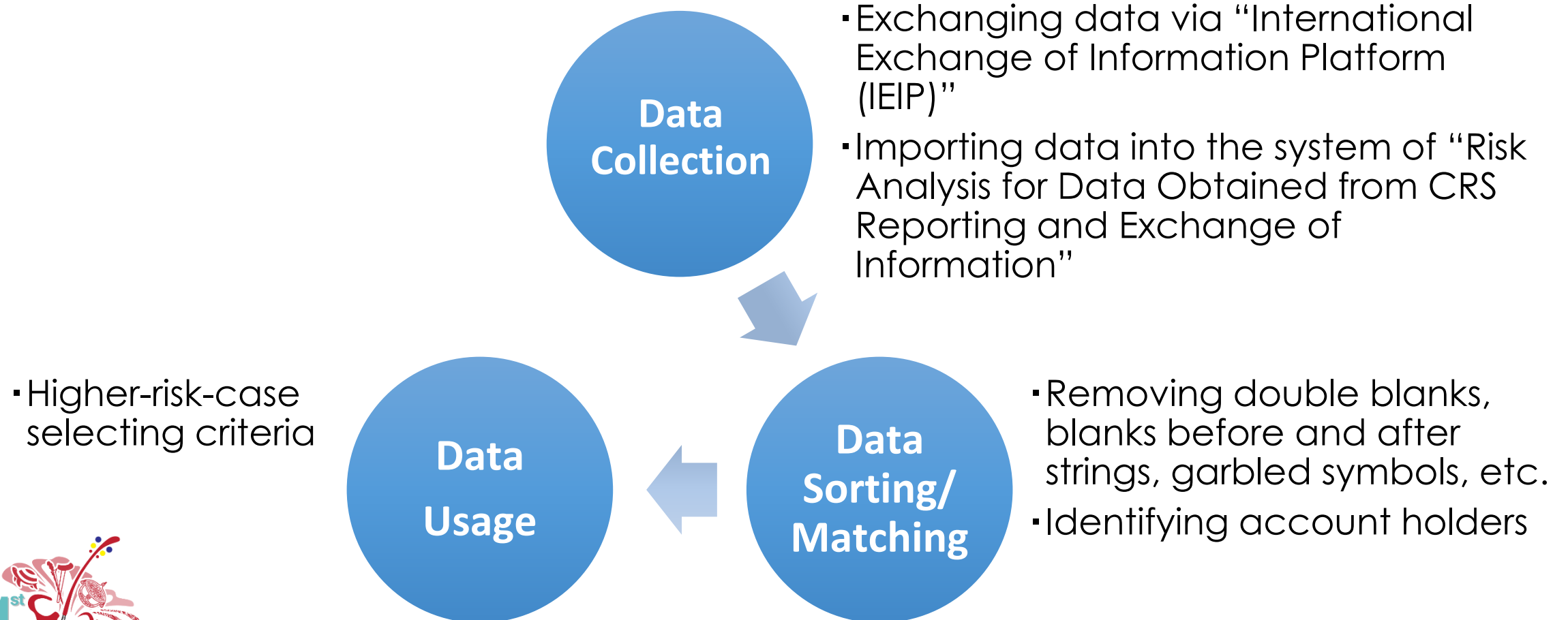
EOI on request (EOIR)		Spontaneous EOI (SEOI)		Automatic EOI (AEOI-CRS) (Reported by 1,801 Reporting Financial Institutions in Chinese Taipei in 2022)		
No. of Case received	No. of Case raised	No. of Case received	No. of Case raised	No. of Reportable accounts	Aggregated account balance	Aggregated payment
133	15	277	8	145,186	US\$70 billion	US\$4 billion

EOIR practice

□ Requirements to use EOIR and ensuring the quality through CA review procedures



Using AEOI-CRS information



Using AEOI-CRS information

❑ Using CRS information on risk analysis for selecting audit cases

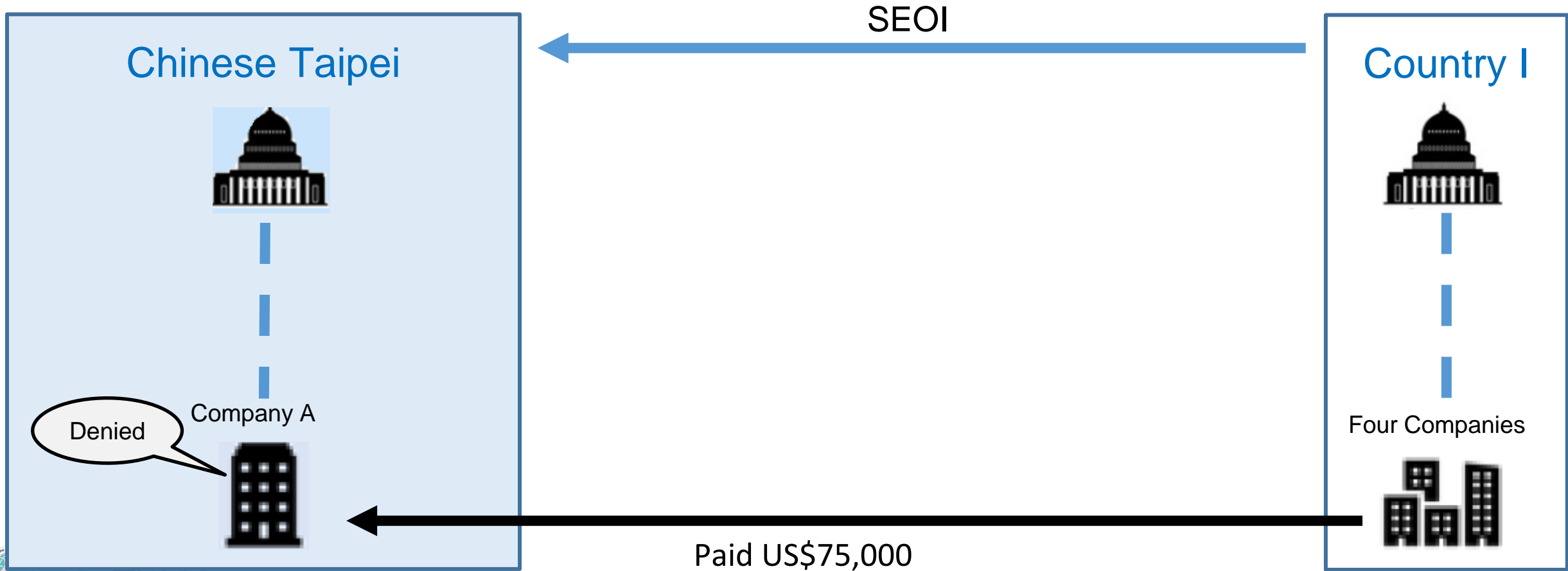
Individual account holders	Overseas income exceeding a certain threshold
	Intentionally underreporting overseas income
	Dual tax resident case with tax audit value
Entity account holders	Overseas dividends exceeding a certain threshold
	Overseas interest exceeding a certain threshold

❑ Using CRS information on risk analysis for taxes other than income tax

- Reference List of Minors' Overseas Accounts
- Reference List of Information for Inheritance Taxation

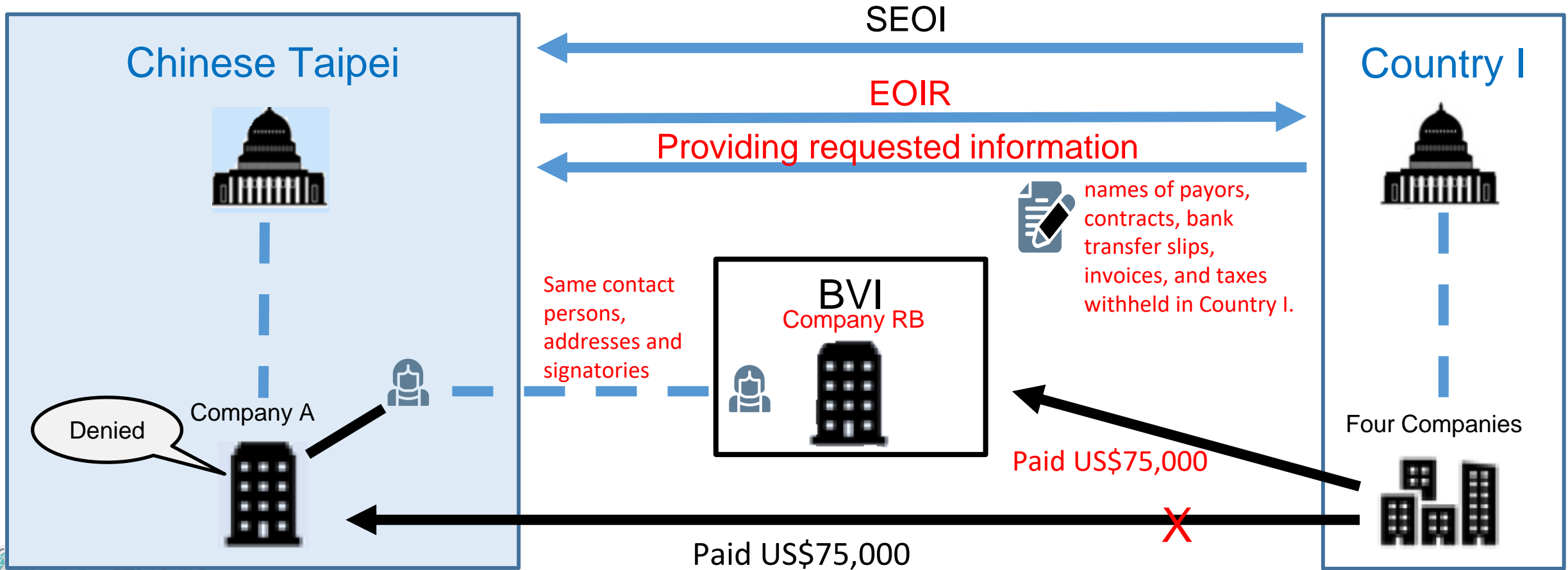
A success story in using EOI medium

- ❑ Raising a successful EOIR case by information previously received via SEOI



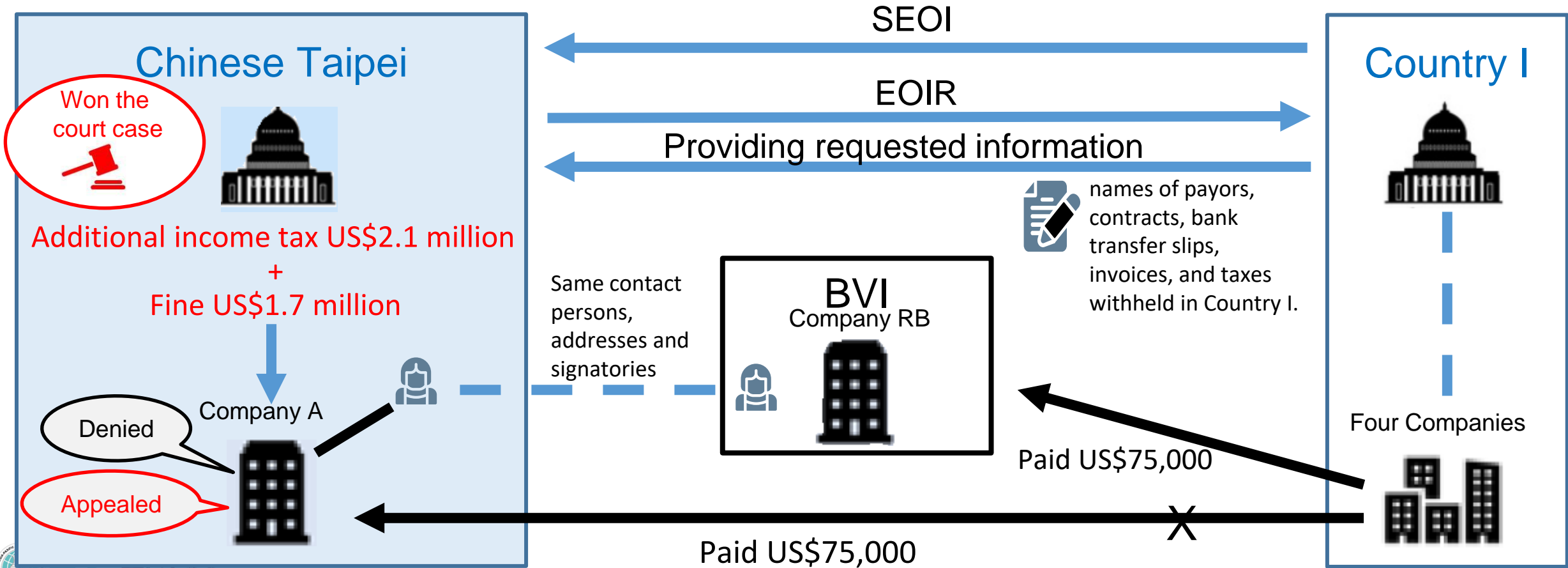
A success story in using EOI medium

❑ Raising a successful EOIR case by information previously received via SEOI



A success story in using EOI medium

❑ Raising a successful EOIR case by information previously received via SEOI



Conclusion

- ❑ Encouraging the use of EOI medium; arranging internal capacity training and incentive mechanisms.
- ❑ Designing and analyzing related models to optimize the use of AEOI-CRS information.
- ❑ Being open to fiscal cooperation and exchange with other jurisdictions.

THANK YOU

