			Assessment					
Country	Issue	Fact	OECD/ Global Forum	TJN's FSI				
	Company Ownership Registration	"Ownership and identity information for single member LLCs is not always available" (GF 2011: 47)	Phase 1: In place, but certain aspects need improvement. Phase 2: Largely Compliant	Companies available without recorded ownership Information (zero credit for company ownership registration)				
USA	AEOI pursuant to CRS	"The Model 1A IGAs entered into by the United States acknowledge the need for the United States to achieve equivalent levels of reciprocal automatic information exchange with partner jurisdictions. They also include a political commitment to pursue the adoption of regulations and to advocate and support relevant legislation to achieve such equivalent levels of reciprocal automatic exchange" (CRS Status of Commitments).	USA not included among "jurisdictions not committed to the CRS", but was neutrally isolated in a footnote.	USA has not committed to the CRS				
Panama	Company Ownership Registration	"there is no need to update the information in the Public Registry following the incorporation and there are no specific sanctions on the company if the stock register is not kept up to date" (GF 2014: 19). In addition, bearer shares will be immobilized by a private custodian (KPMG)	In place, but certain aspects need improvement	Companies available without recorded ownership Information (zero credit for company ownership registration)				
Panama	AEOI pursuant to CRS	Panama will undertake AEOI bilaterally, just like the U.S.	Pre-Panama Papers: "Committed to implement in 2018" / In the eve of Panama Papers: "Jurisdiction not committed to the CRS"	Jurisdiction not committed to the CRS				

	Company	Regarding an SCA (société en	"Not in Place".	Companies
	Ownership	commandite par actions): "There is	However,	available
	Registration	no requirement to provide identity	"Jurisdiction is	without
	g.stration	or ownership information on	ready to move	recorded
		'passive' members	to Phase 2"	ownership
		('commanditaires'), being those	to i mase 2	Information
		with limited liability" (GF 2011:		(zero credit for
		22). In 2015 the Global Forum did		company
		not refer to any changes regarding		ownership
		company registration (GF 2015).		registration)
Switzerland	AEOI	Switzerland signed the MCAA and	Jurisdiction	Jurisdiction
	pursuant to	committed to exchange	committed to	committed to
	CRS	information in 2018	2018	2018 + Blogs
				regarding Swiss
				obstacles (AEOI
				only with
				countries with
				close political
				ties, that offer
				regularization
				and that are
				promising for
				Swiss financial
				industry)
	Company	"Upon the incorporation of a	Phase 1: In	Companies
	Ownership	company in the Virgin Islands, it	place.	available
	Registration	has to be registered in the Register		without
		of Companies (s. 7 BCA). Various	Phase 2:	recorded
		information has to be provided	Compliant	ownership
		upon registration (s. 6 and 9 BCA),		Information
		but this does not include		(zero credit for
		information identifying the owners		(zero credit for company
		information identifying the owners of the company [] Both the ITO		· ·
		information identifying the owners of the company [] Both the ITO [Income Tax Ordinance] and the		company
		information identifying the owners of the company [] Both the ITO [Income Tax Ordinance] and the PTA [Payroll Taxes Act] do not		company ownership
BVI		information identifying the owners of the company [] Both the ITO [Income Tax Ordinance] and the PTA [Payroll Taxes Act] do not impose any obligations on		company ownership
BVI		information identifying the owners of the company [] Both the ITO [Income Tax Ordinance] and the PTA [Payroll Taxes Act] do not impose any obligations on providing ownership information		company ownership
BVI		information identifying the owners of the company [] Both the ITO [Income Tax Ordinance] and the PTA [Payroll Taxes Act] do not impose any obligations on providing ownership information to the authorities upon		company ownership
BVI		information identifying the owners of the company [] Both the ITO [Income Tax Ordinance] and the PTA [Payroll Taxes Act] do not impose any obligations on providing ownership information to the authorities upon registration or keeping such		company ownership
BVI		information identifying the owners of the company [] Both the ITO [Income Tax Ordinance] and the PTA [Payroll Taxes Act] do not impose any obligations on providing ownership information to the authorities upon registration or keeping such information" (GF 2011: 20; TJN		company ownership
BVI		information identifying the owners of the company [] Both the ITO [Income Tax Ordinance] and the PTA [Payroll Taxes Act] do not impose any obligations on providing ownership information to the authorities upon registration or keeping such information" (GF 2011: 20; TJN Note). In 2015 the Global Forum		company ownership
BVI		information identifying the owners of the company [] Both the ITO [Income Tax Ordinance] and the PTA [Payroll Taxes Act] do not impose any obligations on providing ownership information to the authorities upon registration or keeping such information" (GF 2011: 20; TJN Note). In 2015 the Global Forum confirmed that there is no need to		company ownership
BVI		information identifying the owners of the company [] Both the ITO [Income Tax Ordinance] and the PTA [Payroll Taxes Act] do not impose any obligations on providing ownership information to the authorities upon registration or keeping such information" (GF 2011: 20; TJN Note). In 2015 the Global Forum confirmed that there is no need to file ownership information to		company ownership
BVI		information identifying the owners of the company [] Both the ITO [Income Tax Ordinance] and the PTA [Payroll Taxes Act] do not impose any obligations on providing ownership information to the authorities upon registration or keeping such information" (GF 2011: 20; TJN Note). In 2015 the Global Forum confirmed that there is no need to file ownership information to authorities (GF 2015: 22).		company ownership registration)
BVI	AEOI	information identifying the owners of the company [] Both the ITO [Income Tax Ordinance] and the PTA [Payroll Taxes Act] do not impose any obligations on providing ownership information to the authorities upon registration or keeping such information" (GF 2011: 20; TJN Note). In 2015 the Global Forum confirmed that there is no need to file ownership information to authorities (GF 2015: 22). BVI signed the MCAA and	Signed the	company ownership registration) Signed the
BVI	pursuant to	information identifying the owners of the company [] Both the ITO [Income Tax Ordinance] and the PTA [Payroll Taxes Act] do not impose any obligations on providing ownership information to the authorities upon registration or keeping such information" (GF 2011: 20; TJN Note). In 2015 the Global Forum confirmed that there is no need to file ownership information to authorities (GF 2015: 22). BVI signed the MCAA and committed to exchange	MCAA and	company ownership registration) Signed the MCAA and
BVI		information identifying the owners of the company [] Both the ITO [Income Tax Ordinance] and the PTA [Payroll Taxes Act] do not impose any obligations on providing ownership information to the authorities upon registration or keeping such information" (GF 2011: 20; TJN Note). In 2015 the Global Forum confirmed that there is no need to file ownership information to authorities (GF 2015: 22). BVI signed the MCAA and		company ownership registration) Signed the

USA

				Availability of information			Access to i	nformation	Exchange of information					
	Jurisdiction	Type of Review	Type of Evaluation	A1 – Ownership	A2 - Accounting	A3 – Bank	B1 – Access Powers	B2 – Rights and Safeguards	C1 – EOI instruments	C2 – Network of Agreements	C3 – Confidentiality	C4 – Rights and Safeguards	C5 = Timely EOI	Overall Rating
93	93 United States Combined	Combined	Phase 1 Determination	In place, but	In place, but	In place	In place	In place	In place	In place	In place	In place	Not assessed	Largely
			Phase 2 Rating	Largely Compliant	Largely Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant

PANAMA

		Availability of Information			Access to	Information	Exchange of Information					
Jurisdiction	Type of Review	A1 – Ownership	A2 - Accounting	A3 – Bank	B1 – Access Powers	B2 – Rights and Safeguards	C1 – EOI instruments	C2 – Network of Agreements	C3 – Confidentiality	C4 – Rights and Safeguards	C5 – Timely EOI	Move to Phase 2
Panama	Phase 1 + Supplementary	In place, but	Not in place	In place	In place	In place	In place	In place, but	In place	In place	Not assessed	Yes

SWITZERLAND

		Availability of Information			Access to	Information	Exchange of Information					
Jurisdiction	Type of Review	A1 – Ownership	A2 - Accounting	A3 – Bank	B1 – Access Powers	B2 – Rights and Safeguards	C1 – EOI instruments	C2 – Network of Agreements	C3 – Confidentiality	C4 – Rights and Safeguards	C5 – Timely EOI	Move to Phase 2
Switzerland	Phase 1 + Supplementary	Not in place	In place	In place	In place, but	In place	In place, but	In place	In place	In place	Not assessed	Yes

BVI

			Availability of information			Access to i	nformation						
Jurisdiction	Type of Review	Type of Evaluation	A1 – Ownership	A2 - Accounting	A3 – Bank	B1 – Access Powers	B2 – Rights and Safeguards	C1 – EOI instruments	C2 – Network of Agreements	Confidentiality	C4 – Rights and Safeguards	Timely EOI	Overall Rating
Islands	Phase 1 + Supplementary + Phase 2 +	Phase 1 Determination	In place	In place	In place	In place	In place	In place	In place	In place	In place	Not assessed	Largely Compliant
	Supplementary	Phase 2 Rating	Compliant	Partially Compliant	Compliant	Largely Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	Partially Compliant	Compliant