

SAMPLE: CARF Readiness Report

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Supplied by House of Borel LLC. Draft, unpublished.

Field	Value
Client	Falconridge Digital Assets FZE (fictional), VARA-licensed (fictional licence)
Services (fictional)	Crypto-fiat brokerage, crypto-crypto exchange, custody-linked transfers
Users (fictional)	~18,000 individuals, ~240 entities
Review date	SAMPLE, 27 Oct 2026
Overall score	AMBER (SAMPLE)

1. Scope (SAMPLE)

Under the OECD rules, an RCASP is any individual or entity that, as a business, provides a service effectuating Exchange Transactions for or on behalf of customers, including as counterparty or intermediary [S1][S2]. Falconridge's brokerage and exchange activity appears to fit; its UAE nexus (tax residence, incorporation, management or branch) is to be confirmed by its advisers using the CARF nexus hierarchy [S2]. **Score: GREEN** (scope understood; legal confirmation pending).

2. Gap checklist against CARF data fields (SAMPLE)

Fields per Section II of the OECD rules as summarised by the UAE MoF [S1][S2].

CARF field	Captured today?	Gap	RAG
User name	Yes	–	GREEN
User address	Yes	–	GREEN

CARF field	Captured today?	Gap	RAG
Jurisdiction(s) of tax residence	Partial (nationality only)	Self-certification of tax residence needed	RED
TIN(s) per residence jurisdiction	No	Add TIN capture	RED
Date and place of birth (individuals)	DOB yes, place of birth no	Add place of birth	AMBER
Controlling persons of certain entity users	Ownership data held, no tax residence	Add CP self-certification	RED
RCASP name, address, identifying number	Yes	–	GREEN
Per crypto-asset: full name	Yes	–	GREEN
Aggregate gross amount, units, number of transactions: acquisitions/disposals against fiat	Yes, in ledger	Need reporting aggregation by user and asset	AMBER
Same: exchanges between crypto-assets	Yes	Fair-value at transaction time to confirm	AMBER
Reportable Retail Payment Transactions	Not tracked	Flag merchant-payment flows; OECD model customer-data rule over USD 50,000 [S1]	RED
Transfers to/from users, incl. to wallets not associated with a VASP	Partial	Classify outbound transfers	AMBER

3. Due-diligence and reporting steps (SAMPLE)

1. New users: obtain a valid self-certification and confirm its reasonableness at onboarding (from 1 Jan 2027 target) [S3].
2. Pre-existing users: complete self-certification and reasonableness checks by 31 Dec 2027 [S3].
3. Entity users: determine controlling persons where applicable and self-certify them [S2][S3].
4. Identify Relevant Crypto-Assets, Relevant Transactions and Reportable Users [S3].
5. Register on the MoF reporting system and disclose nexus during 2027: **deadline not yet published** [S3].

6. Build CARF XML schema output, operational by 31 Dec 2027 [S3][S2].
7. File Annual CARF Report or Nil Return by 30 Jun 2028 for 2027 [S3].
8. Record-keeping, controls and governance in place by 31 Dec 2026 [S3]. Retention period: **not yet published** for UAE.

4. Timeline to 31 Dec 2026 (SAMPLE plan)

Week of	Action	Owner (fictional)
2 Nov 2026	Advisers confirm RCASP status and nexus	Compliance head
9 Nov 2026	Self-certification form design (tax residence, TIN, place of birth, CPs)	Product
23 Nov 2026	Onboarding build and test	Engineering
7 Dec 2026	Transaction classification incl. retail payments, unhosted transfers	Finance ops
14 Dec 2026	Policies, record-keeping, controls written	Compliance
21 Dec 2026	Board sign-off	Board
31 Dec 2026	Operational preparations complete [S3]	–

5. Score (SAMPLE)

Area	RAG
Scope and nexus	GREEN
User data fields	RED
Transaction data	AMBER
Due-diligence process	RED
Records and governance	AMBER
Overall	AMBER

6. Open items (not yet published by UAE MoF)

- Final Cabinet and Ministerial Decisions (targeted 1 Jan 2027) [S3].
- RCASP registration deadline [S3].
- UAE technical specifications and any UAE-specific XML guidance [S3].
- UAE penalties and record-retention period.
- Primary text of the Oct 2026 MoF Readiness Circular could not be located on mof.gov.ae; dates here rely on PwC's summary of it.

Sources

- [S1] UAE Ministry of Finance, *The Crypto-Asset Reporting Framework*, guidance document (Sep 2025): <https://mof.gov.ae/wp-content/uploads/2025/09/The-Crypto-Asset-Reporting-Framework-Guidance-document-EN.pdf>
- [S2] OECD, *International Standards for Automatic Exchange of Information in Tax Matters: CARF and 2023 update to the CRS* (rules and commentary): https://www.oecd.org/en/publications/international-standards-for-automatic-exchange-of-information-in-tax-matters_896d79d1-en.html
- [S3] UAE MoF CARF Readiness Circular (Oct 2026), as summarised by PwC Middle East (19 Oct 2026; secondary): <https://www.pwc.com/m1/en/services/tax/middle-east-tax-news-alerts/2026/uae-crypto-asset-reporting-framework.html>

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