PCC FAMILY OFFICE BRIEFING

Trust VAT Relief and a New Family Office Programme

CLIENT BRIEFINGS | 25 SEPTEMBER 2026
Review period: 18–24 September 2026
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Executive position

On 23 September the Government announced plans to remove VAT from trust services and certain transfers of property into trusts, launch a coordinated Family Office Programme and legislate for a Tax Residency Certificate.

These are significant policy announcements, not operative changes. Families and providers should assess possible opportunities while continuing to apply current law and obtain advice before changing structures.

Key developments

- Trust VAT relief — proposed for trust services and transfers of property into trusts for specified beneficiaries, including family members; DIR amendments and guidance are pending.
- Family Office Programme — a proposed Bahamas Invest Concierge route would coordinate immigration, licensing, exchange control and approvals through government agreements; eligibility is pending.
- Tax Residency Certificate — legislation is being finalised, with a proposed 90 non-consecutive day presence criterion; not an operative test or foreign tax-residence assurance.
- CARF legislation — the GFSR confirmed on 22 September that domestic legislation is being developed. No Bill, commencement date or domestic reporting period was identified.
- CRS/CFATF work — amended-CRS and Fifth Round preparations continue; the SCB fee consultation closes 25 September.

1. Proposed trust VAT relief

STATUS	**Government policy announcement, 23 September — legislation and DIR guidance pending; not effective**

The Government intends, by end-2026, to remove VAT from trust services and transfers of property into trusts for specified beneficiaries, including family members. DIR is reviewing draft amendments and guidance. The statement does not waive VAT or fix a commencement date.

Why it matters and who is affected

Trustees, settlors, beneficiaries, trust companies and family offices may see changes in pricing and settlement costs. Final law must determine eligible services and assets, the legal form of relief, input VAT treatment, beneficiary qualifications and transition. Do not assume that VAT relief also waives stamp duty, real property tax, registration costs or land approvals.

Practical considerations

Model settlements under current law, with a separate policy scenario. Review invoices, deeds and valuations without promising a saving or delaying a transaction solely on the statement. Bahamian tax, conveyancing and valuation advisers should verify enacted text, commencement and DIR guidance.

2. Family Office Programme and one-stop coordination

STATUS	**Announced policy/administrative initiative — eligibility and approvals pending**

The proposed programme through the Bahamas Invest Concierge envisages transparent government agreements for qualifying family offices, comparable in concept to major development arrangements. These would coordinate immigration, work permits, business licensing, exchange control, regulatory requirements and investment approvals. The concierge unit is expected to be renovated before end-2026; this is not a launch date.

Families establishing principals, staff and investment functions may eventually benefit from coordinated administration. An agreement would not, without express authority and actual approvals, displace existing licensing, immigration, tax, land, AML or exchange-control requirements. Thresholds, agreement terms and treatment of existing offices are unverified.

Practical considerations

Map the family, vehicles, local roles, investment plans, capital and asset flows; identify each currently required approval independently. Seek legal, immigration and regulatory advice before representing that programme participation grants an exemption or residence right.

3. Proposed Tax Residency Certificate

STATUS	Legislation and guidance in preparation — proposed criterion, not operative law

The Government is finalising a framework with a proposed 90 non-consecutive day presence criterion for qualifying individuals and entities. The final statutory test, evidence, entity treatment, process and commencement remain unpublished. A Bahamian certificate does not by itself decide foreign tax residence, domicile, treaty entitlement, management and control or reporting duties. Keep travel and governance evidence, but obtain Bahamian and foreign tax and immigration advice rather than treating 90 days as a current safe harbour.

4. CARF moves from commitment to legislative development

STATUS	Policy and legislative development — not enacted or effective

The Group of Financial Services Regulators stated that its tax-transparency work now includes development of legislation to implement the Crypto-Asset Reporting Framework. This is a material status advance: The Bahamas' political commitment is being translated into domestic legislative work. The OECD lists The Bahamas among jurisdictions undertaking first CARF exchanges by 2028.

Verification point

No draft Bill, appointed-day notice, reporting start date, registration process, portal specification or transitional rule was identified in the official materials reviewed. The 2028 exchange commitment is not, by itself, a confirmed domestic filing deadline.

Why it matters

CARF is designed to enable tax authorities to receive and exchange information on relevant crypto-asset transactions through reporting crypto-asset service providers. A family office may be affected through Bahamian or foreign exchanges, brokers, dealers, custody providers and other intermediaries used by principals, trusts, foundations, private trust companies, family investment vehicles or philanthropic structures.

A self-hosted wallet is not, merely by being self-hosted, equivalent to a reporting service provider. Transactions involving it may nevertheless generate reportable information when they interact with an in-scope provider. The domestic legislation will determine the Bahamian perimeter, due-diligence rules, reporting periods, penalties and transition.

Who is affected

Family offices and private clients holding or transacting in crypto-assets; trustees, foundations, private trust companies, qualified executive entities and family investment vehicles; DARE registrants and foreign crypto-asset service providers; and the tax, legal, fiduciary, custody and investment advisers supporting those structures.

Practical next steps

1. Build a crypto-asset inventory by beneficial owner, legal holder, wallet, custodian, exchange, jurisdiction and transaction purpose.
2. Map which providers may be reporting crypto-asset service providers and where each family member, trust, foundation or entity is tax resident.
3. Reconcile wallet records, exchange statements, fiat on- and off-ramps, cost basis and source-of-funds evidence.
4. Review service-provider terms, consent language and data flows for cross-border reporting and privacy implications.
5. Monitor the Bahamian Bill and obtain Bahamian and foreign tax advice before restructuring or concluding that an asset, wallet or transaction is outside scope.

5. Amended CRS implementation requires classification discipline

STATUS	International standard and implementation work — Bahamian amendments not yet identified

The GFSR reported active working-group work on the Common Reporting Standard and automatic exchange of information. On 21 September, the OECD Global Forum confirmed that international implementation work on the amended CRS is advancing and that first exchanges under the amended standard are expected in September 2027.

The OECD explains that the 2023 amendments expand CRS coverage to electronic-money products, central bank digital currencies and certain indirect crypto-asset investments, strengthen due diligence and reporting, and introduce an exemption for genuine non-profit organisations. Those standards do not amend Bahamian law by themselves. No Bahamian amending instrument, commencement provision or portal schema was identified this week.

Why it matters

Family structures often contain trusts, foundations, holding companies, investment entities, operating businesses and philanthropic vehicles. Classification errors can cascade through controlling-person reporting, self-certifications and financial-institution filings. The amended CRS also narrows the gap between traditional account reporting and newer digital financial products.

Practical next steps

- Refresh the CRS classification memorandum for every entity and arrangement; do not assume historical classifications remain correct.
- Reconfirm controlling persons, tax residencies, taxpayer-identification numbers and self-certifications after material family, governance or ownership changes.
- Ask banks, trustees, administrators and investment managers which amended-CRS data they will require and when.
- For family philanthropy, do not assume a domestic non-profit label automatically satisfies the amended-CRS exemption; obtain advice under the implementing law.

6. CFATF Fifth Round preparation raises the evidentiary standard

STATUS	Supervisory preparation — no new binding rule identified

The GFSR confirmed ongoing work ahead of The Bahamas' upcoming CFATF Fifth Round Mutual Evaluation. Regulators agreed to convene a joint industry session before the on-site assessment and reported continuing work on targeted-financial-sanctions reporting and guidance.

This does not create a new statutory obligation by itself. It is a strong supervisory signal that regulated service providers will be expected to demonstrate effective implementation of existing AML/CFT/CPF, beneficial-ownership and sanctions requirements.

Why it matters

A family office may sit outside direct prudential licensing while depending on banks, trust companies, FCSPs, securities firms, fund administrators, insurers and digital-asset providers. Those firms are likely to test whether records explain ownership, control, wealth creation, asset provenance, transaction purpose, political exposure and sanctions risk consistently across the service chain.

Practical next steps

- Maintain one reconciled ownership-and-control map covering companies, partnerships, trusts, foundations, protectors, councils, committees, nominees and powers of attorney.
- Refresh principal and beneficiary source-of-wealth narratives and link them to contemporaneous evidence, not merely declarations.
- Reconcile KYC data held by banks, trustees, administrators, insurers and investment managers.
- Evidence sanctions and PEP screening, alert disposition, enhanced due diligence and higher-risk approvals.
- Document who decides, who advises, who executes and who independently reviews within the family-office governance perimeter.

7. SCB fee consultations may affect the service chain

STATUS	Consultation — comments close 25 September 2026; not yet in force

SCB's proposed fee rules for digital-asset businesses, FCSPs, investment funds and securities firms remain open for comment until 25 September. The drafts contemplate revised application, registration, renewal and administrative charges and, for DARE registrants, proposed commencement on 1 January 2027.

For most family offices the immediate issue is not a direct levy. It is the possibility that regulated custodians, managers, fund vehicles, corporate-service providers and digital-asset firms will reprice or rationalise services. Family offices with affiliated regulated entities may be directly affected.

Practical next steps

- Regulated family-office affiliates and service providers should submit evidence-based comments by 25 September.
- Ask key providers whether the proposals could change 2027 fees, minimum account sizes or service scope.
- Keep budgets and investment-vehicle economics clear about the distinction between enacted charges and proposals still subject to change.

No-change confirmations

- Operative family-office law: No enacted family-office-specific licensing regime or exemption was identified. The new programme is an announced initiative, not an operative licence or blanket exemption.
- Fiduciary structures and succession: No consequential new enactment, final guidance or judgment for trusts, private trust companies, foundations, executive entities or estates was identified.
- Operative tax: No enacted measure implementing the announced trust-VAT relief or Tax Residency Certificate was identified. No separate wealth, inheritance or investment-incentive enactment was located.
- Immigration: No effective permanent-residence or work-permit change was identified; the Family Office Programme remains a proposal.
- External insurance and philanthropy: No separate material final change was identified.

What family offices and private clients should consider now

- **Policy versus law.** Apply current VAT and transfer-tax rules until enacted amendments and commencement are verified; do not advertise relief today.
- **Establishment file.** Map people, entities, staff, investments and each current approval; distinguish a coordinated programme from a permit.
- **Residence evidence.** Keep travel and governance records, then test actual rules with Bahamian and foreign advisers rather than relying on a proposed 90-day criterion.
- **Reporting integrity.** Reconcile CRS classification, controllers, beneficial owners, source of wealth and crypto holdings across providers and foreign filings.
- **Monitor final texts.** Review eventual DIR amendments, programme terms and certificate Bill before changing structures or client advice.

Priority dates

Date	Action
25 September 2026	SCB comments due on proposed DARE, FCSP, investment-fund and securities-industry fee rules.
End-2026 target	Government aims for trust-VAT amendments/guidance and concierge unit completion; not an operative commencement date.
Not announced	Programme eligibility and launch, residency-certificate law and start date, and scope/transition of trust-VAT relief.
September 2027	First international exchanges under the amended CRS are expected. Bahamian commencement and filing mechanics require confirmation.
2028	The Bahamas has committed to undertake its first CARF exchanges. Domestic reporting periods and deadlines remain to be legislated.
Not yet stated	CFATF industry-session and on-site dates; publication and consultation timetable for CARF legislation.

Primary sources and further reading

1. Government statement, 23 September — trust VAT, Family Office Programme, residence
2. Central Bank — GFSR Third Quarter Meeting
3. OECD — Jurisdictions committed to implement CARF
4. OECD — Regional workshops on the amended CRS conclude
5. OECD — Caribbean workshop on amended CRS and CARF
6. SCB — Consultation Documents
7. SCB — Draft DARE Fees Rules, 2026
8. SCB — Draft Investment Funds Fees Rules, 2026
9. SCB — Draft Securities Industry Fees Rules, 2026
10. SCB — Draft FCSP Fees Rules, 2026
11. Eyewitness News, 24 September — report on Government statement (secondary)

Discussion this briefing with PCC

Contact Pinder Commercial Chambers

Discuss family-office establishment and governance, private trust companies and qualified executive entities, trusts and foundations, succession planning, cross-border tax reporting, digital assets, beneficial ownership and AML/CFT/CPF readiness.

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