

Banc Ceannais na hÉireann Central Bank of Ireland

Eurosystem

Beneficial Ownership Register of Certain Financial Vehicles

Return Completion Guidance

November 2023

Contents

Introduction4
Beneficial Ownership Template Submission5
Step 1 – Download the Beneficial Ownership Template5
Step 2 -Complete the Beneficial Ownership Template
Step 3 - Accessing the Beneficial Ownership Information Return V27
Step 4- Adding the Beneficial Ownership Information Return V2 Instance9
Step 5- Uploading the Beneficial Ownership Template
Step 6 – Return Sign-off Process 11
Guidance for submitting Senior Managing Official details in Beneficial Ownership Template14
Guidance for Unit Trusts when completing submission template

Version Control

Version	Author	Comments	Published Date
1.0	Central Bank of Ireland	Version 1 Published on CBI website	December 2021
2.0	Central Bank of Ireland	Updated to reflect inclusion of PPSN/CBI reference number in the collection template	November 2022
3.0	Central Bank of Ireland	Updates reflect Portal navigation for accessing and submitting BOR Template	November 2023

Introduction

The purpose of the Beneficial Ownership Register of Certain Financial Vehicles (CFV) is to deter Money Laundering (ML) and Terrorist Financing (TF) and to identify those that seek to hide their ownership and control of corporate or legal entities by ensuring that the ultimate owners/controllers of ICAVs, Credit Unions, Unit Trusts, Investment Limited Partnerships, and Common Contractual Funds are identified, and that this information is readily accessible to law enforcement, regulators and obliged entities.

The purpose of this document is to provide technical guidance in relation to the completion of the beneficial ownership return to the register. For information regarding the scope of the register, the legislative background and the use and safeguarding of the data provided, under data protection legislation, refer to <u>Beneficial Ownership Register Of Certain Financial</u> <u>Vehicles Guidance</u>.

For first time filings of beneficial ownership data, CFV are required to download a blank version of the <u>Beneficial Ownership Template</u> and submit via the Central Bank of Ireland's communication and data exchange Portal ('the Portal'). This process is outlined in the step-by-step guide below.

Where a reporting institution wishes to subsequently add or remove a person from their register, they must schedule and submit a new Beneficial Ownership Information Return (see Section <u>4.1</u>). The details of all beneficial owners are submitted each time, and not just the details of any new beneficial owners.

The Excel template <u>must be submitted via the Portal</u> via the return type "Beneficial Ownership Information Return V2". It <u>must not</u> be submitted via email, Portal Messages or any other return type available on the Central Bank Portal. <u>The information contained therein is not considered</u> <u>centrally filed on the register until it is appropriately uploaded to the</u> <u>return type "Beneficial Ownership Information Return V2" and reaches</u> <u>the status "signed off"</u>. Once a file has been successfully signed off by the Presenter, the Portal will lock the return and this data will be copied to a secure internal data store of register information. The Excel template is deleted within 24 hours of being received via this return type.

Beneficial Ownership Template Submission

Step 1 – Download the Beneficial Ownership Template

1.1 CFV must download the <u>Beneficial Ownership Template</u>, which is located on the Central Bank of Ireland website.

Step 2 - Complete the Beneficial Ownership Template

- 2.1 The following details must be entered in respect of **all current Beneficial Owners:**
- Name
- Date of Birth
- PPSN or CBI Reference Number
- Nationality
- Address
- Nature of interest / control
- Is the Person's interest / control direct or indirect?
- Extent of interest / control: % owned or controlled
- Further information / clarification in relation to nature / extent of ownership / control
- Date on which the person was entered into the entity's internal register as a beneficial owner
- Date on which the person left the entity's internal register as a beneficial owner (where applicable)¹

¹ New and continuing (i.e. current) beneficial owners must always be listed on every Beneficial Ownership Template submitted. An outgoing beneficial owner must only be listed once alongside the current beneficial owners in order to record the cessation date on the Beneficial Ownership Register. Where the cessation date of the beneficial owner is **after the point of collection of PPSN/CBI reference numbers i.e. 11 November 2022**, a PPSN/CBI reference number will be required for the ceased beneficial owner in order to pass system validation.

- 2.2 In addition, the person submitting the information to the Central Bank, i.e. **"the presenter"**, must provide the following information in relation to themselves:
- Name
- Address
- Telephone number
- Email address
- Capacity in which the presenter is acting: (e.g. officer/employee of the obliged entity, person acting on behalf of the obliged entity etc.).
- 2.3 Once all of the information has been completed, the status of the file on the 'Cover' worksheet will change to '*Valid*'.
- 2.4 The file must then be saved in the format outlined on the file upload screen on the Portal and then uploaded via the Portal (i.e. file must be named CCCCCCC_YYYYMMDD_BO2 where CCCCCCC is the firm's Institution Code (or CU Number for Credit Unions) on the Portal and YYYYMMDD is the reporting date of the return (**note:** as set out in Section <u>4.2</u>).

Notes on Invalid Statuses

If the status is '*Invalid*' on the cover tab of the Beneficial Ownership Template, some mandatory information is missing from either the '*BOR*' or '*Presenter Details*' worksheets. The '*Data Validation*' worksheet should be checked, as this will highlight the cells in the file with which there are problems. '*Invalid*' files will not be accepted on the Portal.

The file will also not be accepted if the structure of the Microsoft Excel® file has been altered in any way. For example, additional worksheets may not be added or deleted, columns removed or added or the file protection removed.

Step 3 - Accessing the Beneficial Ownership Information Return V2

- 3.1 The Presenter must log into the Portal using their existing login details.
- 3.2 The Presenter will click 'View / Edit returns' under the "Returns" tab on the left navigation pane and they will see a list of all the returns they have access to.

A	Home	< My Pending Actions
\$	Institution Details	Action Id Time Status Constad On Due Data
1	My Institution Profile	Cleated On Die Date
•	Pending Actions	C There are no open pending actions to display.
 	Fitness and Probity	
×	Messages	< View More
c	Request Change	<
	Portal Administration	<
1	Returns	Recent Messages
	View / Edit Returns	From To Subject
	Manage Notifications	
	Minimum Reserve	No recilte

3.3 The Presenter must select the "Beneficial Ownership Information Return V2".

A	Home	
\$	Institution Details	
1	My Institution Profile	
	Pending Actions	
1	Fitness and Probity	
⊠	Messages	
ø	Request Change	
	Portal Administration	
-	Returns	~
	View / Edit Returns	
	Manage Notification	

3.4 Next, the	Presenter	should click	'View/S	Signoff Retu	ırns':
---------------	-----------	--------------	---------	--------------	--------

A	Home	<	Beneficial Ownership Information Return V2
÷	Institution Details	<	Beneficial Ownership Information Return V2
£	My Institution Profile	<	
	Pending Actions	<	View / Signoff Returns
≈	Fitness and Probity	<	
×	Messages	<	View Uploaded Files
œ	Request Change	<	View the files that were previously uploaded for this return
	Portal Administration	<	Load a File
7	Returns	~	Load a data file for this return
	View / Edit Returns		

Step 4- Adding the Beneficial Ownership Information Return V2 Instance

- 4.1 The Beneficial Ownership Information Return is a self-scheduled return. Therefore, the Presenter will need to add a return instance. To do so, click '*Add Return*':
- 4.2 The Presenter will need to enter a '*Reporting Date*' and a '*Submission Due Date*' and click '*Add*'. The Reporting Date must be any date in the past and the Submission Due Date must be any date in the future:

ħ	Home	Add Return Instance
۵	Institution Details	Reporting Date: 24-Oct-2023
Ŧ	My Institution Profile	
9	Pending Actions	
≈	Fitness and Probity	Submission Due Date: 30-Nov-2023
×	Messages	
c	Request Change	
	Portal Administration	
2	Returns	
	View / Edit Returns	
	eate New Message 🛛 📐	Add Cancel

Step 5- Uploading the Beneficial Ownership Template

5.1 The Presenter must now upload the previously completed Beneficial Ownership Template. To do so, on the breadcrumb menu under '*Beneficial Ownership Information Return V2*', the user should click '*Load a File*':



5.2 The Presenter should browse for the file on their local drive and click '*Load File*':

Beneficial Ownership Information Return V2 _load	
Load a Beneficial Ownership Information Retu	rn V2 File
Select a file and click 'Load Choose File No file chosen File' to load it to the server:	
Load File Cancel	

5.3 The Presenter will see a screen showing them that the file is queued and awaiting processing. The Presenter should click '*back*' to refresh the status of the file:

Beneficial Ownership	Information Return V2 File #227142					
C50001_20231024_B02.xlsx is queued and awaiting processing,						
Filename:	C50001_20231024_BO2.xlsx					
Status:	Queued					
Estimated Time to Complete:	0 to 5 minutes					
Return Type:	Beneficial Ownership Information Return V2					
Size:	2876900 bytes					
Uploaded Date:	26-Oct-2023 (15:36)					
Processed Date:	N/A					
Invalid Records:	0					

5.4 The file upload screen will display the status of the file upload. If multiple files were uploaded, the latest will appear on top. The latest file will always be the file that is submitted to the Central Bank:

Beneficial Ownership Information Return V2 Files							
'Beneficial Ownership Information Return V2' Files							
Tracking ID	Filename	Loaded By	Load Date	Processed Date	Status		

5.5 In addition to seeing the status of the file on screen, the Presenter will also receive an automated email notifying them whether the file has been accepted / rejected:



Beneficial Ownership Information Return V2 uploaded by Source on 26 October 2023 15:36 has been accepted.

This is an automatically generated message. Please do not reply to this email.

5.6 If the file is rejected, the user should check that the correct template has been used, and that the status of the template is 'valid', as per guidance above, see <u>Notes on Invalid Statuses.</u>

Step 6 – Return Sign-off Process

6.1 Once the correct file has been uploaded, the Presenter should click 'View / Signoff Returns' on the breadcrumb menu under 'Beneficial Ownership Information Return V2':

Beneficial Ownership Information Return V2 [View / Signotf Returns] [View Uploaded Files]		les		•		
		on Return V2' Files				
[Load a File]						
Tracking ID	Tracking ID Filename		Load Date	Processed Date	<u>Status</u>	
File #227142	C50001_20231024_BO2.xlsx	· · · ·	26-Oct-2023 (15:36)	26-Oct-2023 (15:36)	Accepted	111

The return will now have the status of 'valid'

6.2 The Presenter must click on the Reporting Date:

Beneficial Ownership Information Return V2 Returns Beneficial Ownership Information Return V2							
Reporting Date	Status	Submission Due Date	Last Updated By				
24-Oct-2023	Valid	30-Nov-2023	(Central Bank)	2			

6.3 The Presenter should then click 'finalise':

status	Required	Last Updated By	Last Updated		
st	atus	atus Required	atus Required Last Updated By	atus Required Last Updated By Last Updated	atus Required Last Updated By Last Updated

6.4 The following screen will appear. The Presenter should click 'Back'

Beneficial Ownership Information Return V2 Returns > 24-Oct-2023 > Finalise Return
Beneficial Ownership Information Return V2, 24-Oct-2023 has been finalised
This Return is 'Finalised' - it must now be 'Signed-Off' to be submitted to the Central Bank. Use the back button to navigate to the previous page.
Back

6.5 To enter the Sign-off screen the Presenter must click 'Sign-off':

<u>ction</u>	<u>Status</u>	Required	Last Updated By	Last Updated	
				-	1

6.6 The Presenter must tick the Declaration box. The option to 'Signoff Return' will become available. The Presenter should click this to submit the return:



6.7 Once the return is signed off, the Presenter will see a successful

sign-off message:



Note: The user will also get an automated email confirming that the return has been submitted.

Guidance for submitting Senior Managing Official details in Beneficial Ownership Template

When completing the beneficial ownership template, the following guidance should be followed when completing information fields in respect of Senior Managing Officials:

- Nature of interest/control Select 'Senior Managing Official' from the drop down menu.
- Is the Person's interest / control direct or indirect? 'N/A' must be selected.
- Extent of interest/control: % owned or controlled: this should be left blank
- Further information / clarification in relation to nature / extent of ownership / control: this cell is mandatory and can be used to provide further details.

Guidance for Unit Trusts when completing submission template

Trustee/Settlors

- If the Trustee/Settlor is a corporate/legal entity, use the following field to record details: Further information / clarification in relation to nature / extent of ownership / control;
- Provide the following information as relevant Legal name, Registered Office, Central Bank Institution Code, Companies Registration Office number.

All queries regarding the return will be managed by the Regulatory and Business Services Division (RBSD) within the Central Bank. Please email <u>BOR@centralbank.ie</u> for all register related queries.

For Portal related queries, please contact the Portal helpline at 01 224 4545 or email <u>onlinereturns@centralbank.ie.</u>