

# Beneficial Ownership Register of Certain Financial Vehicles

System Guidance for Certain Financial Vehicles

# **Contents**

Version Control3
Introduction4
System Guidance5
1 Accessing the Beneficial Ownership Register5
2 How to Add a Beneficial Owner(s)7
3 Editing Beneficial Owner details10
4 Remove Beneficial Owner 16
5 Unit Trusts - Adding A Corporate Entity 19
6 Pending Changes: Add/Edit/Remove22
7 Undo Pending Changes: Add/Edit/Remove23
8 Guidance for providing Liquidator Details24
Appendix 1.1 - All CFV Non-Unit Trust Nature of Interest - to - Extent of Interest Cross Validation25
Appendix 1.2 - Unit Trusts Nature of Interest - to - Extent of Interest Cross Validation26
Appendix 2 – Beneficial Owner Data Field Validation27
Appendix 3 – Corporate Entity Data Field Validation (Unit Trust Only)28

# **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
4.0	Central Bank of Ireland	New version of the document to reflect new data collection process	October 2025

# 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 how the beneficial ownership information of CFV is provided to the central 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 Beneficial Ownership Register Of Certain Financial Vehicles Guidance.

CFV are required to access the Beneficial Ownership Register section of the Central Bank of Ireland's Portal ('the Portal'). For details on accessing the Portal refer to the Portal Information Page on the Central Bank of Ireland's website.

Where a CFV wishes to subsequently add or remove a person from their register or update an existing beneficial owner's details, they can carry out self-service changes via the Portal.

# **System Guidance**

### 1 Accessing the Beneficial Ownership Register

Where an individual has not accessed the Portal before please refer to the Portal Information page on the Central Bank of Ireland's website. Once an account has been created, the CFV's Portal Administrator must link the Presenter to the CFV on the Portal.

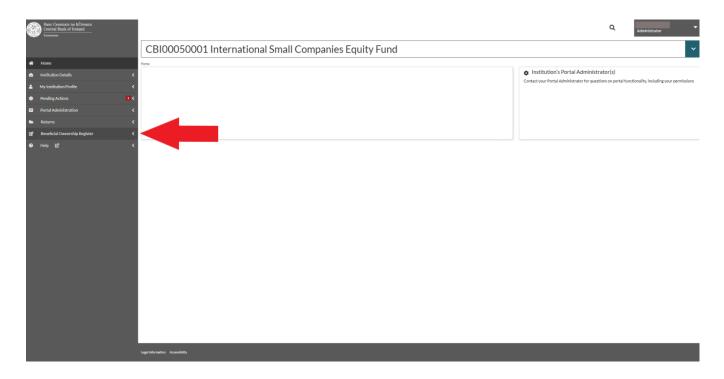
The Portal Administrator must also assign permissions to other Portal Users to view/edit the Beneficial Ownership Register. On the Portal Administration page select 'manage permissions' of the user you wish to grant permissions.



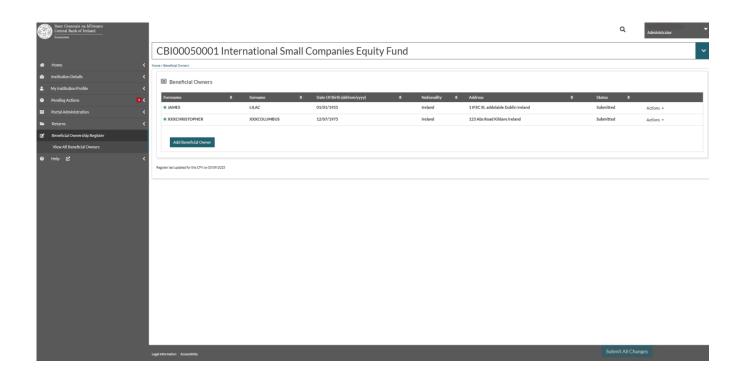
On the manage permissions page under Beneficial Ownership select view/edit for the user as applicable and save.



- 1.1 The CFV Presenter logs into to the Portal.
- 1.2 Select 'Beneficial Ownership Register' on the left-side menu.



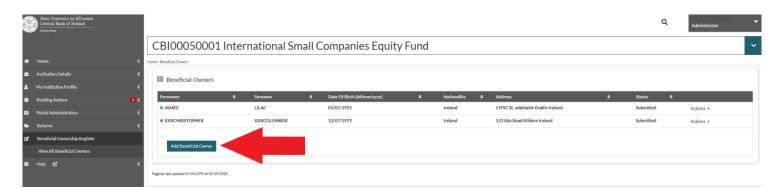
1.3 The Beneficial Ownership Register landing page displays all the CFV's current Beneficial Owners (as previously provided to the register).



### 2 How to Add a Beneficial Owner(s)

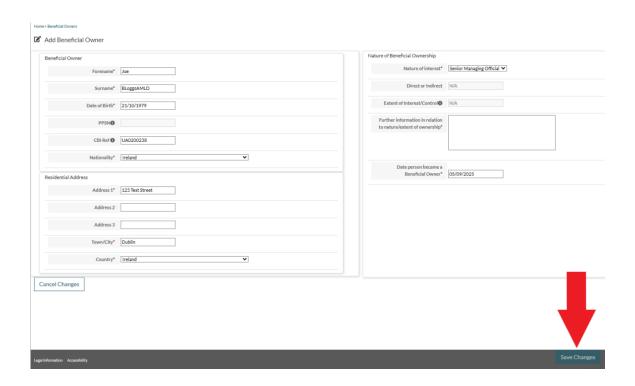
This section provides a step-by-step guide on adding beneficial owners. For information on adding Corporate Entity information (<u>Unit Trusts only</u>), see <u>Section</u> 5.

> 2.1 On the Beneficial Ownership Register landing page click 'Add Beneficial Owner':

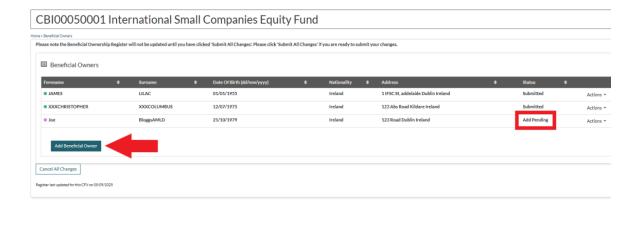


2.2 The following details must be entered in respect of all Beneficial **Owners:** 

- Name Date of Birth **PPSN** or CBI Reference Number **Nationality** Address Nature of interest Is the Person's interest / control direct or indirect? Extent of interest / control: % owned or controlled Further information / clarification in relation to nature / extent control (applicable to Control Via Other Means, Senior Managing Official and Liquidator nature of interest only) Date on which the person became a beneficial owner
- 2.3 Enter all relevant information for that beneficial owner and click 'Save Changes'. The Save Changes button is only clickable when all mandatory fields have been completed. For details on field level validations/rules refer to Appendix 2.



2.4 The Presenter will be returned to the Beneficial Ownership landing page. The details of the beneficial owner saved in step 2.3 will be displayed with an 'Add Pending' status.

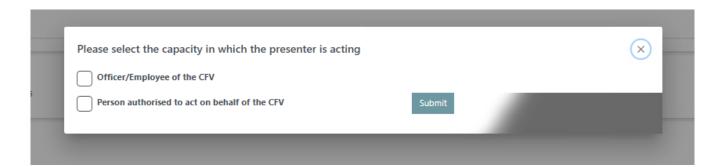




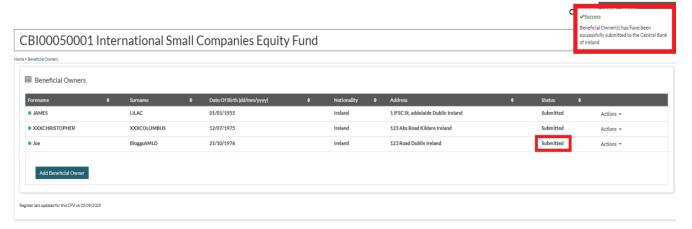
Note: the status 'Add Pending' indicates that this beneficial owner has not yet been added to the Central Register. The Presenter can add more beneficial owners, delete beneficial owners or update existing beneficial owner details as applicable or if all changes have been made can select 'Submit All Changes'.

If the Presenter's session is timed out or they navigate away from the Portal, the changes will remain in the 'Add Pending' status and can be submitted the next time the Presenter accesses the Portal.

2.5 The Presenter must confirm the capacity in which the presenter is acting by selecting one of the below options:



2.6 A pop-up message will be displayed to confirm that the beneficial owner(s) has been added to the Central Register. The successfully added beneficial owner(s) will display on the beneficial ownership landing page with the status of the BO will change from 'Add Pending' to 'Submitted'.



# 3 Editing Beneficial Owner details

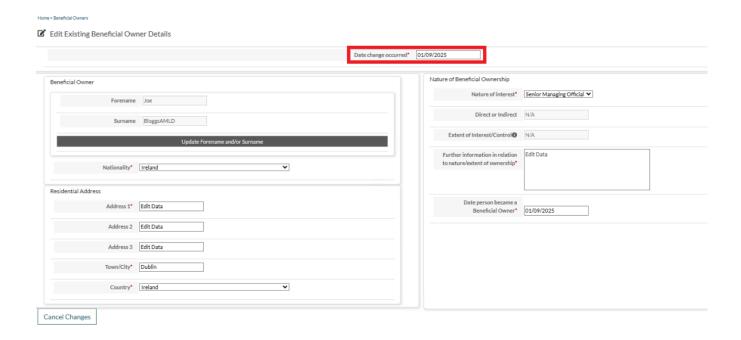
3.1 The Presenter must log into the Portal using their existing login details and navigate to the Beneficial Ownership landing page.



3.2 The Presenter must click the 'Actions' dropdown of the relevant beneficial owner followed by 'Edit Details'.



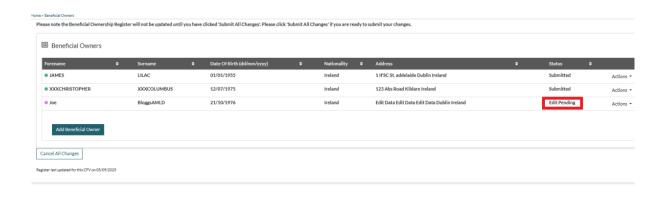
3.3 On the Edit Existing Beneficial Owner Details page, the Presenter can edit all fields except DOB<sup>1</sup>. Where the Presenter edits any details, the presenter must confirm the date the related change occurred for that CFV - not the date the presenter is editing these details on the Portal (unless the change occurred on that precise date). Click save changes to save edited data.



Save Change

3.4 The Presenter will be taken back to the beneficial ownership landing page with the status of the beneficial owner displaying as 'Edit Pending'. The Presenter can make further amendments to beneficial ownership information i.e. edit/add/remove. If no further changes are required, the presenter must click 'Submit All Changes' to ensure the updated details are added to the Central Register.

<sup>&</sup>lt;sup>1</sup> If a Beneficial Owners First Name or Surname is changed, it will be necessary to verify the PPSN or CBI Reference Number (as applicable) again.



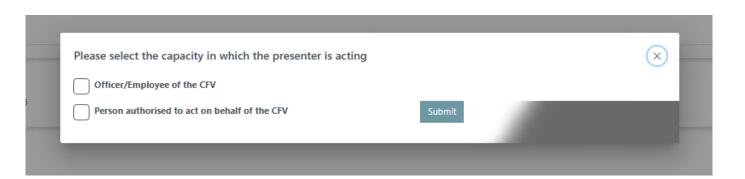


Note: the status 'Edit Pending' indicates that the changes have not yet been added to the Central Register. The Presenter can add more beneficial owners, delete beneficial owners or update existing beneficial owner details as applicable or if all changes

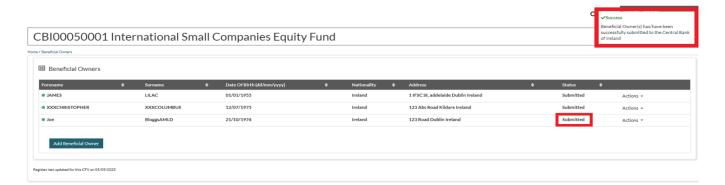
have been made can select 'Submit All Changes'.

If the Presenter's session is timed out or they navigate away from the Portal, the changes will remain in the 'Edit Pending' status and can be submitted the next time the Presenter accesses the Portal.

3.5 The Presenter must confirm the capacity in which they are acting.



3.6 A success pop-up message will be displayed to confirm that the beneficial owner(s) details have been added to the Central Register. The status of the BO will change from 'Edit Pending' to 'Submitted'.



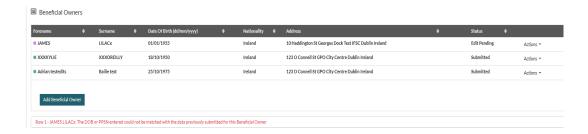
3.7 The Presenter can view their changes after they have been successfully submitted by clicking 'View Details' in the 'Actions' dropdown menu.



#### **Edit Name - Validation failure**

Where a beneficial owner has changed their forename/surname and updated this information with the DSP (where a PPSN has been used to verify identity) or updated the Central Bank of Ireland records (where a CBI Reference Number has been used to verify identity) the beneficial owner's name and date of birth will need to be re-validated. Where the validation protocol does not provide a 100% match, details of the validation error will be visible to the Presenter on the Portal after clicking 'Submit All Changes'. The error message will detail the relevant row on the Portal in the beneficial ownership information provided, which needs to be rectified.

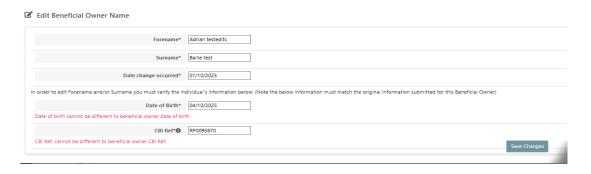
i) Where the PPSN or DOB entered does not match that of the beneficial owner's PPSN or DOB the following error message will be displayed on screen "Row X - 'First Name' 'Surname': The DOB or PPSN entered could not be matched with the data previously submitted for this Beneficial Owner":



ii) Where the first name or surname does not match the DSP records the following error message will be displayed "Row X -'First Name' 'Surname': Name, DOB and PPSN combination must match with Department of Social Protection Database".



Where the CBI Reference or DOB entered does not match that iii) of the beneficial owner's CBI Reference or DOB the following error messages will be displayed on screen in real time: 'Date of birth cannot be different to beneficial owner date of birth' and/or 'CBI Ref. cannot be different to beneficial owner CBI Ref':



Where the first name or surname does not match the Central iv) Bank of Ireland records the following error message will be

### displayed "Row X - 'First Name' 'Surname': Name, DOB and CBI Reference combination must match with CBI Records

#### 10 Haddington St Georges Dock Test IFSC Dublin Ireland Actions \* XXXKYLIE XXXOREILLY 123 O Connell St GPO City Centre Dublin Ireland Actions \* 25/10/1975 123 O Connell St GPO City Centre Dublin Ireland Adrian testedits Row 3 - Adrian testedits Bailie testedit: Name. DOB and CBI Reference Number must match with CBI record

Where such discrepancies arise, the presenter should notify the beneficial owner, who must contact the Department of Social Protection directly at CFV@welfare.ie for PPSN validation issues, or the Central Bank for CBI Reference validation issues in order to resolve the discrepancy. The Central Bank will have no role in resolving data matching issues between the beneficial owner and the DSP.

The DSP advise that to resolve discrepancies, the Beneficial Owner will need to provide them with the following information:

- Name, Address, PPSN and Date of Birth.
- A scanned copy of their Passport or Birth Certificate or National Identity card,
- Proof of Address.

■ Beneficial Owners

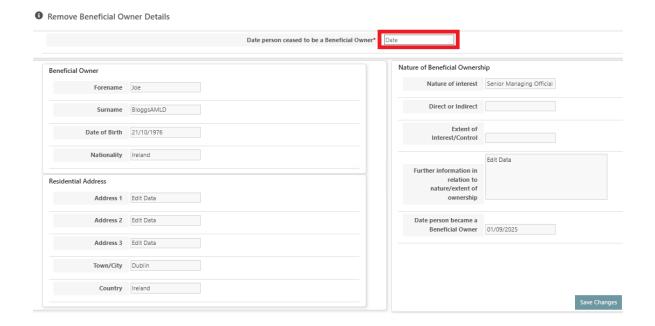
In cases where a beneficial owner's representative, such as an accountant, solicitor, etc. is submitting the e-mail, a scanned copy of a declaration signed by the beneficial owner stating that the representative is acting on their behalf.

#### **4 Remove Beneficial Owner**

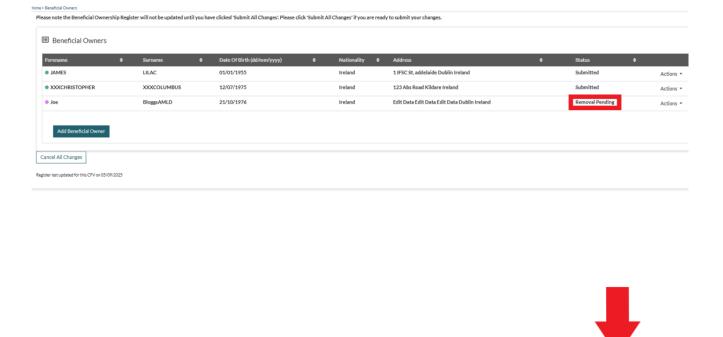
- 4.1 The Presenter must log into the Portal using their existing login details and navigate to the Beneficial Ownership landing page.
- 4.2 The Presenter will click the 'Actions' dropdown of the relevant beneficial owner followed by 'Remove Beneficial Owner'.



4.3 In the next screen the Presenter must enter the actual date the beneficial owner ceased to be a beneficial owner for that CFV, not the date the Presenter is entering the cease date on the Portal. Click 'Save Changes'.



4.4 The Presenter will be taken back to the beneficial ownership landing page, the status of the beneficial owner is 'Removal Pending'. The Presenter can make further amendments to beneficial ownership information i.e. edit/add/remove. If no other changes are required, click 'Submit All Changes'.



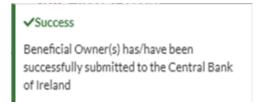
Note: the status 'Removal Pending' indicates that the beneficial owner has not yet been removed from the Central Register. The Presenter can add more beneficial owners, delete beneficial owners or update existing beneficial owner details as applicable or if all changes have been made can select 'Submit All Changes'.

If the Presenter's session is timed out or they navigate away from the Portal, the changes will remain in the 'Removal Pending' status and can be submitted the next time the Presenter accesses the Portal.

4.5 The Presenter must confirm the capacity in which they are acting.

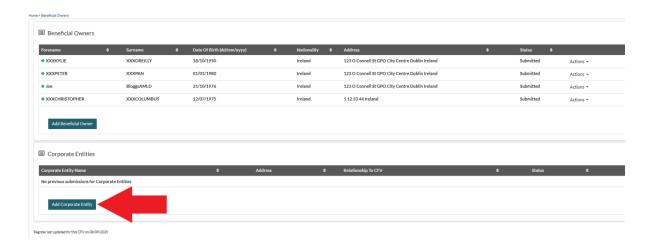
	Please select the capacity in which the presenter is acting			×
	Officer/Employee of the CFV  Person authorised to act on behalf of the CFV	Submit	_	_
ı			_	

4.6 The Presenter will receive 'Success' confirmation on screen that the beneficial ownership register has been updated. The removed beneficial owner will no longer appear on the beneficial ownership landing page.



## 5 Unit Trusts - Adding A Corporate Entity

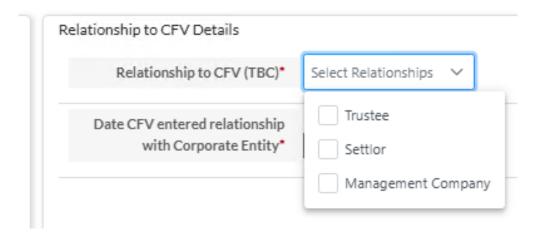
- 5.1 On the beneficial ownership landing page for unit trusts the Presenter can either add a natural person and/or a corporate entity (as applicable) as a beneficial owner. See steps 2.1 - 2.6 on adding a natural person, for information on Nature of Interest validations relating Unit Trusts see Appendix 1.2.
- 5.2 Where a corporate entity is being added to the Central Register, the following details must be entered:
- Corporate Entity Name
- Address
- Relationship to CFV
- Date CFV entered relationship with Corporate Entity
  - 5.3 On the beneficial ownership landing page select 'Add Corporate Entity'.



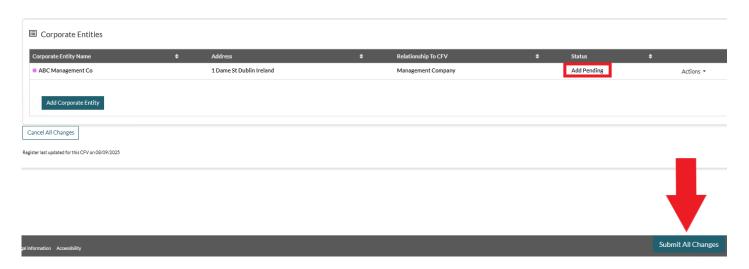
5.4 Enter all relevant information relating to the corporate entity and click 'Save Changes'.



The presenter may select one or more options in the drop down 'Relationship to CFV':



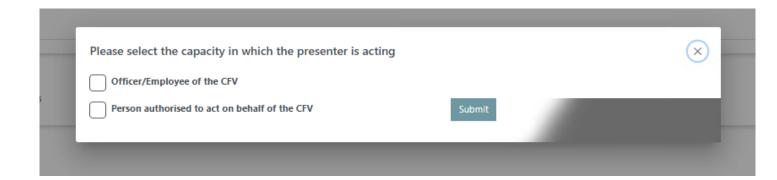
5.5 The Beneficial Ownership landing page will be displayed, the details of the beneficial owner saved in step 5.4 will be displayed with an 'Add Pending' status.



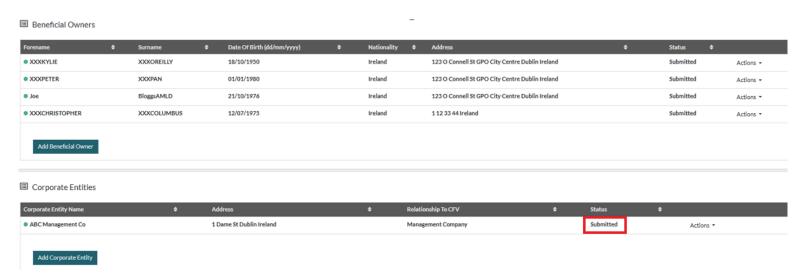
Note: the status 'Add Pending' indicates that this corporate entity has not yet been added to the Central Register. The Presenter can add more corporate entities, delete corporate entities / or update existing corporate entity details as applicable or if all changes have been made can select 'Submit All Changes'.

If the Presenter's session is timed out or they navigate away from the Portal, the changes will remain in the 'Add Pending' status and can be submitted the next time the Presenter accesses the Portal.

5.6 The Presenter must confirm the capacity in which they are acting.

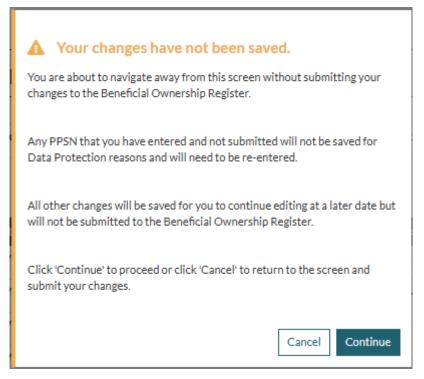


5.7 The Corporate entity will display on the landing page with a 'Submitted' status.



### 6 Pending Changes: Add/Edit/Remove

6.1 Where the Presenter has 1 or more pending changes (add/edit/remove), these changes have not yet been saved to the Central Register. The Presenter can navigate away from the Beneficial Ownership Register on the Portal and the pending changes will be saved<sup>2</sup>. The following pop-up message will appear:



Click 'Continue' to confirm you wish to navigate away from the Beneficial Ownership Register or click 'Cancel' to return to the Beneficial Ownership Register page.

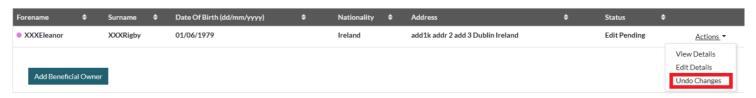
6.2 The Presenter can confirm the pending changes by clicking 'Submit All Changes', or if required they can cancel by selecting undo (see section 7).

<sup>&</sup>lt;sup>2</sup> Any PPSN entered which is in a status of 'Add Pending' or 'Edit Pending' and is not added to the Central Register by clicking 'Submit all Changes' will not be saved once the presenter exits the Portal. All other edits will be saved but PPSN will need to be re-entered for Data Protection reasons.

# 7 Undo Pending Changes: Add/Edit/Remove

7.1 The Presenter may cancel (add/edit/remove) pending changes by selecting 'Undo Changes' from the 'Actions' drop down:





- 7.2 By selecting 'Undo Change' the presenter will:
  - In the scenario of 'Add Pending', delete the pending 7.2.1 Beneficial Ownership details. The Beneficial Owner(s) will not be added to the Central Register.
  - 7.2.2 In the scenario of 'Edit Pending', undo all pending changes. The edits to Beneficial Owner(s) details will not be saved to the Central Register.
  - 7.2.3 In the scenario of 'Removal Pending', the beneficial owner will not be removed and be restored to 'Submitted' status. The Beneficial Owner(s) will not be removed from the Central Register.

### 8 Guidance for providing Liquidator Details

Where a CFV is in liquidation, the Presenter must add the appointed liquidator per the steps in Section 2 above.

- 8.1 The Presenter must remove existing beneficial owners who have been previously entered with a nature of interest of Senior Managing Official (SMO) only, i.e. remove beneficial owner option should be selected and a cease date recorded for all SMO. See section 4 for steps on removing beneficial owners.
- 8.2 The Presenter must add the liquidator, select 'Add BO' on the beneficial ownership landing page. See section 2 for steps on adding beneficial owners.
- 8.3 In the Nature of Interest field select Liquidator from the drop down.

Nature of Beneficial Ownership



Where liquidator is appointed, the Presenter must remove all existing Beneficial Owners via the Remove Beneficial Owner screen.

Note: When 'Liquidator' is selected the following text is displayed on screen 'Where liquidator is appointed, the Presenter must remove all existing Beneficial Owners\_via the Remove Beneficial Owner screen' but only Beneficial Owners where nature of interest is SMO should be removed.

# **Appendix 1.1 - All CFV Non-Unit Trust Nature of Interest - to - Extent of Interest Cross Validation**

	Direct/Indirect Control	Extent	Further Information
Shares	Mandatory	Mandatory	N/A
Voting Rights	Mandatory	Mandatory	N/A
Ownership Interest	Mandatory	Mandatory	N/A
Control via Other Means	N/A	Optional	Optional
Senior Managing Official	N/A	N/A	Mandatory
Liquidator	N/A	N/A	Mandatory

# **Appendix 1.2 - Unit Trusts Nature of Interest - to - Extent of Interest Cross Validation**

	Direct/Indirect Control	Extent	Further Information	Relationship to CFV	Confirm Name of Corporate Entity Exercising Other Means
Shares	Mandatory	Mandatory	N/A	N/A	N/A
Voting Rights	Mandatory	Mandatory	N/A	N/A	N/A
Ownership Interest	Mandatory	Mandatory	N/A	N/A	N/A
Control via Other Means	N/A	Optional	Optional	Mandatory	Mandatory
Liquidator	N/A	N/A	Mandatory	N/A	N/A

# **Appendix 2 - Beneficial Owner Data Field Validation**

BOR Data Point	Validation	Optionality	Optionality - Detailed
	Alphanumeric (including special characters éáíóú'/		
Forename	etc)	Mandatory	Mandatory where a new beneficial owner is being added
	Alphanumeric (including special characters éáíóú'/		
Surname	etc)	Mandatory	Mandatory where a new beneficial owner is being added
	Alphanumeric only, 7 numbers followed by 1 or 2		PPSN is mandatory where a new beneficial owner is being
PPSN	letters	Conditional Mandatory	added and the individual is in possesion of a PPSN
			CBI Reference Number is mandatory where a new beneficial
			owner is being added and the individual is not in possesion
Central Bank of Ireland Reference Number	Alphanumeric only, Must begin with P or CBI	Conditional Mandatory	of a PPSN
Date of Birth - DAY	DD	Mandatory	Mandatory where a new beneficial owner is being added
Date of Birth - MONTH	MM	Mandatory	Mandatory where a new beneficial owner is being added
Date of Birth - YEAR	YY	Mandatory	Mandatory where a new beneficial owner is being added
Nationality	Dropdown List of Countries	Mandatory	Mandatory where a new beneficial owner is being added
Address Line 1	Alphanumeric	Mandatory	Mandatory where a new beneficial owner is being added
Address Line 2	Alphanumeric	Optional	Optional
Address Line 3	Alphanumeric	Optional	Optional
Town / City	Alphanumeric	Mandatory	Mandatory where a new beneficial owner is being added
Country	Dropdown List of Countries	Mandatory	Mandatory where a new beneficial owner is being added
Nature of interest / control	Dropdown list	Mandatory	Mandatory where a new beneficial owner is being added
Is the Person's interest / control direct or indirect	Dropdown list	Mandatory	Mandatory where a new beneficial owner is being added
Extent of interest / control: % owned or controlled	Numeric	Optional	Mandatory where a new beneficial owner is being added
			If extent of interest / control = Control Via Other Means this
			field is optional
			If extent of interest / control = Senior Managing Official this
			field is mandatory
Further information / clarification in relation to			If extent of interest / control = any other role this field is
nature / extent of ownership / control	Alphanumeric (400 Character Limit)	Optional	N/A
Date on which the person was entered into the			
entity's internal register as a beneficial owner	YYYYMMDD	Conditional Mandatory	Mandatory where a new beneficial owner is being added
Date on which the person has left the entity's			
internal register as a beneficial owner	YYYYMMDD	Conditional Mandatory	Mandatory where a beneficial owner is being removed
			Mandatory where changes are being made to an existing
Date Change Occurred	YYYYMMDD	Conditional Mandatory	beneficial owner
Capacity in which the presenter is acting: (eg			
officer/employee of the obliged entity, person			
acting on behalf of the obliged entity etc).	Alphanumeric	Mandatory	

# Appendix 3 - Corporate Entity Data Field Validation (Unit Trust Only)

BOR Data Point	Validation	Optionality	Optionality - Detailed
	Alphanumeric (including special characters éáíóú'/		
Corporate Entity Name	etc)	Mandatory	Mandatory where a new corporate entity is being added
Registered Address 1	Alphanumeric	Mandatory	Mandatory where a new corporate entity is being added
Registered Address 2	Alphanumeric	Optional	Optional
Registered 3	Alphanumeric	Optional	Optional
Town / City	Alphanumeric	Mandatory	Mandatory where a new corporate entity is being added
Country	Dropdown List of Countries	Mandatory	Mandatory where a new corporate entity is being added
Relationship to CFV	Dropdown list	Mandatory	Mandatory where a new corporate entity is being added
Nature of interest / control	Dropdown list	Mandatory	Mandatory where a new corporate entity is being added
Date CFV entered relationship with the Corporate			
Entity	YYYYMMDD	Conditional Mandatory	Mandatory where a new corporate entity is being added
Date the relationship between the CFV and			
Corporate entity ceased	YYYYMMDD	Conditional Mandatory	Mandatory where a corporate entity is being removed
			Mandatory where changes are being made to an existing
Date Change Occurred	YYYYMMDD	Conditional Mandatory	beneficial owner

