



Λευκωσία, 13 Ιανουαρίου 2026

**Προς: Όλα τα Μέλη του ΚΕΒΕ**

**Θέμα: Δημόσια Διαβούλευση της Ευρωπαϊκής Επιτροπής σχετικά με τις μορφές υποβολής πληροφοριών πραγματικού δικαιούχου**

Αγαπητά Μέλη,

Σας ενημερώνουμε ότι η Ευρωπαϊκή Επιτροπή έχει θέσει σε δημόσια διαβούλευση το προσχέδιο του Εκτελεστικού Κανονισμού για τις μορφές υποβολής πληροφοριών Πραγματικού Δικαιούχου (Beneficial Owner), σε συνάφεια με το άρθρο 62 του Κανονισμού (ΕΕ) 2024/1624 και το άρθρο 10 της Οδηγίας (ΕΕ) 2024/1640.

Σκοπός της διαβούλευσης είναι η καθιέρωση τυποποιημένων μορφών υποβολής των σχετικών πληροφοριών, με στόχο την ενίσχυση της διαφάνειας πολύπλοκων εταιρικών δομών στο πλαίσιο της καταπολέμησης της νομιμοποίησης εσόδων από παράνομες δραστηριότητες και της χρηματοδότησης της τρομοκρατίας, καθώς και τον καθορισμό ελάχιστων απαιτήσεων ελέγχου από τα αρμόδια μητρώα.

Καθώς η επίσημη ηλεκτρονική πλατφόρμα υποβολής σχολίων έχει πλέον κλείσει λόγω λήξης της προθεσμίας, και **κατόπιν συνεννόησης με το Τμήμα Εφόρου Εταιρειών και Διανοητικής Ιδιοκτησίας (Κλάδος Εταιρειών)**, σας ενημερώνουμε ότι υπάρχει δυνατότητα να συγκεντρώσουμε απόψεις/παρατηρήσεις των μελών μας και να τις διαβιβάσουμε μέσω email, ώστε να παρουσιαστεί μια συγκροτημένη εικόνα των θέσεων της αγοράς.

Για να μπορέσουμε να ετοιμάσουμε μια ολοκληρωμένη τοποθέτηση και να μεταφέρουμε σωστά τις απόψεις των μελών μας, ώστε να υποστηρίξουμε μια αποτελεσματική και πρακτικά εφαρμόσιμη εναρμόνιση, **παρακαλούμε όπως μέχρι τη Δευτέρα, 19 Ιανουαρίου 2026, μας αποστείλετε τα σχόλιά σας στο email: [servicestradedigitalisation@ccci.org.cy](mailto:servicestradedigitalisation@ccci.org.cy)**

Σχόλια μπορούν να αφορούν, για παράδειγμα, συγκεκριμένα σημεία του προσχεδίου, τεχνικές παρατηρήσεις ή προτάσεις βελτίωσης/απλοποίησης.



Κυπριακό  
Εμπορικό &  
Βιομηχανικό  
Επιμελητήριο

Επισυνάπτεται το Προσχέδιο του Εκτελεστικού Κανονισμού και το Παράρτημα στα Αγγλικά.

Ευχαριστούμε εκ των προτέρων.

Με εκτίμηση,

Στάλω Δημοσθένους  
Διευθύντρια  
Υπηρεσιών Εμπορίου και Ψηφιοποίησης

Nicosia, January 13 2026

**To: Interested parties**

**Re: Public Consultation of the European Commission Regarding the formats for submitting beneficial ownership information**

Dear Members,

We would like to inform you that the European Commission has launched a public consultation on the draft Implementing Regulation concerning the formats for submitting Beneficial Ownership information, in line with Article 62 of Regulation (EU) 2024/1624 and Article 10 of Directive (EU) 2024/1640.

The purpose of the consultation is to establish standardized formats for the submission of the relevant information, with the aim of enhancing the transparency of complex corporate structures in the context of combating money laundering and terrorist financing, as well as setting minimum requirements for the verification of this information by the competent registers.

As the official online platform for submitting comments has now closed due to the deadline having passed, and following communication with the Department of the Registrar of Companies and Intellectual Property (Companies Section), we inform you that there is still the possibility for us to collect comments/observations from our members and forward them via email, so that a consolidated overview of market positions can be presented.

To enable us to prepare a comprehensive position and accurately convey the views of our members, supporting an effective and practically applicable harmonization, please send us your comments **by Monday, 19 January 2026**, to the following email: [servicestradedigitalisation@ccci.org.cy](mailto:servicestradedigitalisation@ccci.org.cy).

Comments may refer, for example, to specific points of the draft, technical observations, or suggestions for improvement/simplification.

Attached you will find the draft Implementing Regulation and its Annex in English.

Thank you in advance.

Sincerely,

Stalo Demosthenous  
Director,  
Department of Services, Trade & Digitalization



Brussels, **XXX**  
**[...]**(2025) **XXX** draft

ANNEXES 1 to 3

**ANNEXES**

**to the**

**COMMISSION IMPLEMENTING REGULATION (EU) .../...**

**on formats for submitting beneficial ownership information**

## **ANNEX I**

### *Description of ownership and control structure*

For the purposes of Article 2(1), point (i), and Article 3(1), point (k), the file upload or the structured data shall contain either of the following:

- (a) a visual representation of the ownership or control structure that the legal entity or legal arrangement belongs to, and that is relevant for the identification of the beneficial owner(s) ('organisational chart');
- (b) a proof that the ownership is dispersed so that no one has a controlling interest, nor control through other means.

The following information shall be made clear and legible in the organisational chart:

- (a) the names and, where applicable, registration numbers of all legal entities and legal arrangements that own or control the legal entity or legal arrangement, and whether each of them is one or more of the following:
  - (1) a legal entity;
  - (2) a legal arrangement;
  - (3) a nominator or a nominee;
- (b) the names of all natural persons acting as nominees, where applicable;
- (c) the nature and extent of ownership or control over the legal entity or legal arrangement, including information on whether it is:
  - (1) direct or indirect;
  - (2) by means of capital participation, voting rights, or other means which shall be specified accordingly;
  - (3) where applicable, the percentage of ownership interest, participation, or voting rights;
- (d) a visual representation of the relationship between the beneficial owners of the legal entity or legal arrangement and all the legal entities and arrangements that are part of the ownership and control structure.

## **ANNEX II**

### *Format of dates*

Dates shall be formatted as yyyy-mm-dd, where yyyy is the year, mm is the month and dd is the day, all expressed in numbers.

### **ANNEX III**

#### *Format of addresses*

Addresses shall be formatted as follows:

Street or house name (obligatory)

Number (voluntary)

Address line 2 (voluntary)

Address line 3 (voluntary)

City (obligatory)

Postal code (obligatory)

Country (in compliance with ISO 3166-1 alpha-3, obligatory)



EUROPEAN  
COMMISSION

Brussels, XXX  
[...] (2025) XXX draft

**COMMISSION IMPLEMENTING REGULATION (EU) .../...**

**of XXX**

**on formats for submitting beneficial ownership information**

(Text with EEA relevance)

*This draft has not been adopted or endorsed by the European Commission. Any views expressed are the preliminary views of the Commission services and may not in any circumstances be regarded as stating an official position of the Commission.*



# COMMISSION IMPLEMENTING REGULATION (EU) .../...

of **XXX**

## on formats for submitting beneficial ownership information

(Text with EEA relevance)

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Directive (EU) 2024/1640 of the European Parliament and of the Council of 31 May 2024 on the mechanisms to be put in place by Member States for the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Directive (EU) 2019/1937, and amending and repealing Directive (EU) 2015/849 (Text with EEA relevance)<sup>1</sup>, and in particular Article 10(6) thereof,

Whereas:

- (1) Regulation (EU) 2024/1624 of the European Parliament and of the Council<sup>2</sup> contains requirements on what information should be reported to the central registers of beneficial owners referred to in Directive (EU) 2024/1640 of the European Parliament and of the Council<sup>3</sup>.
- (2) To provide clarity for entities that have an obligation to report their beneficial ownership to the central registers, ensure consistent quality of data collected and increase the interoperability of the central registers, it is necessary to lay down common formats for the submission of mandatory beneficial ownership information as laid down in Article 10(1) of Directive (EU) 2024/1640. To ensure that registrations are complete and that the central registers contain complete data records, it is necessary to lay down a checklist for minimum requirements.
- (3) In accordance with Regulation (EU) 2024/1624, certain categories of information are to always be submitted to the central register.
- (4) Similarly, the checklist represents the minimum requirements for acceptance of submitted beneficial ownership information. Without a complete submission complying with all those minimum requirements, submissions should not be accepted.

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<sup>1</sup> OJ L, 2024/1640, 19.6.2024.

<sup>2</sup> Regulation (EU) 2024/1624 of the European Parliament and of the Council of 31 May 2024 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing (OJ L, 2024/1624, 19.6.2024, ELI: <http://data.europa.eu/eli/reg/2024/1624/oj>).

<sup>3</sup> Directive (EU) 2024/1640 of the European Parliament and of the Council of 31 May 2024 on the mechanisms to be put in place by Member States for the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Directive (EU) 2019/1937, and amending and repealing Directive (EU) 2015/849 (OJ L, 2024/1640, 19.6.2024, ELI: <http://data.europa.eu/eli/dir/2024/1640/oj>).

- (5) The rules laid down in this Regulation are without prejudice to rules of Member States on additional data points that are laid down for different purposes than those pursued by Directive 2024/1640 and that comply with Union law.
- (6) Registration is presumed to be carried out from the point of view of a legal entity or arrangement. One legal entity or arrangement may have multiple beneficial owners. The entities in charge of central registers may therefore register each beneficial owner separately, through the same repeatable workflow, until all beneficial owners have been registered. Where some beneficial owners can be identified with certainty and some cannot, the repeatable workflows should follow the same logic and end at different points.
- (7) Where a legal entity or a legal arrangement submitting beneficial ownership information is a part of a complex structure that includes multiple legal entities or legal arrangements with links to the same beneficial owner or owners, a visual representation of the ownership or control structure ('organisational chart') should be submitted as it is the most user-friendly and accessible way to understand the corporate structure the legal entity or legal arrangement belongs to. That organisational chart should contain a comprehensive record of all the composite elements of such structures, with indications of their nature and the nature of the links between them. In particular, such an organisational chart should contain the names and the legal form of all legal entities and legal arrangements that own or control the legal entity or legal arrangement, as well as the nature and extent of such ownership or control, and a visual representation of the relationship between the beneficial owners of the legal entity or legal arrangement and all the legal entities and arrangements that are part of the ownership and control structure. At the same time, the entities in charge of central registers should have the possibility to collect information about a complex structure in specified formats or by means of structured or unstructured data fields or file uploads. That flexibility would allow for the evolution of best practices in comprehensively capturing the nature, purpose and all relevant specificities of a complex structure.
- (8) To reduce administrative burden while contributing to a more seamless experience for the registrants and the central registers, it is necessary to provide for certain derogations related to data that is already present in other registers and is to be collected by the entities in charge of central registers. That should apply to certain items of information, including names, addresses, dates of birth, but potentially also to items including ownership interests and various types of basic data about legal entities and legal arrangements. Where the data sought is already retrievable from another register, the format requirements may be waived.
- (9) Registrations made before the date of application of this Regulation should not be affected by the format requirements immediately. However, it would be reasonable for Member States to require that any updates to such existing information should comply with this Regulation.
- (10) In terms of the date as of which the beneficial interest is held, certain roles in legal arrangements may pose challenges. All parties to a legal arrangement should be registered, as those parties are all considered beneficial owners under Regulation (EU) 2024/1624. To avoid different interpretations of that Regulation in respect of defining the time at which the parties' beneficial interest came into being, the date of the beneficial interest for a settlor should be the date when the trust formally comes into existence. For a trustee, it should be the date of their appointment. For the

beneficiaries, it should be the date on which they are declared beneficiaries in the deed or identified by the trustee of a discretionary trust. For a protector, it should be the date of their appointment.

- (11) To provide further clarification on the registration of certain deceased beneficial owners, where the beneficial owner of a legal arrangement is deceased, that fact should be indicated in the relevant data points. However, any data that was submitted when the beneficial owner was alive should continue to be kept in the register in accordance with the data retention provisions laid down in Article 10(20) of Directive (EU) 2024/1640.
- (12) The European Data Protection Supervisor has been consulted in accordance with Article 42(1) of Regulation (EU) 2018/1725 of the European Parliament and of the Council<sup>4</sup> and delivered an opinion on xxx.
- (13) The measures provided for in this Regulation are in accordance with the opinion of the Committee on the Prevention of Money Laundering and Terrorist Financing.
- (14) As Regulation (EU) 2024/1624 applies from 10 July 2027, this Regulation should apply from the same date,

HAS ADOPTED THIS REGULATION:

#### *Article 1*

##### **Formats for submission of data on beneficial owners**

- 1. Data on beneficial owners shall be submitted in the following formats:
  - (a) first name(s): a sequence of characters, letters or numbers containing all of the beneficial owner's first names in full;
  - (b) surname(s): a sequence of characters, letters or numbers containing all of the beneficial owner's surnames in full;
  - (c) place of birth: a sequence of letters or numbers containing locality and country, the latter in compliance with ISO 3166-1 alpha-3;
  - (d) date of birth: a date containing year, month and day, as specified in Annex II;
  - (e) residential address: a sequence of characters, letters or numbers, as specified in Annex III;
  - (f) country of residence: an array containing at least the countries listed in ISO 3166-1 alpha-3;
  - (g) nationalities: an array, allowing multiple choices, containing at least the countries listed in ISO 3166-1 alpha-3 and a 'stateless' option;
  - (h) type of identity document: a sequence of characters, letters or numbers;
  - (i) identity document number: a sequence of characters, letters or numbers.

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<sup>4</sup> Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (OJ L 295, 21.11.2018, p. 39, ELI: <http://data.europa.eu/eli/reg/2018/1725/oj>).

2. By way of derogation from paragraph 1, where the beneficial owner is deceased, that fact may be indicated instead of the data specified in paragraph 1, points (c) to (i).
3. Data on the nature and extent of the beneficial interest and on beneficial owners shall be submitted in the following formats:
- (a) type of ownership interest in the legal entity: an array, allowing multiple choices, with at least the following options:
    - (i) direct ownership;
    - (ii) indirect ownership;
  - (b) for legal arrangements, natural persons, referred to in Article 58 of Regulation (EU) 2024/1624, that were identified as beneficial owners: an array, allowing multiple choices, with at least the following options:
    - (i) settlor;
    - (ii) trustee;
    - (iii) beneficiary;
    - (iv) object of a power;
    - (v) default taker;
    - (vi) protector;
    - (vii) any other natural person exercising ultimate control over the legal arrangement by means of direct or indirect ownership or by other means, including through a chain of control or ownership;
  - (c) for legal entities, natural persons, referred to in Article 57 of Regulation (EU) 2024/1624 that were identified as beneficial owners: an array, allowing multiple choices, with at least the following options:
    - (i) founder;
    - (ii) member of the management body in its management function;
    - (iii) member of the management body in its supervisory function;
    - (iv) beneficiary;
    - (v) any other natural person directly or indirectly controlling the legal entity;
  - (d) percentage of ownership interest in a legal entity: a number allowing two decimal points;
  - (e) nature of control over the legal entity: an array, allowing multiple choices, with at least the following options:
    - (i) control through ownership;
    - (ii) control through voting rights;
    - (iii) control through right of appointments;
    - (iv) control through veto rights;
    - (v) control through distribution of profits;

- (vi) control through formal or informal agreements;
  - (vii) control through relationships between family members;
  - (viii) control through acting in concert with others;
  - (ix) control through nominee arrangements;
- (f) date as of which the beneficial interest is held: a date containing year, month and day, as specified in Annex II.
4. By way of derogation from paragraph 3, where the legal entity or arrangement is a collective investment undertaking, the data on the nature and extent of the beneficial interest shall be submitted in the following formats:
- (a) direct or indirect holding of the units held in the collective investment undertaking: a number allowing two decimal points;
  - (b) ability to define or influence the investment policy of the collective investment undertaking: a sequence of characters, letters and numbers, or a file upload;
  - (c) control of the activities of the collective investment undertaking through other means: a sequence of characters, letters and numbers, or a file upload.
5. By way of derogation from paragraphs 1 to 4 of this Article, where the necessary data is already available in or reported to another register and can be displayed to the end user in full compliance with Regulation (EU) 2024/1624 and this Regulation, the entity in charge of the central register shall reuse this data or request it in the already available and established format.
6. Where it is not possible to identify a beneficial owner, the justification on the reasons for the absence of a beneficial owner shall be submitted in the format of an array with at least the following options:
- (a) a beneficial owner does not exist:
    - (i) the ownership is dispersed such that no one has a sufficient ownership interest, nor does anyone have control through other means;
    - (ii) the legal entity has no legal owners by definition, and no one has a controlling interest, nor control by other means;
    - (iii) the beneficial owner is deceased;
    - (iv) the beneficial owners is unborn descendant;
  - (b) a beneficial owner could not be determined after exhausting all means of identification provided for under Articles 51 to 57 of Regulation (EU) 2024/1624.
7. Data on senior management shall be submitted in accordance with paragraph 1. The derogation laid down in paragraph 5 shall apply equally to this paragraph.
8. Data on the person responsible for retaining the information in cases referred to in Article 63(6) of Regulation (EU) 2024/1624 shall be submitted in the following formats:
- (a) identity of the person: the format shall be the same as specified in paragraph 1, points (a), (b), (h) and (i) of this Article;

- (b) contact details of the person: a postal address, an email address or a phone number.

## *Article 2*

### **Formats for submission of data on legal entities**

1. Data on legal entities shall be submitted in the following format:
  - (a) name of the legal entity: a sequence of characters, letters or numbers;
  - (b) legal form:
    - (i) for legal entities created in the Member State of registration, an array containing the different legal forms allowed in that Member State;
    - (ii) for legal entities created outside a Member State, an array containing at least the terms “Company,” “Foundation” and “Other”;
  - (c) address of the registered or official office: a sequence of characters, letters or numbers, as specified in Annex III;
  - (d) address of the principal place of business where different from the address under point (c): a sequence of characters, letters or numbers, as specified in Annex III;
  - (e) country of creation: an array containing at least the countries listed in ISO 3166-1 alpha-3;
  - (f) names of the legal representatives:
    - (i) for a natural person, the format shall be the same as specified in Article 1, paragraph 1, points (a) and (b);
    - (ii) for a legal person, the format shall be the same as specified in this paragraph, points (a) and (b);
  - (g) reason for registration of legal entities created outside of the Union: an array containing at least the following options:
    - (i) the legal entity is entering into a business relationship with a Union obliged entity;
    - (ii) the legal entity is acquiring real estate in the Union;
    - (iii) the legal entity is acquiring, in the context of an occasional transaction, motor vehicles, watercraft or aircraft, meeting or exceeding the limits specified in Article 67(1), point (c), of Regulation (EU) 2024/1624;
    - (iv) the legal entity is being awarded a public contract for goods or services, or concessions by a contracting authority in the Union;
  - (h) relevant documents and description in relation to point (g): a sequence of characters, letters and numbers, and a file upload;
  - (i) description of ownership and control structure: a file upload, or the submission of structured data, as specified in Annex I;
  - (j) where Article 59 of Regulation (EU) 2024/1624 applies, wherein the class of beneficiaries and its general characteristics shall be identified: a sequence of

characters, letters or numbers shall be used for the description of the class of beneficiaries and its general characteristics.

2. By way of derogation from paragraph 1 of this Article, where the necessary data is already available in or reported to another register and can be displayed to the end user in full compliance with Regulation (EU) 2024/1624 and this Regulation, the entity in charge of the central register shall reuse this data or request it in the already available and established format.

### *Article 3*

#### **Formats for submission of data on legal arrangements**

1. Data on legal arrangements shall be submitted in the following format:
  - (a) name of the legal arrangement: a sequence of characters, letters or numbers;
  - (b) unique identifier of the legal arrangement: a sequence of characters, letters or numbers;
  - (c) information on the trust deed or equivalent: a file upload, allowing the upload of the trust deed or equivalent, and any addenda or other binding documents related to the deed; where the trust deed or equivalent does not exist, a sequence of characters, letters or numbers shall be used instead to provide a general description, complemented by the following data points:
    - (i) type of settlement: an array, allowing multiple choices, containing at least the following options:
      - (1) unilateral;
      - (2) written instrument signed by the settlor and the trustee;
      - (3) *inter vivos*;
      - (4) testamentary;
      - (5) notarial;
    - (ii) law governing the legal arrangement: an array containing at least the countries listed in ISO 3166-1 alpha-3;
    - (iii) revocability of the legal arrangement: an array allowing at least the options revocable and irrevocable;
    - (iv) any reserved powers by the settlor, where applicable: a sequence of characters, letters or numbers;
    - (v) duties, powers and restrictions of the protector, where applicable: a sequence of characters, letters or numbers;
    - (vi) excluded persons, where applicable: a sequence of characters, letters or numbers;
    - (vii) date of original settlement: a date, containing year, month and day, as specified in Annex II;
  - (d) purpose of the legal arrangement: an array with at least the following options:
    - (i) asset management – real estate;
    - (ii) asset management – securities and liquidity management;

- (iii) asset management – inheritance management;
  - (iv) asset management – mixed nature of assets;
  - (v) charitable purposes/donation;
- (e) assets held in the legal arrangement or managed through it: an array containing at least the following options:
  - (i) the value of the assets is less than EUR 1 000 or the equivalent in national currency;
  - (ii) the value of the assets is between EUR 1 000 and EUR 10 000 or the equivalent in national currency.;
  - (iii) the value of the assets is between EUR 10 000 and EUR 100 000 or the equivalent in national currency;
  - (iv) the value of the assets is between EUR 100 000 and EUR 1 000 000 or the equivalent in national currency;
  - (v) the value of the assets is between EUR 1 000 000 and EUR 10 000 000 or the equivalent in national currency;
  - (vi) the value of the assets is between EUR 10 000 000 and EUR 50 000 000 or the equivalent in national currency;
  - (vii) the value of the assets is more than EUR 50 000 000 or the equivalent in national currency;
- (f) place of residence of the trustee or person holding equivalent positions in similar legal arrangements: the format shall be the same as specified in Article 1, paragraph 1, point (e), repeatable in case there is more than one person;
- (g) place of administration, where different from the place of residence: the format shall be the same as specified in Article 1, paragraph 1, point (e), repeatable in case there is more than one person;
- (h) description of the beneficiaries: an array, allowing multiple choice, with the following options:
  - (i) identifiable individually and reported as beneficial owners;
  - (ii) non-identifiable/class of beneficiaries; a sequence of characters, letters or numbers shall be used for further description of the class of beneficiaries, where appropriate;
- (i) reason of registration for legal arrangements administered outside of the Union: the format shall be the same as specified in Article 2, paragraph 1, point (g);
- (j) relevant document(s) and description in relation to point (i): the format shall be the same as specified in Article 2, paragraph 1, point (h);
- (k) description of ownership or control structure: a file upload, or the submission of structured data, as specified in Annex I;
- (l) for discretionary trusts where objects of a power or default takers can be identified, individually or as classes:
  - (i) names and surnames of natural persons that were identified as objects of a power: the format shall be the same as specified in Article 1, paragraph 1, points (a) and (b);



(ii) names of legal entities and arrangements that were identified as objects of a power: the format shall be the same as specified in:

- (1) paragraph 9, points (a), (b) and (e), for legal entities;
- (2) in paragraph 11, points (a) and (b), for legal arrangements;

(iii) description of the objects of a power which are classes: a sequence of characters, letters or numbers;

(iv) names and surnames of natural persons that were identified as default takers: the format shall be the same as specified in paragraph 1, points (a) and (b);

(v) names of legal entities and arrangements that were identified as default takers: the format shall be the same as specified in:

- (1) Article 2, paragraph 1, points (a), (b) and (e), for legal entities;
- (2) this Article and paragraph, points (a) and (b), for legal arrangements;

(vi) description of default takers that are classes: a sequence of characters, letters or numbers.

2. By way of derogation from paragraph 1 of this Article, where the necessary data is already available in or reported to another register and can be displayed to the end user in full compliance with Regulation (EU) 2024/1624 and this Regulation, the entity in charge of the central register shall reuse this data or request it in the already available and established format.

#### *Article 4*

#### **Formats for submission of data on nominees**

1. Data on nominees shall be submitted in the following format:

- (a) names of nominee shareholders for nominee shareholders that are natural persons: the format shall be the same as specified in Article 1, paragraph 1, points (a), (b), (h) and (i);
- (b) names of nominee shareholders for nominee shareholders that are legal persons: the format shall be the same as specified in Article 2, paragraph 1, points (a), (b) and (e);
- (c) status and relation with the legal entity of the nominee shareholder:
  - (i) the date when the nominee arrangement commenced;
  - (ii) an array containing at least the options “There is a formal nominee contract” and “There is an informal nominee agreement”;
  - (iii) a sequence of characters, letters or numbers containing a description of the nature of the nominee arrangement;
- (d) names of nominee directors for nominee directors that are natural persons: the format shall be the same as specified in Article 1, paragraph 1, points (a), (b), (h) and (i);

- (e) names of nominee directors for nominee directors that are legal persons: the format shall be the same as specified in Article 2, paragraph 1, points (a), (b) and (e);
  - (f) status and relation with the legal entity of the nominee director:
    - (i) the date when the nominee arrangement commenced;
    - (ii) an array containing at least the options “There is a formal nominee contract” and “There is an informal nominee agreement”;
    - (iii) a sequence of characters, letters or numbers containing a description of the nature of the nominee arrangement;
  - (g) identity of the nominators for nominators that are natural persons: the format shall be the same as specified in Article 1, paragraph 1, points (a), (b), (h) and (i);
  - (h) identity of the nominators for nominators that are legal persons: the format shall be the same as specified in Article 2, paragraph 1, points (a), (b) and (e);
  - (i) nominator’s beneficial owners for nominators that are legal persons: the format shall be the same as specified in Article 1, paragraph 1, points (a), (b), (h) and (i).
2. By way of derogation from paragraph 1 of this Article, where the necessary data is already available in or reported to another register and can be displayed to the end user in full compliance with Regulation (EU) 2024/1624 and this Regulation, the entity in charge of the central register shall reuse this data or request it in the already available and established format.

## *Article 5* **Checklist**

1. Entities in charge of central registers shall accept submitted beneficial ownership information only where at least the following elements are present and where that submission complies with the relevant points of Articles 1, 2 and 3:
- (a) for a beneficial owner:
    - (i) personal data: Article 1(1), points (a) to (i);
    - (ii) data on the nature and extent of the beneficial interest and the beneficial owner(s) of the legal entity or legal arrangement: the relevant item(s) of Article 1(3) or (4), as appropriate;
  - (b) for a legal entity:
    - (i) basic data: Article 2(1), points (a) to (f);
    - (ii) data on the ownership and control structure: where the ownership and control structure contains more than one legal entity or legal arrangement, Article 2(1), point (i);
    - (iii) for legal entities that are companies, and where it is available: the EUID.
  - (c) for a legal arrangement:
    - (i) basic data: Article 3(1), points (a) to (h);

(ii) data on the ownership or control structure: where the ownership and control structure contains more than one legal entity or legal arrangement, Article 3(1), point (k).

#### *Article 6*

#### **Entry into force and application**

This Regulation shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.

It shall apply from 10 July 2027.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels,

*For the Commission  
The President  
Ursula Von der Leyen*