ECRF BO Working Group Meetings

Questionnaire Issued

Objective – Create Implementation Asset

Analysis Report
Questionnaire Participants
Key Findings

- **2.65** average number of beneficial owners and controllers expected per legal entity.
- **6.7%** of beneficial owners and controllers will change on an annual basis.
- **27%** average volume of foreign beneficial owners is anticipated.
TOP 3 Challenges

- **82%** indicated that achieving timely legislative amendments is a challenge.
- **71%** indicated that the aggressive implementation timeline is a challenge.
- **59%** indicated that it is a complex task for public/industry to determine their beneficial owners and controllers.
Register Milestones – National Legislative Amendments

2017
- April: Gibraltar (25,000)
- June: United Kingdom (4,300,000)

2018
- Jan: Denmark * (325,000)
- April: Italy * (120,000)
- July: Estonia (900,000)
- Jan: Gibraltar (25,000)
- June: United Kingdom (4,300,000)

2019
- June: Malta (120,000)

No. of Live Corporate and Legal Entities in scope
Central Register is Adequate, Current and Accurate

2017
- June: United Kingdom
- Aug: Jersey

2018
- Dec: Denmark
- June: Latvia
- Aug: Sweden
- Dec: Estonia

2019
- Jan: Jersey
- Feb: Estonia
- Apr: Latvia
- Jan: Czech Republic
- June: Latvia

- Oct: Romania

- United Kingdom: 3,100,000 Beneficial Owners and Controllers [4.3 million Legal Entities]
- Denmark: 325,000 Legal Entities
- Latvia: 228,435 Legal Entities
- Sweden: 730,000 Legal Entities
- Estonia: 500,000 Beneficial Owners and Controllers [120,000 Legal Entities]
- Czech Republic: 760,000 Legal Entities
- Latvia: 228,435 Legal Entities
- Romania: 1,500,000 Beneficial Owners and Controllers [900,000 Legal Entities]
- 300,000 Beneficial Owner and Controllers [37,000 Legal Entities]
- 500,000 Beneficial Owner and Controllers [120,000 Legal Entities]
- 200,000 Legal Entities
- 200,000 Legal Entities
- 300,000 Beneficial Owner and Controllers [200,000 Legal Entities]
Filing Channels

- Denmark: 99%
- Estonia: 98%
- Finland: 100%
- Gibraltar: 50%
- Ireland: 100%
- Italy: 100%
- Jersey: 49.5%
- Lithuania: 100%
- Luxembourg: 100%
- Netherlands: 70%
- Romania: 10%
- Sweden: 99%
- UK: 69%

- Paper
- Electronic Filing
- API
Foreign Beneficial Owners

- Jersey: 60%
- Gibraltar: 25%
- Romania: 27%
- Estonia: 15%
- Ireland: 20%
### Policy Challenges

<table>
<thead>
<tr>
<th>Challenge</th>
<th>Agree</th>
<th>Disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>Achieving an agreed definition of Beneficial Owner and Controller</td>
<td>59%</td>
<td>41%</td>
</tr>
<tr>
<td>Definition of access by Competent Authorities</td>
<td>41%</td>
<td>53%</td>
</tr>
<tr>
<td>Development and publication of timely and accurate guidance</td>
<td>53%</td>
<td>47%</td>
</tr>
<tr>
<td>Achieving timely legislative amendments</td>
<td>82%</td>
<td>18%</td>
</tr>
</tbody>
</table>
Challenges

- Aggressive implementation timeline
- Achieving agreed definition of Beneficial Owner and Controller
- Definition of access by Competent Authorities
- Publication of timely and accurate Guidance / FAQs
- Achieving timely legislative amendments
- Complex task to determine their Beneficial Owners and Controllers
- Reporting obligations and timeline
- Interpretation of policy guidance
- Implementation of technology solution
- Implementation of Security Measures
Next Steps

- Opportunity for Contribution / Expansion
- Circulation and Approval Draft Report
- Available for circulation (Participant approval)
- Working group participation – Next Meeting