

Guidance to the Final Solution of the Beneficial Ownership Register

February 2025

Disclaimer

According to the Prevention and Suppression of Money Laundering Activities Laws of 2007-2021, companies and any other legal entities incorporated in the Republic of Cyprus must obtain and hold adequate, accurate and current information on their beneficial ownership, including details of the beneficial interests held.

This guidance for the usage of the Final Solution of the Beneficial Owner Register (hereinafter as 'BO register')

- a) is established within the Directive of the Central Register of Beneficial Owners of Companies and Other Legal Entities of Registrar of Companies and refers to entities registered to the Registrar of Companies and fall under the Law to submit beneficial owner (i.e. companies incorporated or registered under the Companies Law Cap.113 and European Public limited liability Companies)
- b) is of documentary and advisory nature
- c) has no legal value and does not engage the responsibility of the Registrar of Companies and
- d) does not constitute a professional or legal advice

The case studies provide examples of the rationale for determining the beneficial owners to be included in the Beneficial Owner Register. They are not intended to be exhaustive.

The Registrar bears no liability on any decisions taken by the management of the legal entities to disclose or not and/or input or not, the beneficial owners information on the beneficial owners register.

It is noted that the **Registrar of Companies cannot provide any legal advice**. Therefore, it is recommended to **seek legal advice** where needed for the completion of the BO Register.

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Part 1 - The legal framework

On 20 May 2015, the European Council issued Directive (EU) 2015/849 (the “4th Anti-Money Laundering Directive”). The 4th Anti-Money Laundering Directive requires Member States to keep a central register of the beneficial or true owners of firms within their respective jurisdictions. Likewise, for trusts and other legal arrangements.

In 2018 the European Council issued the Directive (EU) 2018/843 (the “5th Anti-money laundering Directive”), which amended the 4th Anti-Money laundering Directive. Under the revised provisions, EU Member States were required to launch publicly accessible registers of beneficial ownership of companies.

The 5th Anti-Money Laundering EU Directive was transposed into Cyprus Legislation through the Prevention and Suppression of Money Laundering Activities Laws of 2007-2021 (the “Law”) on 23 February 2021. It was further amended during 2023.

According to the Law, companies and any other legal entities incorporated in the Republic of Cyprus must obtain and hold adequate, accurate and current information on their beneficial ownership, including details of the beneficial interests held.

The Law provides for the establishment of a central beneficial owners register for companies or other legal entities (“Entities” or “Entity”). The BO register is a centralized register that contains information about the beneficial owners of Entities that fall under the Law.

1.1 Definition of Beneficial Owner

According to the Law, Beneficial Owner (hereinafter referred to as the “BO”) means:

Quote

‘beneficial owner’ means any natural person(s) who ultimately owns or controls the customer and/or the natural person(s) on whose behalf a transaction or activity is being conducted and includes at least:

(a) in the case of corporate entities:

(i) the natural person(s) who ultimately owns or controls a legal entity through direct or indirect ownership of a sufficient percentage of the shares or voting rights or ownership interest in that entity, including through bearer shareholdings, or through control via other means, other than a company listed on a regulated market that is subject to disclosure requirements consistent with Union law or subject to equivalent international standards which ensure adequate transparency of ownership information. A shareholding of 25 % plus one share or an ownership interest of more than 25 % in the customer held by a natural person shall be an indication of direct ownership.

A shareholding of 25 % plus one share or an ownership interest of more than 25 % in the customer held by a corporate entity, which is under the control of a natural person(s), or by multiple corporate entities, which are under the control of the same natural person(s), shall be an indication of indirect ownership. This applies without prejudice to the right of Member States to decide that a lower percentage may be an indication of ownership or control. Control

through other means may be determined, inter alia, in accordance with the criteria in Article 22(1) to (5) of Directive 2013/34/EU of the European Parliament and of the Council (3);

(ii) if, after having exhausted all possible means and provided there are no grounds for suspicion, no person under point (i) is identified, or if there is any doubt that the person(s) identified are the beneficial owner(s), the natural person(s) who hold the position of senior managing official(s) (hereinafter referred to as the “SMO”), the obliged entities shall keep records of the actions taken in order to identify the beneficial ownership under point (i) and this point;

(b) in the case of trusts:

(i) the settlor;

(ii) the trustee(s);

(iii) the protector, if any;

(iv) the beneficiaries, or where the individuals benefiting from the legal arrangement or entity have yet to be determined, the class of persons in whose main interest the legal arrangement or entity is set up or operates;

(v) any other natural person exercising ultimate control over the trust by means of direct or indirect ownership or by other means;

(c) in the case of legal entities such as foundations, and legal arrangements similar to trusts, the natural person(s) holding equivalent or similar positions to those referred to in point (b).

Unquote

Control via other means may include shareholder’s agreement, the exercise of dominant influence, influence through family links or other types of connection with decision-makers, the holding of negotiable shares or convertible stock, and the power to appoint senior management or any other way.

1.2 Purpose of the guidance

This guidance/manual provides information aiming to assist the user in filing the relevant BO information onto the final system solution that has been developed to facilitate the collection of data for the BO register.

Cyprus Entities are obliged to identify and record electronically on the BO register, all relevant information of the beneficial owner/s who own or control them. This is also applicable to companies that provide administrative (including nominee shareholder) services to their clients. Entities are also obliged to always keep the BO register updated.

The beneficial owner information of corporate and other legal entities are kept by obliged entities in certain cases, as per the provisions of the Law regulating Companies providing administrative services and related matters of 2012 to 2020.

This document aims to provide guidance to the final solution, for Entities established or registered in the Republic on fulfilling their obligations regarding the registration of their beneficial owners to the BO register.

1.3 The BO register

According to the Directive regarding the Central Register of Beneficial Owners of Companies and Other Legal Entities (the "Directive") issued by the Registrar of Companies (the "Registrar"), the Registrar maintains and publishes exclusively in electronic form the information regarding the BO register. Filing of beneficial ownership details with the BO register will be performed by entering the required information for each beneficial owner through the on-line portal. There are **no paper forms** to be submitted **or any filing fee**.

Entities considered are:

- Companies incorporated or registered under the Companies Law Cap.113
- European Public limited liability Companies
- Partnerships. On the basis of a legal opinion obtained from the Attorney General's Office, partnerships are considered to be legal entities and as such they must disclose BO details to the register.

The Directive does not apply to the following entities:

- Companies listed on a regulated market that is subject to disclosure requirements consistent with Union law or subject to equivalent international standards which ensure adequate transparency of ownership information.
- Companies whose directors submitted an application for strike off pursuant to Article 327 (2A) (a) of the Companies Law, prior to the commencement of the Directive.
- Companies whose liquidation has been enacted before the commencement of the Directive (12 March 2021).
- Overseas companies (branches)

All entities whose **strike off or liquidation** has been enacted **after 12 March 2021 should complete the details of their BO, on the BO Register.**

In order to obtain access and use the e-filing system, entities and their officers/partners must first obtain access through the government gateway portal "Cy Login", if not already registered. For further details about registration to Cy Login see [Part II](#) below.

According to the definition in the Companies Law "officer", in relation to a legal entity, includes a director, manager or secretary whereas and in relation to a partnership the possibility of registration lies on the partners. (The General and Limited Partnership and Business Names Law).

1.4 Information to be filed

The information to be filed on the BO register for each **natural person** beneficial owner is the following:

- A. Name, surname, date of birth, nationality and residential address
- B. Nature and extent of the beneficial interest held directly or indirectly by each beneficial owner, including through percentage of shares, voting rights, or the nature and extent of the significant influence or control with other means exercised by each controlling person (See [Annex II](#) and [Annex III](#)). It must be noted that in the case of jointly-group of natural persons the extent will be submitted in total for all the natural persons
- C. Identification document number indicating the type of document and the country of document issuance (Identity card or passport or ARC)

- D. Date on there were changes in the particulars of the natural person or the date on which the natural person ceased to be a beneficial owner.

In cases where the shareholding structure of a Cyprus Entity registered in the Republic, leads to **Trust/s, Foundation/s, Other similar legal arrangements** as beneficial owner(s), the information to be submitted in the BO register is the following:

- Name
- Registration number (if any)
- Country of Jurisdiction
- Nature and extent of the beneficial interest held directly or indirectly including through percentage of shares, voting rights or the nature and extent of the Significant influence or control with other means exercised by each controlling person. It must be clarified that the nature and extent of the beneficial interest will be submitted exclusively on the percentage of the trust, foundation or other similar legal arrangement.
- Data of Natural Persons as described below in details for each entity.
- Date on which there were changes in the particulars of a Trust, Foundation, Other similar legal arrangements or the date on which it ceased to be a beneficial owner for BO register purposes.

In cases where the shareholding structure of a Cyprus Entity registered in the Republic, leads to an **entity listed on a regulated market subject to disclosure requirements under European Union law or subject to equivalent international standards that ensure adequate transparency of proprietary ownership information**, the following information to be submitted in the BO register:

- Name
- Registration number (if applicable)
- Jurisdiction,
- Name of regulated market
- Country of regulated market.
- Nature and extent of the beneficial interest held. It must be clarified that the nature and extent of the beneficial interest will be submitted exclusively on the percentage of the listed company in the entity.
- Date on which there were changes in the particulars of a listed entity or the date on which it ceased to be a beneficial owner for BO register purposes.

In the event where **no natural person is identified as the beneficial owner** based on the ownership rights or when there is doubt that the person identified is the beneficial owner, the details of the senior management official must be submitted, indicating whether the person is a director in the company or whether it holds another position, by declaring that position. In this case, the **nature and extent of the beneficial interest is not submitted** on the system.

The responsibility for the submission of information lies with the Entity. A director or manager of an organization who refuses or omits or neglects to fulfil the submission obligations for BO is jointly and/or severally liable with the organization for the repayment of the fine imposed on the organization.

1.5 Investment Funds

Investment Funds are considered the entities that are registered with the Department as Undertakings for Collective Investment (UCI) as follows:

- UCITS - Undertakings for Collective Investment in Transferable Securities;
- AIF – Alternative Investment Fund;
- AIFLNP - Alternative Investment Fund with a Limited Number of Persons;
- RAIF - Registered Alternative Investment Funds.

It is noted that in the case of Investment funds, the filing of BO information in the Register must be submitted for **both for natural persons holding management shares as well as for natural persons holding investor shares.**

Where the Investment Fund is structured as an "umbrella type Fund" with more than one investment compartments, the definition of BO shall apply to the legal entity registered at the umbrella level. It is provided that the "umbrella" type of Investment Fund constitutes a single legal entity.

In order to determine the BOs (person holding more than 25% of the value of the shares of an Investment Fund), the **most recent official calculation of the Net Asset Value (NAV) shall be considered.**

Investment Funds must notify for any changes with respect to the BOs within 45 days from the official calculation of NAV:

- If an Investment Fund calculates the NAV on a quarterly basis, then every quarter it should notify the changes with respect to its BOs, if any, in the Register.
- In case of an ad hoc NAV calculation, at any given time, and within 45 days from the said calculation, a relevant notification should be made to the Register, of the changes, if any, to the information with respect to the BOs already registered.

In the case of externally managed Investment Funds, where no natural person can be identified as the BO, or where there is doubt as to the natural person identified as the BO, given that all possible means have been exhausted and given that there is no reasonable suspicion, the General Manager of the External Manager of the Investment Fund will be declared as the BO in the BO register.

To conclude, where no natural person can be identified as BO, or where there is doubt as to the natural person identified as the BO, given that all possible means have been exhausted and given that there is no reasonable suspicion, the person or persons holding the position(s) of senior executive director(s) of the Investment Fund will be declared as the BOs.

1.6 Timing of filings

It must be noted that the system of the final solution has been developed to support the functionalities of the Register of BO on the basis of the requirements of the 4th and 5th AML Directive. The final solution was implemented on 14th November 2023.

Transition from interim solution to final solution system:

On the basis of the announcements issued by the Registrar of Companies on 10th November 2023 (press [here](#)), 20th December 2023 (press [here](#)), 12nd January 2024 (press [here](#)), 17 January 2024 (press [here](#)), 31 January 2024 (press [here](#)), 08 February 2024 (press [here](#)), 16 December 2024 (press [here](#)) and the Directives [ΚΔΠ 401/2023](#), [ΚΔΠ 34/2024](#), [ΚΔΠ 120/2024](#), and [ΚΔΠ 423/2024](#) of the Registrar, published on 15th December 2023, 29/01/2024, 29/03/2024 and 16/12/2024 respectively following the launch of the final system solution on 14th November 2023:

- a. The prescribed time for submitting details of the beneficial owners for all cases of Companies and other Legal Entities has been extended until January 31, 2025. The company or other legal entity, is responsible for the true and correct submission and confirmation of information on the beneficial owners of companies and other legal entities. A director or manager of an organization who refuses or omits or neglects to fulfil the submission obligations for BO is jointly and/or severally liable with the organization for the repayment of the fine imposed on the organization. The organization must confirm the details of BO or senior management officials or due diligence (whichever is applicable) for the year 2024 until 31/03/2025 as ΚΔΠ 423/2024.
- b. As of February 1, 2024, non-compliance will result in the imposition of administrative and other penalties, in accordance with L.188(I)/2007 and Directive ΚΔΠ 112/2021, as amended and in force.
- c. Companies and other entities where the BO leads to:
 - i. **trust**, must submit the details as mentioned in section 3.1.2 Trusts
 - ii. **other legal arrangements similar to trusts**, must submit the details as mentioned in section 3.1.3 Other legal arrangements similar to Trusts
 - iii. **foundations**, must submit the details mentioned in section 3.1.4 Foundations
 - iv. **Company and other legal entity listed on a regulated market**, must submit the details as mentioned in section 3.1.5 Company and other legal entity listed on a regulated market subject to disclosure requirements under European Union law & Company and other legal entity subject to equivalent international standards that ensure adequate transparency of proprietary information

Starting from 14th November and onwards the following services are available on the system:

- i. Electronic search in the Register of BO
- ii. Exercise due diligence
- iii. Exemption from access to BO information
- iv. Request for access to minor's data
- v. Submission of an exemption request in the following cases:
 - Organizations listed on a regulated market, that is subject to disclosure requirements consistent with Union law,
 - Organizations subject to equivalent international standards which ensure adequate transparency of ownership information.

From the 1st of April 2024, the following additional services are available on the system:

- Yearly confirmation (01/10-31/12) of BO
- Discrepancy

- Enforcement of all the penalties according to the Law

Change of BO information:

In case of a change in the information of a BO, an entity must, **forty-five (45) days** from the date that the change in the information of the beneficial owners contained in the Register of Beneficial Owners of Corporate and other Legal Entities was brought to its attention, file onto the BO register the information regarding the new BO or the change on the details of an existing BO owner.

With regards to Investment Funds, any changes with respect to the BOs must be notified **within forty-five (45) days** from the official calculation of NAV:

- If an Investment Fund calculates the NAV on a quarterly basis, then every quarter it should notify the Registrar of any changes in its BO information.
- In the event of an ad hoc NAV calculation, at any given time, and within 45 days from the said calculation, a relevant notification should be made to the Register, of the changes, if any, to the information with respect to the BOs already registered.

New registrations:

All new registrations/incorporations must, no later than ninety (90) days from the date of their registration/incorporation, file electronically onto the BO Register, all information in respect of each of their beneficial owner/s.

Confirmation of BO details:

During the period from 1st October to 31st December of each calendar year, an Entity must confirm electronically, to the Registrar its beneficial owners. The organization must confirm the details of BO or senior management officials or due diligence (whichever is applicable) for the year 2024 until 31/03/2025 as ΚΔΠ 423/2024.

1.7 Penalties

The responsibility for the true and accurate submission of the BO information lies with the Entity itself. A director or manager of an organization who refuses or omits or neglects to fulfil the submission obligations for BO is jointly and/or severally liable with the organization for the repayment of the fine imposed on the organization.

It is highlighted that fines and penalties may be imposed to Entities that do not comply with the Registrar's Directives and the provisions of the AML Law regarding the disclosure of all requested BO data to the BO register. For more details, please refer to the Registrar's Directive for the Prevention and Suppression of Money Laundering and Terrorist Financing (Beneficial Owners) of 2021 (ΚΔΠ 112/2021) as amended.

It must be noted that during the first period of the final solution i.e. **from 14 November 2023 to 31/03/2024 no penalties** imposed in case of non-compliance. However, an additional extension of the stipulated time for submitting data of the beneficial owners for all cases of Companies and Other Legal Entities was granted, until 31/01/2025. In order to implement the above decision, the Registrar of Companies issued on 16/12/2024 the amending Directive ΚΔΠ 423/2024 ([ΚΔΠ 423/2024](#)). At the same time, the referenced ΚΔΠ also provides for an extension of the prescribed time for processing the data confirmation procedure for the year 2024 until 31 March 2025.

From 1 February 2025, failure to comply with submitting of beneficial owners will result in the imposition of administrative and other fines, in accordance with the provisions of Law 188(I)/2007, as amended and passed by the House of Representatives and implemented on 16/12/2024, and of the ΚΔΠ112/2021, as amended and in force.

Starting 1st February 2025 and onwards, in case of non-compliance, notwithstanding the criminal liability or prosecution of any person, where there is a failure to comply with the reporting obligations about the beneficial owners, the entity shall be liable to a penalty of:

- one hundred Euros (€ 100) instead of two hundred Euros (€200) and
- a further fine of fifty Euros (€ 50) for each day of continuation of the violation with a maximum total fine of five thousand Euros (€ 5,000) instead of twenty thousand Euros €20.000.

It is further understood that, director or manager of a company or other legal entity shall not be held for the repayment of the fine imposed on the company or legal entity if he had exercised due diligence on the compliance and the violation is not due to any act or omission or negligence on his behalf. For more information see section **3.5 Due Diligence**.

1.8 Access to information submitted to the BO register (e-search)

Following the Court of Justice of the European Union (CJEE) access to information submitted to the BO register was suspended for the general public. The following persons shall, in any case, have access to the information concerning the beneficial owner(s) through the electronic BO register:

1. Competent Supervisory Authorities, the FIU, the Customs Department, the Tax Department, the Police, the Treasury of the Republic of Cyprus, Audit Office of the Republic of Cyprus, the Internal Audit Service, Directorate General Growth of Ministry of Finance, the European Commission, the European Court of Auditors, the European Anti-Fraud Office (OLAF) and the European Public Prosecutor's Office (EPPO) have fast and unlimited access without the submission of a fee or notifying the Entity;
2. Obligated entities, in the context of conducting due diligence and identification measures for the client as defined in the Law have access to the **name, month and year of birth, nationality and country of residence** of the BO as well as to the **nature and extent of the beneficial interest** held, following payment of three euros and fifty cents (€3.50) fee, per Entity and the approval of the e-request by the Registrar of Companies officers

Competent Supervisory Authorities, the FIU, the Customs Department, the Tax Department, the Police, the Treasury of the Republic of Cyprus, Audit Office of the Republic of Cyprus, the Internal Audit Service, Directorate General Growth of Ministry of Finance, the European Commission, the European Court of Auditors, the European Anti-Fraud Office (OLAF) and the European Public Prosecutor's Office (EPPO) have **unrestricted access** to the BO information.

The BO Register will maintain the current record of the BO of each entity. The Register of beneficial owners will not maintain any information regarding the beneficial owner(s) of a company prior to the 12 March 2021.

1.9 Discrepancies

A discrepancy exists in the case where the information provided in the Register of Beneficial Owners is inconsistent with the information the competent authorities and/or obliged entities have at their disposal. In these cases, the aforementioned authorities and/or obliged entities must submit relevant documents and information evidencing the discrepancy. Instructions for submitting a discrepancy at the following link: [Discrepancies/Ανατιστοιχίες](#)

Part 2 – Cy Login access to log on BO register

The e-system of beneficial owner is available both in Greek and English language.

The submission of data via the electronic service "Registration of beneficial owner particulars" is **possible through governmental gateway Cy Login in one of following ways:**

1. via the creation of a corporate/partnership profile from the legal entity itself
2. by the official/partner (natural person) of the legal entity on behalf of which the BO details will be submitted onto the system,
3. by the official/partner (legal person) of the legal entity on behalf of which the BO details will be submitted onto the system

A **corporate/partnership profile** can be created through “**Cy Login**” and authenticated at a designated authentication centre as described below.

A **natural person’s profile** in “**Cy Login**” must be authenticated either online via an e-banking account or via **video call** with Citizens Service Centres (for citizens with a Cyprus identification card) or in the absence of an e-banking account, by physical presence in one of the designated authorized identification centres.

A prerequisite to creating a corporate/partnership profile is the acquisition of a corporate/partnership email. This email cannot be the email of an official or person acting on behalf of the company or the email of a service provider.

To create a natural person’s profile, the creation of a personal email is a prerequisite.

Access to the Register should be exclusively given to the **legal entity’s officers** or the **legal entity itself**.

Governmental gateway “Cy Login” does not permit the use of the same email to create more than one profile, either companies/partnerships or natural persons.

2.1 Non-registered in “Cy Login”

Company/Partnership profile

If you do not have a corporate/partnership profile in “Cy Login” you must register one by following the steps below:

1. Click [here](#) to Register as a Legal Entity
2. Authenticate your corporate/partnership profile. For further details, click [here](#).

Natural person profile

If you do not have a natural person profile in “Cy Login” you must register one by following the steps below:

1. Click [here](#) to Register as a natural person
2. Authenticate your profile. For further details, click [here](#)

Profile authentication will be operated **exclusively** to the authorized Citizen Service Centers or Post Offices.

2.2 Registered and authenticated profile of legal or natural person in “Cy Login”

Important note 1:

If you already have created a corporate/partnership profile or a natural person’s profile in “Cy Login” **you must not create a new account**. You must only secure that your account is authenticated by entering the company’s/partnership’s or natural person’s profile in “Cy Login” and select “My profile”. If the company’s/partnership’s registration number or identity number of the natural person is displayed in the field «Unique Identifier», this means that your company’s/partnership’s or natural person’s profile has been authenticated. Otherwise, you must proceed with the authentication of the company’s/partnership’s or natural person’s profile as described in paragraph **2.1 Non-registered in “Cy Login”**.

Important note 2:

At present, identification of a natural person’s profile for the purpose of registering the beneficial owner’s details, is possible **only for Cypriot citizens** holding a Cypriot identity card. Therefore, the ID number must be the same as the one registered in the Companies Register in order to obtain access to the BO system. The identification of a natural person via **passport number is not accepted**.

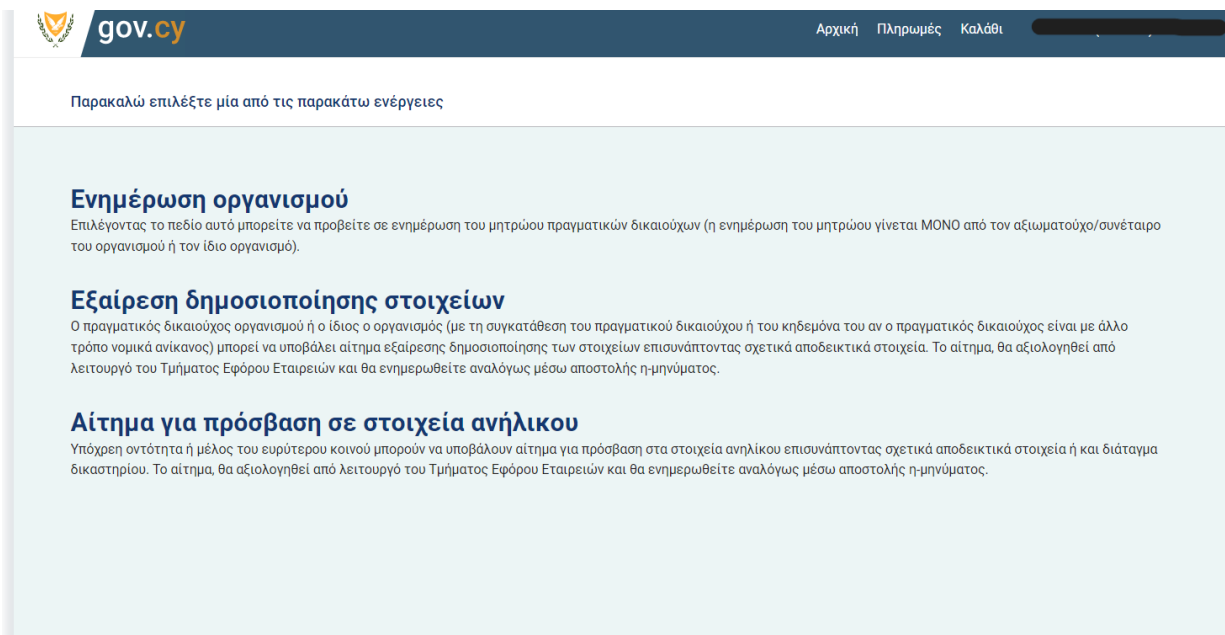
If your legal entity’s or natural person ‘s profile is authenticated, follow the steps below to log in the BO register:

The screenshot shows the gov.cy website interface for logging into the BO register. The page title is "Καλωσορίσατε στο Μητρώο Πραγματικών Δικαιούχων του Εφόρου Εταιρειών". The header includes the gov.cy logo and navigation links: Αρχική, Πληρωμές, Καλάθι. The main content area has a heading "Καλωσορίσατε στο Μητρώο Πραγματικών Δικαιούχων του Εφόρου Εταιρειών" and a sub-heading "Σύμφωνα με την εγγραφή σας στο CY Login, είστε νομικό πρόσωπο. Αν όμως είστε νομικό πρόσωπο και ανήκετε στις υπόχρεες οντότητες, τότε επιλέξτε "Υπόχρεη οντότητα". Εδώ μπορείτε να δείτε τον κατάλογο με τις Υπόχρεες Οντότητες." Below this are two radio buttons: "Νομικό πρόσωπο" (selected) and "Υπόχρεη οντότητα". A green message states: "Τα πιο κάτω στοιχεία είναι αυτά που καταχωρίζατε στην εγγραφή σας στο CY Login. Κατά την περιήγηση σας στο σύστημα Πραγματικών δικαιούχων το πιο κάτω ηλεκτρονικό ταχυδρομείο θα χρησιμοποιηθεί για επικοινωνία. Έχετε την δυνατότητα να προσθέσετε καινούργιο για τις ανάγκες του συστήματος των "Πραγματικών δικαιούχων". Below this are four input fields: "Όνομα", "Επώνυμο", "Αριθμός ταυτότητας/ARC", and "Ηλεκτρονικό ταχυδρομείο". The "Αριθμός ταυτότητας/ARC" field has "HE" followed by a redacted number. Below these fields is a "Προσθήκη ηλεκτρονικού ταχυδρομείου" field. A "Επόμενο" button is at the bottom right. The footer includes the Republic of Cyprus logo, copyright information, and logos for the European Union and Cyprus.

1. Click <https://ubo.meci.gov.cy/sign-in>
2. Enter your CY Login credentials (Password, Username). Important note: Access to the BO system for the services mentioned in par.6 below is given to authenticated via CY-login, profiles (natural or legal persons). It must be noted that the natural or legal person accessing the BO system to proceed with the services mentioned below on behalf of an entity, must be an appointed officer/partner in that entity, otherwise no

access will be given. Furthermore, in order for a natural person to obtain access to the BO system, s/he must submit for identification purposes s/his ID number which must be the same as the one registered with the Companies Register. The identification of a natural person via passport number is not accepted.

3. You are now logged into the e-system for the BO register
4. You will be asked to select whether you are a natural/legal person or an Obligated entity so that relevant access be given to the BO system
5. In case you are logged in for the 1st time you will be welcomed to the system of the final solution. Here, you may add a second email address if applicable and press “next” in order to further proceed. This second email will be used for communication purposes with the BO register circumventing the Cy Login
6. In case where you have entered the BO system as a natural or a legal person you will be automatically directed to choose one of the following actions:
 - Updating the Entity (Ενημέρωση οργανισμού).
 - Exemption from disclosure of information (Εξαίρεση δημοσιοποίησης στοιχείων).
 - Request for access to minor’s data (Αίτημα για πρόσβαση σε στοιχεία ανήλικου).



The screenshot shows the gov.cy website interface. At the top, there is a navigation bar with the logo and the text "gov.cy". To the right of the logo, there are links for "Αρχική", "Πληρωμές", and "Κατάθι". Below the navigation bar, there is a message: "Παρακαλώ επιλέξτε μία από τις παρακάτω ενέργειες". The main content area is divided into three sections, each with a heading and a description:

- Ενημέρωση οργανισμού**
Επιλέγοντας το πεδίο αυτό μπορείτε να προβείτε σε ενημέρωση του μητρώου πραγματικών δικαιούχων (η ενημέρωση του μητρώου γίνεται ΜΟΝΟ από τον αξιωματούχο/συνέταιρο του οργανισμού ή τον ίδιο οργανισμό).
- Εξαίρεση δημοσιοποίησης στοιχείων**
Ο πραγματικός δικαιούχος οργανισμού ή ο ίδιος ο οργανισμός (με τη συγκατάθεση του πραγματικού δικαιούχου ή του κηδεμόνα του αν ο πραγματικός δικαιούχος είναι με άλλο τρόπο νομικά ανίκανος) μπορεί να υποβάλει αίτημα εξαίρεσης δημοσιοποίησης των στοιχείων επισυνάπτοντας σχετικά αποδεικτικά στοιχεία. Το αίτημα, θα αξιολογηθεί από λειτουργό του Τμήματος Εφόρου Εταιρειών και θα ενημερωθείτε αναλόγως μέσω αποστολής η-μηνύματος.
- Αίτημα για πρόσβαση σε στοιχεία ανήλικου**
Υπόχρη οντότητα ή μέλος του ευρύτερου κοινού μπορούν να υποβάλουν αίτημα για πρόσβαση στα στοιχεία ανήλικου επισυνάπτοντας σχετικά αποδεικτικά στοιχεία ή και διάταγμα δικαστηρίου. Το αίτημα, θα αξιολογηθεί από λειτουργό του Τμήματος Εφόρου Εταιρειών και θα ενημερωθείτε αναλόγως μέσω αποστολής η-μηνύματος.

Part 3 – Submission of info to BO register and searches

Important note: all fields marked with (*) are compulsory.

The BO Register can **ONLY** be updated by the officer of the entity or the entity itself. A director or manager of an organization who refuses or omits or neglects to fulfil the submission obligations for BO is jointly and/or severally liable with the organization for the repayment of the fine imposed on the organization.

gov.cy Αρχική Πληρωμές Καλάθι

Παρακαλώ επιλέξτε μία από τις παρακάτω ενέργειες

Ενημέρωση Πραγματικών Δικαιούχων

Η ενημέρωση του Μητρώου Πραγματικών Δικαιούχων για τον οργανισμό που θα επιλέξετε γίνεται ΜΟΝΟ από τον αξιωματούχο/συνέταιρο (φυσικό ή νομικό πρόσωπο) του οργανισμού ή τον ίδιο τον οργανισμό.

Εταιρεία και άλλη νομική οντότητα που είναι εισηγμένη σε ρυθμιζόμενη αγορά, η οποία υπόκειται σε απαιτήσεις γνωστοποίησης κατά τη νομοθεσία της Ευρωπαϊκής Ένωσης.

Επιλέγοντας το πεδίο αυτό μπορείτε να δηλώσετε ότι ο οργανισμός σας είναι εισηγμένος σε ρυθμιζόμενη αγορά συνεπώς εξαιρείται της υποβολής πραγματικού δικαιούχου. Σε περίπτωση που ο οργανισμός σας παύσει να είναι εισηγμένος σε ρυθμιζόμενη αγορά, η οποία υπόκειται σε απαιτήσεις γνωστοποίησης κατά την νομοθεσία της Ευρωπαϊκής Ένωσης τότε θα πρέπει να τον αφαιρέσετε από την εξίσωση και θα πρέπει να ενημερώσετε το Μητρώο των Πραγματικών Δικαιούχων.

Εταιρεία και άλλη νομική οντότητα που υπόκειται σε ισοδύναμα διεθνή πρότυπα τα οποία εξασφαλίζουν επαρκή διαφάνεια των πληροφοριών ιδιοκτησίας.

Επιλέγοντας το πεδίο αυτό μπορείτε να δηλώσετε ότι ο οργανισμός σας υπόκειται σε ισοδύναμα διεθνή πρότυπα συνεπώς εξαιρείται της υποβολής πραγματικού δικαιούχου. Σε περίπτωση που ο οργανισμός σας παύσει να υπόκειται σε ισοδύναμα διεθνή πρότυπα τα οποία εξασφαλίζουν επαρκή διαφάνεια των πληροφοριών ιδιοκτησίας τότε θα πρέπει να τον αφαιρέσετε από την εξίσωση και θα πρέπει να ενημερώσετε το Μητρώο των Πραγματικών Δικαιούχων.

Click **“Update Beneficial Owners”** (Ενημέρωση Πραγματικών Δικαιούχων) or other options accordingly in case of listed entities.

gov.cy Αρχική Πληρωμές Καλάθι

Παρακαλώ επιλέξτε μία από τις παρακάτω ενέργειες

Ενημέρωση Πραγματικών Δικαιούχων

Εταιρεία Συνεταιρισμός Συνεταιρισμός (BN) Ευρωπαϊκή εταιρεία

Η επιλογή τύπου "Συνεταιρισμός (BN)" να επιλέγεται ΜΟΝΟ εαν στον αριθμό εγγραφής του συνεταιρισμού εμφανίζεται το πρόθεμα BN.

* Αριθμός εγγραφής
HE

Καθαρισμός Αναζήτηση

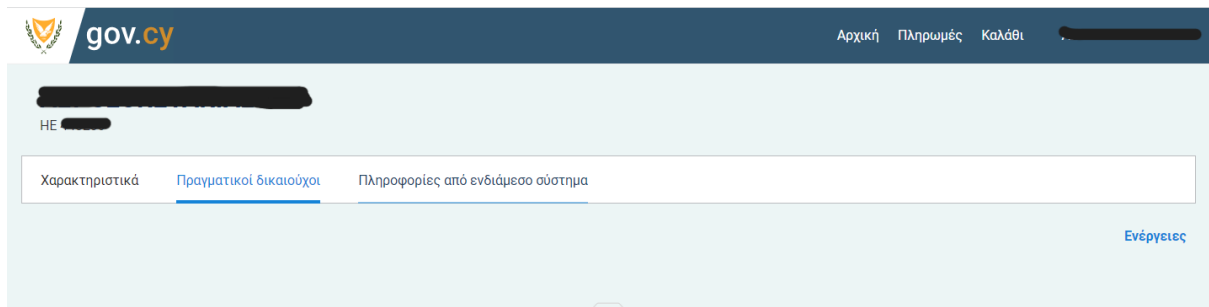
Αποτελέσματα αναζήτησης

Αριθμός εγγραφής	HE	Ημερομηνία εγγραφής	
Τύπος	Limited Company	Υποκατηγορία	Ιδιωτική
Κατάσταση οργανισμού	Εγγεγραμμένη		

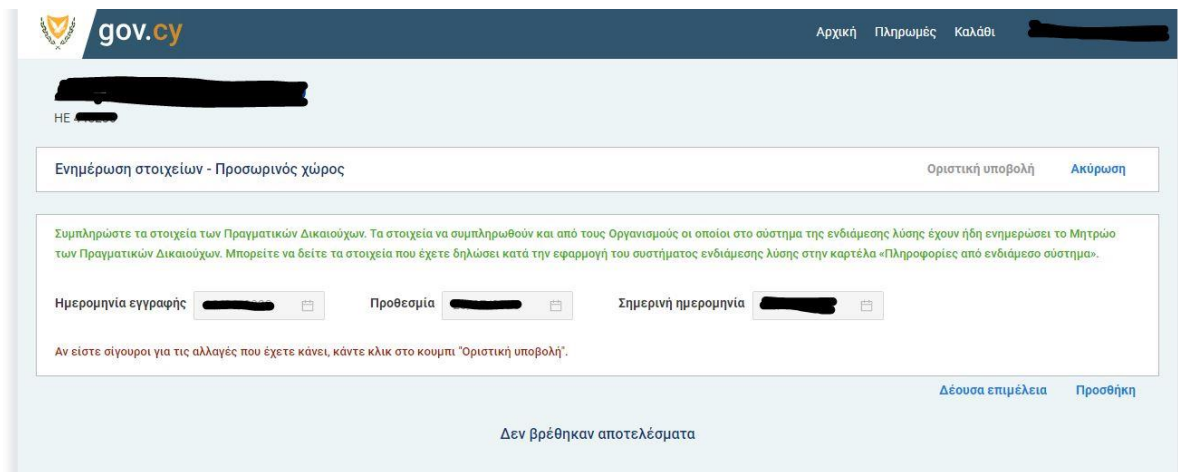
Αγορά έρευνας Μελέτη

Enter entity’s registration number and click “Search” (Αναζήτηση) in order to view the entity’s details. Press “Study”(Μελέτη) to view **entity’s details, beneficial owner(s) and the information transferred from the interim solution** (if any). See **3.7.1 View**

For the options “Αγορά έρευνας” (Purchase e-search), please see more details below in section **3.7.2 Purchase e-search**.



Press “**Actions**” (Ενέργειες) to move to the next screen.

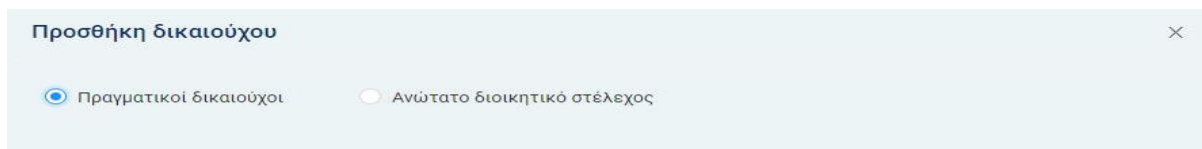


Click “**Addition**” (Προσθήκη) to enter the data of the BO or Senior Management official. In case where the BO or SMO was submitted in the interim solution, the BO details will appear in the section “Information from interim solution”.

In case where the BO details have not been submitted during the interim solution, you must proceed to the addition of the BO or SMO into the final solution system.

For the “Due diligence” (Δέουσα επιμέλεια) option, look at section **3.5 Due Diligence** of this guidance.

Select Type (BO or Senior Management Official)



Select the appropriate field depending on whether the entry is (i) a beneficial owner **or** (ii) a senior management official and complete the details for **each entry separately**. It must be clarified that you must submit the details of **only one** the above categories.

3.1 Beneficial Owner

Select the appropriate field depending on whether the beneficial owner is (a) Natural person
b) Jointly - Group of Natural Persons, (c) Trust, (d) Foundation, (e) Other legal arrangement similar to trust (f) Company and other legal entity listed on a regulated market subject to disclosure requirements under European Union law, (g) Company and other legal entity subject to equivalent international standards that ensure adequate transparency of ownership information.

The screenshot shows the gov.cy website interface. The main page is titled "Ενημέρωση στοιχείων - Προσωρινός χώρος" (Update details - Temporary space). A modal window titled "Προσθήκη δικαιούχου" (Add Beneficial Owner) is open, allowing the user to select the type of beneficial owner. The modal has two main sections: "Προσθήκη δικαιούχου" and "Φυσικό Πρόσωπο".

Προσθήκη δικαιούχου

- Πραγματικοί δικαιούχοι
- Ανώτατο διοικητικό στέλεχος

Φυσικό Πρόσωπο

- Φυσικό Πρόσωπο
- Από κοινού - Ομάδα Φυσικών Προσώπων
- Εμπιστευμα
- Ίδρυμα
- Νομικές διευθετήσεις παρεμφερείς με τα Εμπιστεύματα
- Εταιρεία και άλλη νομική οντότητα που είναι εισηγμένη σε ρυθμιζόμενη αγορά, η οποία υπόκειται σε απαιτήσεις γνωστοποίησης κατά τη νομοθεσία της Ευρωπαϊκής Ένωσης
- Εταιρεία και άλλη νομική οντότητα που υπόκειται σε ισοδύναμα διεθνή πρότυπα τα οποία εξασφαλίζουν επαρκή διαφάνεια των πληροφοριών ιδιοκτησίας

Buttons: **Ακύρωση** (Cancel), **Επόμενο** (Next)

3.1.1 Natural person & Jointly – Group of Natural persons

For input of information regarding natural persons, the following fields must be completed:

- Κύπριος πολίτης
 Κάτοικος Κύπρου - Μη Κύπριος Πολίτης
 Άλλο

Υπηκοότητα

[Προσθήκη 2ης υπηκοότητας](#)

* Υπηκοότητα

Κυπριακή

* Ταυτοποιητικό έγγραφο

Ταυτότητα

* Αριθμός ταυτοποιητικού εγγράφου

* Χώρα έκδοσης

Κύπρος

Προσωπικά στοιχεία

* Όνομα

* Επώνυμο

* Όνομα με Λατινικούς χαρακτήρες

* Επώνυμο με λατινικούς χαρακτήρες

* Ημερομηνία γέννησης

__/__/__

Διεύθυνση

* Χώρα διαμονής

Χώρα διαμονής

* Ταχυδρομικός τομέας

* Πόλη / Επαρχία

* Περιοχή / Δήμος / Κοινότητα

* Οδός

* Αριθμός

Κτήριο (Παρακαλώ να συμπληρωθεί με λατινικούς χαρακτήρες και κεφαλαία)

Αριθμός γραφείου / διαμερίσματος

Οροφος

Ακύρωση

Προηγούμενο

Επόμενο

Personal Data:

The following **personal information** should be completed:

- Nationality
- Identification document type
- Number of identification document
- Country of issue of document
- Name in Greek & Latin characters
- Surname in Greek & Latin characters
- Date of birth

For **Cyprus nationals**, the ID of the natural person is locked as selected and corresponding information filled must be completed accordingly **exactly as indicated in the ID**. In the event of a Cyprus national with **dual citizenship**, is mandatory to submit as the first nationality Cyprus along with the ID number.

For **Cyprus nationals (not Cypriot citizens)** only one of the following three identification documents is acceptable in the register:

- ID number
- Passport number
- ARC number

For **Non-Cypriot nationals that are not resident in Cyprus**, the passport or ID of the natural person must be selected.

The name and surname must be completed exactly as indicated in the selected document.

In cases of persons with a **second nationality**, all details for second nationality must be added as well.

Residential address:

The following details of the **natural person's home address** should be completed:

- i. Country of Residence
- ii. Postal code
- iii. City/Province
- iv. Area/Municipality/Community
- v. Street name
- vi. Number
- vii. Building name
- viii. Office/Apartment number
- ix. Floor number

The address must be the permanent residential address of the natural person and must be completed in Greek characters.

International addresses may be completed in Latin characters.

The building must always be completed in Latin characters and capital letters in all cases (e.g. "XENIOS BUILDING").

Whenever input regarding natural persons is required (For **BOs of Trusts, Foundations and Other legal arrangements similar to Trusts**), the user will be prompted to complete all above fields.

Important note:

- 1) In the event of submission of BO details for Trusts, Foundations and Other legal arrangements similar to Trusts the details of natural person must be submitted, for each entry you must choose the field 'Add' (Προσθήκη).
- 2) It is clarified that the option Jointly – Group of Natural persons is **not applicable** for the categories mentioned above.

3.1.1.1 Nature and extend of beneficial interest

Calculation of the beneficial ownership of the share capital:

It is advised to review the group structure, statutory and governing documents of the company and other legal entities (i.e. Shareholders' certificates, Articles of Association, Shareholders Agreement or other), to determine whether an individual owns more than 25% of the shares.

All shares issued by the company or other legal entity should be considered when calculating the ownership percentages. The percentage is calculated using the nominal (or par) value of the shares. Shares which have never been issued or which have been bought back and cancelled, should not be included.

The calculation is a purely "mathematical" quantitative approach to the criterion of "ownership" of shares, thus, it is necessary to verify who owns the shares and in what proportion.

Where the proportion of shareholding must be determined via several successive levels of **indirect** ownership, the total percentage of ownership ultimately held by each individual is the multiplication of the ownership percentages, please refer to Annex II – Case number 2.

In case of ownership direct or indirect, the total ownership percentage is the addition of the different proportions held directly or indirectly by that person. For details, please refer to Annex II- Case number 4 - Direct and Indirect shareholding.

A beneficial owner may have a direct, an indirect or a combination of both direct and indirect ownership on a legal entity. As per the definition of beneficial owner, the ownership interest threshold is set at 25% +1 share or an ownership interest of more than 25% in the customer held by a natural person.

Consequently, if an individual holds more than 25% of the shares, he/she is deemed by the legislation to be the BO. Consequently, this individual is to be entered in the BO Register. If on the other hand, an individual holds less than 25% of the shares, this individual is not to be eliminated automatically, as he could be a BO, within the meaning of the law, through the notion of "control" explained below.

The nature and extent of beneficial interest **must be completed in all cases (Natural person, Jointly - Group of Natural Persons, Trust, Foundation, Other similar legal arrangements and listed entities)**. It must be clarified that the nature and extent of the beneficial interest will be submitted exclusively on the **percentage of the trust, foundation, other similar legal arrangement and listed entities in the entity**. In addition, in the case of jointly-group of

natural persons, the extent submitted will be the total amount for all natural persons included in the “jointly” group.

In cases where a senior management official is the beneficial owner **this part is not completed.**

Είδος δικαιώματος

Το είδος του δικαιώματος της ιδιοκτησίας σας είναι άμεση, έμμεση ή και τα δύο; Ο πραγματικός δικαιούχος μπορεί να έχει άμεση ή έμμεση ιδιοκτησία σε μια νομική οντότητα ή και τα δύο.

Να επιλέγεται υποχρεωτικά μια εκ των τριών πιο κάτω κατηγοριών

- Άμεση ιδιοκτησία Ως ένδειξη άμεσης ιδιοκτησίας αποτελεί συμμετοχή είκοσι πέντε τοις εκατό (25%) συν μια (1) μετοχή ή ιδιοκτησιακό δικαίωμα άνω του είκοσι πέντε τοις εκατό (25%) στον πελάτη που κατέχεται από φυσικό πρόσωπο.
- Έμμεση ιδιοκτησία Ως ένδειξη έμμεσης ιδιοκτησίας αποτελεί συμμετοχή είκοσι πέντε τοις εκατό (25%) συν μια (1) μετοχή ή ιδιοκτησιακό δικαίωμα άνω του είκοσι πέντε τοις εκατό (25%) στον πελάτη που κατέχεται από νομικό πρόσωπο, το οποίο βρίσκεται υπό τον έλεγχο φυσικού προσώπου ή προσώπων ή από πολλά νομικά πρόσωπα τα οποία βρίσκονται υπό το έλεγχο του ίδιου φυσικού προσώπου ή προσώπων ή μέσω διευθέτησης άσκησης καθηκόντων μετόχου (nominee arrangement) ή άλλης διευθέτησης.
- Άμεση και έμμεση ιδιοκτησία Για παράδειγμα ένα φυσικό πρόσωπο μπορεί να έχει άμεση ιδιοκτησία με κατοχή 15% των μετοχών καθώς και έμμεσο ιδιοκτησιακό δικαίωμα 20% επί των μετοχών, ανεβάζοντας το τελικό ιδιοκτησιακό του δικαίωμα του στα 35%.

Only **one** of the following three options must be ticked:

- i. **Direct ownership** – Reflecting a direct shareholding of 25% plus one shares or an ownership interest of more than 25 % in the customer held by a natural person. For further details, please refer to Annex II – Case number 1.
- ii. **Indirect ownership** – Reflecting an indirect shareholding or control of 25% plus one shares by the beneficial owner, through the ownership or control of one or more corporate entity/ies. For further details, please refer to Annex II – Case number 2.
- iii. **Direct & indirect ownership** – Reflecting a beneficial owner that may have a direct ownership by holding 15% of the shares as well as indirect ownership of 20% on the shares, raising his total ownership right to 35%. For further details, please refer to Annex II – Case number 3.

Έκταση δικαιώματος

Na επιλέγεται **ΜΟΝΟ** μία από τις πιο κάτω κατηγορίες. Σημειώστε ότι το σύνολο της έκτασης δικαιώματος τόσο ατομικά (για τον κάθε ΠΔ) όσο και μεταξύ των ΠΔ υπολογίζεται αυτόματα από το σύστημα και δεν πρέπει να ξεπερνά το 100% στην κάθε περίπτωση (ατομικό και στο σύνολο). Σημείωση: Σε περίπτωση που η κάθε μετοχή που κατέχει φυσικό πρόσωπο αντιστοιχεί σε δικαίωμα ψήφου να συμπληρώνεται μόνο το κουτάκι «ποσοστό μετοχών».

Ποσοστό Μετοχών

Ο αριθμός που καταχωρείται πρέπει να είναι μεγαλύτερος ή ίσος του 25%+1 μετοχή και μικρότερος ή ίσος του 100%.

* Δηλώστε το Ποσοστό Μετοχών

Το φυσικό πρόσωπο κατέχει ή ελέγχει τελικά τη νομική οντότητα μέσω άμεσης ή έμμεσης ιδιοκτησίας ή έλεγχου του είκοσι πέντε τοις εκατό (25%) συν μια (1) μετοχή.

Δικαιώματα ψήφου

Ο αριθμός που καταχωρείται πρέπει να είναι μεγαλύτερος ή ίσος του 25%+1 μετοχή και μικρότερος ή ίσος του 100%.

* Δηλώστε το Ποσοστό Μετοχών

Το φυσικό πρόσωπο κατέχει ή ελέγχει τελικά τη νομική οντότητα μέσω άμεσης ή έμμεσης ιδιοκτησίας ή έλεγχου άνω του είκοσι πέντε τοις εκατό (25%) στα δικαιώματα ψήφου

Σημαντική επιρροή ατόμου ή έλεγχος με άλλα μέσα

Έλεγχος με άλλα μέσα

* Επιλέξτε μια εκ των πιο κάτω κατηγοριών

- Μέσω συμφωνίας μετόχων
- Μέσω δεσπόζουσας επιρροής, επιρροής μέσω οικογενειακών δεσμών ή άλλων τύπων διασυνδέσεων με τα κέντρα λήψης αποφάσεων
- Μέσω της κατοχής διαπραγματεύσιμων μετοχών ή μετατρέψιμων μετοχών
- Μέσω της εξουσίας διορισμού ανώτατων διοικητικών στελεχών
- Με άλλο τρόπο (να δοθούν σχετικές λεπτομέρειες)

Δηλώστε το ποσοστό άμεσης ή έμμεσης ιδιοκτησίας εαν εφαρμόζεται

Το φυσικό πρόσωπο έχει το δικαίωμα να ασκήσει ουσιαστικά σημαντική επιρροή ή έλεγχο με άλλα μέσα στην εταιρεία. Τέτοια μέσα δυνατό να περιλαμβάνουν συμφωνία με τους ιδιοκτήτες ή τη διοίκηση του νομικού προσώπου, ή λόγω άλλων στενών δεσμών και επιρροής με το νομικό πρόσωπο. Σε περίπτωση που κανένας μέτοχος δεν κατέχει έμμεσα ή άμεσα πάνω από το 25% των μετοχών, η εταιρεία πρέπει να αποφασίσει ποια φυσικά πρόσωπα ελέγχουν την εταιρεία, εφόσον η έννοια «έλεγχος» περιλαμβάνει, πέραν του ποσοστού μετοχών και οποιονδήποτε έχει επαρκές ποσοστό δικαιωμάτων ψήφου ή ιδιοκτησιακού συμφέροντος ή έλεγχου με οποιοδήποτε άλλο μέσο στην εταιρεία.

Only one of the following three options must be selected and completed according to the %age owned or controlled:

- **Percentage of the shares** - Where the beneficial owner ultimately owns or controls the legal entity through direct or indirect ownership or control of 25% plus one shares. For further details, please refer to Annex III – Case number 1.
- **Voting rights** - Where the beneficial owner ultimately owns or controls the legal entity through direct or indirect ownership or control of more than 25% of voting rights. For further details, please refer to Annex III – Case number 2.
- **Significant influence or control with other means** - For further details, please refer to Annex III - Case number 4 - Significant Influence or control with other means.

In cases where option (iii) is selected, indicating significant influence or control with other means, additional clarifications must be provided.

A natural person may exercise significant influence or control via other means over a company. Such means may include agreement with the owners or the management of the legal entity or due to other close relationship and influence.

More specifically **one of the following options** must be selected:

- Through shareholder's agreement
- Through the exercise of significant influence, influence through family links or other types of connection with decision-makers
- Through the holding of negotiable or convertible shares
- Through the power to appoint senior management
- Other (Details to be provided accordingly)

If applied, the percentage of direct or indirect ownership must be disclosed.

In case no shareholder owns directly or indirectly more than 25% of the shares, the entity must decide which natural person(s) control(s) the entity. The meaning of "control" in such a case is extended beyond the ownership percentage of shares, but includes anyone with sufficient percentage of voting rights, ownership interest, or control via other means in the entity.

Additional Beneficial Owners

In case of additional beneficial owners click "Addition" (Προσθήκη) and repeat all above steps for the additional beneficial owners.

Note that the total %age will be calculated automatically by the system and it should not exceed 100% for each entity.

3.1.1.2 Submission of Beneficial owner information

The screenshot shows a web form for submitting Beneficial Owner (BO) information. At the top, there is a header with a redacted name and the letters 'HE'. Below this is a navigation bar with the text 'Ενημέρωση στοιχείων - Προσωρινός χώρος' and two buttons: 'Οριστική υποβολή' and 'Ακύρωση'. The main content area contains a green instruction: 'Συμπληρώστε τα στοιχεία των Πραγματικών Δικαιούχων. Τα στοιχεία να συμπληρωθούν και από τους Οργανισμούς οι οποίοι στο σύστημα της ενδιάμεσης λύσης έχουν ήδη ενημερώσει το Μητρώο των Πραγματικών Δικαιούχων. Μπορείτε να δείτε τα στοιχεία που έχετε δηλώσει κατά την εφαρμογή του συστήματος ενδιάμεσης λύσης στην καρτέλα «Πληροφορίες από ενδιάμεσο σύστημα».' Below the instruction are three input fields: 'Ημερομηνία εγγραφής', 'Προθεσμία', and 'Σημερινή ημερομηνία', each with a calendar icon. A note at the bottom of the form reads: 'Αν είστε σίγουροι για τις αλλαγές που έχετε κάνει, κάντε κλικ στο κουμπι "Οριστική υποβολή".' At the very bottom right, there are two buttons: 'Δέουσα επιμέλεια' and 'Προσθήκη'.

Upon completion of all the required fields click the button “Entry” (Καταχώριση) to submit the BO details.

“Final submission” (Οριστική Υποβολή) must then be clicked in order the BO data to be updated and held in the system.

The screenshot shows the 'Πραγματικοί δικαιούχοι' (Beneficial Owners) section of the system. At the top, there is a header with a redacted name and the letters 'HE'. Below this is a navigation bar with three tabs: 'Χαρακτηριστικά', 'Πραγματικοί δικαιούχοι' (which is selected and highlighted with a blue underline), and 'Πληροφορίες από ενδιάμεσο σύστημα'. The main content area displays two entries for Beneficial Owners. Each entry consists of a redacted name at the top, followed by three fields: 'Υπηκοότητα', 'Ημερομηνία γέννησης', and 'Οδός', each with a redacted value.

Following submission, all details of the beneficial owner or the senior management official, will be saved and the details will appear under section “Beneficial Owners” (Πραγματικοί δικαιούχοι).

3.1.2 Trusts

* Επωνυμία

Αριθμός εγγραφής

* Χώρα δικαιοδοσίας

Complete the Name of the Trust, the registration number (if applicable) and the Jurisdiction where the Trust is established.

For the next step follow the guidance on section “**3.1.1.1 Nature and extend of beneficial interest**” above. It must be noted that the nature and extent of the beneficial interest, will be submitted exclusively on the **percentage of the trust in the entity** and not divided by each of the categories listed below.

Προσθήκη δικαιούχου - Εμπίστευμα

- Εμπιστευματοπάροχος
- Εμπιστευματοδόχος ή επίτροπος
- Δικαιούχος
- Προστάτης
- Οποιοδήποτε άλλο φυσικό πρόσωπο ασκεί τον τελικό έλεγχο

In the case the final BO is a **Trust**, the user **must** submit information regarding the following, leading up to a natural person:

- a) **Settlor**
- b) **Trustee**
- c) **Beneficiary**
- d) Protector (Provisional)
- e) Any other natural person exercises ultimate control (Provisional)

For trusts registered in the Republic of Cyprus, the first 3 categories mentioned above are mandatory to be completed.

For Trusts registered in a jurisdiction other than Cyprus, **at least one** of the above-mentioned fields must be completed (Settlor, Trustee, Beneficiary, Protector, Any other person exercises ultimate control).

For the next step follow guidance on section **3.1.1 Natural person & Jointly – Group of Natural persons** and upon completion follow guidance on section **3.1.1.2 Submission of Beneficial owner information**.

For further details, please refer to [Annex I, Case number 2 - Trust](#)

3.1.3 Other legal arrangements similar to Trusts

* Επωνυμία

Αριθμός εγγραφής

* Χώρα δικαιοδοσίας

Complete the Name of the Legal arrangement, the registration number (if applicable) and the Jurisdiction where the Legal arrangement is established.

For the next step follow the guidance on section **3.1.1.1 Nature and extend of beneficial interest** above. It must be noted that the nature and extent of the beneficial interest will be submitted exclusively on the **percentage of the legal arrangement in the entity** and not divided by each of the categories listed below.

Προσθήκη δικαιούχου - Νομικές διευθετήσεις παρεμφερείς με τα Εμπιστεύματα

- Εμπιστευματοπάροχος
- Εμπιστευματοδόχος ή επίτροπος
- Δικαιούχος
- Προστάτης
- Οποιοδήποτε άλλο φυσικό πρόσωπο ασκεί τον τελικό έλεγχο
- Άλλη ιδιότητα (Δηλώστε)

In the case the final BO is a **Legal arrangement**, the user **must** submit information regarding the following, leading up to a natural person:

- a) **Settlor**
- b) **Trustee**
- c) **Beneficiary**
- d) Protector
- e) Any other natural person exercises ultimate control
- g) Other capacity

For Legal arrangement registered in the Republic of Cyprus or in a jurisdiction other than Cyprus, **at least one** of the above-mentioned fields must be completed (Settlor, Trustee, Beneficiary, Protector, Any other person exercises ultimate control, Other capacity).

For the next step follow guidance on section **3.1.1 Natural person & Jointly – Group of Natural persons** and upon completion follow guidance on **3.1.1.2 Submission of Beneficial owner information**.

For further details, please refer to Annex I, Case number 12 - Other legal arrangements similar to Trust.

3.1.4 Foundations

* Επωνυμία

Αριθμός εγγραφής

* Χώρα δικαιοδοσίας

Complete the Name of the **Foundation**, the registration number (if applicable) and the Jurisdiction where the **Foundation** is established.

For the next step follow the guidance on section **3.1.1.1 Nature and extend of beneficial interest** above. It must be noted that the nature and extent of the beneficial interest will be submitted exclusively on the **percentage of the foundation in the entity** and not for each of the categories mentioned below.

Προσθήκη δικαιούχου - Ίδρυμα

- Ιδρυτής
- Μέλος του Διοικητικού Συμβουλίου
- Μέλος της Διεύθυνσης
- Άλλη ιδιότητα (Δηλώστε)

In the case the final BO is a **Foundation**, the user **must** submit information for **at least one** of the following, leading up to a natural person:

- a) Founder
- b) Member of the Board of Directors
- c) Member of the Management
- d) Other relationship (please specify) – e.g. Beneficiaries

For the next step follow guidance on **3.1.1 Natural person & Jointly – Group of Natural persons** and upon completion follow guidance on **3.1.1.2 Submission of Beneficial owner information**.

For further details, please refer to [Annex I – Case number 7](#).

3.1.5 Company and other legal entity listed on a regulated market subject to disclosure requirements under European Union law & Company and other legal entity subject to equivalent international standards that ensure adequate transparency of proprietary information

* Επωνυμία

Αριθμός εγγραφής

* Χώρα δικαιοδοσίας

* Όνομα ρυθμιζόμενης αγοράς

* Χώρα ρυθμιζόμενης αγοράς

Complete the name of the **Listed entity**, the registration number (if applicable), the Jurisdiction, the name of regulated market and the country of regulated market.

For the next step follow the guidance on section **3.1.1.1 Nature and extend of beneficial interest** above. It must be noted that the nature and extent of the beneficial interest will be submitted exclusively on the **percentage of the listed company in the entity**.

Δηλώνω υπεύθυνα ότι τα στοιχεία που έχουν δηλωθεί για τον Πραγματικό Δικαιούχο που υπόκειται σε ισοδύναμα διεθνή πρότυπα τα οποία εξασφαλίζουν επαρκή διαφάνεια των πληροφοριών ιδιοκτησίας είναι ορθά και ως εκ τούτου εξαιρείται της υποχρέωσης υποβολής στοιχείων πραγματικών δικαιούχων. Η παρούσα δήλωση υποβάλλεται συνειδητά για σκοπούς εφαρμογής του Ν.188(Ι)/2007 και της Οδηγίας Κ.Δ.Π. 112/2021 ως τροποποιήθηκε και με γνώση ότι κάνοντας ψευδή και/ή παραπλανητική αναφορά θα υπόκειμαι σε κυρώσεις, με ποινή ψευδορκίας, σύμφωνα με τους νόμους της Κυπριακής Δημοκρατίας και δηλώνω υπεύθυνα ότι όλες οι πληροφορίες που έχω δώσει, είναι αληθινές.

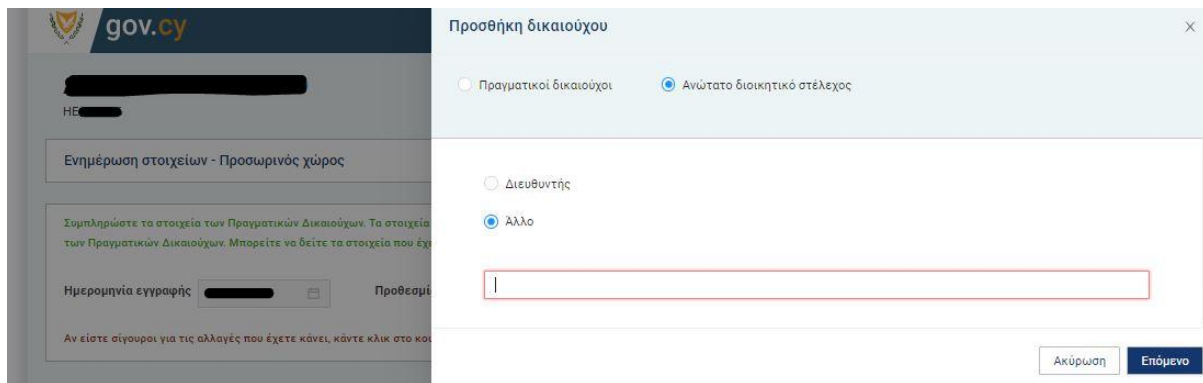
Αποδοχή

Finally, press “**Acceptance**” (“**Αποδοχή**”), giving consent that the details submitted for the Beneficial Owner are accurate and true, and therefore exempting the entity from the obligation to submit additional details of Beneficial Owners.

Upon completion follow guidance on **3.1.1.2 Submission of Beneficial owner information**.

For further details, please refer to Annex I, [Case number 4 - Listed Entity](#).

3.2 Senior Management Official



The field «**Senior Management official**» should be selected **only if no natural person is identified as the beneficial owner** based on the ownership rights or when there is doubt that the person identified is indeed the beneficial owner. If the field «Senior Management official» has been selected, proceed to indicate whether the person is a **director** in the company or whether there are any **other** reasons that make this person a Beneficial Owner.

For the next step follow guidance on section **3.1.1 Natural person & Jointly – Group of Natural persons** and upon completion follow guidance on **3.1.1.2 Submission of Beneficial owner information**.

For further details, please refer to Annex I, [Case number 3 - No BO with >25% ownership](#).

3.3 Listed entities

Παρακαλώ επιλέξτε μία από τις παρακάτω ενέργειες

Ενημέρωση Πραγματικών Δικαιούχων

Η ενημέρωση του Μητρώου Πραγματικών Δικαιούχων για τον οργανισμό που θα επιλέξετε γίνεται ΜΟΝΟ από τον αξιωματούχο/συνέταιρο (φυσικό ή νομικό πρόσωπο) του οργανισμού ή τον ίδιο τον οργανισμό.

Εταιρεία και άλλη νομική οντότητα που είναι εισηγμένη σε ρυθμιζόμενη αγορά, η οποία υπόκειται σε απαιτήσεις γνωστοποίησης κατά τη νομοθεσία της Ευρωπαϊκής Ένωσης.

Επιλέγοντας το πεδίο αυτό μπορείτε να δηλώσετε ότι ο οργανισμός σας είναι εισηγμένος σε ρυθμιζόμενη αγορά συνεπώς εξαιρείται της υποβολής πραγματικού δικαιούχου. Σε περίπτωση που ο οργανισμός σας παύσει να είναι εισηγμένος σε ρυθμιζόμενη αγορά, η οποία υπόκειται σε απαιτήσεις γνωστοποίησης κατά την νομοθεσία της Ευρωπαϊκής Ένωσης τότε θα πρέπει να τον αφαιρέσετε από την εξαίρεση και θα πρέπει να ενημερώσετε το Μητρώο των Πραγματικών Δικαιούχων.

Εταιρεία και άλλη νομική οντότητα που υπόκειται σε ισοδύναμα διεθνή πρότυπα τα οποία εξασφαλίζουν επαρκή διαφάνεια των πληροφοριών ιδιοκτησίας.

Επιλέγοντας το πεδίο αυτό μπορείτε να δηλώσετε ότι ο οργανισμός σας υπόκειται σε ισοδύναμα διεθνή πρότυπα συνεπώς εξαιρείται της υποβολής πραγματικού δικαιούχου. Σε περίπτωση που ο οργανισμός σας παύσει να υπόκειται σε ισοδύναμα διεθνή πρότυπα τα οποία εξασφαλίζουν επαρκή διαφάνεια των πληροφοριών ιδιοκτησίας τότε θα πρέπει να τον αφαιρέσετε από την εξαίρεση και θα πρέπει να ενημερώσετε το Μητρώο των Πραγματικών Δικαιούχων.

Entities listed on a regulated market that are subject to disclosure requirements under European Union law or subject to equivalent international standards which ensure adequate transparency of proprietary information, are exempted from the obligation to submit the BO details onto the register.

* Όνομα ρυθμιζόμενης αγοράς

* Χώρα ρυθμιζόμενης αγοράς

Δηλώνω υπεύθυνα ότι τα στοιχεία που έχουν δηλωθεί για την εταιρεία και άλλη νομική οντότητα που είναι εισηγμένη σε ρυθμιζόμενη αγορά, η οποία υπόκειται σε απαιτήσεις γνωστοποίησης κατά τη νομοθεσία της Ευρωπαϊκής Ένωσης, είναι ορθά και ως εκ τούτου εξαιρείται της υποχρέωσης υποβολής στοιχείων πραγματικών δικαιούχων.

Η παρούσα δήλωση υποβάλλεται συνειδητά για σκοπούς εφαρμογής του Ν.188(Ι)/2007 και της Οδηγίας Κ.Δ.Π. 112/2021 ως τροποποιήθηκε και με γνώση ότι κάνοντας ψευδή και/ή παραπλανητική αναφορά θα υπόκειμαι σε κυρώσεις, με ποινή ψευδορκίας, σύμφωνα με τους νόμους της Κυπριακής Δημοκρατίας και δηλώνω υπεύθυνα ότι όλες οι πληροφορίες που έχω δώσει, είναι αληθινές.

Αποδοχή

A declaration in the final solution, however, must be performed according to the entity's disclosure requirements, stating, the name of the regulated market, the jurisdiction and that the entity is exempted from submission of the beneficial owner.

In the event that the company ceases to be subject to the above, the option "Remove" (Αφαίρεση) shall be selected and the company must proceed to file the BO details onto the registry.

3.4. Obligated Entities

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Καλωσορίσατε στο Μητρώο Πραγματικών Δικαιούχων του Εφόρου Εταιρειών

Σύμφωνα με την εγγραφή σας στο CY login, είστε νομικό πρόσωπο. Αν όμως είστε νομικό πρόσωπο και ανήκετε στις υπόχρεες οντότητες, τότε επιλέξτε "Υπόχρεη οντότητα". Εδώ μπορείτε να δείτε τον κατάλογο με τις Υπόχρεες Οντότητες.

Νομικό πρόσωπο Υπόχρεη οντότητα

Παρακαλώ επιλέξτε την Υπόχρεη οντότητα στην οποία ανήκετε, σύμφωνα με το άρθρο 24 του περί της Παρεμπόδισης και Καταπολέμησης της Νομιμοποίησης Εσόδων από Παράνομες Δραστηριότητες Νόμο του 2007 (188(Ι) 2007), όπου παρουσιάζονται όλες οι Υπόχρεες Οντότητες. Για περισσότερες πληροφορίες πατήστε [Εδώ](#).

- Πιστωτικό Ίδρυμα
 - Χρηματοπιστωτικός Οργανισμός
 - Ελεγκτής, εξωτερικός λογιστής, φορολογικός σύμβουλος
 - Ανεξάρτητος επαγγελματίας νομικός όταν συμμετέχει, είτε ενεργώντας εξ ονόματος και για λογαριασμό πελάτη του στο πλαίσιο χρηματοπιστωτικής συναλλαγής ή συναλλαγής επί ακίνητης ιδιοκτησίας
 - Φυσικό ή νομικό πρόσωπο που παρέχει υπηρεσίες σε επιχειρήσεις
 - Κτηματομεσίτες
 - Πάροχοι υπηρεσιών τυχερών παιχνιδιών
 - Καζίνο
- Πάροχοι υπηρεσιών που αφορούν Κρυπτοπερουσικά Στοιχεία
- Πρόσωπα, η εποπτεία των οποίων ανατίθεται στην Επιτροπή Κεφαλαιαγοράς δυνάμει των διατάξεων του περί Επιτροπής Κεφαλαιαγοράς Κύπρου Νόμου ή οποιοδήποτε άλλο νόμου
- Πρόσωπα που εμπορεύονται ή ενεργούν ως μεσάζοντες στο εμπόριο έργων τέχνης, ακόμη και όταν αυτό πραγματοποιείται από αίδουσες τέχνης και οίκους δημοπρασιών, όταν η αξία της συναλλαγής ή σειράς συνδεδεμένων πράξεων ανέρχεται σε 10 000 EUR ή περισσότερο
- Πρόσωπα που αποθηκεύουν, εμπορεύονται ή ενεργούν ως μεσάζοντες στο εμπόριο έργων τέχνης, όταν αυτό πραγματοποιείται από ελεύθερους λιμένες, όταν η αξία της συναλλαγής ή σειράς συνδεδεμένων πράξεων ανέρχεται σε 10 000 EUR ή περισσότερο

Επόμενο

In case where an entity is an Obligated Entity as per [Section 2A of the AML Law](#), it should be declared in the system following the below steps:

- Login in the BO Register with you CY login credentials
- Tick Obligated Entity (Υπόχρεη οντότητα) and then choose from the list the option which is applicable to you i.e.
 - I. **Πιστωτικό ίδρυμα** (Credit institution)
 - II. **Χρηματοπιστωτικός οργανισμός** (Financial institution)
 - III. **Ελεγκτής, εξωτερικός λογιστής, φορολογικός σύμβουλος** (Auditor, external accountant, and tax advisor)
 - IV. **Ανεξάρτητος επαγγελματίας νομικός, όταν συμμετέχει, είτε ενεργώντας εξ ονόματος και για λογαριασμό πελάτη του στο πλαίσιο χρηματοπιστωτικής συναλλαγής ή συναλλαγής επί ακίνητης ιδιοκτησίας**(Independent legal professional, when it participates, whether acting on behalf of a client in a financial or real estate transaction)
 - V. **Φυσικό ή νομικό πρόσωπο που παρέχει τις ακόλουθες υπηρεσίες σε επιχειρήσεις** (Natural or legal person offering services to companies)
 - VI. **Κτηματομεσίτες** (Estate agents)
 - VII. **Πάροχοι υπηρεσιών τυχερών παιχνιδιών** (Providers of gambling services)

- VIII. **Καζίνο (Casino)**
- IX. Διαγράφηκε βάση τον τροποποιητικό νόμο N. 172(I)/2024 του βασικού νόμου N. 188(I)/2007. (It has been deleted based on the amending law L. 172(I)/2024 of the basic law N. 188(I)/2007).
- X. **Πάροχοι Υπηρεσιών που αφορούν Κρυπτοπεριουσιακά Στοιχεία (Crypto Asset Service Providers)**
- XI. **Πρόσωπα, η εποπτεία των οποίων ανατίθεται στην Επιτροπή Κεφαλαιαγοράς δυνάμει των διατάξεων του περί Επιτροπής Κεφαλαιαγοράς Κύπρου Νόμου ή οποιουδήποτε άλλου νόμου (Persons, whose supervision is assigned to CySEC under the provisions of the law of the Cyprus Securities and Exchange Commission or any other law)**
- XII. **Πρόσωπα που εμπορεύονται ή ενεργούν ως μεσάζοντες στο εμπόριο έργων τέχνης, ακόμα και όταν αυτό πραγματοποιείται από αίθουσες τέχνης και οίκους δημοπρασιών, όταν η αξία της συναλλαγής ή σειράς συνδεδεμένων πράξεων ανέρχεται σε δέκα χιλιάδες ευρώ (€10.000) ή περισσότερο (Persons trading or acting as intermediaries in the trade of works of art, even when such trade - is carried out by art galleries and auction houses, where the value of the transaction or a series of linked transactions amounts to ten thousand Euro (€10.000) or more)**
- XIII. **Πρόσωπα που αποθηκεύουν, εμπορεύονται ή ενεργούν ως μεσάζοντες στο εμπόριο έργων τέχνης, όταν αυτό πραγματοποιείται από ελεύθερους λιμένες, όταν η αξία της συναλλαγής ή σειράς συνδεδεμένων πράξεων ανέρχεται δέκα χιλιάδες ευρώ (€10.000) ή περισσότερο (Persons storing, trading or acting as intermediaries in the trade of works of art when this is carried out by free ports, where the value of the transaction or a series of linked transactions amounts to ten thousand Euro (€10.000) or more)**
- Click **“Next”** (Επόμενο) **to submit your request**

Σύμφωνα με την εγγραφή σας στο CY login, είστε φυσικό πρόσωπο. Αν όμως είστε φυσικό πρόσωπο και ανήκετε στις υπόχρεες οντότητες, τότε επιλέξτε "Υπόχρεη οντότητα". Εδώ μπορείτε να δείτε τον κατάλογο με τις Υπόχρεες Οντότητες.

Φυσικό πρόσωπο

Υπόχρεη οντότητα

Το αίτημα σας έχει προωθηθεί στον Έφορο Εταιρειών και θα πάρετε απάντηση μετά την αξιολόγηση του.

- Following submission of the request, the Registrar will contact you via the email uboobligedentity@meci.gov.cy, attaching a relevant solemn declaration for the obliged entity to sign and submit back to the Registrar via the email already mentioned.
- Upon examination of your request a relevant reply (approval, rejection, or additional required information) will be sent to your email.

In the event you have accidentally chosen the option “obliged entity” and you do not wish to be authorized as one, you must send an email to uboobligedentity@meci.gov.cy, in order your request to not be processed.

If you have selected your role as “natural” or “legal person”, but you also wish to be authorized as an “obliged entity” you must send an email to uboobligedentity@meci.gov.cy, attaching the relevant solemn declaration along with a signed letter stating the reasons for the incorrect selection. Your request will be examined, and a relevant notification will be sent to your email.

Once your request is approved you are then granted access to the following services:

1. E-search (you may search multiple entities either by the registration number or registration name)
2. Submission of info to BO register
3. Request for exemption from access to beneficial owner details
4. Request for access to minor’s data

Important notes:

1. The above described procedure is performed only once. You may conduct an electronic search on the condition that you have been approved as an obliged entity and that you accept the solemn declaration.
2. An obliged entity may proceed to purchase BO details for multiple entities upon payment of a relevant fee of € 3.50 for each entity
3. Access to the service “submission of BO details” is granted only to obliged entities appointed as officers in the entity concerned.

 gov.cy Αρχική Πληρωμές Καλάθι user

Παρακαλώ επιλέξτε μία από τις παρακάτω ενέργειες

Έρευνα

Μπορείτε να προβείτε σε έρευνα στα στοιχεία πραγματικού δικαιούχου για τον οργανισμό που σας ενδιαφέρει. Προσθέστε στο καλάθι σας τα αποτελέσματα που επιθυμείτε και ακολουθώντας προχωρήστε στην πληρωμή για να δείτε τις λεπτομέρειες στα στοιχεία πραγματικού δικαιούχου του/των οργανισμού/ων που επιλέξατε. Το καλάθι διατηρεί τα επιλεγμένα μόνο για οση ώρα είστε συνδεδεμένοι. Μετά την αποσύνδεση σας το καλάθι αδειάζει.

Ενημέρωση οργανισμού

Επιλέγοντας το πεδίο αυτό μπορείτε να προβείτε σε ενημέρωση του μητρώου πραγματικών δικαιούχων (η ενημέρωση του μητρώου γίνεται ΜΟΝΟ από τον αξιωματούχο/συντάκτο του οργανισμού ή τον ίδιο οργανισμό).


Εξαίρεση δημοσιοποίησης στοιχείων

Ο πραγματικός δικαιούχος οργανισμού ή ο ίδιος ο οργανισμός (με τη συγκατάθεση του πραγματικού δικαιούχου ή του κηδεμόνα του αν ο πραγματικός δικαιούχος είναι με άλλο τρόπο νομικά ανίκανος) μπορεί να υποβάλει αίτημα εξαίρεσης δημοσιοποίησης των στοιχείων επισυνάπτοντας σχετικά αποδεικτικά στοιχεία. Το αίτημα, θα αξιολογηθεί από λειτουργό του Τμήματος Εφόρου Εταιρειών και θα ενημερωθείτε αναλόγως μέσω αποστολής η-μηνύματος.

Αίτημα για πρόσβαση σε στοιχεία ανήλικου

Υπόχρη οντότητα ή μέλος του ευρύτερου κοινού μπορούν να υποβάλουν αίτημα για πρόσβαση στα στοιχεία ανήλικου επισυνάπτοντας σχετικά αποδεικτικά στοιχεία ή και διάταγμα δικαστηρίου. Το αίτημα, θα αξιολογηθεί από λειτουργό του Τμήματος Εφόρου Εταιρειών και θα ενημερωθείτε αναλόγως μέσω αποστολής η-μηνύματος.

 Όροι χρήσης Πολιτική απορρήτου Προσβασιμότητα
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 Με τη χρηματοδότηση της Ευρωπαϊκής Ένωσης NextGenerationEU

 Κύπρος — το αύριο
ΕΣΣΕΟ ΑΝΑΚΑΜΨΗΣ ΚΑΙ ΑΝΔΕΚΤΟΤΗΤΑΣ

gov.cy Αρχική Πληρωμές Καλάθι user

Έρευνα

Με όλες τις λέξεις Με μερικές από τις λέξεις

* Αριθμός εγγραφής * Επωνυμία

Παρακαλώ συμπληρώστε τουλάχιστον το ένα από τα δύο πεδία

Αναζήτηση

Αποτελέσματα αναζήτησης Βρέθηκαν 0

Δεν βρέθηκαν αποτελέσματα

Όροι χρήσης Πολιτική απορρήτου Προσβασιμότητα
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Important note: The list obliged entities with all categories and subcategories is provided in the article 2 A of the Law 188 (I)/2007 on the Prevention and Suppression of Money Laundering and Terrorist Financing Laws of 2007.

3.5 Due Diligence

HE [redacted]

Ενημέρωση στοιχείων - Προσωρινός χώρος Οριστική υποβολή [Ακύρωση](#)

Συμπληρώστε τα στοιχεία των Πραγματικών Δικαιούχων. Τα στοιχεία να συμπληρωθούν και από τους Οργανισμούς οι οποίοι στο σύστημα της ενδιάμεσης λύσης έχουν ήδη ενημερώσει το Μητρώο των Πραγματικών Δικαιούχων. Μπορείτε να δείτε τα στοιχεία που έχετε δηλώσει κατά την εφαρμογή του συστήματος ενδιάμεσης λύσης στην καρτέλα «Πληροφορίες από ενδιάμεσο σύστημα».

Ημερομηνία εγγραφής [calendar icon] Προθεσμία [calendar icon] Σημερινή ημερομηνία [calendar icon]

Αν είστε σίγουροι για τις αλλαγές που έχετε κάνει, κάντε κλικ στο κουμπι "Οριστική υποβολή".

[Δέουσα επιμέλεια](#) [Προσθήκη](#)

According to the provisions of the Directive (ΚΔΠ 112/2021) as amended, director or manager of a company or other legal entity shall not be held for the repayment of the fine imposed on the company or legal entity if he had exercised due diligence on the compliance and the violation is not due to any act or omission or negligence on his behalf. The due diligence should be submitted within the time frames mentioned in the Directive as amended to avoid fines. For example, in case of company's discrepancy the due diligence should be submitted within 30 days, according to paragraph 15(3)(b) of the Directive as amended, from the date the Department requests, from the corporate or other legal entity and each of its officers, a written statement with a reasoned reply whether the discrepancy is valid and if it is indeed valid, the amendment information for registration by electronic means in the Register of Beneficial Owners of Corporate and Other Legal Entities required to resolve the discrepancy.

Due diligence is submitted to the beneficial ownership system by the company or other legal entity itself or its officers with the relevant documentation/affidavit, signed by the company's officers. The documentation/affidavit of the due diligence must include, among other information, the last details of the beneficial owners that are known to the company or other legal entity and its officers as defined by the Directive ΚΔΠ 112/2021 as amended. It is noted that more details on due diligence are available in the Directive ΚΔΠ 112/2021 as amended as well as in Law 188(I)/2007 and especially in articles 60 - 66 of the aforementioned Law.

It is furthermore emphasized that, as per the provisions of Article 61A(10)(f)(ii) of the Law, a person who knowingly makes a false, misleading or fraudulent declaration to the Registrar of Companies as to the beneficial owners of its client (company or other legal entity), is guilty of an offense and, upon conviction, shall be liable to imprisonment not exceeding 1 year or to a fine not exceeding €100.000 or both.

Instructions for submitting due diligence to the system at the following link: [Βήματα της ενέργειας της δέουσας επιμέλειας/Steps of the due diligence action](#)

gov.cy

HE

Ενημέρωση στοιχείων - Προσωρινός χώρος

Συμπληρώστε τα στοιχεία των Πραγματικών Δικαιούχων. Τα στοιχεία να συμπληρωθούν και από τους Οργανισμούς οι οποίοι εκπροσωπούν τους Πραγματικούς Δικαιούχων. Μπορείτε να δείτε τα στοιχεία που έχετε δηλώσει κατά την εφαρμογή του συστήματος ενδιάμεσης ενημέρωσης.

Ημερομηνία εγγραφής: [] Προθεσμία: [] Σημερινή ημερομηνία: []

Αν είστε σίγουροι για τις αλλαγές που έχετε κάνει, κάντε κλικ στο κουμπι "Οριστική υποβολή".

Δεν βρέθηκαν αποτελέσματα

Οροι χρήσης Πολιτική απορρήτου Προσβασιμότητα
© Republic of Cyprus, 2023

Δέουσα επιμέλεια

* Περιγράψτε τον λόγο για τον οποίο ζητάτε Δέουσα Επιμέλεια

* Ανέβασμα εγγράφου
Click to upload

Ακύρωση Οριστική υποβολή

3.6 Changes to the entity’s ownership structure

Where there are changes in the BO information already submitted into the system (e.g. termination of BO, change in BO percentage of shares, change of address etc), the system **must be updated forty-five (45) days** from the date of the change.

The screenshot shows a web interface for a company (HE [redacted]). The main navigation bar includes tabs for 'Χαρακτηριστικά', 'Πραγματικοί δικαιούχοι' (selected), 'Πληροφορίες από ενδιάμεσο σύστημα', and 'Ενέργειες'.

From “Beneficial Owners” screen, click “**Actions**” (Ενέργειες). You will be transferred to the BO information you have submitted.

The screenshot shows the 'Ενημέρωση στοιχείων - Προσωρινός χώρος' screen. It includes a header with 'Ενημέρωση στοιχείων - Προσωρινός χώρος' and buttons for 'Οριστική υποβολή' and 'Ακύρωση'. A green message states: 'Επιλέξτε ημερομηνία αλλαγής και προβείτε στις ενέργειες που επιθυμείτε (τροποποίηση, παύση, προσθήκη)'. Below this, there are two date pickers: 'Ημερομηνία αλλαγής' (set to 29/11/2023) and 'Σημερινή ημερομηνία' (set to 29/11/2023). A red note says: 'Αν είστε σίγουροι για τις αλλαγές που έχετε κάνει, κάντε κλικ στο κουμπι "Οριστική υποβολή"'. At the bottom right, there are buttons for 'Δέουσα επιμέλεια' and 'Προσθήκη'. Below the date pickers, there is a form with fields for 'Υψηκότητα', 'Ημερομηνία γέννησης', and 'Οδός', each with a redacted value. At the bottom right of this section are buttons for 'Επαναφορά', 'Τροποποίηση', and 'Παύση'.

Amend **accordingly** the “change date”. The date used must be the date that the change took place.

Depending on the scenario select:

- “**Addition**” (Προσθήκη) – For addition of a new BO or SMO
- “**Change**” (Τροποποίηση) – For changes of details of existing BO or SMO
- “**Termination**” (Παύση) – For termination of a person as BO or SMO
- “**Restore**” (Επαναφορά) – For restoring changes in BO or SMO data before the final submission.

For the next step, follow guidance on section **3.1.1 Natural person & Jointly – Group of Natural persons** and upon completion follow guidance on **3.1.1.2 Submission of Beneficial owner information**.

3.7 View & Purchase e-search

Ενημέρωση Πραγματικών Δικαιούχων

Εταιρεία Συνεταιρισμός Συνεταιρισμός (BN) Ευρωπαϊκή εταιρεία

Η επιλογή τύπου "Συνεταιρισμός (BN)" να επιλέγεται ΜΟΝΟ εαν στον αριθμό εγγραφής του συνεταιρισμού εμφανίζεται το πρόθεμα BN.

* Αριθμός εγγραφής
HE [REDACTED] Καθαρισμός Αναζήτηση

Αποτελέσματα αναζήτησης

Αριθμός εγγραφής	HE [REDACTED]	Ημερομηνία εγγραφής	[REDACTED]
Τύπος	Limited Company	Υποκατηγορία	Ιδιωτική
Κατάσταση οργανισμού	Εγγεγραμμένη		

Αγορά έρευνας Μελέτη

3.7.1 View

gov.cy Αρχική Πληρωμές Καλάθι [REDACTED]

[REDACTED]
HE [REDACTED]

Χαρακτηριστικά Πραγματικοί δικαιούχοι Πληροφορίες από ενδιάμεσο σύστημα

Press “Study” (Μελέτη) to view **entity’s details, beneficial owner(s)** (for more details please see above) **and the information transferred from the interim solution.**

Entity’s details:

Χαρακτηριστικά Πραγματικοί δικαιούχοι Πληροφορίες από ενδιάμεσο σύστημα

Αριθμός εγγραφής	HE [REDACTED]
Τύπος	[REDACTED]
Κατάσταση οργανισμού	Εγγεγραμμένη
Ημερομηνία εγγραφής	[REDACTED]
Υποκατηγορία	Ιδιωτική
Ημ. τελευταίας καταχώρησης Π.Δ.	[REDACTED]
Εγγεγραμμένο γραφείο	[REDACTED]
Ηλεκτρονικό ταχυδρομείο	[REDACTED]

Here, entity’s details such as **registration number, type, organisation status, registration date, sub type, date of submission of BO data, registered office and email address** are shown.

Information transferred from the interim solution:

Χαρακτηριστικά	Πραγματικοί δικαιούχοι	Πληροφορίες από ενδιάμεσο σύστημα	
Όνομα	[REDACTED]	Είδος δικαιώματος	
Επώνυμο	[REDACTED]	Είδος δικαιώματος	[REDACTED]
Ημερομηνία γέννησης	[REDACTED]	Έκταση δικαιώματος	[REDACTED]
Υπηκοότητα	[REDACTED]	Ποσοστό μετοχών	[REDACTED]
Υπηκοότητα	[REDACTED]	Δικαιώματα ψήφου	[REDACTED]
Αριθμός ταυτότητας	[REDACTED]	Ελεγχος με άλλα μέσα	[REDACTED]
Αριθμός διαβατηρίου	[REDACTED]	Σημαντική επιρροή ατόμου ...	[REDACTED]
Χώρα έκδοσης	[REDACTED]		
Διεύθυνση	[REDACTED]		
Χώρα διαμονής	[REDACTED]		
Ταχυδρομικός τομέας	[REDACTED]		
Οδός	[REDACTED]		
Αριθμός	[REDACTED]		
Κτήριο	[REDACTED]		
Όροφος	[REDACTED]		
Περιοχή / Δήμος / Κοινότητα	[REDACTED]		
Πόλη / Επαρχία	[REDACTED]		

Under this tap, you will find all the information submitted to the interim solution and transfer to the final solution.

Information includes:

a) Personal details

- Name
- Surname
- Date of birth
- Nationality
- ID number
- Passport number
- Country of issuance

b) Residential Address

- Country of Residence
- Postal code
- Number
- Building name
- Floor number
- Area/Municipality/Community
- City/Province

c) Nature of beneficial interest

d) Extent of beneficial interest

- Percentage of shares
- Voting Rights
- Control with other means
- Significant influence

3.7.2 Purchase e-search

Ενημέρωση Πραγματικών Δικαιούχων

Εταιρεία Συνεταιρισμός Συμμετοχή

Η επιλογή τύπου "Συνεταιρισμός (BN)" να επιλέγεται Μ

* Αριθμός εγγραφής
HE [REDACTED]

Αποτελέσματα αναζήτησης

ALT SECRETARIAL LTD	
Αριθμός εγγραφής	HE [REDACTED]
Τύπος	Limited Company
Κατάσταση οργανισμού	Εγγεγραμμένη

Υπεύθυνη δήλωση

Δηλώνω υπεύθυνα ότι ως υπόχρεα οντότητα αιτούμαι τα στοιχεία των Πραγματικών Δικαιούχων στα πλαίσια της λήψης μέτρων δέουσας επιμέλειας και προσδιορισμού ταυτότητας. Ζητώ την παρούσα έρευνα συνειδητά για σκοπούς εφαρμογής του Ν.188(I)/2007 και της Οδηγίας Κ.Δ.Π. 112/2021 ως τροποποιήθηκε και με γνώση ότι κάνοντας ψευδή και/ή παραπλανητική δήλωση θα υπόκειμαι σε κυρώσεις, με ποινή ψευδορκίας, σύμφωνα με τους νόμους της Κυπριακής Δημοκρατίας και δηλώνω υπεύθυνα ότι όλες οι πληροφορίες που έχω δώσει, είναι αληθινές.

Καθαρισμός Αναζήτηση

Αγορά έρευνας Μελέτη

Μη αποδοχή Αποδοχή

For the option "Purchase e-search, you should consent "Αποδοχή" that you are requesting information for the Beneficial Owner in the context of conducting due diligence and identification measures as defined in the Law. Following a payment of € 3.50 per entity through the "payments" tab and the approval of the e-request there will be a possibility for 3 days access to the paid surveys which includes the name, month and year of birth, nationality and country of residence of the BO as well as to the nature and extent of the beneficial interest held. In the event the option "Non consent" (Μη αποδοχή) is selected, you must send an email to Ubos@meci.gov.cy providing the reasons of non-acceptance. Following the examination by the Department a relevant answer will be sent to the applicant.

3.8 Competent and Supervisory Authorities

Competent and Supervisory Authorities (hereinafter as 'CSA) as mentioned in par.1. 8 above have free, timely and unrestricted access to the information on the beneficial ownership of an entity. In order to obtain access to the BO system, authorities must send a relevant request letter to the Registrar of Companies.

An important prerequisite to gain access to the BO system, is to register as an **Organization** on the governmental gateway Gov.cy and see relevant information in Cy Login website with regards to the process). For more information or guidance to registering with CY Login please send an email to cyloginsupport@dits.dmrid.gov.cy.

Following the registration as an Organization with CY Login, you may proceed to give access to the "assistants" (see relevant information [here](#)) of your organization in order to have access to the BO system and inform the Registrar by sending a letter with the following:

1. Name & surname of the assistants
2. Email

In the event, where a person is no longer an assistant in the Organization, the Registrar must be notified accordingly by sending an email at Ubos@meci.gov.cy requesting the person's removal from assistant to the Organization.

CSAs may proceed to do e-search over an entity's beneficial ownership information either via the entity's registration number/name or via the BO personal information (name and surname, and date of birth and if available the identification document details). The result of the search may be saved in the CSA's workplace on the system. It is noted that it is possible to save multiple searches for BO information.

The screenshot shows the gov.cy website header with the logo and navigation links: Αρχική, Χώρος εργασίας, user. Below the header, there is a message: Παρακαλώ επιλέξτε μία από τις παρακάτω ενέργειες. The main content area has two sections: **Έρευνα οργανισμού** (Company Search) and **Έρευνα πραγματικού δικαιούχου** (Beneficial Owner Search). Each section includes a brief description of the search process. The footer contains the Republic of Cyprus logo, copyright information (© Republic of Cyprus, 2023), and logos for the European Union and the Cyprus Development Fund (Κύπρος—το αύριο).

The screenshot shows the gov.cy website search results page. The header is the same as the previous screenshot. The main content area is titled **Έρευνα** (Search) and has two radio buttons: Με όλες τις λέξεις (With all words) and Με μερικές από τις λέξεις (With some of the words). There are two input fields: Αριθμός εγγραφής (Registration number) and Επωνυμία (Name), both containing redacted text. Below the input fields, there is a message: Παρακαλώ συμπληρώστε τουλάχιστον το ένα από τα δύο πεδία (Please complete at least one of the two fields). There are two buttons: Καθαρισμός (Clear) and Αναζήτηση (Search). Below the search area, there is a section titled Αποτελέσματα αναζήτησης (Search results) with the count Βρέθηκαν 1 (1 found). The results are displayed in a table with the following information: Αριθμός εγγραφής (Registration number): HE [redacted], Ημερομηνία εγγραφής (Registration date): [redacted], Τύπος (Type): Εταιρεία (Company), Υποκατηγορία (Subcategory): [redacted], Κατάσταση οργανισμού (Company status): Εγγεγραμμένη (Registered). There is a button Προσθήκη στον χώρο εργασίας (Add to workplace) at the bottom right of the results table. The footer is the same as the previous screenshot.



Έρευνα πραγματικού δικαιούχου

* Όνομα * Επώνυμο * Ημερομηνία γέννησης

Ταυτοποιητικό έγγραφο Αριθμός ταυτοποιητικού εγγράφου

Καθαρισμός

Αναζήτηση

Αποτελέσματα αναζήτησης

[Redacted]

Αριθμός εγγραφής	HE[Redacted]	Ημερομηνία εγγραφής	[Redacted]
Τύπος	Εταιρεία	Υποκατηγορία	[Redacted]
Κατάσταση οργανισμού	Εγγεγραμμένη		

Προσθήκη στον χώρο εργασίας



Part 4 - Special requests

4.1 Request for exemption from access of beneficial owner information

In exceptional cases, the BO of a company or other legal entity or the company itself or another legal entity, if it has proven consent by the BO or his/her guardian in case the BO is otherwise legally incompetent or incapable, may, upon written request to the Registrar of Companies, request exemption from the access of an obliged entity or member of the general public to the whole or part of the information about the BO on the grounds that access to such information will expose the BO to disproportionate risk, risk of fraud, kidnapping, blackmail, harassment, violence, extortion or intimidation.

The screenshot shows the gov.cy website interface for requesting an exemption from disclosure of information. The main heading is 'Εξαιρέση δημοσιοποίησης στοιχείων'. There are four radio buttons for selecting the entity type: 'Εταιρεία' (selected), 'Συνεταιρισμός', 'Συνεταιρισμός (BN)', and 'Ευρωπαϊκή εταιρεία'. A note states: 'Η επιλογή τύπου "Συνεταιρισμός (BN)" να επιλέγεται ΜΟΝΟ εάν στον αριθμό εγγραφής του συνεταιρισμού εμφανίζεται'. Below this, there is a field for 'Αριθμός εγγραφής' with the value 'HE'. A table titled 'Αποτελέσματα αναζήτησης' shows search results for the registration number 'HE', including details like 'Αριθμός εγγραφής', 'Τύπος', 'Κατάσταση οργανισμού', 'Ημερομηνία εγγραφής', 'Υποκατηγορία', and 'Ιδιωτική'. On the right side, there is a form titled 'Εξαιρέση από την πρόσβαση' with a close button. It contains a text area for the request, a dropdown for 'Επιλέξτε τον λόγο εξαιρέσεως', a text area for 'Περιγράψτε τους λόγους για τους οποίους αιτείστε την εξαιρέση', and two 'Click to upload' buttons for supporting documents. At the bottom right, there are 'Ακύρωση' and 'Καταχώριση' buttons.

The request must be addressed to the Registrar of Companies in a written report which will include a summary on the grounds of exemption of the BO information.

It is emphasised that the above outlined procedure should be performed via the e-system of the BO register following the below steps:

- Login in the BO Register with you CY login credentials
- Click Exception for disclosure of Information (Εξαιρέση δημοσιοποίησης στοιχείων)
- Enter entity's registration number
- Choose from the drop-down menu the reason you wish the exception
- Summarised description for the reasons claiming exemption
- Upload the written report and the supporting documents for your request
- Click **"Input"** (Καταχώριση) **to submit your request**

There is no fee for the submission of such request.

Each case will be evaluated based on the evidence provided by the applicant as being appropriate to support his/her request for exemption (e.g. court order). Based on the decision by the Registrar a relevant answer will be sent to the applicant via email.

It is noted that, based on the provisions of article 13(2) of the Registrar’s Directive, the Registrar may ask for further clarifications or submission of further information to be able to evaluate the request.

4.2 Request for access to minor’s data

In cases where the beneficial owner of an entity is a minor, access to the information held by the Registrar of Companies, shall be provided subject to the submission of a written request. The request must include a letter detailing the reasons of the request accompanied by supporting documentation submitted by an obliged entity or a member of the general public.

The screenshot displays the 'gov.cy' website interface for submitting a request for access to minor's data. The main heading is 'Αίτημα για πρόσβαση σε στοιχεία ανήλικου'. The user has selected 'Εταιρεία' as the entity type. The registration number field contains 'HE'. The search results table shows one entry: 'HE' (Registration Number), 'Εταιρεία' (Type), 'Εγγεγραμμένη' (Status), and 'Ιδιωτική' (Sub-category). On the right, there is a text area for providing reasons for the request, accompanied by two upload buttons: 'Επισύναψη επιστολής' and 'Επισύναψη εγγράφων για τεκμηρίωση αιτήματος'. At the bottom right, there are buttons for 'Ακύρωση' (Cancel) and 'Καταχώριση' (Submit).

The Registrar of Companies shall thoroughly assess the written request and the circumstances of the case and may ask questions, request clarifications and additional information before deciding whether to allow access or not.

The request for access to minor’s data should be performed via the e-system of the BO register following the below steps:

- Login in the BO Register with you CY login credentials
- Click Request for access to the details of minors (Αίτημα για πρόσβαση στα στοιχεία ανηλίκων)
- Enter entity’s registration number
- Described in the box the reasoning you wish the access to minor’s data
- Upload the written report and the supporting documents for your request
- Click **“Input”** (Καταχώριση) **to submit your request**

There is no fee for the submission of such request. Based on the decision by the Registrar a relevant answer will be sent to the applicant via email.

4.3 Requests for access to the BO register for users who are not authenticated

gov.cy Αρχική

Καλωσορίσατε στο Μητρώο Πραγματικών Δικαιούχων του Εφόρου Εταιρειών

Σύμφωνα με την εγγραφή σας στο CY Login, είστε φυσικό πρόσωπο μη ταυτοποιημένο. Οι ενέργειες που μπορείτε να προβείτε είναι οι ακόλουθες:

- 1 Αίτημα για εξαιρέση δημοσιοποίησης στοιχείων Πραγματικού δικαιούχου.
- 2 Αίτημα για πρόσβαση σε στοιχεία ανηλίκου.

Για να έχετε πρόσβαση και στις ενέργειες "Έρευνα οργανισμού" και "Ενημέρωση Π. Δ." πρέπει να ταυτοποιηθείτε στο CY Login με τα στοιχεία που έχετε καταχωρίσει κατά την εγγραφή σας.

Τα πιο κάτω στοιχεία είναι αυτά που καταχωρίζετε στην εγγραφή σας στο CY Login. Κατά την περιήγηση σας στο σύστημα Πραγματικών δικαιούχων το πιο κάτω ηλεκτρονικό ταχυδρομείο θα χρησιμοποιηθεί για επικοινωνία. Έχετε την δυνατότητα να προσθέσετε καινούργιο για τις ανάγκες του συστήματος των "Πραγματικών δικαιούχων".

Όνομα [Redacted]
Επώνυμο [Redacted]
Αριθμός ταυτότητας/ARC [Redacted]
Ηλεκτρονικό ταχυδρομείο [Redacted]

Προσθήκη ηλεκτρονικού ταχυδρομείου

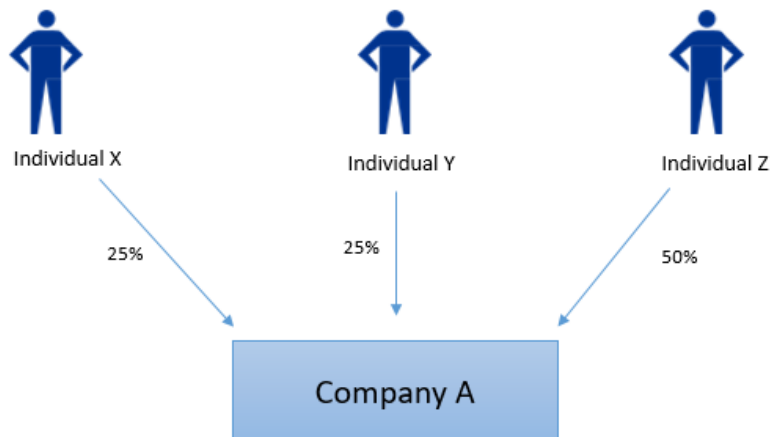
Επόμενο

In cases where a natural or legal person is not authenticated in Cy Login, it may have access to the following two functions:

- **Exemption from access of beneficial owner information** (Εξαιρέση δημοσιοποίησης στοιχείων Πραγματικού δικαιούχου). For details see **4.1 Request for exemption from access of beneficial owner information.**
- **Access to the details of minors** (Αίτημα για πρόσβαση στα στοιχεία ανηλίκου). For details, see **4.2 Request for access to minor's data.**

Annex I – Identify the BO

Case number 1 - Basic

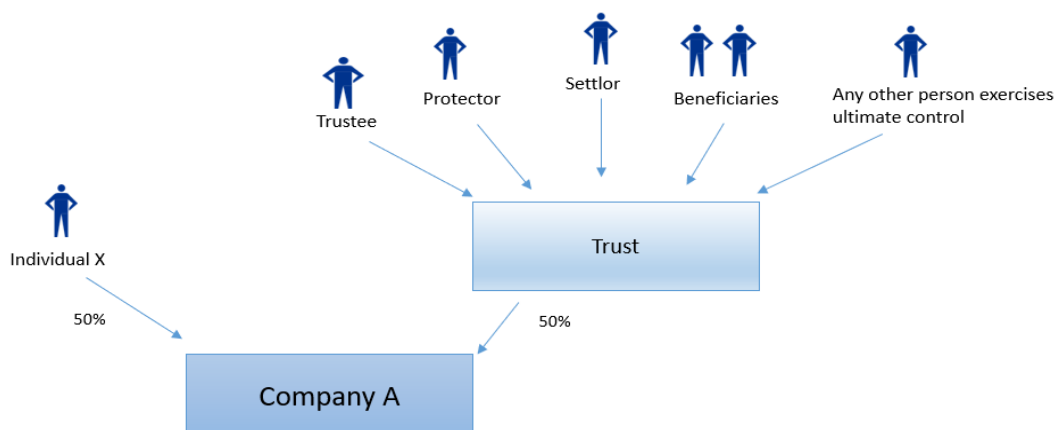


Company A direct shareholders are Individual X (25%), Individual Y (25%) and Individual Z (50%). Individual Z has 50% ownership and voting rights in the Company A.

Individual Z is the only natural person that owns Company A through direct shareholding of greater than 25%. Consequently, Individual Z is the beneficial owner of Company A.

The option “Beneficial Owner” and “Natural person” must be selected for input of Individual Z details. See **3.1.1 Natural person & Jointly – Group of Natural persons**.

Case number 2 - Trust



The direct shareholders of Company A are Individual X (50%) and a Trust (50%).

The BOs of the Trust are the Trustee, Settlor, Beneficiaries, Protector and Any other natural person exercises ultimate control as per section (b) of the definition of beneficial owner.

Company A beneficial owners to be declared in the BO registry are thus the following:

- a) Individual X (50%)
- b) Trust (50%)
 - Trustee
 - Settlor
 - Beneficiaries
 - Protector (Provisional)
 - Any other natural person exercises ultimate control (Provisional)

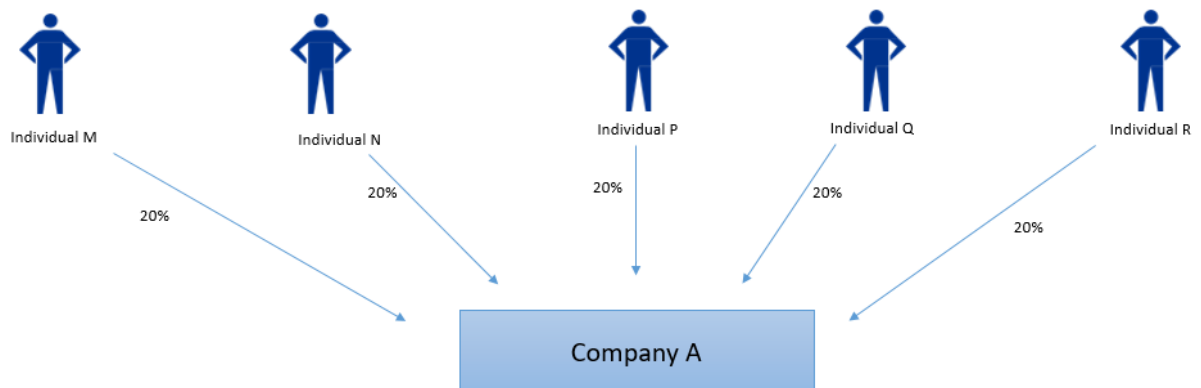
For Individual X, the option “Beneficial Owner” and “Natural person” must be selected. For input of Individual X details, see **3.1.1 Natural person & Jointly – Group of Natural persons**

For the Trust the option “Beneficial Owner” and “Trust” must be selected. Relevant trust details along with the relevant information for each natural person (i.e. Trustee, Settlor, Beneficiaries, Protector, Any other natural person exercises ultimate control, should be declared, see **3.1.2 Trusts**

For trusts registered in the Republic of Cyprus, the details of settlor, trustee and beneficiary are mandatory to be completed.

For Trusts registered in a jurisdiction other than Cyprus, at least one of the categories mentioned in **3.1.2 Trusts** must be completed.

Case number 3 - No BO with >25% ownership



Company A direct shareholders are Individual M (20%), Individual N (20%), Individual P (20%), Individual Q (20%) and Individual R (20%).

No natural person owns Company A with shareholding of greater than 25%.

No natural person controls Company A via other means.

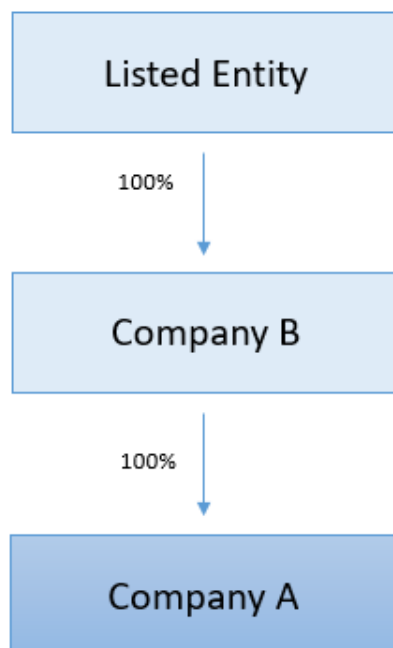
The beneficial owners of Company A, are the natural person(s) holding the position(s) of Senior Managing Official(s). Company A shall keep records of the actions taken in order to identify the beneficial ownership. See **Definition of Beneficial Owner**.

The option "Senior Management Official" must be selected. Additionally, it must be specified whether the Senior Management Official is a Director or has a different capacity, by clicking the corresponding box and making the relevant declarations.

If a controlling person via other means is identified, then the controlling person must be declared as Beneficial owner instead of the Senior Management Official.

For submission, see **3.2 Senior Management Official**.

Case number 4 - Listed Entity



Case 4 A:

The direct shareholder of Company A is the Company B.

The direct shareholder of Company B is a listed company in the Frankfurt (EU) stock exchange. The listed entity has an indirect ownership in Company A.

Company A beneficial owner to be declared in the BO registry is the listed entity.

The option “Beneficial Owner” must be selected and then “Company and other legal entity listed on a regulated market subject to disclosure requirements **under European Union law**” should be ticked.

Case 4 B:

The direct shareholder of Company A is the Company B.

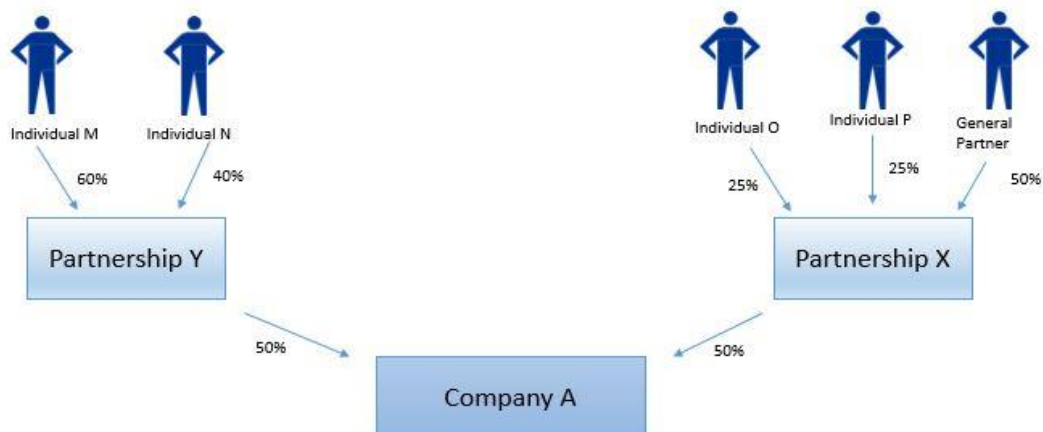
The direct shareholder of Company B is a listed company in the London (Non EU) stock exchange. The listed entity has an indirect ownership in Company A.

Company A beneficial owner to be declared in the BO registry is the listed entity.

The option “Beneficial Owner” must be selected and then “Company and other legal entity subject to **equivalent international standards** that ensure adequate transparency of ownership information” should be ticked.

For both scenarios, relevant information regarding the listed company should be declared. See **3.1.5 Company and other legal entity listed on a regulated market subject to disclosure requirements under European Union law & Company and other legal entity subject to equivalent international standards that ensure adequate transparency of proprietary information.**

Case number 5 - Partnership



The direct shareholders of Company A are Partnership Y (50%) and Partnership X (50%).

Partnership Y partners are the following:

- a) Individual M (60%)
- b) Individual N (40%)

Partnership X partners are the following:

- a) Individual O (25%)
- b) Individual P (25%)
- c) General partner (50%)

Individual M has 30% ($60\% \times 50\%$) indirect ownership in Company A through Partnership Y. Individual N has 20% ($40\% \times 50\%$) indirect ownership in Company A through Partnership Y. Individual O and Individual P have 12.50% ($25\% \times 50\%$) indirect ownership respectively in Company A through Partnership X.

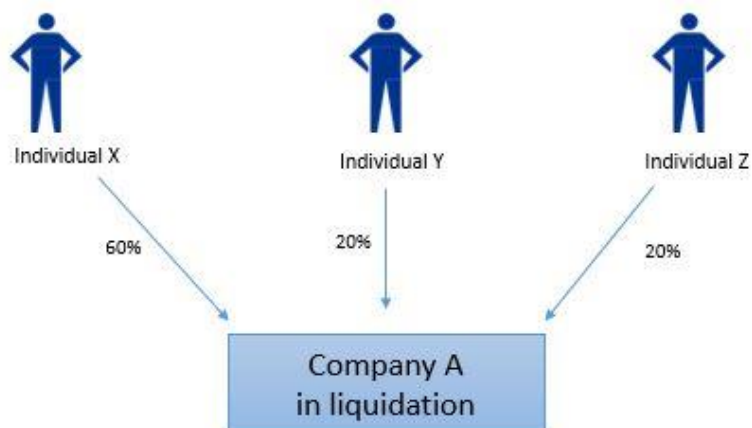
General partner has 25% ($50\% \times 50\%$) indirect ownership in Company A through Partnership X.

Individual M (30%) is the only natural person that indirectly own Company A through direct shareholding of greater than 25%. Consequently, Individual M is the beneficial owner of Company A.

If the General partner has the authority to represent the Partnership X and the other 2 partners have provided the mandate to vote and take decisions regarding the partnership's investment in Company A, then General partner must also be stated as the beneficial owner of Company A.

See section **Definition of Beneficial Owner**. For input of Individual M's Information, see **3.1.1 Natural person & Jointly – Group of Natural persons**. In "Type of BO" the option "Beneficial Owner" and "Natural person" must be selected for input of Individual M.

Case number 6 - Liquidation after 12 March 2021



Company A entered into a voluntary liquidation. The date of approval of the shareholders' resolution regarding the liquidation is 17 March 2021.

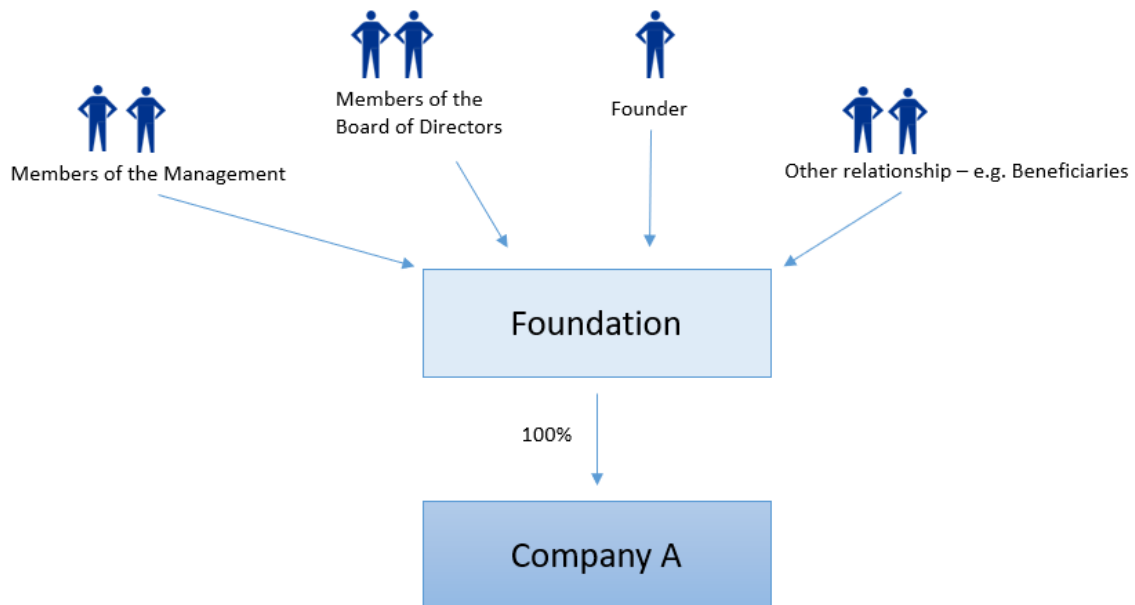
Company A has obligation to register its beneficial ownership info into the BO Register, since it entered into a voluntary liquidation **after** 12 March 2021, according to paragraph 3(d) of the Company Directive Κ.Δ.Π. 112/2021

The direct shareholders of Company A are Individual X (60%), Individual Y (20%) and Individual Z (20%).

Individual X is the only natural person whose ownership in Company A is greater than 25%. Consequently, Individual X is the beneficial owner of Company A.

For input of Individual X details, the option "Beneficial Owner" and "Natural Person" must be ticked, and then his/her details must be submitted. See **3.1.1 Natural person & Jointly – Group of Natural persons**.

Case number 7 - Foundation



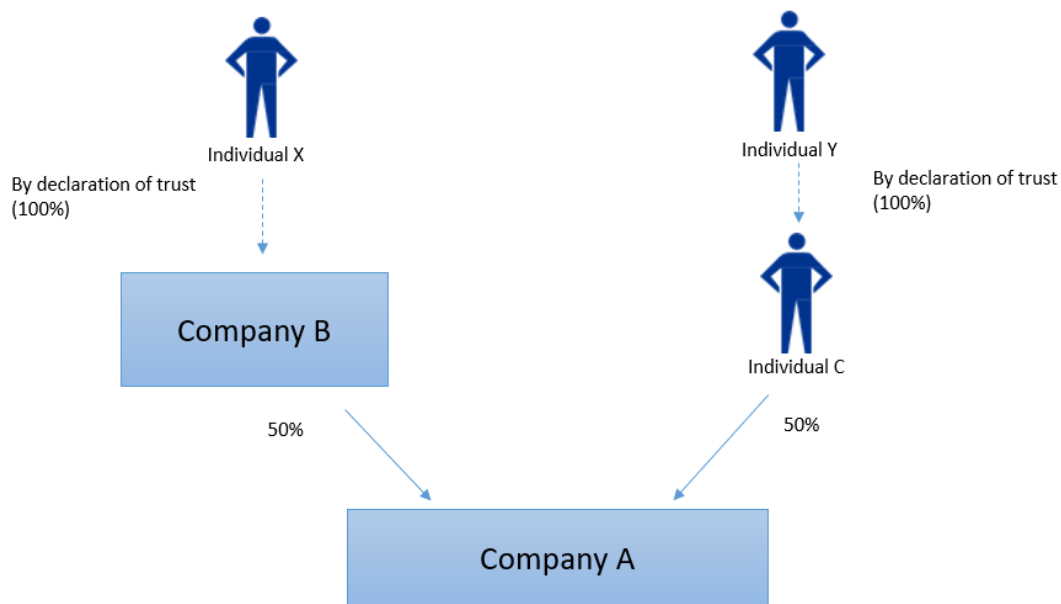
The direct shareholder of Company A is the Foundation.

The BOs of the Foundation are the Founder, Members of the Board of Directors, Members of the Management and any other relationship like the Beneficiaries of the Foundation as per section (c) of the **Definition of Beneficial Owner**.

Company A beneficial owner to be declared in the BO registry is the relevant information regarding a minimum one of the Founder, Members of the Board of Directors, Members of the Management and any other relationship like the Beneficiaries of the Foundation.

The options “Beneficial Owner” and “Foundation” must be selected. For input of the Foundation details, see **3.1.4 Foundations**.

Case number 8 - Nominee shareholder



The direct shareholders of Company A, are Company B (50%) and Individual C (50%) as nominee shareholders (i.e. Company B and Individual C hold 50% each in Company A, on behalf of Individuals X and Y, respectively, through declarations of trust).

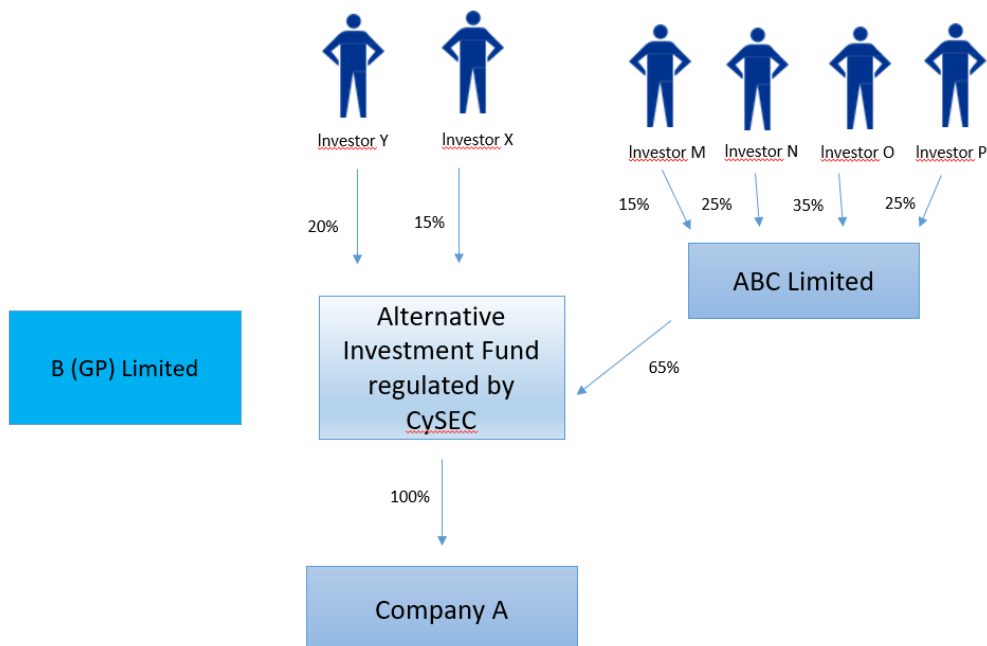
Company B and Individual C are regulated Administrative Service Providers and can hold shares on behalf of their clients.

Company A indirect shareholders are Individual X (50%) and Individual Y (50%). Each one, Individual X and Y, have 50% ownership and voting rights in Company A.

Individual X and Y are the only natural persons that own Company A through indirect shareholding of greater than 25%. Consequently, Individual X and Y are the beneficial owners of Company A. See **Definition of Beneficial Owner**

The option “Beneficial Owner” and “Natural Person” must be selected for input of Individual X and Y details. See **3.1.1 Natural person & Jointly – Group of Natural persons**

Case number 9 - Alternative Investment Fund



Company A direct shareholder is an Alternative Investment Fund (100%). Alternative Investment Fund has 100% ownership and voting rights in Company A.

Investor Y owns 20% of units in Alternative Investment Fund
Investor X owns 15% of units in Alternative Investment Fund
ABC Limited owns 65% of units in Alternative Investment Fund.

Investor Y has 20% (20% X 100%) indirect ownership in Company A through Alternative Investment Fund.

Investor X has 15% (15% X 100%) indirect ownership in Company A through Alternative Investment Fund.

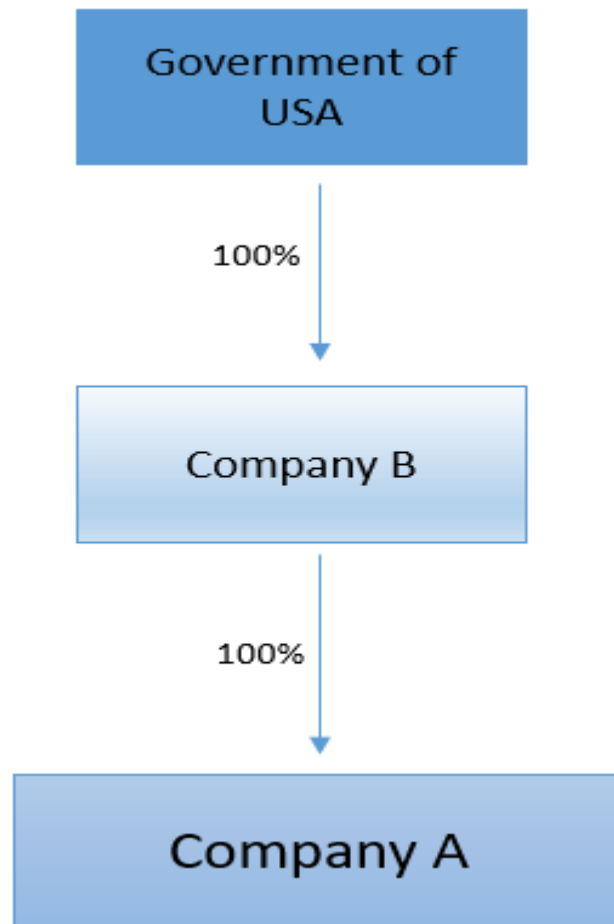
Investor M has 9.75% (15% X 65%) indirect ownership in Company A through ABC Limited.
Investor N has 16.25% (25% X 65%) indirect ownership in Company A through ABC Limited.
Investor O has 22.75% (35% X 65%) indirect ownership in Company A through ABC Limited.
Investor P has 16.25% (25% X 65%) indirect ownership in Company A through ABC Limited.

No natural person owns Company A with shareholding of greater than 25%.

The Alternative Investment Fund is managed by B (GP) Limited being the Management Company of the fund. Therefore, the beneficial owners of Company A, are the natural person(s) holding the position(s) of Senior Managing Official(s) in B (GP) Limited. Company A shall keep records of the actions taken in order to identify the beneficial ownership. See **Definition of Beneficial Owner**.

The option "Senior Management Official" must be selected. Additionally, the Senior Management Official capacity must be disclosed by clicking the corresponding box and making the relevant declarations. For more details, see **3.2 Senior Management Official**.

Case number 10 - Companies owned by national or local governments



Company A direct shareholder is Company B (100%). Company B has 100% ownership and voting rights in Company A.

Government of USA (100%) is the indirect shareholder of Company A.

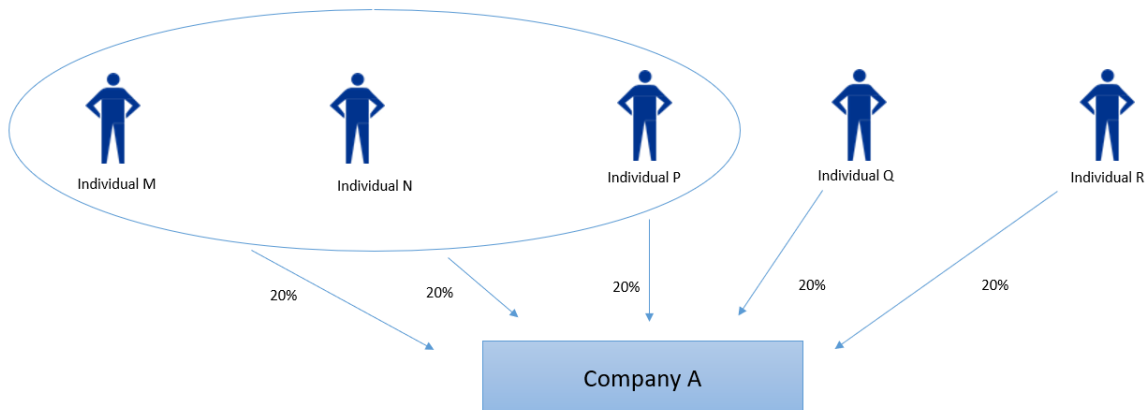
No natural person owns Company A with shareholding of greater than 25%.
No natural person controls Company A via other means.

The beneficial owners of Company A, are the natural person(s) holding the position(s) of Senior Managing Official(s). Company A shall keep records of the actions taken in order to identify the beneficial ownership. See **Definition of Beneficial Owner**.

The option "Senior Management Official" must be selected. Additionally, it must be specified whether the Senior Management Official is a Director or has a different capacity, by clicking the corresponding box and making the relevant declarations. See **3.2 Senior Management Official**.

If a controlling person via other means is identified, then the controlling person must be declared as Beneficial owner instead of the Senior Management Official.

Case number 11 - Joint Arrangement



Company A direct shareholders are Individual M (20%), Individual N (20%), Individual P (20%), Individual Q (20%) and Individual R (20%).

No natural person owns Company A with shareholding of greater than 25%.

Individual M (20%), individual N (20%) and Individual P (20%) made a joint arrangement where they agreed to exercise all of their rights arising from their shares in Company A, jointly in a predetermined way. Therefore, Individuals M, N and P are deemed to hold the total number of shares held by the three of them (60%).

It is noted that their joint arrangement covers appointment or removal of directors with a majority of board level voting rights.

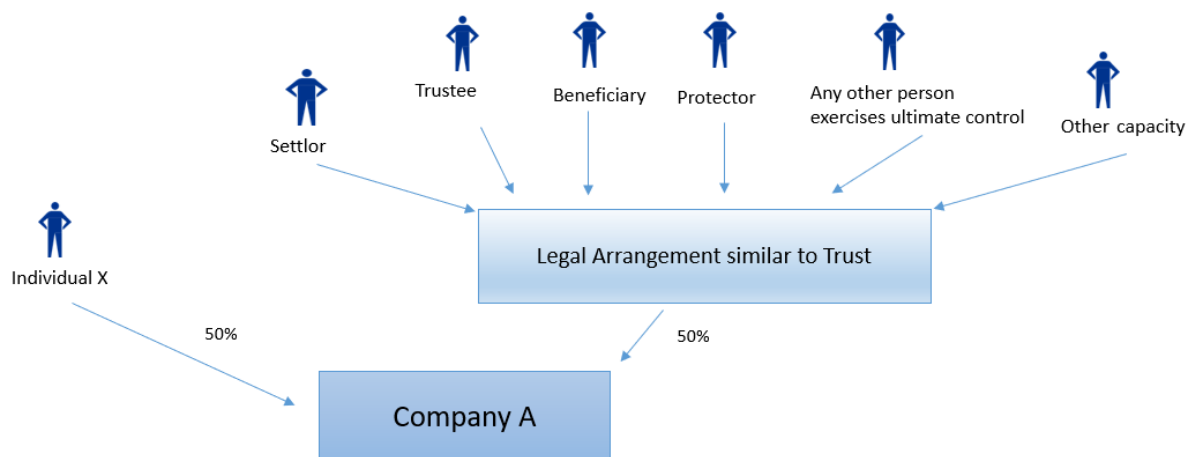
Consequently, since their joint arrangement covers more than 25% of the shares in the Company A (60%), Individual M, N and P are the beneficial owners of Company A. See **Definition of Beneficial Owner**

The option “Beneficial Owner” and “Jointly – Group of Natural persons” must be selected. For input of Individual M, N and P details, see **3.1.1.1 Nature and extend of beneficial interest**.

Case number 12 - Other legal arrangements similar to Trust

The direct shareholders of Company A are Individual X (50%) and Legal Arrangement similar to trust (50%).

The BOs of the Legal arrangement similar to trust are the Trustee, Settlor, Beneficiaries Protector, as per section (b) of the definition of beneficial owner.



Company A beneficial owners to be declared in the BO registry are thus the following:

- a) Individual X (50%)
- b) Legal Arrangement (50%)
 - Settlor
 - Trustee
 - Beneficiary
 - Protector (Provisional)
 - Any other natural person exercises ultimate control (Provisional)
 - Other capacity (Provisional)

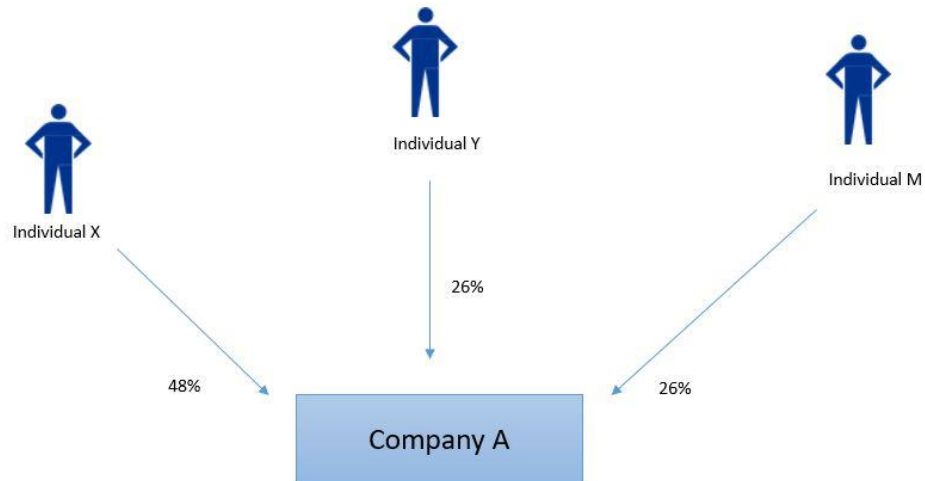
For Individual X, the option “Beneficial Owner” and “Natural person” should be ticked in order to declare his/her data see **3.1.1 Natural person & Jointly – Group of Natural persons**.

For the Legal Arrangement, the option “Beneficial Owner” and “Other Legal arrangement similar to Trust” must be selected. Relevant legal arrangement’s details along with the relevant information for each natural person (i.e. Settlor, Trustee, Beneficiary, Protector, Any other natural person exercises ultimate control and Other capacity) should be declared, see **3.1.3 Other legal arrangements similar to Trusts**.

For Legal arrangement registered in the Republic of Cyprus or in a jurisdiction other than Cyprus, at least **one** of the above-mentioned categories must be completed.

Annex II – Nature of the beneficial interest

Case number 1 - Direct Shareholding



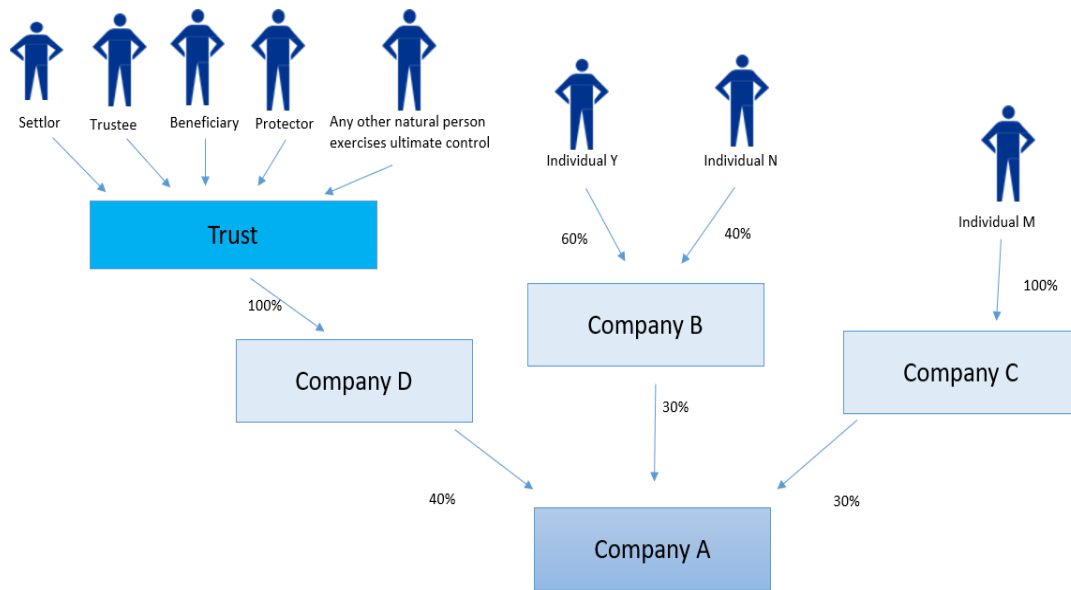
The direct shareholders of Company A are individuals X, Y and M.

Individual X (48%), Individual Y (26%) and Individual M (26%) each directly hold more than 25% of the share capital of Company A.

Company A beneficial owners to be declared in the BO registry are Individual X, Individual Y and Individual M.

In section “**3.1.1.1 Nature and extend of beneficial interest**” the option “**Direct Ownership**” must be selected for Individuals X, Y and M.

Case number 2 - Indirect Shareholding



The direct shareholders of Company A are Company D (40%), Company B (30%) and Company C (30%).

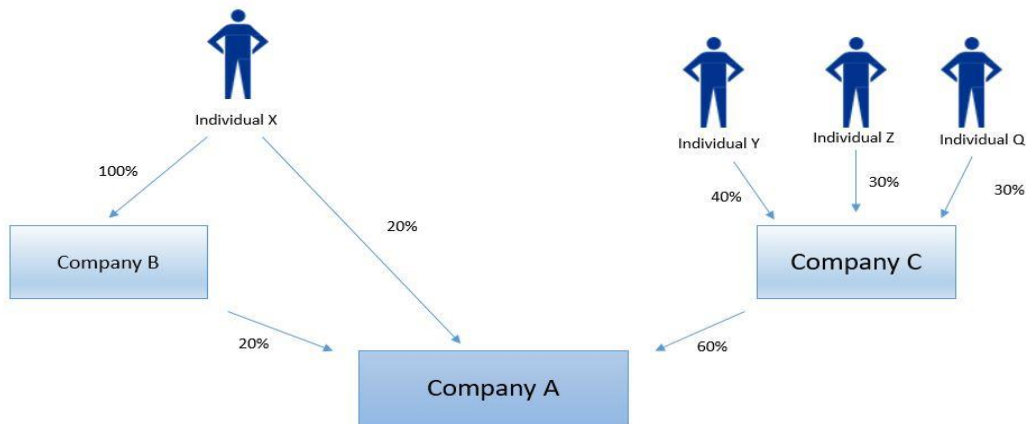
The Trust has 40% ($100\% \times 40\%$) indirect ownership in Company A through Company D. Individual Y has 18% ($60\% \times 30\%$) indirect ownership in Company A through Company B. Individual N has 12% ($40\% \times 30\%$) indirect ownership in Company A through Company B. Individual M has 30% ($100\% \times 30\%$) indirect ownership in Company A through Company C.

The BOs of the Trust are the Settlor, Trustee, Beneficiary, Protector, Any other person exercises ultimate control as per section (c) of the definition of beneficial owner

Company A beneficial owners to be declared in the BO registry are Individual M (30%) and the Trust (40%), its Settlor, Trustee, Beneficiary, Protector and Any other person exercises ultimate control that indirectly own Company A through effective shareholding of greater than 25%. See **Definition of Beneficial Owner**.

In section **3.1.1.1 Nature and extend of beneficial interest**, the option “**Indirect Ownership**” must be selected for both the Trust and Individual M.

Case number 3 - Direct and Indirect shareholding



The direct shareholders of Company A are Individual X (20%), Company B (20%) and Company C (60%).

Company C direct shareholders are:

- a) Individual Y (40%)
- b) Individual Z (30%)
- c) Individual Q (30%)

Company B holds the shares in Company A on behalf of Individual X.

Individual X has 20% direct ownership in Company A and 20% indirect ownership in Company A through Company B, totalling 40%.

Individual Y has 24% (40% X 60%) indirect ownership in Company A through Company C.

Individual Z has 18% (30% X 60%) indirect ownership in Company A through Company C.

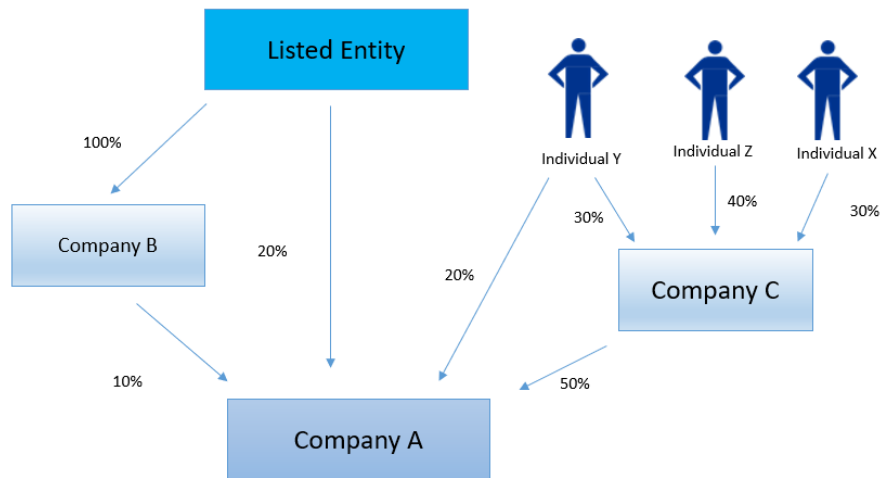
Individual Q has 18% (30% X 60%) indirect ownership in Company A through Company C.

Individual X (40%) is the only natural person that meets the Beneficial Owner definition for Company A, through direct and indirect shareholding being greater than 25%. Consequently, Individual X is the beneficial owner of Company A.

See **Definition of Beneficial Owner**.

In section **3.1.1.1 Nature and extend of beneficial interest** the option “**Direct and indirect Ownership**” must be selected for Individual X.

Case number 4 - Direct and Indirect shareholding



The direct shareholders of Company A are Company B (10%), Listed Entity (20%), Individual Y (20%) and Company C (50%).

The Listed Entity has 20% direct ownership in Company A and 10% (10% X 100%) indirect ownership in Company A through Company B, totalling 30%.

Individual Y has 20% direct ownership in Company A and 15% (30% X 50%) indirect ownership in Company A through Company C, totalling 35%.

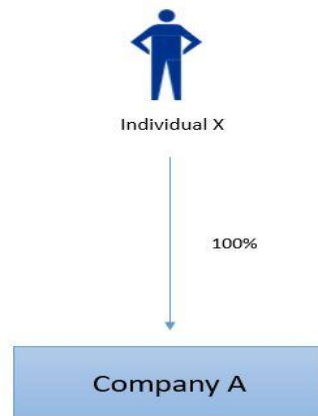
Individual Z has 20% (40% X 50%) indirect ownership in Company A through Company C. Individual X has 15% (30% X 50%) indirect ownership in Company A through Company C.

Company A beneficial owners to be declared in the BO registry are the Listed Entity (30%) and Individual Y (35%), that hold through direct and indirect shareholding greater than 25%.

In section **3.1.1.1 Nature and extend of beneficial interest** the option “**Direct and indirect Ownership**” must be selected for the Listed Entity and Individual Y.

Annex III – Extent of the beneficial interest

Case number 1 - Percentage of the shares



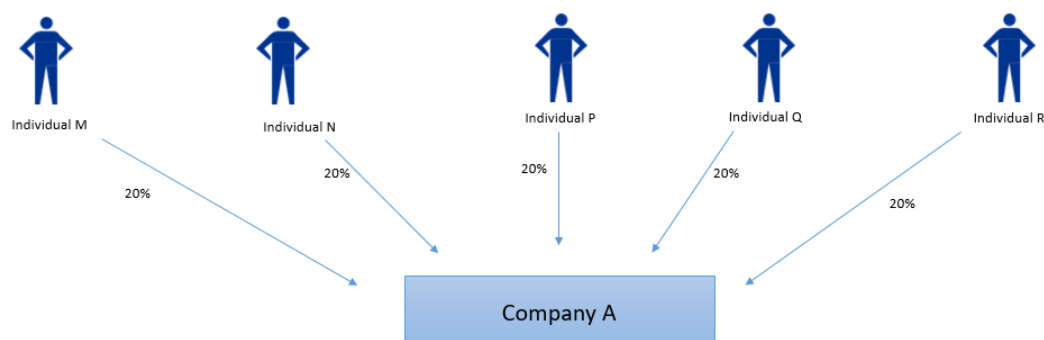
Company A direct shareholder is Individual X (100%).

Individual X is the only natural person that owns Company A through direct shareholding of greater than 25%. Consequently, Individual X is the beneficial owner of Company A.

See **Definition of Beneficial Owner**.

In the section "Extent of the beneficial interest" the option "Percentage of the shares" must be selected and input 100% at the field "Enter the percentage of the shares" at the BO Register reflecting the extent of the beneficial interest of Individual X, see section **3.1.1.1 Nature and extend of beneficial interest**.

Case number 2 - Voting rights



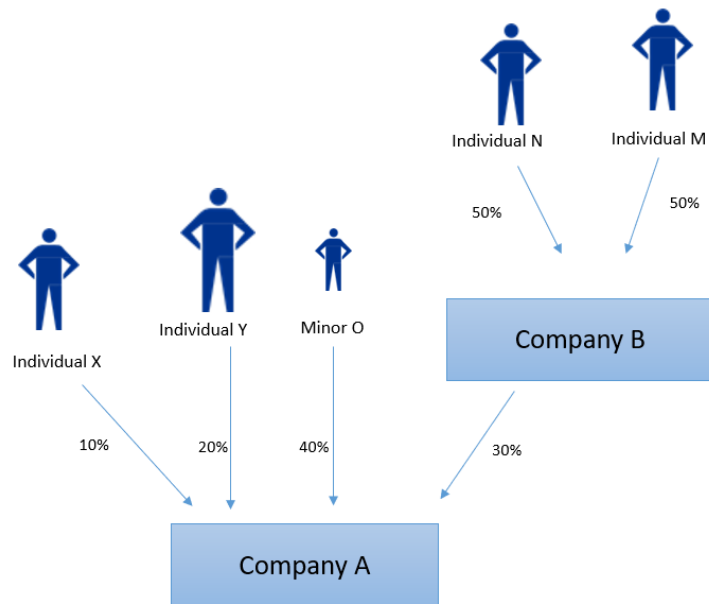
Company A direct shareholders are Individual M (20%), Individual N (20%), Individual P (20%), Individual Q (20%) and Individual R (20%).

No natural person owns Company A with shareholding of equal or greater than 25% plus one share.

Following a review of the governing documents of company A (Articles of Association, Shareholders Agreement or other), the only natural person having voting rights in Company A is Individual M. Consequently, the Beneficial Owner of Company A is individual M following the control that can be exercised through the 100% voting rights.

In the section "Extent of the beneficial interest" the option "Voting rights" must be selected and input 100% at the field "Enter the percentage of the shares" at the BO Register reflecting the extent of the beneficial interest of Individual M, see section **3.1.1.1 Nature and extend of beneficial interest**.

Case number 3 - Minor



Company A direct shareholders are Individual X (10%), Individual Y (20%), Minor O (40%) and Company B (30%).

Individual N has 15% ($30\% \times 50\%$) indirect ownership in Company A through Company B.

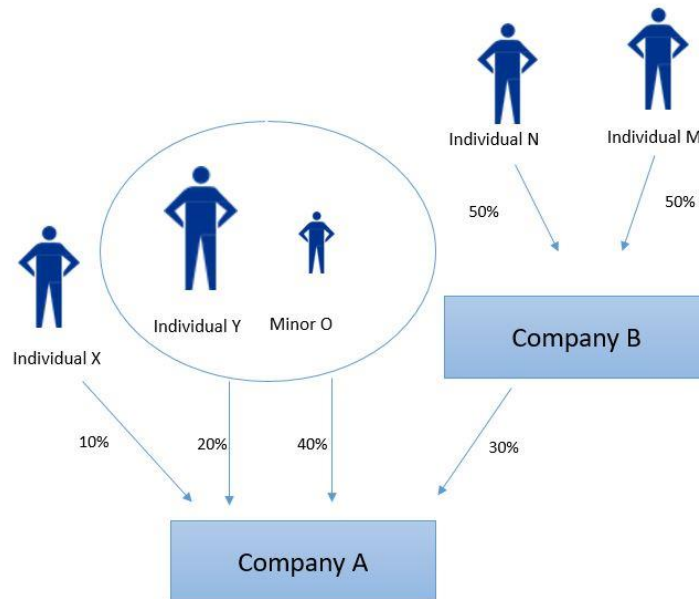
Individual M has 15% ($30\% \times 50\%$) indirect ownership in Company A through Company B.

Minor O should be declared in the BO register.

See section **Definition of Beneficial Owner**.

For Minor O, in the section “Extent of the beneficial interest” the option “Percentage of the shares” must be selected and input 40% at the field “Enter the percentage of the shares” at the BO Register reflecting the extent of the beneficial interest of Individual X, see section **3.1.1.1 Nature and extend of beneficial interest**.

Case number 4 - Significant Influence or control with other means (Family)



Company A direct shareholders are Individual X (10%), Individual Y (20%), Minor O (40%) and Company B (30%).

Individual N has 15% ($30\% \times 50\%$) indirect ownership in Company A through Company B.

Individual M has 15% ($30\% \times 50\%$) indirect ownership in Company A through Company B.

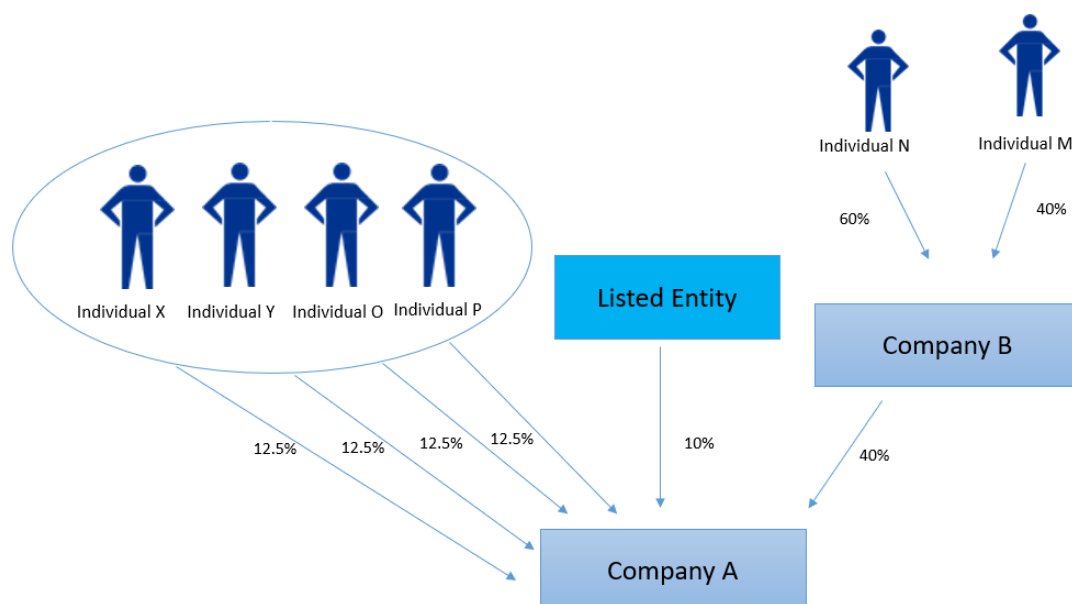
Individual Y acts on behalf of Minor O, being the parent of 10 year old Minor O.

Individual Y is the only natural person that controls the Company A and consequently, considered to be the beneficial owner.

See section **Definition of Beneficial Owner**

In the section “Extent of the beneficial interest”, the option “Significant Influence or control with other means”, and the option “Through the exercise of significant influence, influence through family links or other types of connection with decision-makers” should be selected at the BO Register, reflecting the extent of the beneficial interest of Individual Y. For more details see section **3.1.1.1 Nature and extend of beneficial interest**.

Case number 5 - Significant Influence or control with other means
(Shareholders agreement)



Company A direct shareholders are Listed Entity (10%), Company B (40%) and Individual X (12.5%), Individual Y (12.5%), Individual O (12.5%) and Individual P (12.5%).

Individual N has 24% (60%x40%) indirect ownership in Company A through Company B.
Individual M has 16% (40%x40%) indirect ownership in Company A through Company B.

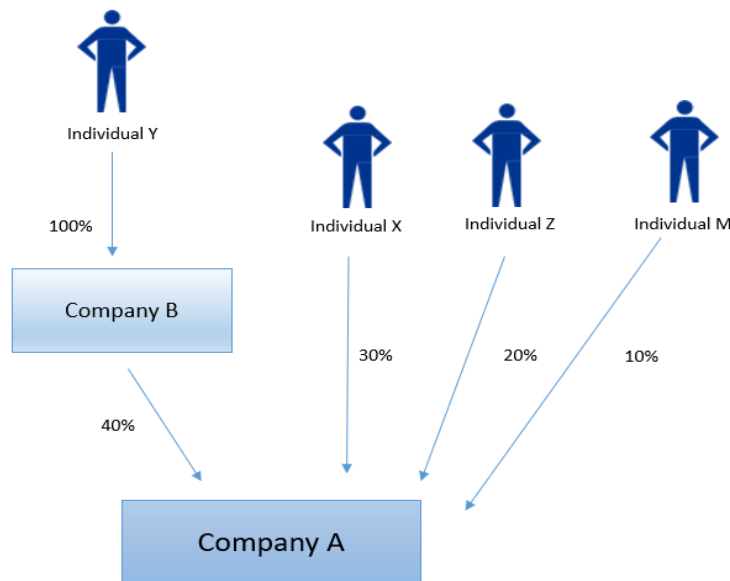
Individuals X, Y, O and P have signed a shareholders' agreement on the basis of which they act in concert at general meetings, and thus controlling the company by "other means"

Therefore, Individuals X, Y, O and P are the only natural persons that control Company A and consequently, considered to be the beneficial owners.

See **Definition of Beneficial Owner**

In the section "Extent of the beneficial interest", the option "Significant Influence or control with other means" and the option "Through Shareholder's agreement" must be selected reflecting the extent of the beneficial interest of Individuals X, Y, O and P. See also section **3.1.1.1 Nature and extend of beneficial interest.**

Case number 6 - Voting rights additional



Company A direct shareholders are Company B (40%), Individual X (30%), Individual Z (20%) and Individual M (10%).

Individual Y has 40% (40% X 100%) indirect ownership in Company A through Company B.

Following a review of the governing documents of Company A (Articles of Association, Shareholders Agreement or other), the only person having voting rights in Company A is Individual X, having 60% voting rights in the Company, representing individuals Z and M.

Consequently, the Beneficial Owners of Company A are Individual Y and Individual X. See **Definition of Beneficial Owner**.

For Individual X, in the section “Extent of the beneficial interest” the option “Voting rights” must be selected and input 60% at the field “Enter the percentage of the shares” at the BO Register reflecting the extent of the beneficial interest of Individual X.

For Individual Y, in the section “Extent of the beneficial interest” the option “Other (Details to be provided accordingly)” in the section “Significant influence or control with other means” must be ticked with completing the field of “Enter the percentage of the shares” at the BO Register indicating that Individual Y indirectly owns 40% in Company A.

For more details, see section **3.1.1.1 Nature and extend of beneficial interest**.