

Example Paper Forms for Collecting Beneficial Ownership Data

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This document provides example forms to guide officials tasked with developing paper forms to collect beneficial ownership information. It refers to these officials as 'implementers.' OpenOwnership recommends that data is collected electronically, but we have produced these example forms to guide paper based data collection in situations where it is to be used.

Form 1: Information about the declaring Entity

Form 2: Information about a Beneficial Owner & their interests

Form 3: Declaration of shares or interest held indirectly through a legal entity

Form 4: Declaration of shares or interest held indirectly through a natural person

Form 5: Reasons for not specifying any Beneficial Owners

A submission will, as a minimum, consist of **Form 1**, plus one or more of **Form 2**, which should be completed for each of the declaring entity's Beneficial Owners. Forms 3-5 provide examples to guide collection of additional information that may be specified in disclosure requirements.

These example forms are suitable for guiding form development for a national company register or a sector specific register implemented as part of the Extractive Industries Transparency Initiative (EITI) Standard. The forms cover beneficial ownership information and are not intended to capture other details required for a company or sector specific register.

How to use these forms

Implementers should use these forms to understand the information fields that OpenOwnership recommends are collected, and OpenOwnership's guidance on how best to collect this information on paper forms. If all fields in the example forms are used, then the information collected will be compliant with the Beneficial Ownership Data Standard (BODS) v0.1.

This template should be adapted to fit the intended purpose and policy context. Adaptations may be necessary to match local legislation and conventions for recording fields such as date and address, as well as to cater for the different situations in which companies are required to submit beneficial ownership information. In the guidance notes alongside the forms, we highlight areas that implementers may wish to adapt, along with some considerations when doing so. Please contact our Helpdesk (support@openownership.org) if you would like further guidance.



Form 1: Information about the declaring Entity

Submission reference		<ul style="list-style-type: none"> For official use only
Submission Date	20 __ / __ / __ (year-month-day)	<ul style="list-style-type: none"> The date on which this information is submitted Input the month as abbreviated text e.g., 2015-01-30
Legal identifier on this register		<ul style="list-style-type: none"> [For official use only] This is the identifier that has been assigned to the declaring entity [as a result of this application]
Name of entity		<ul style="list-style-type: none"> The name of the declaring entity as it appears on this register
Alternative name(s) for the declaring entity		<ul style="list-style-type: none"> If the declaring entity is known by any other name or names please list them here
Legal form of the declaring entity		<ul style="list-style-type: none"> This should be one of [list]
Date of Founding	__ __ / __ / __ (year-month-day)	<ul style="list-style-type: none"> The date when the declaring entity was founded, created or registered Input the month as abbreviated text e.g., 2015-01-30
Registered address of the declaring entity		
Building name/number		
Street		
Locality		<ul style="list-style-type: none"> This is usually the name of the city, town or village where the declaring entity is located
Region		<ul style="list-style-type: none"> In [name of country] this is usually the name of a [local name(s) for a region]
[Postcode]		
Country		

Implementers should issue a submission reference that groups all of the forms that are completed as part of a submission together.

Officials entering information into an electronic system should use this date, when the form was submitted, not the date when they input the data. The date format used throughout this form is ISO8601 (YYYY-MM-DD). An alternative may be more appropriate, but the form should specify what format should be used.

If the form is collecting the data for a new entity registration then implementers may wish to include "For official use only" and amend the text accordingly.

Here, the implementer should list the different types of legal form for which beneficial ownership information can be submitted. Each element in this list must map to one, and only one, of the properties in the BODS entityType property (<https://standard.openownership.org/en/v0-1/schema/reference.html#entitytype>).

"Region" refers to the first level administrative division of the country (e.g. state, county, province). Text should be amended to match local usage.

Postcode can otherwise be known as PIN or ZIP Code. This should be amended to match local usage.

Form 2: Information about a Beneficial Owner & their interests

A Beneficial Owner is defined as [insert local legal definition on which Beneficial Ownership disclosure requirements are based].

One of these forms should be completed for each Beneficial Owner of the declaring entity.

Part A: Information about a Beneficial Owner

A.1. Beneficial Owner status

Please select one, and only one, of the following:

This Beneficial Owner has provided their details, which are declared in Part A.2 below	
This Beneficial Owner is exempt from having their details published	
This Beneficial Owner is a State or a State Owned Enterprise, which is declared in A.3 below	
This Beneficial Owner has not provided enough information to identify themselves	

If the Beneficial Owner has not provided enough information to identify themselves, please provide supporting information below:

This row should only be included if there is a legal provision for Beneficial Owners to be exempt from having their details published.

This section may be used in contexts where there is legal process in place for declaring entities to demonstrate they have undertaken steps to try and identify the Beneficial Owner.



A.2. Personal details about this Beneficial Owner

Legal name of this Beneficial Owner		
Title		
Full name		<ul style="list-style-type: none"> This should be the current, full legal name of the Beneficial Owner
Now, please tell us about the separate parts of the Beneficial Owner's full name.		
Family name(s)		<ul style="list-style-type: none"> The family names of the Beneficial Owner In [name of country] people often refer to this as their [term for family name in common usage]
Other/Given name(s)		<ul style="list-style-type: none"> The given names of the Beneficial Owner used to distinguish the individual within the family In [name of country] people often refer to this as their [term for given name in common usage]
Date of Birth	____ / ____ / ____ (year-month-day)	<ul style="list-style-type: none"> Input the month as abbreviated text e.g., 1972-06-28
Identification details of this Beneficial Owner		
Identifier		<ul style="list-style-type: none"> This must be the unique identifier issued with that means of identification
Identification type		<ul style="list-style-type: none"> This must be a government issued means of identification Such means of identification must be either a [list of acceptable means of identification]
Issuing authority		<ul style="list-style-type: none"> The name of the authority responsible for issuing the means of identification.
Issuing authority's country		<ul style="list-style-type: none"> The issuing authority's country

Examples include surname, family name, or last name. Implementers may wish to include a relevant example for their context.

Examples include first name, given name. Implementers may wish to include a relevant example for their context.

Examples here may include national identity card, driving license, voters card and the data page of an international passport.

Details of how the Beneficial Owner can be contacted		
Service Address	Building name/ number	• The contact address of the Beneficial Owner
	Street	
	Locality	• This is usually the name of the city, town or village
	Region	• In [name of country] this is usually the name of a [local name(s) for a region]
	Postcode	
	Country	
Home Address (not for publication)	Building name/ number	• The home address of the Beneficial Owner
	Street	
	Locality	• This is usually the name of the city, town or village
	Region	• In [name of country] this is usually the name of a [local name(s) for a region]
	Postcode	
	Country	
Email address (not for publication)		• Only provide this if you wish us to contact you by email
Phone number (not for publication)		• Only provide this if you wish us to contact you by phone

This should be consistent with the guidance for Region chosen for the Entity form.

Implementers may wish to include guidance about consent and privacy that aligns with local legislation and regulation here.



Here we suggest that implementers provide the local definition of a PEP for clarification.

Details of the Beneficial Owner's Politically Exposed Person (PEP) status		
Is the beneficial owner a Politically Exposed Person (PEP)?	Yes / No	<ul style="list-style-type: none"> A Politically Exposed Person (PEP) is someone who has been entrusted with a prominent public function. In [country] this is defined as [include local definition]
Reason		<ul style="list-style-type: none"> The reason for this person being declared a politically-exposed person
Place where the beneficial owner is a PEP		<ul style="list-style-type: none"> The place should either be a country or a region of a country
Date started		<ul style="list-style-type: none"> The date that the beneficial owner became a PEP
Details of the Beneficial Owner's residency status(es) and nationality/nationalities		
Tax residency		<ul style="list-style-type: none"> A jurisdiction or jurisdictions in which the Beneficial Owner is resident for tax purposes
Nationality/nationalities		<ul style="list-style-type: none"> The nationalities held by the Beneficial Owner

A.3. Identification details of a Beneficial Owner that is a State or a State Owned Enterprise

Name		<ul style="list-style-type: none"> Name of the State or State Owned Enterprise
Where the Beneficial Owner is a State Owned Enterprise and is a registered entity		
Identifier		<ul style="list-style-type: none"> A unique identifier issued by a registrar
Registrar		<ul style="list-style-type: none"> The name of the authority responsible for issuing the unique identifier
Where the Beneficial Owner is a State Owned Enterprise, is established on a statutory basis and is not a registered entity		
Statutory basis		<ul style="list-style-type: none"> The name and date of the relevant legislation

Part B: Information about the shares or interest in the declaring entity held by the Beneficial Owner

B.1. Interests held

Shares or interest held in the declaring entity		
Percentage of shares or interest held directly		<ul style="list-style-type: none"> The percentage of shares or interest that are directly held by the Beneficial Owner in the declaring entity
Percentage of shares or interest held indirectly		<ul style="list-style-type: none"> The percentage of shares or interest that are held by the Beneficial Owner in the declaring entity, where these are held indirectly through one or more legal owner(s) Where shares or interest is held indirectly one or more of Forms 3 and 4 should be completed
Date this person became a Beneficial Owner by virtue of their shareholding(s)	____ / __ / __ (year-month-day)	<ul style="list-style-type: none"> Input the month as abbreviated text e.g., 2015-01-30
Details: Please provide any further information to clarify the nature of the interest held in shares		

This section provides one example of 'interests held', that of shares in a company or interest in a limited liability partnership. There are multiple ways in which ownership or control of an entity can be held and implementers may wish to use this section to create a full list. The full list of ways that ownership or control can be expressed using BODS v0.1 is Shareholding, Voting rights, Appointment of board, Influence or control, Senior managing official, Settlor of trust, Trustee of a trust, Protector of a trust, Beneficiary of a trust, Other influence or control of a trust, Rights to surplus assets and Rights to receive profits or income.

The value here should be equal to the sum of the percentages declared in the accompanying Forms 3 and 4.

Form 3: Declaration of shares or interest held indirectly through a legal entity

Use this form to declare the details of legal entities who directly hold shares or interest in the declaring entity, and the percentage of the Beneficial Owner's overall interest held through them.

Only legal entities with a direct interest in the declaring entity need to be declared through this form.

Use one form for each legal entity. Declare every legal entity which directly holds shares or interest in the declaring entity. Use multiple copies of this form as necessary.

Name of legal entity		<ul style="list-style-type: none"> Name of the legal owner of shares or interest in the declaring entity
Legal form		<ul style="list-style-type: none"> This should be the legal form as held by the legal owner's registration agency
Registration agency name		<ul style="list-style-type: none"> The official registration agency for entities of this legal owner's type
Country or Jurisdiction		<ul style="list-style-type: none"> Country or jurisdiction where this legal owner is registered
Registration number		<ul style="list-style-type: none"> Unique registration number assigned to the legal owner by the registration agency declared above Where the Beneficial Owner holds the shares or interest through a publicly listed company [the Legal Entity Identifier (LEI), in jurisdictions where having an LEI is mandated, otherwise a stock ticker or International Securities Identification Number (ISIN)]
Percentage		<ul style="list-style-type: none"> The percentage of the Beneficial Owner's overall shares or interest in the declaring entity held through this legal owner
Start date		<ul style="list-style-type: none"> Date when this percentage of the Beneficial Owner's shares or interest in the declaring entity held through this legal owner began

Where interests are held indirectly through a chain of legal owners, this form only requires that the legal owners with a direct interest in the entity need to be declared. Implementers may wish to amend this in alignment with local legislation and regulation.

Form 4: Declaration of shares or interest held indirectly through a natural person

Use this form to declare the details of natural persons who directly hold shares or interest in the declaring entity, and the percentage of the Beneficial Owner's overall interest held through them.

Only the natural persons with a direct interest in the declaring entity need to be declared through this form.

Use one form for each natural person. Declare every natural person who directly hold shares or interest in the declaring entity. Use multiple copies of this form as necessary.

Title		
Full name		<ul style="list-style-type: none"> This should be the current, full legal name of this legal owner
Now, please tell us about the separate parts of this legal owner's full name.		
Family name(s)		<ul style="list-style-type: none"> The family names of this legal owner. In [name of country] people often refer to this as their [term for family name in common usage]
Other/Given name(s)		<ul style="list-style-type: none"> The given names of this legal owner used to distinguish the individual within the family In [name of country] people often refer to this as their [term for given name in common usage]
Date of Birth	___/___/___ (year-month-day)	<ul style="list-style-type: none"> Input the month as abbreviated text e.g., 1972-06-28

This should be consistent with the guidance for Beneficial Owner name in Form 2.

Identification details of this legal owner		
Identifier		<ul style="list-style-type: none"> This must be the unique identifier issued with the means of identification
Identification type		<ul style="list-style-type: none"> This must be a government issued means of identification Such means of identification must be either a [list of acceptable means of identification]
Issuing authority		<ul style="list-style-type: none"> The name of the authority responsible for issuing the means of identification
Issuing authority's country		<ul style="list-style-type: none"> The issuing authority's country
Details of how this legal owner can be contacted		
Service Address	Building name/ number	<ul style="list-style-type: none"> The contact address of this legal owner
	Street	
	Locality	<ul style="list-style-type: none"> This is usually the name of the city, town or village
	Region	<ul style="list-style-type: none"> In [name of country] this is usually the name of a [local name(s) for a region]
	Postcode	
	Country	
Home Address (not for publication)	Building name/ number	<ul style="list-style-type: none"> The home address of this legal owner
	Street	
	Locality	<ul style="list-style-type: none"> This is usually the name of the city, town or village
	Region	<ul style="list-style-type: none"> In [name of country] this is usually the name of a [local name(s) for a region]
	Postcode	
	Country	

Examples here may include national identity card, driving license, voters card and the data page of an international passport.

This should be consistent with the guidance for Region chosen for the Entity form.



Email address (not for publication)		
Phone number (not for publication)		
Percentage		<ul style="list-style-type: none">• The percentage of the Beneficial Owner's overall shares or interest in the declaring entity held through this legal owner
Start date		<ul style="list-style-type: none">• Date when this percentage of the Beneficial Owner's shares or interest in the declaring entity held through this legal owner began

Implementers may wish to include some guidance about consent and privacy that aligns with local legislation and regulation here.

Form 5: Reasons for not specifying any Beneficial Owners

Note that if:

- The declaring entity has traced its beneficial owner(s) but they have not provided their details, or
- The declaring entity's beneficial owners are exempt from disclosure,

then beneficial ownership forms should still be completed for those people. However, in limited circumstances a declaring entity might not provide any Beneficial Owners.

If you are not providing the details of any beneficial owners then please complete the following.

This declaring entity is not providing details of any beneficial owners because (please check one, and only one, of the following reasons):	
It has no beneficial owners	
It cannot trace its beneficial owners	
It refuses to declare its beneficial owners The penalty for refusal to declare beneficial owners is [X]	
It is not required to disclose its beneficial owners	

Implementers may wish to amend these to align with local legislation and regulation.

Implementers, if they choose to retain this option, may wish to highlight the penalty for refusing to disclose beneficial owners.

Please provide further supporting information for not disclosing any beneficial owners