



Ministry of Financial Services & Commerce

Cayman Islands Government

TECHNICAL GUIDANCE

Beneficial Ownership Filing

Issued by the Competent Authority for Beneficial Ownership
on 15 March 2024.

(Revised on 17 February 2025)

FOREWORD

The Cayman Islands is committed to maintaining the stability of its financial services industry and other industries which form an integral part of its economy. In response to the dynamic landscape of regulatory requirements and international standards, significant technological updates with respect to the reporting of beneficial ownership information has been undertaken by the Cayman Islands.

This technical guidance document (**Guidance**) serves as a comprehensive guide to the enhancements of the comma separated values file format (**CSV File**) which is used by industry members to report beneficial ownership information via the corporate administration platform (**CAP**).

APPLICABILITY

This Guidance applies to any trust and/or corporate services provider (**TCSP**) undertaking beneficial ownership filings via CAP with the Cayman Islands Competent Authority for Beneficial Ownership (**Competent Authority**).

PARTS

For ease of reference, this Guidance is provided in the following two parts:

[Part I – New CSV File](#)

[Part II – Filing Beneficial Ownership Information](#)

ADDITIONAL RESOURCES

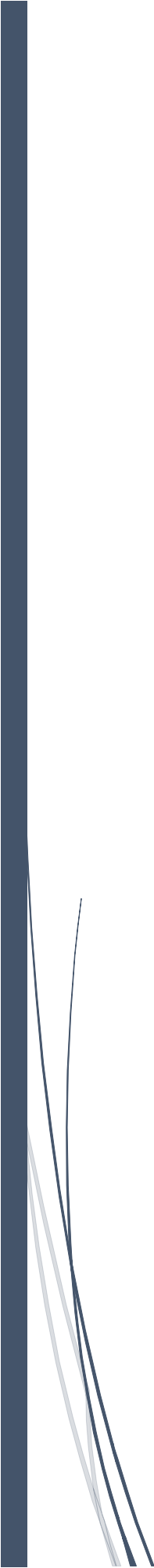
BO Bulk Upload File (CSV) - Revised 18 July 2024.csv (blank CSV File with the new data fields)

BO Bulk Upload File (EXCEL) - Revised 21 August 2024.xlsx (excel worksheet with sample data)

TECHNICAL SUPPORT

Utilising any software capable of editing a CSV File is recommended (e.g., MS Excel, LibreOffice Calc). Please ensure that the file is saved in a “.csv” file extension to preserve its format and UTF-8 encoding.

If assistance is required with the new CSV File, please send an email to competentauthority@gov.ky, ensuring that the following subject line is included in the email: **“Technical Assistance – CSV File”**.



TECHNICAL GUIDANCE

PART I – New CSV File

1. OVERVIEW OF CHANGES

1.1 Scope of Changes

In summary, the changes made to the CSV File includes:

- adding new fields
- removing existing fields
- renaming existing field names

For ease of reference, the table below provides:

- updated data fields, including any renaming where relevant, (in **black, bold font**)
- new data fields (in **orange, bold font**)
- new options within updated data fields (in **green, italicised bold font**)
- options within a new data field (in **blue, italicised bold font**)

FIELDS
Entity
Year
Month
BO Status <i>Options - legalPerson, confirmed, pending or noChange or deleted</i>
RBO Type <i>Options - BO, RLE, DBO or CT</i>
BO First Name
BO Middle Name
BO Last Name
BO DOB
BO ID Type
BO ID Number
BO ID Country of Issue

BO ID Date of Issue
BO ID Date of Expiry
RLE Registration No
RLE/DBO/CT Name
RLE/DBO/CT Legal Form
BO/RLE/DBO/CT PO Box
BO/RLE/DBO/CT Address Line 1
BO/RLE/DBO/CT Address Line 2
BO/RLE/DBO/CT Address Line 3
BO/RLE/DBO/CT Address Line 4
BO/RLE/DBO/CT Postal Code
BO/RLE/DBO/CT Country
BO Service Address PO Box
BO Service Address Line 1
BO Service Address Line 2
BO Service Address Line 3
BO Service Address Line 4
BO Service Address Postal Code
BO Service Address Country
BO Nationality
Additional Nationalities <i>Options - Yes, No</i>
Mechanism of Control <i>Options - Voting rights, Shares, Partnership interest, Ultimate effective control, Senior Managing Official, Trustee, Other means</i>
Date Became an RBO
Date Ceased to be an RBO
Date RBO Particulars Confirmed
Date Restriction Notice Issued
Date Restriction Notice Withdrawn

Category of Legal Person <i>Options - a, b, c, d, 9</i>
Name of Stock Exchange
Jurisdiction of Stock Exchange
Licence Number
Regulatory Law
Company Name
Company Address Line 1
Company Address Line 2
Company PO Box
Company Postal Code
Company Country
Individual First Name
Individual Last Name
Individual Telephone Number
Individual Email Address
Name of Exempted Listed Parent

2. CSV FILE DATA FIELDS

2.1 Order of Fields & Naming Conventions

No changes should be made to the CSV File. It is imperative that the order of the fields and their respective names remain unchanged. Any changes to the order of the fields or the names of fields will result in upload errors.

2.2 Data Fields, Description & Status

The Act introduces a number of new data fields to the beneficial ownership register. In order to facilitate the filing of adequate, accurate and current information, the table below has been provided as reference for the type of information required for each data field.

The below is a guide when completing the BO Status field.

BO STATUS	use when...
<i>legalPerson</i>	• a Legal Person is categorised in Section 12(1)(a) through (d) or 12(9) of the Act • upon entering this status, the only data required will be in accordance with Section 12 of the Act • refer to Appendix A
<i>confirmed</i>	• when the RBO's particulars are confirmed
<i>pending</i>	• the RBO's particulars are not confirmed • upon entering this status, all fields <u>except</u> Entity, Year, Month and RBO Type are optional
<i>noChange</i>	• there is no change to the information previously filed (during the last filing) with respect to the relevant RBO • upon entering this status, only the following fields will be mandatory: (i) Entity (ii) Year (iii) Month (iv) BO Status
<i>deleted</i>	• an RBO should be removed in the system because of an error

NB. "Removed" is not a status available in the CSV File. This status appears on the Registrar's system to indicate that an RBO was removed from the beneficial ownership register as a result of the CSP selecting the status "deleted" in the CSV file.

Status	Summary
"O"	optional fields
"M"	mandatory fields
"C"	provision of further information is conditional on "BO Status" and "RBO Type" (see below)

FIELD		DESCRIPTION
Entity	M	- a valid entity type is: Company (<i>CR</i>), Exempted Limited Partnerships and Limited Partnerships (<i>PX</i>), Limited Liability Company (<i>LC</i>) or Limited Liability Partnership (<i>LP</i>) - entity type must be placed before the entity number - entity number must be eight (8) digits long - if the number is less than eight digits, place zeros before the number to make it eight digits (example: if a company number is 12345, the entity number is CR00012345) - Data Type: Alpha Numeric (as may be relevant)
Year	M	- year that filing is applicable to Data Type: Number
Month	M	- must be between 1 and 12 representing the relevant month of the year filing is applicable (example: January would be entered as 1) Data Type: Number
BO Status	M	Options: <i>legalPerson, confirmed, pending or noChange or deleted</i> Note - leave "BO Status" blank if no beneficial owners are identified and the "Mechanism of Control" is "Senior Managing Official" Data Type: Text (case sensitive)

RBO Type	C	Options: <i>BO, RLE, DBO or CT</i> Note - “BO” should be used if (i) no beneficial owners are identified and (ii) the “Mechanism of Control” field (below) is “Senior Managing Official”. <u>All data points relevant to a “BO” must also be provided with respect to the SMO.</u> Note - for trust structures, a combination of BO (natural person) and CT (corporate trustee) where relevant may be used. - <u>mandatory if</u> the BO Status field is “<i>confirmed</i>”, “<i>pending</i>” or left blank. - <u>not required if</u> the BO Status field is “<i>legalPerson</i>”, “<i>noChange</i>” or “<i>deleted</i>” Data Type: Text (case sensitive)
BO First Name	M	- <u>mandatory if</u> the RBO Type is “<i>BO</i>” - <u>not required if</u> the RBO Type is “<i>RLE</i>”, “<i>CT</i>” or “<i>DBO</i>” Data Type: Text
BO Middle Name	O	Data Type: Text
BO Last Name	M	- <u>mandatory if</u> the RBO Type is “<i>BO</i>” - <u>not required if</u> the RBO Type is “<i>RLE</i>”, “<i>CT</i>” or “<i>DBO</i>” Data Type: Text
BO DOB	C	- <u>mandatory if</u> the RBO Type is “<i>BO</i>” - <u>not required if</u> the RBO Type is “<i>RLE</i>”, “<i>CT</i>” or “<i>DBO</i>” - must be consistent with the following format- yyyyMMdd or dd-MMM-yyyy Data Type: Date
BO ID Type	M	Options: <i>PP (passport), DL (driver’s licence) or NID (national identification)</i> - mandatory if the RBO Type is “<i>BO</i>” Data Type: Text

BO ID Number	C	- <u>mandatory if</u> the RBO Type is “BO” - <u>not required if</u> the RBO Type is “RLE”, “CT” or “DBO” Data Type: Text
BO ID Country of Issue	C	- <u>mandatory if</u> the RBO Type is “BO” - <u>not required if</u> the RBO Type is “RLE”, “CT” or “DBO” - entry must be the code of the issuing country (example “US” for United States of America) Data Type: Text Reference: Appendix D
BO ID Date of Issue	C	- <u>mandatory if</u> the RBO Type is “BO” - <u>not required if</u> the RBO Type is “RLE”, “CT” or “DBO” - must be consistent with the following format- yyyyMMdd or dd-MMM-yyyy Data Type: Date
BO ID Date of Expiry	C	- <u>mandatory if</u> the RBO Type is “BO” - <u>not required if</u> the RBO Type is “RLE”, “CT” or “DBO” - must be consistent with the following format- yyyyMMdd or dd-MMM-yyyy - “no expiry date” must be entered where there is no expiry date Data Type: Date or Text (as may be relevant)
RLE Registration No	C	- <u>mandatory if</u> the RBO Type is “RLE” - <u>not required if</u> the RBO Type is “BO”, “CT” or “DBO” - <u>optional if</u> the RBO Type is “RLE” and the “RLE” BO Status is “Pending” Data Type: Text
RLE/DBO/CT Name	C	- <u>mandatory if</u> the RBO Type is “RLE”, “CT” or “DBO” - <u>not required if</u> the RBO Type is “BO” - <u>optional if</u> the RBO Type is “RLE”, “CT” or “DBO” and the “RLE” or “DBOs” BO Status is “Pending” Data Type: Text

RLE/DBO/CT Legal Form	C	- <u>mandatory if</u> the RBO Type is “<i>RLE</i>”, “<i>CT</i>” or “<i>DBO</i>” - <u>not required if</u> the RBO Type is “<i>BO</i>” - <u>optional if</u> the RBO Type is “<i>RLE</i>”, “<i>CT</i>” or “<i>DBO</i>” and the “<i>RLE</i>”, “<i>CT</i>” or “<i>DBOs</i>” BO Status is “<i>Pending</i>” Data Type: Text
BO/RLE/DBO/CT PO Box	O	Data Type: Numerical
BO/RLE/DBO/CT Address Line 1	M	- full address must be provided utilising all address fields if necessary Data Type: Text
BO/RLE/DBO/CT Address Line 2	M	Data Type: Text
BO/RLE/DBO/CT Address Line 3	O	- use as necessary in providing complete address Data Type: Text
BO/RLE/DBO/CT Address Line 4	O	- use as necessary in providing complete address Data Type: Text
BO/RLE/DBO/CT Postal Code	O	Data Type: Numerical or Alpha Numerical (as may be relevant)
BO/RLE/DBO/CT Country	M	Data Type: Text Reference: Appendix D
BO Service Address PO Box	O	Data Type: Numerical

BO Service Address Line 1	C	- <u>mandatory if</u> the RBO Type is “BO” - <u>not required if</u> the RBO Type is “RLE”, “CT” or “DBO” - <u>optional if</u> the RBO Type is “BO” and the “BO’s” BO Status is “Pending” - full address must be provided utilising all address fields if necessary Data Type: Text
BO Service Address Line 2	C	- <u>mandatory if</u> the RBO Type is “BO” - <u>not required if</u> the RBO Type is “RLE”, “CT” or “DBO” - <u>optional if</u> the RBO Type is “BO” and the “BO’s” BO Status is “Pending” - complete address must be provided utilising all address fields if necessary Data Type: Text
BO Service Address Line 3	O	- use as necessary in providing complete service address Data Type: Text
BO Service Address Line 4	O	- use as necessary in providing complete service address Data Type: Text
BO Service Address Postal Code	O	Data Type: Numerical or Alpha Numerical (as may be relevant)
BO Service Address Country	C	- <u>mandatory if</u> the RBO Type is “BO” - <u>not required if</u> the RBO Type is “RLE”, “CT” or “DBO” - <u>optional if</u> the RBO Type is “BO” and the “BO’s” BO Status is “Pending” Data Type: Text Reference: Appendix D

BO Nationality	M	- <u>mandatory if</u> the RBO Type is “BO” - <u>not required if</u> the RBO Type is “RLE”, “CT” or “DBO” Data Type: Text Reference: Appendix D
Additional Nationalities	M	Options: Yes, No - <u>mandatory if</u> the RBO Type is “BO” - <u>not required if</u> the RBO Type is “RLE”, “CT” or “DBO” Data Type: Text
Mechanism of Control	M	<u>mandatory if</u> the RBO type is “BO”, “RLE”, “DBO” or “CT” and the BO Status is “Confirmed”. <u>not required if</u> the BO Status is “noChange”, “deleted” and “legalPerson”. Options: Voting rights, Shares, Partnership interest, Ultimate effective control, Senior Managing Official, Trustee, Other means Data Type: Text
Date Became an RBO	C	- <u>mandatory if</u> the RBO Type is “BO”, “RLE”, “CT” or “DBO” - <u>optional if</u> the “BO”, “RLE”, “CT” or “DBO’s” BO Status is “Pending” - must be consistent with yyyyMMdd or dd-MMM-yyyy Data Type: Date
Date Ceased to be an RBO	O	- must be consistent with yyyyMMdd or dd-MMM-yyyy Data Type: Date
Date RBO Particulars Confirmed	M	- <u>mandatory if</u> the RBO Type is “BO”, “RLE”, “CT” or “DBO” - <u>optional if</u> the “BO”, “RLE”, “CT” or “DBO’s” BO Status is “Pending” - must be consistent with yyyyMMdd or dd-MMM-yyyy Data Type: Date

Date Restriction Notice Issued	O	- must be consistent with yyyyMMdd or dd-MMM-yyyy Data Type: Date
Date Restriction Notice Withdrawn	O	- must be consistent with yyyyMMdd or dd-MMM-yyyy Data Type: Date
Category of Legal Person	C	- <u>mandatory if</u> the BO Status is “<i>legalPerson</i>” - <u>not required if</u> the BO Status is “<i>confirmed</i>”, “<i>pending</i>” “<i>noChange</i>” or “<i>deleted</i>” - According to Section 12(9) the BO details must be filed along with the contact person when Category of Legal Person 9 is selected. - Applicable only when BO Status is “<i>confirmed</i>” Refer to row numbers 15,16 and 17 on the sample CSV file to see how contact details and BO details are filed for Category of Legal Person 9 Details are filed for the same Entity, Month and Year Data Type: Text Reference: Appendix A
Name of Stock Exchange	M	- <u>mandatory if</u> the BO Status is “<i>legalPerson</i>” in category 12(i)(a) - <u>not required if</u> the BO Status is “<i>legalPerson</i>” in any other category (refer to Section 12(1)(a)) Data Type: Text Reference: Appendix C
Jurisdiction of Stock Exchange	M	- <u>mandatory if</u> the BO Status is “<i>legalPerson</i>” in category 12(1)(a) - <u>not required if</u> the BO Status is “<i>legalPerson</i>” in any other category Data Type: Text Reference: Appendix D

Licence Number	M	- <u>mandatory if</u> the BO Status is “<i>legalPerson</i>” in category 12(1)(b) - <u>not required if</u> the BO Status is “<i>confirmed</i>”, “<i>pending</i>”, “<i>deleted</i>” or “<i>noChange</i>” Data Type: Numerical or Alpha Numerical (as may be relevant)
Regulatory Law	M	- <u>mandatory if</u> the BO Status is “<i>legalPerson</i>” in category 12(1)(b) or 12(1)(c) - <u>not required if</u> the BO Status is “<i>confirmed</i>”, “<i>pending</i>” or “<i>noChange</i>”, “<i>deleted</i>” or a “<i>legalPerson</i>” in any other category Data Type: Text
Company Name	O	- <u>optional if</u>; - BO Status is “<i>legalPerson</i>” in category 12(1)(c) or 12(1)(9) - the RBO Type is “<i>DBO</i>” or “<i>CT</i>” - <u>not required if</u> - BO Status is “<i>noChange</i>”, “<i>deleted</i>” - “<i>legalPerson</i>” category is 12(1)(a),12(1)(b),12(1)(d). - BO Status is “<i>confirmed</i>”, “<i>pending</i>” when RBO Type is “<i>BO</i>”, “<i>RLE</i>” Data Type: Text
Company Address Line 1	O	- <u>optional if</u>; - BO Status is “<i>legalPerson</i>” in category 12(1)(c) or 12(1)(9) - the RBO Type is “<i>DBO</i>” or “<i>CT</i>” - <u>not required if</u> - BO Status is “<i>noChange</i>”, “<i>deleted</i>” - “<i>legalPerson</i>” category is 12(1)(a),12(1)(b),12(1)(d). - BO Status is “<i>confirmed</i>”, “<i>pending</i>” when RBO Type is “<i>BO</i>”, “<i>RLE</i>” Data Type: Text

Company Address Line 2	O	- <u>optional if;</u> - BO Status is “<i>legalPerson</i>” in category 12(1)(c) or 12(1)(9) - the RBO Type is “<i>DBO</i>” or “<i>CT</i>” - <u>not required if</u> - BO Status is “<i>noChange</i>”, “<i>deleted</i>” - “<i>legalPerson</i>” category is 12(1)(a),12(1)(b),12(1)(d). - BO Status is “<i>confirmed</i>”, “<i>pending</i>” when RBO Type is “<i>BO</i>”, “<i>RLE</i>” Data Type: Text
Company PO Box	O	- <u>optional if;</u> - BO Status is “<i>legalPerson</i>” in category 12(1)(c) or 12(1)(9) - the RBO Type is “<i>DBO</i>” or “<i>CT</i>” - <u>not required if</u> - BO Status is “<i>noChange</i>”, “<i>deleted</i>” - “<i>legalPerson</i>” category is 12(1)(a),12(1)(b),12(1)(d). - BO Status is “<i>confirmed</i>”, “<i>pending</i>” when RBO Type is “<i>BO</i>”, “<i>RLE</i>” Data Type: Numerical
Company Postal Code	O	- <u>optional if;</u> - BO Status is “<i>legalPerson</i>” in category 12(1)(c) or 12(1)(9) - the RBO Type is “<i>DBO</i>” or “<i>CT</i>” - <u>not required if</u> - BO Status is “<i>noChange</i>”, “<i>deleted</i>” - “<i>legalPerson</i>” category is 12(1)(a),12(1)(b),12(1)(d). - BO Status is “<i>confirmed</i>”, “<i>pending</i>” when RBO Type is “<i>BO</i>”, “<i>RLE</i>” - full address must be provided utilising all address fields if necessary Data Type: Numerical or Alpha Numerical (as may be relevant)

Company Country	O	- <u>optional if;</u> - BO Status is “<i>legalPerson</i>” in category 12(1)(c) or 12(1)(9) - the RBO Type is “<i>DBO</i>” or “<i>CT</i>” - <u>not required if</u> - BO Status is “<i>noChange</i>”, “<i>deleted</i>” - “<i>legalPerson</i>” category is 12(1)(a),12(1)(b),12(1)(d). - BO Status is “<i>confirmed</i>”, “<i>pending</i>” when RBO Type is “<i>BO</i>”, “<i>RLE</i>” Data Type: Text Reference: Appendix D
Individual First Name	M	- <u>mandatory if;</u> - BO Status is “<i>legalPerson</i>” in category 12(1)(c) or 12(1)(9) - the RBO Type is “<i>DBO</i>” or “<i>CT</i>” - <u>not required if</u> - BO Status is “<i>noChange</i>”, “<i>deleted</i>” - “<i>legalPerson</i>” category is 12(1)(a),12(1)(b),12(1)(d). - BO Status is “<i>confirmed</i>”, “<i>pending</i>” when RBO Type is “<i>BO</i>”, “<i>RLE</i>” Data Type: Text
Individual Last Name	M	- <u>mandatory if;</u> - BO Status is “<i>legalPerson</i>” in category 12(1)(c) or 12(1)(9) - the RBO Type is “<i>DBO</i>” or “<i>CT</i>” - <u>not required if</u> - BO Status is “<i>noChange</i>”, “<i>deleted</i>” - “<i>legalPerson</i>” category is 12(1)(a),12(1)(b),12(1)(d). - BO Status is “<i>confirmed</i>”, “<i>pending</i>” when RBO Type is “<i>BO</i>”, “<i>RLE</i>” Data Type: Text

Individual Telephone Number	M	- <u>mandatory if;</u> - BO Status is <i>"legalPerson"</i> in category 12(1)(c) or 12(1)(9) - the RBO Type is <i>"DBO"</i> or <i>"CT"</i> - <u>not required if</u> - BO Status is <i>"noChange"</i>, <i>"deleted"</i> - <i>"legalPerson"</i> category is 12(1)(a),12(1)(b),12(1)(d). - BO Status is <i>"confirmed"</i>, <i>"pending"</i> when RBO Type is <i>"BO"</i>, <i>"RLE"</i> Data Type: Numerical
Individual Email Address	M	- <u>mandatory if;</u> - BO Status is <i>"legalPerson"</i> in category 12(1)(c) or 12(1)(9) - the RBO Type is <i>"DBO"</i> or <i>"CT"</i> - <u>not required if</u> - BO Status is <i>"noChange"</i>, <i>"deleted"</i> - <i>"legalPerson"</i> category is 12(1)(a),12(1)(b),12(1)(d). - BO Status is <i>"confirmed"</i>, <i>"pending"</i> when RBO Type is <i>"BO"</i>, <i>"RLE"</i> Data Type: Text
Name of Exempted Listed Parent	O	- optional if the BO Status is <i>"legalPerson"</i> in category 12(1)(a) - not required if the BO Status is <i>"confirmed"</i>, <i>"pending"</i> or <i>"noChange"</i>, <i>"deleted"</i> or a <i>"legalPerson"</i> in any other category Data Type: Text

2.3 Matrix by BO Status & RBO Type

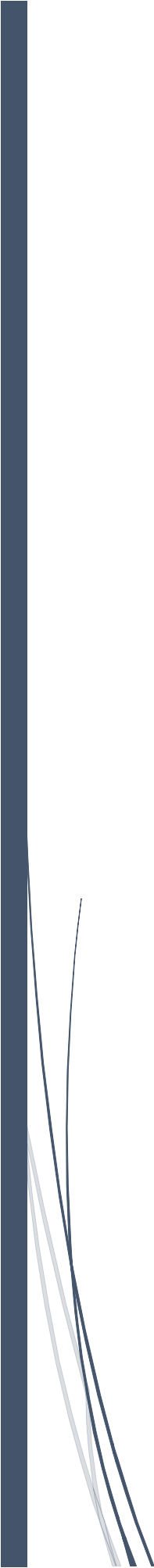
For the avoidance of doubt, a matrix has been provided at Appendix B - Matrix by BO Status & RBO Type which indicates the data fields which are (i) mandatory, (ii) conditional or (iii) optional based on BO Status and RBO Type.

Appendix B has been developed and included for the benefit of information technology personnel/teams when implementing the new CSV File.

For further clarity, please refer to the Act and Regulations which should always be relied on to determine the obligations and relevant data to be provided.

For the avoidance of doubt, the fields below (excluding renamed data points or options within new fields) were introduced by the Act. Post Compliance Date, the fields below will be mandatory based on BO Status and RBO Type.

FIELD	CSV FILE COLUMN
BO Nationality	AF
Additional Nationalities	AG
Mechanism of Control	AH
Individual First Name	AY
Individual Last Name	AZ
Individual Telephone Number	BA
Individual Email Address	BB



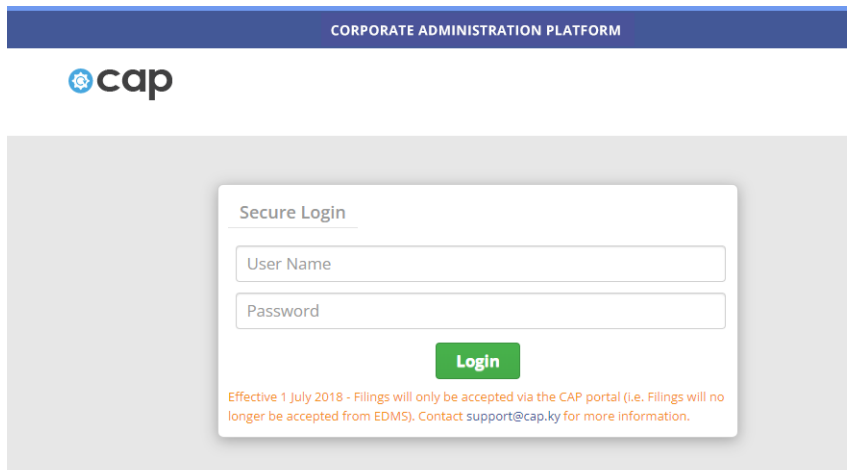
TECHNICAL GUIDANCE

PART II – Filing Beneficial Ownership Information

3. POPULATING AND SAVING THE BENEFICIAL OWNERSHIP REGISTER

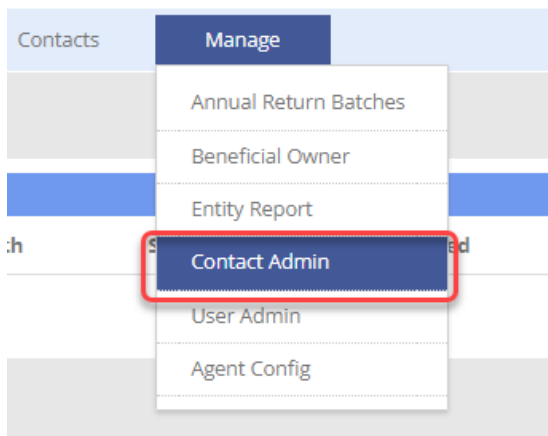
Populate beneficial ownership information in the new CSV File and save the information by following the steps below.

- i. Log into the CAP portal by launching the browser and going to <https://cap.secure.ky>. The recommended browsers for this task are **Google Chrome** and **Mozilla Firefox**.



The screenshot shows the 'CORPORATE ADMINISTRATION PLATFORM' header with the 'cap' logo. Below is a 'Secure Login' form with fields for 'User Name' and 'Password', and a green 'Login' button. A note at the bottom states: 'Effective 1 July 2018 - Filings will only be accepted via the CAP portal (i.e. Filings will no longer be accepted from EDMS). Contact support@cap.ky for more information.'

- ii. On the home screen, navigate to the **Manage** tab (on the right of the screen) and select **Contact Admin**.



- iii. Once the Contact Administration screen loads, click on the **Sample Beneficial Owner Upload** link under Sample CSV files.

Contact Administration

Import Processing

To add or update contact or entity information in bulk, you can use the import feature below. The import file must be in CSV format (save as CSV from Excel), sample files are below.

Note: Bulk upload currently does not work with Internet Explorer. Please use Firefox or Google Chrome.

CSV File *

[Choose File](#) No file chosen

Import Type *

[Import](#)

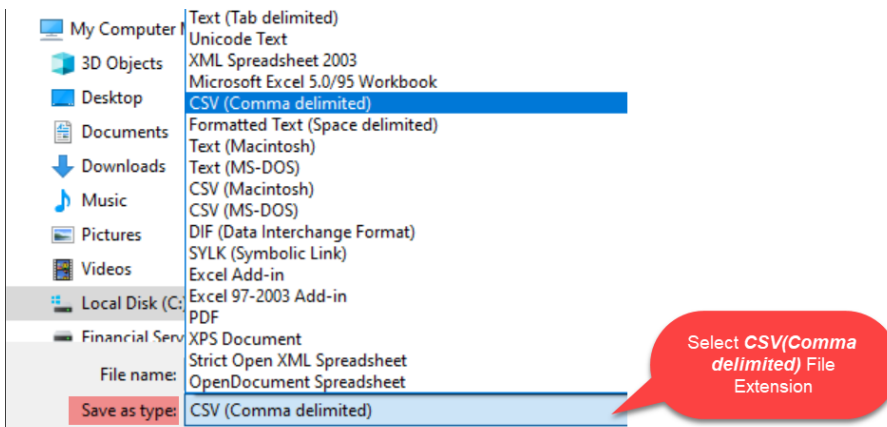
Sample CSV files

- Sample Person Contact Import
- Sample Entity Contact Import
- Sample Director Relationship Import
- Sample Economic Substance Bulk Submit
- Sample Beneficial Owner Upload**

User Guides & Example

- ES Bulk Submit User Guide
- ES Bulk Uploading Example
- BO Bulk Upload User Guide
- BO Bulk Uploading Example
- BO Bulk Upload CSV file Config & Error Messages Guide
- Beneficial Owner FAQs
- BO Enforcement Manual

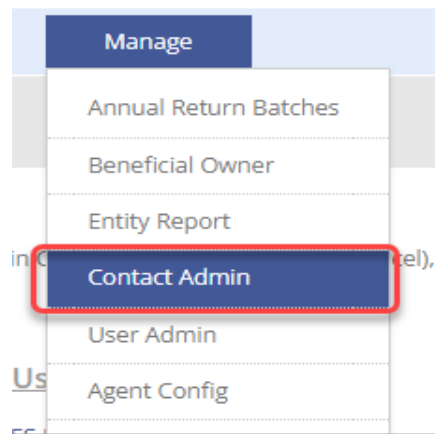
- iv. Populate the **Sample Beneficial Ownership Upload** file with the beneficial ownership information to be filed with the Competent Authority. Please ensure that no punctuation marks are used.
- v. Once complete, it is important that the document is saved in the CSV File type. The manner in which this may be accomplished will vary based on editor used. For example, when using Excel and saving the document, the ability to choose a “Save as type” (below the “File name” field) will be provided. “CSV (Comma delimited)” will appear as one of the options available - this file type should be chosen.



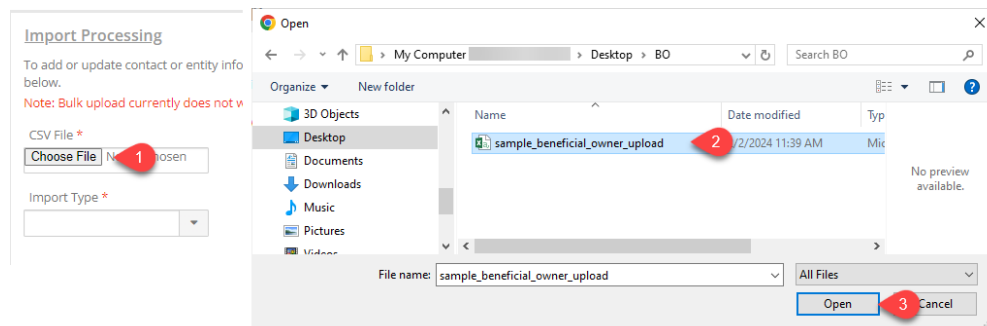
4. UPLOADING THE BENEFICIAL OWNERSHIP REGISTER

Upload completed CSV File by following the steps below.

- i. On the Contact Administration screen, click the **Manage** tab and then click **Contact Admin**.



- ii. Once the page loads, click on **Choose File** (under the CSV File*) and select the beneficial ownership file which should be filed with the Competent Authority (refer to 1, 2 & 3 in the screenshot below).

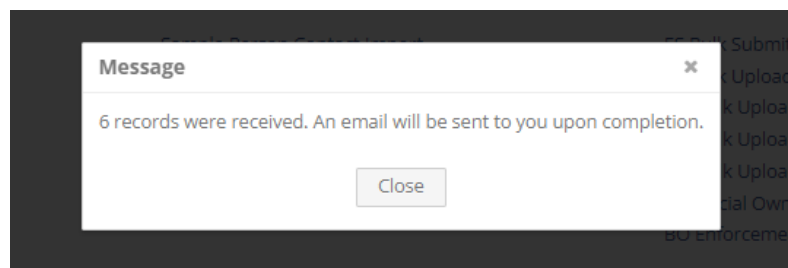


Once Open has been clicked (above), the file name will be displayed next to the **Choose File** button (under the CSV File*).

- iii. Click on the **Import Type*** drop-down menu and click on **Beneficial Owner** and then click **Import** (green button) to start the upload.

The image shows two side-by-side screenshots of the 'Import Processing' form. Both screenshots have the title 'Import Processing' and a subtitle 'To add or update contact or entity information in bulk, you can upload a CSV file below.' Below this is a note: 'Note: Bulk upload currently does not work with Internet Explorer.' The form has two main sections: 'CSV File *' and 'Import Type *'. In the 'CSV File *' section, there is a 'Choose File' button and a text input field containing 'sample...load.csv'. In the 'Import Type *' section, there is a dropdown menu. In the left screenshot, the dropdown menu is open, showing a list of options: 'Person Contact', 'Entity Contact', 'Director Relationship', 'Economic Substance', and 'Beneficial Owner'. The 'Beneficial Owner' option is highlighted in blue, and a red callout bubble with the number '1' points to it. In the right screenshot, the dropdown menu is closed, and the text 'Beneficial Owner' is visible in the input field. Below the dropdown menu, there is a green 'Import' button, which is highlighted with a red callout bubble with the number '2'. At the bottom of each form, there is a link labeled 'Import History'.

- iv. A message box will appear confirming how many records were processed. Click **Close**.
- v. An email will be sent to the user undertaking the filing in CAP confirming the numbers of records processed, including failures and successes.



5. NAVIGATING HISTORICAL DATA

The history of all uploads will be displayed in the Contact Administration screen under the **Import History** section.

Import History			
Import Message	Import By	Import Date	Failures
6 beneficial owners have been processed with 6 failures.		02-Feb-2024 12:23	
1 beneficial owners have been processed with 1 failures.		02-Feb-2024 12:22	
2 of 2			

Import Message	summary of the number of beneficial owners processed together with the amount of failures (n.b., this assessment is done by number of rows)
Import By	indicates the user logged into CAP undertaking the upload
Import Date	the date and time of the upload
Failures	by clicking the icon, a summary of failures (identified by line/row number) may be accessed

For a detailed historical record of all filings undertaken for each entity, click on the **Manage** tab and then click on the **Beneficial Owner** tab. Click on More  (left of screen) to view all the entities listed alphabetically.

Beneficial Owner						
- Search						
Client Ref	Registration #	Entity	Year	Month	Status	Last Modified
1	6	1() ; Limited	2024	1	Upload	08-Feb-2024 10:56
1	6	1() ; Limited	2023	12	None	01-Dec-2023 03:30

For ease of reference, the table below provides the meaning of the various system “Status(es)”.

None	system defaults to “none” at the beginning of each month until such time as beneficial ownership is submitted for the specific month
Same	no changes registered with respect to beneficial ownership
Upload	beneficial ownership particulars were successfully filed for the period
Removed	legal person was removed from the beneficial ownership register

For a specific search, click the **Search** (blue bar at the top of Beneficial Owner screen) and the search pane will expand allowing specific information to be entered.

Beneficial Owner

+ Search

Registration # OPTIONAL

Entity OPTIONAL

Year Month OPTIONAL OPTIONAL

Status OPTIONAL

Last Modified From OPTIONAL

To OPTIONAL

Search Clear Export

Client Ref	Registration #	Entity	Year	Month	Status	Last Modified
------------	----------------	--------	------	-------	--------	---------------

APPENDIX A - CATEGORY OF LEGAL PERSON

ARC	CLP	Name of STX	JUR STX	LN	RL	CP First Name	CP Middle Name	CP Last Name	CP PO Box	CP Add Line 1 & 2	CP Add Line 3 & 4	CP PC	CP Country	Name Ex Listed Parent
s. 12(1) (a) <i>(listed or is a subsidiary of a listed entity, on the Cayman Islands Stock Exchange or an approved stock exchange)</i>	a	X	X											
s. 12 (1) (b) <i>(licenced under a regulatory law)</i>	b			X	X									
s. 12 (1) (c) <i>(a fund registered under the Private Funds Act (as amended) or the Mutual Funds Act (as amended))</i>	c				X	X		X	X	X		X	X	
s. 12(1) (d) <i>(exempted by Cabinet by virtue of this Act)</i>	d													
s.12 (1) (e) <i>(another legal person not falling within, or not opting to fall within paragraph (a) to (d))</i>	e	• where the RBO is an individual, the required particulars as set out at section 12(5) must be provided • where the RBO is an RLE, the required particulars as set out at section 12(7) must be provided												
s. 12 (9) <i>(where a legal person is being wound up)</i>	9					X		X	X	X		X	X	

TABLE KEY	
ARC	Alternative Route to Compliance
CLP	Category of Legal Person
JUR STX	Jurisdiction of STX
STX	Stock Exchange
LN	Licence Number
RL	Regulatory Law
CP	Contact Person
Add	Address Line
CPPC	CP Postal Code
Name Ex Listed Parent	Name of Exempted Listed Parent

APPENDIX B - MATRIX BY BO STATUS AND RBO TYPE

KEY

M – mandatory

O – optional

NR – not required

Fields	Confirmed BO Individual	Confirmed BO Entity	Confirmed BO Entity	Confirmed BO Entity	Pending BO Individual	Pending BO Entity	Pending BO Entity	Pending BO Entity	No Change Filing	Delete Entity	Category of Legal Person (a)	Category of Legal Person (b)	Category of Legal Person (c)	Category of Legal Person (d)	Category of Legal Person (9)
Entity	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M
Year	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M
Month	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M
BO Status	confirmed	confirmed	confirmed	confirmed	pending	pending	pending	pending	noChange	deleted	legalPerson	legalPerson	legalPerson	legalPerson	legalPerson
RBO Type	BO	RLE	DBO	CT	BO	RLE	DBO	CT	NR	NR	NR	NR	NR	NR	NR
BO First Name	M	NR	NR	NR	O	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
BO Middle Name	O	NR	NR	NR	O	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
BO Last Name	M	NR	NR	NR	O	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
BO DOB	M	NR	NR	NR	O	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
BO ID Type	M	NR	NR	NR	O	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
BO ID Number	M	NR	NR	NR	O	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
BO ID Country of Issue	M	NR	NR	NR	O	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
BO ID Date of Issue	M	NR	NR	NR	O	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
BO ID Date of Expiry	M	NR	NR	NR	O	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
RLE Registration No	NR	M	NR	NR	NR	O	NR	NR	NR	NR	NR	NR	NR	NR	NR
RLE/DBO/CT Name	NR	M	M	M	NR	O	O	O	NR	NR	NR	NR	NR	NR	NR
RLE/DBO/CT Legal Form	NR	M	M	M	NR	O	O	O	NR	NR	NR	NR	NR	NR	NR
BO/RLE/DBO/CT PO Box	O	O	O	O	O	O	O	O	NR	NR	NR	NR	NR	NR	NR

BO/RLE/DBO/CT Address Line 1	M	M	M	M	O	O	O	O	NR	NR	NR	NR	NR	NR	NR
BO/RLE/DBO/CT Address Line 2	M	M	M	M	O	O	O	O	NR	NR	NR	NR	NR	NR	NR
BO/RLE/DBO/CT Address Line 3	O	O	O	O	O	O	O	O	NR	NR	NR	NR	NR	NR	NR
BO/RLE/DBO/CT Address Line 4	O	O	O	O	O	O	O	O	NR	NR	NR	NR	NR	NR	NR
BO/RLE/DBO/CT Postal Code	O	O	O	O	O	O	O	O	NR	NR	NR	NR	NR	NR	NR
BO/RLE/DBO/CT Country	M	M	M	M	O	O	O	O	NR	NR	NR	NR	NR	NR	NR
BO Service Address PO Box	O	NR	NR	NR	O	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
BO Service Address Line 1	M	NR	NR	NR	O	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
BO Service Address Line 2	M	NR	NR	NR	O	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
BO Service Address Line 3	O	NR	NR	NR	O	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
BO Service Address Line 4	O	NR	NR	NR	O	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
BO Service Address Postal Code	O	NR	NR	NR	O	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
BO Service Address Country	M	NR	NR	NR	O	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
BO Nationality	M	NR	NR	NR	O	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Additional Nationalities	M	NR	NR	NR	O	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Mechanism of Control	M	M	M	M	O	O	O	O	NR	NR	NR	NR	NR	NR	NR
Date Became an RBO	M	M	M	M	O	O	O	O	NR	NR	NR	NR	NR	NR	NR
Date Ceased to be an RBO	O	O	O	O	O	O	O	O	NR	NR	NR	NR	NR	NR	NR
Date RBO Particulars Confirmed	M	M	M	M	O	O	O	O	NR	NR	NR	NR	NR	NR	NR
Date Restriction Notice Issued	O	O	O	O	O	O	O	O	NR	NR	NR	NR	NR	NR	NR
Date Restriction Notice Withdrawn	O	O	O	O	O	O	O	O	NR	NR	NR	NR	NR	NR	NR
Category of Legal Person	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	M (a)	M (b)	M (c)	M (d)	M (9)
Name of Stock Exchange	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	M	NR	NR	NR	NR
Jurisdiction of Stock Exchange	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	M	NR	NR	NR	NR
Licence Number	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	M	NR	NR	NR
Regulatory Law	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	M	M	NR	NR

Company Name	NR	NR	O	O	NR	NR	O	O	NR	NR	NR	NR	O	NR	O
Company Address Line 1	NR	NR	O	O	NR	NR	O	O	NR	NR	NR	NR	O	NR	O
Company Address Line 2	NR	NR	O	O	NR	NR	O	O	NR	NR	NR	NR	O	NR	O
Company PO Box	NR	NR	O	O	NR	NR	O	O	NR	NR	NR	NR	O	NR	O
Company Postal Code	NR	NR	O	O	NR	NR	O	O	NR	NR	NR	NR	O	NR	O
Company Country	NR	NR	O	O	NR	NR	O	O	NR	NR	NR	NR	O	NR	O
Individual First Name	NR	NR	M	M	NR	NR	O	O	NR	NR	NR	NR	M	NR	M
Individual Last Name	NR	NR	M	M	NR	NR	O	O	NR	NR	NR	NR	M	NR	M
Individual Telephone Number	NR	NR	M	M	NR	NR	O	O	NR	NR	NR	NR	M	NR	M
Individual Email Address	NR	NR	M	M	NR	NR	O	O	NR	NR	NR	NR	M	NR	M
Name of Exempted Listed Parent	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	O	NR	NR	NR	NR

APPENDIX C - APPROVED STOCK EXCHANGES (schedule 4, Companies Act SL 16 of 2023, as amended)

1. Amman Stock Exchange
2. Athens Stock Exchange
3. Australian Securities Exchange
4. B3 S.A.
5. BATS Global Markets
6. Bermuda Stock Exchange
7. BOAG Borsen AG
8. Bolsa de Barcelona
9. Bolsa de Bilbao
10. Bolsa de Madrid
11. Bolsa de Valencia
12. Bolsa de Comercio de Buenos Aires
13. Bolsa de Comercio de Santiago
14. Bolsa de Valores de Caracas
15. Bolsa de Valores de Lima
16. Bolsa de Valores de Colombia
17. Bolsa Mexicana de Valores (Mexican Stock Exchange)
18. Bolsas y Mercados Espanoles
19. Borsa Istanbul
20. Borsa Italiana
21. Borse Berlin
22. Borse Frankfurt
23. Borse Munchen
24. Borse Stuttgart
25. BSE Limited
26. Bucharest Stock Exchange
27. Budapest Stock Exchange
28. Bursa Malaysia (including the Main Market and the ACE Market)
29. Chicago Board Options Exchange
30. CME Group
31. Colombo Stock Exchange
32. Cyprus Stock Exchange
33. Deutsche Borse
34. Dusseldorf Stock Exchange
35. Eurex
36. Euronext Brussels
37. Euronext Dublin
38. Euronext Lisbon

39. Euronext NV
40. Euronext Oslo Bor
41. Euronext Paris
42. Fukuoka Stock Exchange
43. Hong Kong Exchange and Clearing (HKEX) (including Growth Enterprise Market (GEM))
44. Indonesia Stock Exchange
45. Intercontinental Exchange
46. International Securities Exchange
47. Johannesburg Stock Exchange
48. Korea Exchange (including KOSPI and KOSDAQ Market Divisions)
49. London Stock Exchange (including AIM)
50. Luxembourg Stock Exchange
51. Malta Stock Exchange
52. Montreal Exchange
53. Nagoya Stock Exchange
54. Nasdaq
55. Nasdaq Copenhagen (formerly known as Copenhagen Stock Exchange)
56. Nasdaq Dubai
57. Nasdaq Helsinki
58. Nasdaq Iceland
59. Nasdaq OMX Nordic
60. Nasdaq PHLX
61. Nasdaq Riga
62. Nasdaq Stockholm
63. Nasdaq Tallinn
64. Nasdaq Vilnius
65. National Stock Exchange of Australia
66. National Stock Exchange of India
67. New York Stock Exchange (NYSE)
68. New Zealand Stock Exchange
69. NYSE American
70. NYSE Arca
71. NYSE Chicago
72. NYSE Euronext
73. Osaka Exchange
74. Philippine Stock Exchange
75. Prague Stock Exchange
76. Saudi Exchange (Tadawul)
77. Shanghai Stock Exchange
78. Shenzhen Stock Exchange
79. Singapore Exchange (including Catalist)
80. SIX Swiss Exchange

- 81. Stock Exchange of Mauritius
- 82. Taipei Exchange
- 83. Taiwan Stock Exchange
- 84. The Egyptian Exchange
- 85. The Stock Exchange of Thailand
- 86. Tokyo Stock Exchange
- 87. Toronto Stock Exchange (including TSX Venture Exchange)
- 88. Warsaw Stock Exchange
- 89. Wiener Borse AG (Vienna Stock Exchange)
- 90. Any stock exchange that the Registrar may from time to time designate as an approved stock exchange by way of notice published in the Gazette.

APPENDIX D - COUNTRY CODE & NAME

AD	Andorra
AE	United Arab Emirates
AF	Afghanistan
AG	Antigua and Barbuda
AI	Anguilla
AL	Albania
AM	Armenia
AO	Angola
AQ	Antarctica
AR	Argentina
AS	American Samoa
AT	Austria
AU	Australia
AW	Aruba
AX	Åland Islands
AZ	Azerbaijan
BA	Bosnia and Herzegovina
BB	Barbados
BD	Bangladesh
BE	Belgium
BF	Burkina Faso
BG	Bulgaria
BH	Bahrain
BI	Burundi
BJ	Benin
BL	Saint Barthélemy
BM	Bermuda
BN	Brunei Darussalam
BO	Bolivia (Plurinational State of)
BQ	Bonaire, Sint Eustatius and Saba
BR	Brazil
BS	Bahamas
BT	Bhutan
BV	Bouvet Island
BW	Botswana
BY	Belarus
BZ	Belize
CA	Canada

CC	Cocos (Keeling) Islands
CD	Congo, Democratic Republic of the
CF	Central African Republic
CG	Congo
CH	Switzerland
CI	Côte d'Ivoire
CK	Cook Islands
CL	Chile
CM	Cameroon
CN	China
CO	Colombia
CR	Costa Rica
CU	Cuba
CV	Cabo Verde
CW	Curaçao
CX	Christmas Island
CY	Cyprus
CZ	Czechia
DE	Germany
DJ	Djibouti
DK	Denmark
DM	Dominica
DO	Dominican Republic
DZ	Algeria
EC	Ecuador
EE	Estonia
EG	Egypt
EH	Western Sahara
ER	Eritrea
ES	Spain
ET	Ethiopia
FI	Finland
FJ	Fiji
FK	Falkland Islands (Malvinas)
FM	Micronesia (Federated States of)
FO	Faroe Islands
FR	France
GA	Gabon

GB	United Kingdom of Great Britain and Northern Ireland
GD	Grenada
GE	Georgia
GF	French Guiana
GG	Guernsey
GH	Ghana
GI	Gibraltar
GL	Greenland
GM	Gambia
GN	Guinea
GP	Guadeloupe
GQ	Equatorial Guinea
GR	Greece
GS	South Georgia and the South Sandwich Islands
GT	Guatemala
GU	Guam
GW	Guinea-Bissau
GY	Guyana
HK	Hong Kong
HM	Heard Island and McDonald Islands
HN	Honduras
HR	Croatia
HT	Haiti
HU	Hungary
ID	Indonesia
IE	Ireland
IL	Israel
IM	Isle of Man
IN	India
IO	British Indian Ocean Territory
IQ	Iraq
IR	Iran (Islamic Republic of)
IS	Iceland
IT	Italy
JE	Jersey
JM	Jamaica
JO	Jordan
JP	Japan
KE	Kenya

KG	Kyrgyzstan
KH	Cambodia
KI	Kiribati
KM	Comoros
KN	Saint Kitts and Nevis
KP	Korea (Democratic People's Republic of)
KR	Korea, Republic of
KW	Kuwait
KY	Cayman Islands
KZ	Kazakhstan
LA	Lao People's Democratic Republic
LB	Lebanon
LC	Saint Lucia
LI	Liechtenstein
LK	Sri Lanka
LR	Liberia
LS	Lesotho
LT	Lithuania
LU	Luxembourg
LV	Latvia
LY	Libya
MA	Morocco
MC	Monaco
MD	Moldova, Republic of
ME	Montenegro
MF	Saint Martin (French part)
MG	Madagascar
MH	Marshall Islands
MK	North Macedonia
ML	Mali
MM	Myanmar
MN	Mongolia
MO	Macao
MP	Northern Mariana Islands
MQ	Martinique
MR	Mauritania
MS	Montserrat
MT	Malta
MU	Mauritius
MV	Maldives

MW	Malawi
MX	Mexico
MY	Malaysia
MZ	Mozambique
NA	Namibia
NC	New Caledonia
NE	Niger
NF	Norfolk Island
NG	Nigeria
NI	Nicaragua
NL	Netherlands, Kingdom of the
NO	Norway
NP	Nepal
NR	Nauru
NU	Niue
NZ	New Zealand
OM	Oman
PA	Panama
PE	Peru
PF	French Polynesia
PG	Papua New Guinea
PH	Philippines
PK	Pakistan
PL	Poland
PM	Saint Pierre and Miquelon
PN	Pitcairn
PR	Puerto Rico
PS	Palestine, State of
PT	Portugal
PW	Palau
PY	Paraguay
QA	Qatar
RE	Réunion
RO	Romania
RS	Serbia
RU	Russian Federation
RW	Rwanda
SA	Saudi Arabia
SB	Solomon Islands
SC	Seychelles
SD	Sudan

SE	Sweden
SG	Singapore
SH	Saint Helena, Ascension and Tristan da Cunha
SI	Slovenia
SJ	Svalbard and Jan Mayen
SK	Slovakia
SL	Sierra Leone
SM	San Marino
SN	Senegal
SO	Somalia
SR	Suriname
SS	South Sudan
ST	Sao Tome and Principe
SV	El Salvador
SX	Sint Maarten (Dutch part)
SY	Syrian Arab Republic
SZ	Eswatini
TC	Turks and Caicos Islands
TD	Chad
TF	French Southern Territories
TG	Togo
TH	Thailand
TJ	Tajikistan
TK	Tokelau
TL	Timor-Leste
TM	Turkmenistan
TN	Tunisia
TO	Tonga
TR	Türkiye
TT	Trinidad and Tobago
TV	Tuvalu
TW	Taiwan, Province of China
TZ	Tanzania, United Republic of
UA	Ukraine
UG	Uganda
UM	United States Minor Outlying Islands
US	United States of America
UY	Uruguay
UZ	Uzbekistan
VA	Holy See

VC	Saint Vincent and the Grenadines
VE	Venezuela (Bolivarian Republic of)
VG	Virgin Islands (British)
VI	Virgin Islands (U.S.)
VN	Viet Nam
VU	Vanuatu
WF	Wallis and Futuna
WS	Samoa
YE	Yemen
YT	Mayotte
ZA	South Africa
ZM	Zambia
ZW	Zimbabwe