**CB4REACH Consortium**

**Identification of shareholders/beneficiaries**

**PART A: Identification of shareholders of the potential registrant**

Please identify any legal entities and/or individuals holding shares or voting rights **directly or indirectly** in the potential registrant, i.e., the legal entity wishing to purchase a letter of access from the CB4REACH Consortium.

In case of complex ownership structures, a “family tree” graphic showing the ownership/control structure of the potential registrant should be provided to illustrate the shareholding and voting rights structure. Where a direct or indirect shareholder is a publicly listed company, please provide information on shareholdings and voting rights of shareholders who are subject to reporting requirements under applicable law (each a “**Relevant Shareholder**”).

For **each** Relevant Shareholder (both **direct and indirect**), please provide the information listed in the attached questionnaire, **using a separate sheet for each Relevant Shareholder**.

Where the potential registrant is acting as an only representative (“**OR**”) on behalf of its parent company or another affiliated entity, the information is to be provided in relation to the OR.

Where shares are held in trust for another entity, the information also needs to be provided in relation to the beneficiary/beneficiaries.

**Example:**

The potential registrant in Germany is acting as an OR for its parent company in Switzerland which owns all of the shares of the German company. 49% of the shares of the Swiss company are owned by a company in Luxemburg which is owned by A. 51% of the shares of the Luxemburg company are owned by a listed U.S. corporation (“Parent”). The Parent has three Relevant Shareholders (B, C and D). B is a private individual, C is a lawyer who is holding the shares on behalf of his client X and D is a company from the Bahamas whose sole shareholder is Y.

The information needs to be provided for

* the potential registrant in Germany
* the company in Switzerland
* the company in Luxemburg
* the company in the U.S.
* **each** of A, B, C, D, X and Y.

**Part B: Identification of shareholders of client(s) of Only Representatives**

If the potential registrant is acting as an OR who is a **service provider** (i.e., there are no direct or indirect shareholdings of the client or any of its affiliates in the OR), the following information is to be provided **in addition to the information in Part A**:

Please identify any legal entities and/or individuals holding shares or voting rights **directly or indirectly** in the **client of the OR**.

In case of complex ownership structures, a “family tree” graphic should be provided to illustrate the shareholding and voting right structure. Where a direct or indirect shareholder is a publicly listed company, please provide information on shareholdings and voting rights of individual shareholders who are subject to reporting requirements under applicable law. **Please note that in order to provide this information, the OR will need to specifically request this information from the client.**

For **each** Relevant Shareholder (both **direct and indirect**), please provide the information listed in the attached questionnaire, **using a separate sheet for each Relevant Shareholder**.

**Example:**

The potential registrant in Germany is a service provider who is acting as an OR for a company in Switzerland. All of the shares of the service provider are held by the individuals A and B.

The client of the OR is a Singapore-based company whose shares are wholly owned by an Indian company. 49% of the shares of the Indian company are owned by a German listed company. Individuals C and D as well as a French state-owned company are Relevant Shareholders of the German company, the rest is free float. The remaining 51% of the shares of the Indian company are owned jointly by three individuals (E, F and G).

The information needs to be provided for

* The OR
* The company in Switzerland
* The company in Singapore
* The company in India
* The company in Germany
* The company in France
* **each** of the individuals A through G

For providing the requested information, please use the questionnaire below (one sheet per shareholder):

**CB4REACH Consortium – Reporting of Shareholders**

**NOTE:**

**The information below is to be provided separately for each shareholder (i.e., one sheet per shareholder)**

**Information on Shareholder and potentially associated person or entity****[[1]](#footnote-1)**

**Name of reporting entity:**

**Address:**

**Company registration number and register of reporting entity, VAT No, EORI number   
(if applicable)**

**Name(s) of directors/managing directors/C-level executives**/otherwise authorised representatives **of reporting entity (if applicable)** including Date of Birth, Place of Birth, and Nationality

**Percentage of interest held and/or number of voting rights controlled (whichever is greater) by the relevant shareholder** or potentially associated person or entity, including details on instruments leading to potential control (cf. footnote below), if applicable

**Beneficial Owner(s) (if applicable)**

1. Please also include information on any person or entity, potentially controlling or associated with the client of the OR by, alone or pursuant to an agreement with another shareholder or other third party as defined in the Best Practice Guide of the Council of the EU (cf [Council Document 8519/18](https://data.consilium.europa.eu/doc/document/ST-8519-2018-INIT/en/pdf)):

   (a) having the right or exercising the power to appoint or remove a majority of the members of the administrative, management or supervisory body of such legal person or entity;

   (b) having appointed solely as a result of the exercise of one's voting rights a majority of the members of the administrative, management or supervisory bodies of a legal person or entity who have held office during the present and previous financial year;

   (c) controlling alone, pursuant to an agreement with other shareholders in or members of a legal person or entity, a majority of shareholders' or members' voting rights in that legal person or entity;

   (d) having the right to exercise a dominant influence over a legal person or entity, pursuant to an agreement entered into with that legal person or entity, or to a provision in its Memorandum or Articles of Association, where the law governing that legal person or entity permits its being subject to such agreement or provision;

   (e) having the power to exercise the right to exercise a dominant influence referred to in point (d), without being the holder of that right;

   (f) having the right to use all or part of the assets of a legal person or entity;

   (g) managing the business of a legal person or entity on a unified basis, while publishing consolidated accounts;

   (h) sharing jointly and severally the financial liabilities of a legal person or entity, or guaranteeing them.

   For further background see [FAQs](https://finance.ec.europa.eu/publications/asset-freeze-and-prohibition-provide-funds-or-economic-resources_en) on sanctions against Russia and Belarus, with focus on the following legislation: Council Regulation (EU) No 269/2014) [↑](#footnote-ref-1)