Additional Frequently Asked Questions (FAQs) on the Implementation of Beneficial Ownership Requirements for Labuan Entities

Disclaimer

These Frequently Asked Questions ("FAQs") are intended solely to provide general guidance and clarification on the implementation and application of the beneficial ownership requirements under the relevant Labuan laws, namely the Labuan Companies Act 1990, Labuan Trusts Act 1996, Labuan Foundations Act 2010 and Labuan Limited Partnerships and Limited Liability Partnerships Act 2010, including their respective amendments ("Labuan legislation"), as well as the Guidelines on Beneficial Ownership for Labuan Entities and the relevant Guidance Notes issued in relation thereto.

These FAQs does not constitute legal advice, regulatory approval, or a definitive interpretation of the law or regulatory requirements. The application of the beneficial ownership requirements may vary depending on the specific facts, structure, arrangements and circumstances of each Labuan entity.

Accordingly, Labuan entities, trust companies, authorised agents, beneficial owners and other relevant persons are encouraged to obtain their own independent legal, regulatory, compliance or professional advice, where necessary, in relation to the implementation and application of the relevant beneficial ownership requirements to their particular circumstances.

Labuan FSA reserves the right to amend, revise, supplement or update these FAQ, Guidelines, Guidance Notes or any related requirements from time to time.

Section A: FAQs on the Revision to the Guidelines on Beneficial Ownership for Labuan entities	
1.	**Can an authorised agent maintain beneficial ownership information for multiple Labuan entities in a single consolidated Register of Beneficial Owners (ROBO) or system, provided that each entity's records are clearly distinguishable, complete, accurate, and kept up to date?** *Each Labuan entity is required to have its own ROBO. Where an authorised agent administers multiple entities, the beneficial owner (BO) information may be maintained within an internal system or consolidated database within its Management Information System (MIS), provided that the BO information for each entity is clearly identifiable and can be readily retrieved for the respective entity.*
2.	**Does Labuan FSA prescribe a standard template for the written notice to confirm beneficial ownership particulars, or may Labuan entities adopt their own template?** *Labuan FSA does not prescribe a standard template for written notices to confirm BO information. The format may be determined by the Labuan entity or its authorised agent, provided it captures all the necessary information to identify and confirm the beneficial owner in accordance with the applicable legislation, the Guidelines and the Guidance Note.*
3.	**When should a beneficial ownership change be treated as taking effect—** **(a) from the actual date the BO change occurs (e.g., appointment/cessation/change of particulars); or** **(b) only from the date the Labuan entity/authorised agent receives the BO's notification (for ROBO update purposes)?** *The change in beneficial ownership (including a person becoming or ceasing to be a beneficial owner, or any change to beneficial ownership particulars) takes effect from the date the change occurs (i.e. the effective date of the appointment/change/cessation), and not from the date the Labuan entity or its authorised agent is notified.*

4.	**What are the authorised agent's obligations in relation to the ROBO and MIS, including maintenance, submission to Labuan FSA, and availability upon request?** *Under the relevant Labuan legislation, the Guidelines on Beneficial Ownership for Labuan Entities and the Guidance Note on Submission of Beneficial Ownership Information for Labuan Entities, each Labuan entity is required to maintain adequate, accurate and up-to-date beneficial ownership information in its ROBO.* *The applicable statutory requirements are set out under the respective legislation governing:* *(a) Labuan companies and foreign Labuan companies;* *(b) Labuan trusts;* *(c) Labuan foundations; and* *(d) Labuan limited partnerships and Labuan limited liability partnerships.* *Where the BO information is administered by an authorised agent, Labuan trust company, trustee or other relevant person responsible for the entity, as applicable, the information in the ROBO should be maintained within the relevant Management Information System ("MIS") or other prescribed system in accordance with the applicable requirements.* *The MIS may serve as a central repository supporting the ROBO and may contain information beyond the minimum statutory requirements.* *For the avoidance of doubt, the ROBO and/or MIS is not required to be submitted to Labuan FSA on a routine basis. Rather, the relevant Labuan entity and the person responsible for maintaining its BO information, as applicable, are required to:* *a. maintain and keep the ROBO adequate, accurate and up to date;* *b. ensure that the required BO information is submitted to Labuan FSA through the prescribed ROC Registry System within the applicable timelines; and* *c. ensure that the ROBO, together with relevant supporting information and documents, is readily available to Labuan FSA upon request, examination or inspection.*

	The specific responsibility for maintaining, updating and submitting the BO information should be determined by reference to the relevant legislation and requirements applicable to the particular type of Labuan entity.
5.	**What are the minimum information requirements for the ROBO?** *Every Labuan entity that is subject to the beneficial ownership requirements is required to maintain a ROBO containing the information required under the applicable Labuan legislation, the Guidelines on Beneficial Ownership for Labuan Entities and the Guidance Note on Submission of Beneficial Ownership Information for Labuan Entities.* *<u>Statutory minimum information</u>* *The requirement to maintain beneficial ownership information applies under the respective legislation governing:* *(a) Labuan companies and foreign Labuan companies;* *(b) Labuan trusts;* *(c) Labuan foundations; and* *(d) Labuan limited partnerships and Labuan limited liability partnerships.* *At a minimum, the ROBO should contain the prescribed particulars of each beneficial owner under the applicable legislation, including:* *(a) full name;* *(b) address;* *(c) nationality;* *(d) identification details;* *(e) usual place of residence;* *(f) date the person becomes a beneficial owner;* *(g) date the person ceases to be a beneficial owner; and* *(h) such other information as may be determined by Labuan FSA.* *<u>Additional information under the Guidelines and Guidance Note</u>* *In addition to the statutory particulars, adequate, accurate and up-to-date information and supporting records should be maintained to establish the basis upon which the relevant natural person has been identified as a beneficial owner.* *Depending on the nature and legal structure of the Labuan entity, such information may include:*

	(a) the nature and basis of ownership, beneficial interest, control or influence; *(b) percentage of shareholding, voting rights or capital contribution, where applicable;* *(c) the person's designation, capacity, role or position in the Labuan entity or arrangement;* *(d) the person's rights, powers, interests or entitlement to benefits, where applicable;* *(e) Politically Exposed Person ("PEP") status, where applicable;* *(f) dates of notices issued and information or confirmation received for BO identification and verification purposes; and* *(g) supporting documents and records evidencing the relevant ownership, control, beneficial interest or influence structure.* *The nature of the information required will depend on the type of Labuan entity. For example, shareholding and voting rights may be relevant to a company; capital contribution, ownership or control rights may be relevant to a partnership; while rights, powers, beneficial interests, entitlement to benefits and effective control may be relevant to a trust or foundation.* *<u>Supplementary information</u>* *Where further relevant information is obtained through customer due diligence, BO verification or other compliance processes, such information may also be maintained to support the completeness, accuracy and reliability of the BO information.* *Labuan FSA may determine from time to time, under the applicable legislation, the form, manner and extent of the BO information required to be maintained and lodged.*
6.	**Pursuant to Item 7 of the FAQ on the BO Guidelines, if the Labuan entity is in the process of winding up or liquidation, how does it comply with the requirements under the Guidelines?** *Once a Labuan entity has formally entered into a winding-up or liquidation process, including upon the appointment of a liquidator, the entity would*

	generally no longer be subject to the ongoing beneficial ownership reporting and updating requirements under the Guidelines during the relevant liquidation process. *However, any existing records, information or documents maintained prior to the commencement of the winding-up or liquidation process should continue to be retained in accordance with the applicable legal and regulatory requirements, where applicable.* *If the winding-up or liquidation process is subsequently cancelled, terminated or reversed (reinstated), the Labuan entity will again be subject to the applicable requirements under the Guidelines.*
Section B: FAQs on the identification of Beneficial Owners *As mentioned during the briefing session held on 9 February 2026 on the revised Guidelines on Beneficial Ownership for Labuan Entities, there are no changes to the existing requirements for the identification of beneficial owners. For further guidance, please refer to Paragraph 6 – Identification of Beneficial Owner for a Labuan Entity in the Guidelines.*	
Part I: FAQ on Identification of Beneficial Owners in Relation to Labuan trusts	
7.	**In what circumstances may a trustee of a trust be regarded as a beneficial owner under the Guidelines?** *The identification of beneficial ownership ("BO") for a Labuan Trust should be assessed in accordance with paragraph 6.5 of the Guidelines on Beneficial Ownership for Labuan Entities.* *Whether a trustee is regarded as a beneficial owner depends on the specific facts, roles, rights and powers exercised under the trust arrangement and is not determined solely by the person's designation as trustee.* *In general, a trustee may be regarded as a beneficial owner where the trustee exercises, or has the right to exercise, ultimate effective control or influence over the trust arrangement, including where the trustee has powers relating to:* *(a) the administration and management of the trust;* *(b) distribution of trust assets;* *(c) investment decisions;* *(d) appointment or removal of relevant parties; or* *(e) amendment, termination or direction of the trust arrangement.* *The assessment should be made based on the terms of the trust deed, the actual operation of the trust arrangement and the applicable beneficial ownership criteria under the Guidelines.* *For the avoidance of doubt, the determination of beneficial ownership for a trust is ultimately a case-by-case assessment and may involve more than one*

	beneficial owner depending on the ownership, control and influence structure of the trust arrangement.
8.	**For a trust arrangement, if there is no ultimate beneficial owner ("UBO") and the trustees are the persons exercising control over the trust, while the beneficiaries only receive benefits upon distribution of trust assets, how should beneficial ownership be determined under the Guidelines?** *The identification of BO for a Labuan Trust should be assessed in accordance with Paragraph 6.5 of the Guidelines. In the context of a trust arrangement, the BO assessment is not limited solely to traditional ownership concepts, as a trust is a legal arrangement rather than a legal person with shareholders or owners.* *In this regard, the identification of BO may include the settlor, trustee, protector (if any), beneficiaries or class of beneficiaries, and any other natural person who ultimately exercises effective control or influence, or holds a beneficial interest in relation to the trust arrangement, based on the applicable criteria set out in the Guidelines.* *The assessment of BO should be conducted on a case-by-case basis, taking into account the specific arrangements of the trust, including the rights, powers, interests and level of control exercised within the trust structure.* *For trustees, the assessment may include consideration of the extent of control or influence exercised over the administration, management, distribution or investment decisions of the trust. For beneficiaries, a person should not be automatically excluded from the BO assessment solely because the person's benefit arises only upon the distribution of trust assets.* *Accordingly, any person who benefits from the trust or has an entitlement or interest under the trust deed or related arrangements may be considered as a BO, where the relevant criteria under the Guidelines are met.*
9.	**Do the beneficial ownership submission requirements apply to non-registered trusts, and what beneficial ownership information is required for such trusts under the Guidelines?** *Under the Guidelines, the beneficial ownership ("BO") requirements apply to Labuan entities established, registered or created under the relevant Labuan legislation, including Labuan trusts established under the Labuan Trusts Act 1996.* *In this regard, section 12 of the Labuan Trusts Act 1996 provides that a Labuan trust validly created under the Act may be registered with the Authority. Accordingly, the fact that a Labuan trust is not registered with the Authority does not by itself necessarily mean that the trust falls outside the scope of the applicable BO considerations under the Guidelines.*

	Where the BO requirements are applicable, the beneficial ownership information to be identified, maintained and submitted for such trusts should be assessed in accordance with the applicable provisions of the Guidelines relating to Labuan trusts. *In this regard, the BO assessment may include the settlor, trustee, protector (if any), beneficiaries or class of beneficiaries, and any other natural person who ultimately exercises effective control or influence, or holds a beneficial interest in relation to the trust arrangement, where the relevant criteria under the Guidelines are met.* *The relevant trust company, trustee or authorised agent is expected to maintain adequate, accurate and up-to-date BO information and supporting records relating to such persons, including information relating to their identity, role, interest, rights, powers or level of control in connection with the trust arrangement, in accordance with the applicable requirements under the Guidelines and Guidance Note.*
Part II: FAQ on Identification of Beneficial Owner in relation to Labuan Foundation	
10.	**In determining beneficial ownership of a Labuan foundation, should beneficiaries also be identified as beneficial owners, or would identification of the founder alone be sufficient under the Guidelines?** *The identification of beneficial ownership ("BO") for a Labuan Foundation should be assessed in accordance with Paragraph 6.4 of the Guidelines, taking into account the specific rights, interests, powers and level of control exercised within the foundation structure.* *In this regard, the identification of the founder alone as BO may not necessarily be sufficient for BO purposes. Depending on the specific arrangements of the foundation, the founder, beneficiaries, officers or other persons may also be identified as BOs where they meet the applicable criteria under the Guidelines.* *The BO assessment should be conducted on a case-by-case basis, including consideration of whether the relevant person:* *(a) benefits or may benefit from the foundation;* *(b) forms part of a class of beneficiaries;* *(c) has any entitlement, interest or rights under the foundation's charter or related arrangements; or* *(d) exercises ultimate effective control or influence over the foundation.* *Accordingly, any person who benefits from the foundation or has an entitlement or interest under the foundation's charter or related documents may also be considered as a BO, where the relevant criteria under the Guidelines are met.*

11.	**For a Labuan Foundation, where some beneficiaries are below the age of 18, are the details of such minor beneficiaries required to be recorded and submitted as beneficial owners under the Guidelines?** *The requirement to identify and record beneficial owners is not limited by age. Accordingly, a person should not be excluded from the BO assessment solely because the person is below the age of 18.* *Where a minor meets the relevant BO criteria under the Guidelines, including where the minor is identified as a beneficiary or otherwise has a qualifying interest, benefit or level of control in relation to the foundation, the relevant particulars should be recorded in the ROBO and submitted to Labuan FSA in accordance with the applicable requirements under the Guidelines and Guidance Note.*
12.	**For a Labuan Foundation with tiered beneficiaries, should secondary beneficiaries be included in the beneficial ownership register during the lifetime of primary beneficiaries, notwithstanding that their interests are contingent and they may be unaware of their designation?** *In the case of multiple tiers of beneficiaries, secondary beneficiaries may be included in the ROBO if they meet the BO criteria under the Guidelines, taking into account the nature of their entitlement to benefits or their ability to exercise ultimate ownership or ultimate effective control, as provided under the foundation's charter.*
13.	**What is the scope of paragraph 6.4(ii) under the BO Guidelines for Labuan Foundations, which refers to discretionary beneficiaries or other persons identified as higher risk, and can illustrative examples be provided on the types of persons intended to be captured under this provision?** *Paragraph 6.4(ii) of the Guidelines refers to discretionary beneficiaries or other persons who may receive benefits at the discretion of the council under the foundation's charter, and who have been identified as presenting higher risk based on the applicable AML/CFT risk assessment framework, for example:* *(a) a politically exposed person ("PEP");* *(b) a person connected to a higher-risk jurisdiction; or* *(c) other persons identified as presenting elevated AML/CFT risks.* *This provision is intended to enhance transparency in situations where a person may have a discretionary, contingent or indirect relationship to the foundation arrangement but may nevertheless present higher regulatory or AML/CFT risks requiring additional consideration under the BO assessment framework.*

	Accordingly, even where a person's entitlement to benefits is discretionary, contingent or not presently vested, such person may still be considered for inclusion in the Register of Beneficial Owners ("ROBO") where: *(a) the person falls within the relevant discretionary beneficiary or related person category under the foundation arrangement; and* *(b) the applicable higher-risk considerations under the Guidelines are present.* *The assessment should be conducted on a case-by-case basis having regard to the specific structure, arrangements and risk profile of the foundation.*
14.	**For a Labuan Foundation, where the named beneficiaries under the Charter do not have control over the Foundation or its assets, and any distribution is subject to the discretion of the Officers pursuant to the Charter and Articles, are such beneficiaries considered as BO for purposes of the ROBO if:** **<u>Scenario (a):</u>** **The beneficiaries are unaware that they have been named until they receive a distribution from the Foundation; and/or** **<u>Scenario (b):</u>** **The founder retains effective control of the Foundation during his lifetime, including acting as an Officer, while the beneficiaries (e.g. spouse and children) are kept unaware of the existence of the Foundation until after the Founder's demise, particularly where:** **(i) the Founder wishes to retain the ability to change the beneficiaries in the future; and** **(ii) the authorised agent is presently unable to obtain KYC information from such beneficiaries?** **In such circumstances, should only the Founder be recorded as the BO, or must the named beneficiaries also be included in the ROBO?** **Further, how can the above be reconciled with the concept under the Labuan Foundations Act 2010 that the Foundation is the beneficial owner of the assets endowed by the Founder, and that pursuant to section 50(2), the Labuan Foundation has the capacity, rights, powers and privileges of an individual person, particularly in the context of asset protection and protection against creditors' claims?** *Where beneficiaries are identified as BOs but confidentiality considerations exist, the authorised agent is nevertheless expected to maintain adequate, accurate and up-to-date BO information and supporting records as part of the ROBO and internal compliance records in accordance with the applicable requirements under the Guidelines and Guidance Note.*

	In circumstances where the beneficiaries are presently unaware of their status or complete KYC information cannot presently be obtained, the authorised agent should: *(a) document the reasons for the limitation;* *(b) maintain available information obtained from the Charter, internal records or the founder/officers administering the foundation;* *(c) continue taking reasonable steps on an ongoing basis to obtain and update the relevant BO and KYC information; and* *(d) ensure that such information is maintained with appropriate confidentiality safeguards and made available to Labuan FSA upon lawful request or examination.* *For the avoidance of doubt, although a Labuan Foundation is a separate legal entity and legally owns the assets endowed to it under the Labuan Foundations Act 2010, the BO framework under the Guidelines is intended for regulatory transparency purposes and therefore focuses on identifying the relevant natural person(s) connected to the ownership, benefit or control structure of the foundation, rather than treating the foundation itself as the beneficial owner for ROBO purposes.*
15.	**For a Labuan Foundation, how should the written notice requirement under section 24C of the Labuan Foundations Act 2010 be satisfied where a named beneficiary is unaware that he or she has been designated as a beneficiary, including where the beneficiary is a minor? In such circumstances, to whom should the notice be given, and who may validly acknowledge or confirm receipt of the notice on behalf of the beneficiary and subsequently provide BO information to the Labuan Foundation?** *Section 24C(1) of the Labuan Foundation Act 2010 (LFA) provides that a Labuan foundation shall, by written notice, require "any founder, council member, officer, supervisory person or beneficiary" to provide beneficial ownership information within such reasonable time and in such manner as specified in the notice. Therefore, the provision expressly identifies categories of persons from whom the Labuan foundation may require information.* *Further, section 24C(1)(a) of the LFA expressly contemplates that a person receiving the notice will inform the Labuan foundation whether they are a beneficial owner and, if not, identify, as far as possible, the beneficial owners by name or by providing other particulars sufficient to identify them.* *Due to unique arrangement of the Labuan Foundation, where a named beneficiary is unaware of his or her designation, or where the beneficiary is a minor and direct confirmation cannot reasonably be obtained, the Labuan foundation may issue the notice under section 24C(1) of the LFA to the Founder or any other person specified in that provision who has sufficient knowledge of the foundation's ownership, control and beneficiary arrangements.*

	The recipient of the notice may provide or confirm the relevant information concerning the beneficiary without the beneficiary being directly notified for the purposes of section 24C of the LFA. Where the Founder possesses sufficient knowledge of the relevant arrangements, the Founder may accordingly identify the beneficial owner and provide the requisite particulars in response to the notice. *For clarity, the Founder or other notice recipient would not be regarded as providing the confirmation "on behalf of" the beneficiary in the sense of acting as the beneficiary's representative or agent. Rather, that person is responding to the notice in his or her own capacity as a person from whom information may lawfully be obtained under section 24C(1) of the LFA. The fact that the Founder provides the information also does not mean that the Founder is automatically regarded as the beneficial owner. The actual beneficial owner must continue to be determined in accordance with the Act and the applicable beneficial ownership criteria under paragraph 6.4 of the Guidelines on Beneficial Ownership for Labuan Entities.* *Where information is obtained without direct confirmation from the beneficiary, the authorised agent should nevertheless take reasonable steps to ensure that the beneficial ownership information maintained is adequate, accurate and up to date. In particular, the authorised agent should maintain the available information and supporting records, document any limitations or reasons why complete information or KYC information could not presently be obtained directly from the beneficiary, and continue taking reasonable steps to obtain, verify and update the relevant information where necessary. Appropriate confidentiality safeguards should also be maintained.* *This approach does not constitute an exemption or waiver from the beneficial ownership requirements and does not permit a beneficiary who satisfies the applicable beneficial ownership criteria to be omitted from the beneficial ownership records. It merely recognises that, in appropriate circumstances, the information required under section 24C of the LFA may be obtained from the Founder or another person specified in section 24C(1) of the LFA, rather than directly from the beneficiary. Labuan FSA may nevertheless require further information or verification from the relevant person where necessary for supervisory, regulatory or examination purposes.*
Part III: FAQ on identification of Beneficial Owners in relation to publicly listed companies	
16.	**Where a publicly listed company is unable to identify a beneficial owner under the Guidelines, is a statutory declaration from the publicly listed company sufficient for beneficial ownership reporting purposes?** *The identification of BO should be conducted in accordance with the criteria set out under Paragraph 6 of the Guidelines, which focuses on identifying the natural person(s) who ultimately exercise ownership, control or effective influence over the entity. This assessment applies to all Labuan entities, including those owned by or connected to a publicly listed company.*

	Further, pursuant to paragraph 7.8, where the Labuan entity is unable to identify any natural person as its BO after taking all reasonable steps based on the criteria set out in paragraph 6, as an interim measure, the entity is required to record a natural person in a senior management position who is primarily in charge of the Labuan entity. The entity is required to continue to undertake reasonable measures to identify a natural person who meets the definition of a BO and is required to update the ROBO accordingly once the beneficial owner is identified.
17.	**Would a person satisfying Criteria C and/or D under the Appendix I of the Guidance Note be regarded as a beneficial owner for purposes of the Guidelines, particularly in the context of publicly listed companies?** *Yes. Under Appendix I of the Guidance Note, a person may be identified as a beneficial owner ("BO") where the person meets one or more of the applicable criteria under Criteria A, B, C, D and/or E, depending on the specific structure and circumstances of the relevant entity.* *In particular, Criteria C and D relate to entity-level control and effective influence, and may be relevant in situations where beneficial ownership cannot be identified solely through ownership interests. While such criteria are commonly applied in the context of publicly listed companies or entities with dispersed ownership structures, their applicability should ultimately be assessed based on the specific facts, arrangements and control structure of the entity concerned.*
18.	**In what circumstances may senior management be recorded as a beneficial owner in the ROBO, and how long may such an arrangement be maintained? Additionally, who is responsible in identifying the appropriate senior management official (SMO) ?** *With reference to Item 4 of the FAQ on the Guidelines, the recording of senior management official (SMO) in the ROBO is intended only as an interim or fallback measure in circumstances where, after taking all reasonable steps in accordance with the applicable beneficial ownership criteria, the Labuan entity is unable to identify any natural person who ultimately owns or exercises effective control over the entity.* *For the avoidance of doubt, where senior management personnel independently meet the beneficial ownership criteria based on ownership, control or effective influence, such person may be identified and recorded as the beneficial owner in their own capacity, and such record would not be regarded as an interim arrangement.*

	The interim recording of senior management is not intended to be a permanent arrangement. The Labuan entity and authorised agent are expected to continue undertaking reasonable measures and ongoing reviews to identify the actual beneficial owner, particularly in cases involving complex ownership or control structures. *Once the actual beneficial owner is identified, the ROBO and the relevant submission to Labuan FSA should be updated accordingly within the applicable timelines under the relevant legislation, Guidelines and Guidance Note.* *Where additional time is required to determine the beneficial owner, the Labuan entity and authorised agent should properly document:* *(a) the reasonable steps taken to identify the beneficial owner;* *(b) the reasons why no natural person could presently be identified; and* *(c) the basis for maintaining the interim senior management record.* *Such records and supporting documentation should be maintained and made available to Labuan FSA upon request, where necessary.* *In relation to the query on the identification of the senior management official, the relevant Labuan entity and authorised agent are responsible for assessing and determining the appropriate SMO based on the entity's management and control structure, supported by the relevant internal records and documentation.*
Section C: FAQs on Guidance Note on Submission of Beneficial Ownership Information for Labuan entities	
19.	**What is the role of the Labuan FSA Coral Pearl system in relation to beneficial ownership reporting, given that BO information is already submitted through the system?** *Labuan FSA is currently undertaking the integration of the BO Submission Portal known as "PEARL" into the Corporate Online Registry @ Labuan FSA known as "COR@L system" as part of the development of a unified ROC Registry System, including for purposes relating to the submission and management of beneficial ownership ("BO") information.* *Pending the completion of the integration, the existing submission and reporting arrangements through the relevant system will continue to apply, unless otherwise notified by Labuan FSA.* *Any further updates, implementation details or revised submission processes relating to the integration will be communicated by Labuan FSA in due course*.

20.	**How can a partnership lodge its beneficial ownership (BO) information in the COR@L system?** *Users can continue to access the beneficial ownership information submission platform via the PEARL system. Moving forward, the PEARL system will be integrated with the COR@L system to establish a single ROC Registry System.*
21.	**Will the existing submission methods (i.e. Annexure, Form 26A and the PEARL system) continue to remain applicable for beneficial ownership ("BO") submission and compliance purposes until the new system takes effect on 1 July 2026?** *With reference to the announcement made in PEARL, starting from 1 July 2026, the current submission methods, Form 26A and the annexure to Form 27 and 40, will be discontinued and should not be attached to the system.*
22.	**For State-Owned Enterprises ("SOEs"), Government-Linked Companies ("GLCs") and Government-Linked Investment Companies ("GLICs"), will both the current submission framework and the system effective from 1 July 2026 require disclosure of:** **a. the relevant Ministerial/Public Office; and** **b. a natural person beneficial owner (e.g. senior management)?** *Please refer to the Guidelines and Item No. 5 of the accompanying Frequently Asked Questions Guidelines on Beneficial Ownership For Labuan Entities* *If no BO is identified through ownership or entity-level control, the Labuan entity should assess whether control is exercised by a public office. Where it is verified that a person holding a public office exercises such control, the relevant public office information as specified under Paragraph 4.5(a) of the Guidance Note on Submission of Beneficial Ownership Information for Labuan Entities (the Guidance Note) may be reported as the BO.* *The recording of a Senior Management official is applicable only as an interim measure when no natural person can be identified as a BO.*
23.	**When will the relevant statutory forms for beneficial ownership reporting be made available for the new sectors, namely foundations, trusts, and partnerships?** *According to the announcement in the PEARL system, the BO forms for new sectors were made available in July 2026.*
24.	**With reference to paragraph 8.5(ii) of the BO Guidelines dated 10 October 2025, please confirm whether the Nominee Declaration Form is to be lodged via the "Other Application" in COR@L.**

	Users can submit the Nominee Declaration Form via the dedicated "File Upload" feature when submitting the new BO form which will be integrated with the new ROC Registry System. The said system will be available on 1 July 2026.
25.	**With reference to the annual submission due on or before 31 January of each year, effective from 31 January 2027, kindly confirm the following:** **(a) the form, document or information required to be submitted by Labuan entities to Labuan FSA; and** **(b) whether the lodgement of the document or information stated in (a) above is to be made through "Other application" in COR@L** *All Labuan entities that are subject to the annual BO submission requirement are required to submit the prescribed BO information in accordance with paragraph 4.0 of the Guidance Note on Submission of Beneficial Ownership Information for Labuan Entities and the requirements applicable to the relevant type of Labuan entity.* *The prescribed BO information and supporting documents should be submitted using the relevant digital BO form made available for the respective type of Labuan entity through the PEARL system.*
26.	**With reference to the first submission deadline under the new framework for existing Labuan Partnerships, Labuan Foundations and Labuan Trusts being 1 July 2026, kindly confirm the corresponding deadline applicable to existing Labuan Companies.** *The corresponding deadline for existing Labuan companies is 31 January 2027.*