

August 2016

A Guide to the UK Extractive Industries Transparency Initiative (UK EITI)

Impact on Oil & Gas Companies

Introduction

The purpose of this guidance document is to help UK oil and gas companies to complete templates for the second year of the UK's EITI implementation, covering payments made in the 2015 calendar year. Below you will find a summary of the improvements made compared to last year and an explanation for any changes made. Prior versions of this guidance, for reference purposes, can be found [here](#).

Since the UK published its first report in April 2016 (which can be found here [\[link\]](#)), the UK EITI multi-stakeholder group (MSG) has conducted a thorough 'lessons learned' process. This aimed to ensure that future reports are better targeted in focus and that the administrative burden is minimised for companies who remain in scope. The number of oil and gas companies receiving templates inviting them to participate this year has reduced substantially; from approximately 200 last year to 47 in 2016.

Consistent with the new [EITI Standard](#) and the approach taken last year, the vast majority of the payments made to Government agencies above the materiality threshold will be collected from both Industry and Government and then reconciled by the Independent Administrator (IA), Moore Stephens.

It is worth noting that the second report, to be published by April 2017, will be the first time that the UK's EITI candidacy will be subject to the process of 'validation' led by the International EITI Secretariat and supported by an independent validator. The EITI Board will make the final determination of whether the requirements are met or unmet, and on the UK's overall compliance in accordance with provision 8.3.a.ii of the EITI Standard. It is hoped that this process will result in the UK becoming a fully compliant EITI country, but in order to do so, company participation will be a vital component. The UK's MSG highly values the company contributions it has received to date and encourages comprehensive participation in this validation year for the second report.

Later this year, the IA will compare company information submitted in the template to information collected by the various Government agencies; namely HMRC, the Oil & Gas Authority (OGA) and the Crown Estate. This will lead to the reconciliation process later in 2016, to establish the cause of any differences that may be identified.

Background

The Extractive Industries Transparency Initiative (EITI) is a global standard ensuring transparency of payments from natural resources. It is a voluntary initiative, implemented by countries whose governments sign up to do so. The initiative requires:

- Companies to publish the payments they make to a Government for their oil, gas and mining activities;
- Governments to disclose the payments they receive from oil, gas and mining companies;
- These figures to be reconciled by an independent administrator, and then published in a report.

In May 2013, the UK Prime Minister committed the UK to implement the EITI. This commitment was intended to help the public hold decision makers to account and to create a more open and transparent global economy which is good for business.

The UK EITI objectives set out in May 2014 aim to place more domestic information in the public domain that will increase public understanding and debate. This will allow the Government to be held to account for its policies relating to the extractive industries in the UK. Specifically, the UK EITI objectives are to:

1. Recognise and support the principles set out in the EITI Standard.
2. Enhance public accountability on the revenues from the UK's extractives industries.
3. Increase public understanding of the social and economic impacts of the UK's extractive industries and enrich public debate on the governance and stewardship of the UK's oil, gas and mineral resources.
4. Ensure information is readily accessible and presented to the public in a clear manner.
5. Support moves towards common global reporting standards in oil, gas and mining and promote a level playing field for business in the UK and internationally.
6. Support the UK Government's championing of extractives transparency and open government.

The first report, covering payments made to and received by the Government in the 2014 calendar year, was published on 15 April 2016. A total of £2,374 million payments were covered, representing participation by 59 companies across the oil & gas sector.

1. Which oil & gas companies will be issued with a reporting template?

Fewer companies (or groups of companies) will be issued with a reporting template than last year, in an explicit attempt to better target those companies who made material payments to Government in 2015.

Each company (or group) which has made or received a payment above the materiality threshold (£86,000, unchanged from year 1) to either HMRC or the Crown Estate will receive a reporting template. Additionally, material payments made to the new industry regulator, the Oil & Gas Authority (or/and DECC for payments before April 2015) regarding either license fees or the (new in 2015 calendar year) OGA Levy (if in the top 80%) of OGA payments will also receive a reporting template. Company contacts established last year will be the direct recipient of the email correspondence including the template and will be asked to act as a single reference point to respond to any reconciliation queries raised by the IA.

2. When will companies receive the data request and what's the reporting deadline?

Like last year, the data collection process for the first reporting period will be based on an Excel reporting template. These templates will be issued in the week commencing 22 August 2016. Companies will be allowed a period of 6 weeks to complete and return the template to Moore Stephens. It is hoped that this will help avoid the summer vacation period, and with fewer companies being required to take part, the reconciliation process will be shorter and simpler compared to the process last year. Reconciliation queries are expected to conclude by the end of November, avoiding the busy year end period for companies.

Moore Stephens have set up a generic inbox (UKeiti@moorestephens.com) from which companies will receive reporting templates and other communications. Issues of the security levels and options for physical or digital signatures for the reporting template have been reviewed in light of the experience from last year and are deemed to be robust.

3. How is the issue of confidentiality managed?

Last year, HMRC developed a confidentiality waiver that companies were asked to sign which enabled them to provide certain payment information to the IA that would otherwise be considered taxpayer confidential. These waivers remain valid unless they are revoked by the respective company. For the majority of companies within scope for this year's EITI templates, no changes will be required.

For some companies who, for various reasons, don't yet have a confidentiality waiver in place, they will be requested to provide one as part of this year's EITI communications. This waiver will

accompany the reporting template issued by Moore Stephens. Like last year, a single waiver can be prepared covering all members of a group. Companies will need to ensure that the signatory of the waiver is duly authorised to perform this task on behalf of the relevant legal entities.

Completed waivers should be returned to Moore Stephens as soon as possible and no later than the deadline for the completion of the reporting template.

Waiver forms can also be downloaded [here](#).

4. What payment information needs to be reported?

As outlined in the previous guide, the payment types to be included in the published UK EITI Report for oil and gas companies are:

- Ring Fence Corporation Tax (RFCT) and Supplementary Charge (SC);
- Petroleum Revenue Tax (PRT);
- Petroleum Licence Fees;
- (new for 2015) the OGA Levy; and
- Payments to the Crown Estates Commissioners in respect of pipelines operated by companies that are engaged in UK extractive activities.

Changes compared to last year's EITI process

In January 2015, HMRC amended the payment processes for companies within Group Payment Arrangements (GPA) to enable companies to separately identify ring fence and non-ring fence payments. To the extent that companies took this option, HMRC will communicate the receipts of RFCT and SC to the IA for the purposes of the reconciliation process. If this option was taken by your group, please include details of the 'tagged' RFCT/SC payments in the reporting template.

Some groups may have chosen not to take this option, instead making a single payment per instalment deadline which is not capable of being split between ring fence and non-ring fence elements by HMRC. For companies in this second category, please supply figures based on the full payment made under the GPA, even though you may now know what the appropriate split between main rate CT and RFCT/SC should be.

During 2015, the OGA, the industry's new arm's length regulator, was established, funded by industry via a levy. The OGA began using its revenue raising powers by issuing invoices for the OGA levy in October 2015. As this levy is another instance where the Government agency collects money from the oil and gas industry and the amounts collected (£10m for 2015, rising to £20m pa in later periods) are substantial, this revenue stream has been accepted within the scope of EITI from 2015 onwards.

Companies who are not already in scope as a material taxpayer or making a material payment to the Crown Estate may be within scope for EITI reporting purposes if their payment to the OGA in respect of petroleum licence fees and the OGA levy are within the top [80%] of OGA receipts for 2015. For

companies who are not making material tax or Crown Estate payments and whose OGA payments fall below this 80% threshold, the company will not be sent a template and not be required to participate in EITI for 2015 payments. OGA payments above the materiality threshold will be reported unilaterally in the report so that there is transparency on the level of government receipts from both petroleum licence fees and the OGA levy. This 80% methodology removes the burden of EITI reporting for over 25 groups of companies who would have otherwise been within scope and is a good example of increased targeting within the UK EITI project.

5. Complying with the EITI requirements

A) Reporting template

The reporting template was developed by Moore Stephens with the help of the UK EITI reconciliation sub-group. The template that will be issued by Moore Stephens will incorporate some spreadsheet controls and enhancements.

A copy of the draft reporting template can be downloaded from [here](#).

B) Step by Step Guide

Operating instructions have been prepared to help oil & gas companies with the completion of the reporting template. The guide covers:

- Payment types;
- Corporation Tax (CT) and the Supplementary Charge (SC);
- Interest;
- Disclosure Threshold;
- Group Reporting; and
- Guidance on the completion of each of the templates.

This document can be found at Annex 1 (below)

C) Licence payments to OGA (or DECC if paid before April 2015)

It has been agreed that the whole amount of the licence fee should be reported by the licence administrator for each licence, typically the operator. Other parties to the licence are not required to disclose any contribution that they make to the cost of the licence fee (e.g. through cash calls).

Any other fees payable to OGA/DECC which do not represent the license fee (e.g. for well consents, or approvals for Decommissioning plans etc.) are out of scope for EITI purposes and should not be included.

D) OGA Levy

The OGA Levy is a new payment, introduced in 2015, raised from licensees depending on the number of licences held and their type (production or exploration/pre-production). It was introduced to fund the new industry regulator, the Oil & Gas Authority (OGA).

Invoices were sent out in early October 2015 and to the extent that these invoices were paid within calendar year 2015 they are to be reported within this EITI report. Companies are required to disclose their company total and not the breakdown by licence.

E) Interest and penalties

As a pragmatic measure, it has been agreed that any interest or penalty payments should be included as an element of the payment with which they are associated. For example, interest payable or repayable that relates to Petroleum Revenue Tax (PRT) should be added to, or deducted from, the associated PRT payment or repayment and a single figure reported showing the total.

Interest and penalties are therefore not required to be separately disclosed. This approach is likely to be different from that taken by many companies to their reports under the UK Reports on Payments to Governments Regulations 2014. Those regulations do not require the reporting of interest or penalties.

The treatment of interest and penalties is summarised in the Step by Step Guide (Annex 1).

F) Materiality threshold

As a pragmatic measure, it has been agreed that the £86,000 disclosure threshold will be applied at the group level for each payment type. For UK EITI purposes, Ring-Fence Corporation Tax and Supplementary Charge, Petroleum Revenue Tax, Petroleum Licence Fees and Crown Estate payments will only have to be reported if the group payments for each payment type exceed £86,000.

This approach is likely to be different from that taken by many companies to their reports under the UK Reports on Payments to Governments Regulations 2014. The approach to the materiality threshold is summarised in the Step by Step Guide (Annex 1).

6. What information needs to be provided on the beneficial ownership of companies and politically exposed persons (PEPs)?

Beneficial Ownership

The requirements around beneficial ownership are focused on private, unlisted entities. The approach to beneficial ownership is aligned with the related provisions of the Small Business, Enterprise and Employment Act 2015.

Broadly speaking, private companies will be asked to provide information on any individuals that have a material influence on the company either through a direct shareholding, one or more intermediary entities (e.g. companies partnerships, trusts) or by other means. Information will also be requested for such individuals with political influence.

From 30 June 2016, companies are required to submit information to Companies House on people with significant control (PSC) with their confirmation statements. The threshold for beneficial ownership under the UK EITI shadows these requirements. Therefore, companies that have filed this information at Companies House can choose to confirm that they have filed this information and provide the link to the relevant page at Companies House.

The requirements for listed companies (and their subsidiaries) are extremely modest. Companies that are members of a group for which the parent is listed will only be asked to confirm that listed status, as listed companies are already required to publish information on beneficial ownership.

Politically Exposed Persons

In accordance with the decision of the UK EITI MSG, for the purposes of the UK EITI, declarations are also required from private, unlisted entities in respect of politically exposed persons (PEPs) who directly or indirectly ultimately own or control more than five per cent (5%) of a company that is reporting material payments to the UK Government under the UK EITI.

All private, unlisted entities reporting under UK EITI should complete the PEP declaration **in addition** to the beneficial ownership declaration.

Data protection considerations may mean that in some cases the information requested may not be provided by beneficial owners, or may be provided without the consent necessary for its processing. See the additional guidance below relating to the Data Protection Act 1998.

A guide to the beneficial ownership requirements for UK EITI purposes can be accessed from the UK EITI website. The guide covers the following aspects:

Beneficial Ownership

- Definition
- Meaning of person with significant control
- Publicly listed company requirements
- Reporting Requirement
- Due Diligence
- Relevant date

Politically Exposed Persons

- Definition
- Ownership Threshold
- Reporting Requirement

- Due Diligence
- Relevant date

Data Protection

- Personal Data
- The Principles
- Processing of Personal Data
- Consent

7. What happens after the reporting templates are returned to the independent administrator?

Moore Stephens will spend some time analysing the disclosures made by companies and the reports that they receive from government bodies. In any instances where differences are identified between the payment amounts disclosed by some companies and the data provided by the relevant government body. During this period, Moore Stephens will produce a compilation of those differences, covering the names of the companies, the relevant payment type and the unreconciled amounts.

During the period from [mid-October to late November], Moore Stephens will work with the relevant companies and government bodies to review the unreconciled payments with a view to determining why those differences arise and to complete the reconciliation process, where possible.

8. What information will be included in the UK EITI Report?

The second UK EITI Report that will be published in early spring 2017, will show the amounts paid for each of the reportable payments by each reporting company in the 2015 calendar year and all payments above the materiality threshold made to the OGA (with only the top 80% likely to be capable of reconciliation to company information). Information will also be included relating to beneficial owners and politically exposed persons. An important part of the report will, like last year, be the contextual information on the oil & gas, mining and quarrying sectors to put the payment information into the context of the economic and social benefit of the extractive industries to the UK.

9. Contacts

Government

For more information on EITI, please contact Margaret Sutherland on 020 7215 3585 margaret.sutherland@beis.gsi.gov.uk.

Industry

For more information on this guidance please contact Claire Ralph on 020 7802 2411 cralph@oilandgasuk.co.uk or Stephen Blythe on 07774 127368 blythejs@outlook.com

Claire Ralph, on behalf of Oil & Gas UK
25 August 2015

Annex 1: Step by Step Guide for Completion of Template for Payments made in 2015 Calendar Year (Oil & Gas)

These instructions are designed to help oil and gas companies complete the oil & gas reporting template. All payments are to be made in GBP (£), to the nearest whole pound. This may contrast with the reporting currency used under the UK Government Payments Regulations 2014 where other currencies are permitted.

Group Reporting

One set of templates should be completed for all companies that are subsidiaries of a common ultimate parent company. If, for any reason, a company decides to send a separate set of templates to the Independent Administrator (IA), it should explain its reasons for doing so. This would have no impact on the application of the disclosure threshold, which should continue to be applied at the group level.

Disclosure Threshold

Wherever possible, the requirements of the UK EITI process will be aligned with the UK Government Payments Regulations 2014, especially the materiality threshold chosen for each payment stream (for a list of in scope payment streams see section 4 'What payment information needs to be reported?'). This materiality threshold has been set at £86,000 for 2015 payments.

For the purposes of UK EITI, this threshold should be applied to each payment type at a group level.

Therefore, if the group as a whole pays more than £86,000, or receives more than £86,000 by way of repayment in relation to any of the individual payment types that will be included in the published EITI report. It should include all of the payments or repayments of that type made in 2015 notwithstanding any individual payment which may fall below the threshold.

Corporation Tax and the Supplementary Charge

See section 4 'What payment information needs to be reported?' for guidance regarding payments under a GPA covering non- RFCT as well as RFCT/SC.

See section 5 'Complying with the EITI requirements' regarding the treatment of 'Interest and Penalties'.

The following examples illustrate how the threshold should be applied in practice:

3. Two companies (henceforth know as A and B) that are subsidiaries of the same parent company make payments of Ring Fence Corporation Tax (RFCT) and Supplementary Charge (SC) in 2014. Company A pays £100,000 and Company B pays £50,000. Both payments should be entered on the template.
4. Two companies that are subsidiaries of the same parent make payments of RFCT and SC, with a third company receiving a repayment. Company A pays £100,000, Company B pays £50,000 and the third company, Company C, receives a repayment of £50,000. Both payments and the repayment should be entered on the template.
5. Two companies that are subsidiaries of the same parent make payments of RFCT and SC, with a third company receiving a repayment. Company A pays £40,000, Company B pays £40,000

and Company C receives a repayment of £100,000. Both payments and the repayment should be entered on the template.

6. Two companies that are subsidiaries of the same parent make payments of RFCT and SC, with one of those companies also making a payment of Non Ring Fence Corporation Tax (N-RFCT). Company A pays £50,000 and Company B pays £25,000 of RFCT and SC, with Company B also making a payment of N-RFCT of £100,000. No entries are required on the template.
7. Two companies that are subsidiaries of the same parent each have interests in two oil fields that are liable to Petroleum Revenue Tax (PRT). Each company pays PRT of £25,000 for each of the fields in 2014, leading to a total payment of £100,000. Each payment should be entered on the template.

Petroleum License fees and OGA levy payments

See section 4 'What payment information needs to be reported?' for guidance regarding the methodology adopted to target EITI on the groups making the most substantial contributions to the OGA in 2015.

1. A company with only one petroleum licence pays a licence fee of £75,000. It does not need to make any entry on the template.
2. Two companies that are subsidiaries of the same parent company each have one petroleum licence. Each company pays a licence fee of £75,000 in 2014. Both payments should be entered on the template.
3. The Oil & Gas Authority Levy is new for 2015 and is payable by the group on behalf of its subsidiary company license interests. These payments are not to be split down between licenced areas to affect the disclosure of material payments above the threshold. E.g. a group pays an OGA levy of £100,000 across its four production licenses - £25,000 per license. The full group total of £100,000 is reportable on the template as a single figure.
4. In future periods there may be some repayment of OGA Levy as a result of underspends by the OGA. To the extent that the repayments of OGA Levy relating to prior years are received within a reporting period and they bring the payment of the OGA of the year in question below the disclosure threshold, these payments would not be reportable, even though the repayment relates to a different year than the payment being made. E.g. in 2016 a group pays a total of £100,000 of OGA levy in relation to 2016, and receives a partial repayment in 2016 of their 2015 Levy payment of £25,000. The net payment is £75,000 (£100,000 - £25,000), which is below the disclosure threshold and therefore no payment is reportable for that year.

Template 1 - Tax and Licence Summary

This template produces a summary of the detailed payments information contained in the supporting worksheets. Companies are required to check information on the amounts paid to, or repaid by, the UK government in respect of certain payment types in the year ended 31 December 2015 are consistent with entries in the supporting worksheets. Green cells are read only and determined by formulae.

Reporting group: Enter the name that is generally used to identify the enterprise that conducts the operations that give rise to the payments included in the report e.g. Shell, BG Group.

Contact Details - Name of contact person, Telephone number and E-mail address: Enter the particulars for the individual who should be contacted if the Independent Administrator (IA) has any questions

Signature: Enter the name of the senior company official who has been appointed as the authorised person for this purpose.

Columns

Payments (£): Sums all payments of the relevant type made during the reporting period

Repayments (£): Sums all repayments of the relevant type made during the reporting period

Net Payment (£): Net sum representing the sum of all payments and repayments of the relevant type made during the reporting period

Rows

1. *Ring Fence Corporation Tax and Supplementary Charge:* Sums the amounts shown for payments and repayments

2. *Petroleum Revenue Tax:* Sums payments and repayments across all legal entities included in the PRT Template

3. *Petroleum Licence Fees:* Sums payments and repayments across all legal entities included in the Licence Fees Template

4. *OGA Levy:* Sums payments and repayments across all legal entities included in the OGA Levy Template

5. *The Crown Estate:* Sums payments and repayments across all legal entities included in the Crown Estate Template

Sum of Reported Payments: Sums payments and repayments shown in 1 to 5 above

CELLS IN GREEN ARE DETERMINED BY FORMULAE AND ARE READ ONLY. CELLS FOR DATA ENTRY ARE COLOURED WHITE.

Template 2 – Ring Fence Corporation Tax and Supplementary Charge

Reporting Entity (Name): Enter the name of the legal entity or the GPA that made the payment or received the repayment. More than one entry might be required

UTR: Enter the Unique Taxpayer Reference for the entity or the GPA that made the payment or received the repayment

RFCT/SC (£)

Payment: Enter the total amount of all payments made by the reporting entity in the reporting period in sterling, rounded to the nearest pound

Repayment: Enter the total amount of all repayments made by the reporting entity in the reporting period in sterling, rounded to the nearest pound

NET: Enter the sum of the payment and repayment amounts shown above

N.B. If the group has not 'tagged' the RFCT/SC payment as distinct from the N-RFCT payment under the GPA then they are to enter the total payment made in the period. If tagging has been used please enter only the tagged RFCT/SC payment here.

Template 3 - Petroleum Revenue Tax

Reporting Entity (Name): Enter the names of the legal entities that are participators in the fields for which payments were made or repayments were received during the reporting period.

Field (Name): Enter the name of the field to which the payments or repayments relate

PRT Reference: Enter the PRT reference number

Payment: Enter the total amount of all payments made by the reporting entity in the reporting period in sterling, rounded to the nearest pound

Repayment: Enter the total amount of all repayments made by the reporting entity in the reporting period in sterling, rounded to the nearest pound

NET: The sum of the payment and repayment amounts shown above is automatically calculated in the green cell

Template 4 - Licence Fees

Reporting entity (Name): Enter the name of the licensee that paid the licence fees during the reporting period

Licence Number: Enter the licence number to which each payments relate

Licence Fee Payment(£): Enter the amount paid in sterling, rounded to the nearest pound

Licence Fee Repayment(£): Enter the amount repaid in sterling, rounded to the nearest pound (which is quite exceptional)

Template 5 – OGA Levy

Reporting entity (Name): Enter the name of the legal entity that paid the OGA Levy during the reporting period

Payment(£): Enter the amount paid in sterling, rounded to the nearest pound

Repayment(£): Enter the amount repaid in sterling, rounded to the nearest pound

Template 6: The Crown Estate

Reporting Entity (Name): Enter the name of the legal entity that made the payment to the Crown Estate

License Number or other reference: Enter the relevant reference, if appropriate

Payment (£): Enter the amount paid in sterling, rounded to the nearest thousand

If, exceptionally, a refund is received during the year, the amount should be shown in brackets

Template 7 - Beneficial Ownership

Company identification

Full legal name of the company: Enter full legal name

Unique identification number: Enter company registration number

Contact address: Enter the company's registered address

Preliminary questions to assist companies to identify whether the BO template should be completed:

1. Is the company a publicly listed company, or a wholly owned subsidiary of a publicly listed company?

- Yes – there is no need to complete the remainder of the form
- No – please go to the following question

2. Is the company reporting payments to the UK Government under the UK EITI?

- Yes – please go to the following question
- No – there is no need to complete the remainder of the form

3. Has the company filed information to Companies House on people with significant control (PSC) as part of its confirmation statement

- Yes – please provide a link to the confirmation statement and go to the section “Additional identification for Politically Exposed Persons (PEP)” below

URL to PSC information in confirmation statement:

- No – please complete the remainder of the form (Beneficial ownership and PEP identification)

Declaration prepared by: Name, Position, Email address, Telephone number

Beneficial ownership identification

Identity of the beneficial owner:

Name: Enter full name

Month and year of birth: Enter mm/yyyy

Nationality: Enter nationality

Country of residence: Enter country name

Date when beneficial interest was acquired: Enter dd/mm/yyyy

Service address: Residential addresses are not required. Enter a contact address

Method of control: Enter either 1,2,3,4 or 5 from the list shown below

Possible methods of control:

1. The individual holds, directly or indirectly, more than 25% of the shares in the company. The 25% threshold is calculated with reference to the nominal value of the shares in the case of a company with share capital. If the company does not have a share capital, the condition is met by an individual holding a right to share in more than 25% of the entity's capital or profits

2. The individual holds, directly or indirectly, more than 25% of the voting rights in the company. Voting rights held by the company itself are disregarded for this purpose.
3. The individual holds the right, directly or indirectly, to appoint or remove a majority of the board of directors of the company
4. The individual has the right to exercise, or actually exercises, significant influence or control over the company. (The Secretary of State for Business Energy & Industrial Strategy is required to issue guidance on the meaning of 'significant influence or control' and regard must be had to that guidance in interpreting this condition).
5. The trustees of a trust or the members of a firm that is not a legal person exercise control over the company through one or more of 1. to 4. in their capacity as such or would do if they were individuals, and the individual has the right to exercise, or actually exercises, significant control or influence over the activities of that trust or firm.

Additional identification for Politically Exposed Persons (PEP)

Identity of the PEP:

Name: Enter full name

Month and year of birth: Enter mm/yyyy

Nationality: Enter nationality

Country of residence: Enter country name

Date when interest was acquired: Enter dd/mm/yyyy

Service address: Residential addresses are not required. Enter a contact address

Political Connection

Name of public office holder: Enter name

Public office position and role: Enter details

Date when office was assumed: Enter dd/mm/yyyy

Date when office was left, if applicable: Enter dd/mm/yyyy

If the PEP beneficial owner is not the public office holder, PEP beneficial owner's connection with the public office holder: Enter details

Beneficial ownership attestation

The company should select one of the following forms of attestation as appropriate.

1. Full Attestation

"I, undersigned, for and on behalf of [company], confirm that all information provided in the above beneficial ownership declaration is, to the best of my knowledge, accurate and reliable."

Attestation prepared by: Name, Position, Signature

2. Qualified Attestation

"I, undersigned, for and on behalf of [company], confirm that all information provided in the above beneficial ownership declaration is, to the best of my knowledge, accurate and reliable, subject to the following qualifications:

- Information was not received from one or more beneficial owners; and/or

- One of more beneficial owners did not give satisfactory consent for the disclosure of information; and/or
- Other – please specify.”

Attestation prepared by: Name, Position, Signature