SEYCHELLES DOMESTIC BENEFICIAL OWNERSHIP DATABASE

POPULATION GUIDELINES

SEYCHELLES

FIU

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1. Definitions

BO Act means the Beneficial Ownership Act 2020

BO database means the Domestic - Seychelles Beneficial Ownership Database maintained by the FIU as per Section 13 (1) of the BO Act

BO Regulations means the Beneficial Ownership Regulations 2020

Competent Authority means the authorities specified under Section 4 (1) of the BO Act, namely the Financial Services Authority and the Financial Intelligence Unit

Financial Intelligence Unit means the body corporate established under Section 10 of the Anti-Money Laundering and Countering the Financing of Terrorism Act 2020 and the nodal agency designated to maintain the Seychelles Beneficial Ownership Database

goAML Web Application means the integrated software solution developed by the United Nations Office on Drugs and Crime (UNODC) and implemented by the FIU as its preferred IT platform for population of the beneficial ownership information and secure communications with the FIU

Resident Agent means –
(a) a secretary appointed under Section 179 of the Companies Act;
(b) the person responsible under Section 12 of the Registration of Associations Act;
(g) a partner of a partnership under the Civil Code of Seychelles Act

Responsible Executive means the person in charge of the overall operations of the business/organisation i.e., the Director, CEO or equivalent

2. Acronyms and Abbreviations

BO	Beneficial Ownership
BO Act	Beneficial Ownership Act, 2020

BO Regulations	Beneficial Ownership Regulations, 2020
FIU	Financial Intelligence Unit
goAML	goAML Web Application
UNODC	United Nations Office on Drugs and Crime

3.   Scope and Overview

3.1. This user guide has been issued by the Financial Intelligence Unit ("FIU"), pursuant to Section 13 (3) of the Beneficial Ownership Act, 2020 ("BO Act"), with the aim of providing detailed guidance on the procedures to be followed by Resident Agents for the population of BO information, onto the Seychelles BO Database maintained by the FIU.

3.2. It is important that the user guide is read carefully before proceeding to the platform, so as to ensure that the functionalities of the database are understood and all relevant information are available prior to the population of the BO information.

3.3. This user guide shall not be applicable for listed companies or a legal person which is formed, incorporated or established outside of Seychelles, excluding an overseas company registered under the Companies Act.

Legal Disclaimer: The FIU reserves the right to amend, modify or change the contents of this document when deemed appropriate and necessary.

4.   goAML Web Icon

ICON	DESCRIPTION
✚	Add Additional Entries
🗑	Delete
🖨	Preview Report
💾	Save Report
✈	Submit Report

5. Beneficial Ownership Database Platform

5.1. The platform can be accessed from the FIU's website (www.seychellesfiu.sc) or by directly entering the URL link (https://www.fiu.sc:4443/bo_domestic) into the web browser window, which will take you directly to the Domestic- Beneficial Ownership Database web page, as displayed below:

- **Register Link** – contains the links for new registrations to gain a user access to the goAML platform;

- **Login Link** – contains the links to log in for Resident Agents/users that have already registered on the goAML platform.

- On the homepage press the login button to enter onto your account if you have already completed the registration process.

- Enter your username and password in the standard format captured during registration and click the Login button to proceed.

5.2. The BO database runs within Firefox and Google Chrome. It is advisable to add the URL to the trusted sites and have pop ups enabled to prevent the site from being blocked.

6. BO Database Landing Page

6.1. The landing page is displayed as per below;

6.1.1 **Header:** Contains the FIU logo with the home link. Click on the FIU logo to return to the application's home page.

6.1.2 **Menu bar:** The element for navigating to the goAML Web functions. Hover over a link in the menu bar with the mouse pointer to see the functions it contains, as per below:

- Logged in user details - details which user is logged in, from which institution (e.g., Jane from XYZ Registered Agent);
- Menu Bar[1] - contains New Reports / Drafted Reports / Submitted Reports/ Message Board / My goAML / Help / Logout. Clicking any of the link item will give a user access to the functionality required (i.e., clicking message board populates the message board);
- Information Bar - contains the FIU information with links to download goAML documentation;
- Logout - allows you to logout as a user.

6.1.3 **Logout from goAML**[2]:

- Click on Logout in the navigation bar; and

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[1] If you see the menu but not all entries mentioned, then you simply do not have access permissions for all of them.

[2] Please note that the user will be automatically logged out after 15 minutes of inactivity.

- Your goAML session is terminated.

7. Getting Started

7.1. The link for uploading BO information of legal persons for the first time is accessible on the home page by clicking **New Reports** as displayed below[3].

8. Create Web Report

8.1. Select **Web Reports** under **New Reports** tab from the menu bar as displayed below.
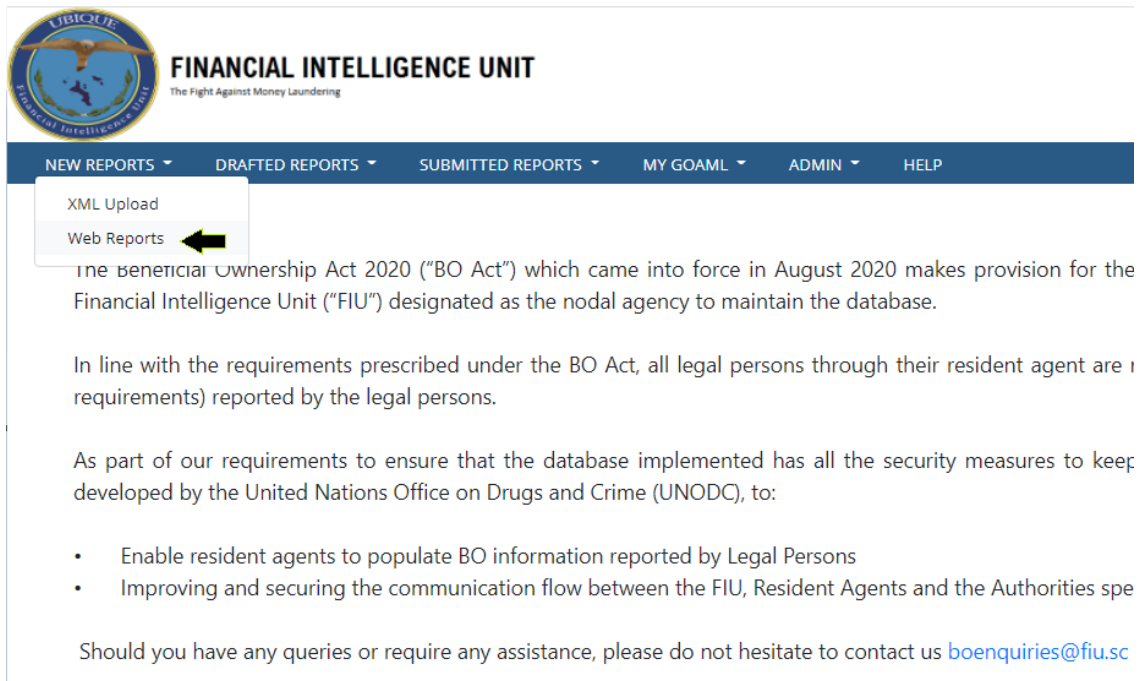
8.2. After selecting **Web Reports** the page will be displayed as per below. From the report type drop-down field, select **BO - Registrable Particulars** and click **Create Report**.
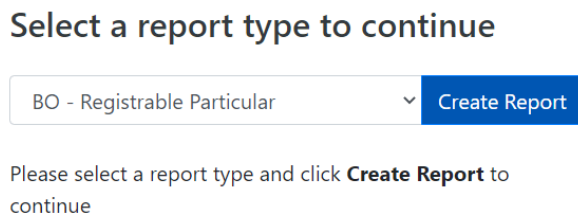
8.3. The **BO - Registrable Particulars** landing page will be displayed with four (4) tabs in the navigator on the left with the following headings:
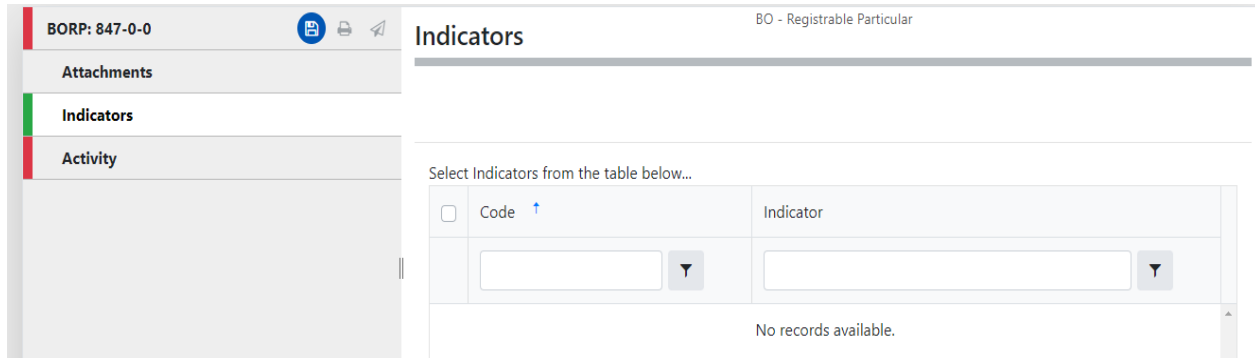
▪ BORP: (Report ID);
▪ Attachments;
▪ Indicators; and
▪ Activity.

8.4. At the top of the report tab and on the navigator on the left, you will find the Report ID which is automatically generated for each report.

8.5. The fields in the **BO - Registrable Particulars** tab such as **Reporting Person** and **Location** is automatically generated from information provide in your registration details.

Indicators

8.6.   For the purpose of uploading of BO information, the **Indicators** tab illustrated below is <u>not applicable</u> and is <u>not required</u> to be filled**.**

Activity

8.7.   To upload BO information of legal persons for the first time, select the **Activity** tab in the navigator on the left.

8.8.   The Legal Person tab will display three (3) tabs with the following headings:

- Not Applicable
- Not Applicable
- Legal Person;

Legal Person

8.9.   Select **Legal Person** tab which will take you to the following page:

8.10. This form is required to be completed with details of each legal person under the Resident Agent's administration.
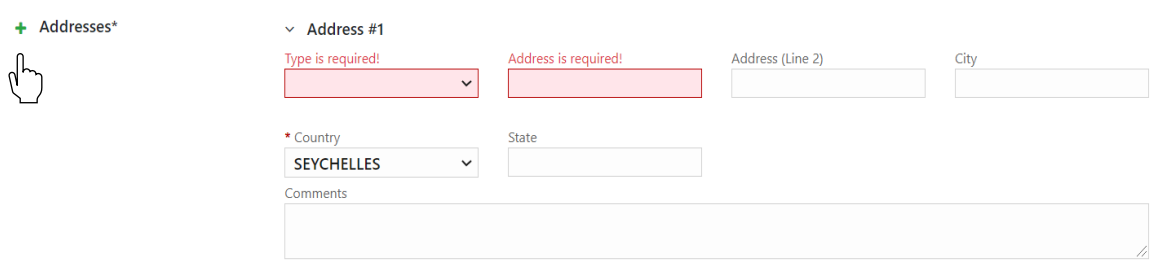
8.11. Resident Agents are advised to ensure that all mandatory fields are completed with the required information, to ensure successful submission of BO reports onto the BO database.

- **Name**: The full registered name of the legal person.
- **Incorp/ Reg No**: The unique incorporation or registration number issued to the legal person, upon incorporation or registration by the Registrar of Companies and Associations.
- **Legal Form**: Select whether the legal person is an association, domestic company or partnership.
- **Incorp/ Reg Date**: The date the legal person was incorporated or registered.
- **Incorporation Country**: the country name that the legal person has been incorporated or registered. Seychelles has been set as the default value.
- **Tax Number:** The Tax Identification Number of the legal person.

The **Comments** field is optional where you can include any information you believe is relevant to provide.

Address

8.12. The address details provided for the legal person must be the principal place of business. Note that at least one address must be provided, with the option to add multiple addresses by clicking the **green plus (+)**, if required.

- **Type:** Select Business from the available drop-down list. (This filed is mandatory).

- **Address:** The full physical address of the principal place of business in Seychelles of the legal person, to include details such as office/room number, building name and street name. (This field is mandatory).[4]

- **Address (Line 2):** Long addresses may be split into the two address fields.

- **City:** Town or the respective district or area e.g., Victoria, Providence, Ile Perseverance, etc.

- **Country:** Select Seychelles. (This filed is mandatory).

- **State:** The Island e.g., Mahé, Praslin etc.

The **Comments** field is optional where you can include any information you believe is relevant to provide. Once all the required fields have been completed, the tab will change colour from **red** to **white**

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[4] Ensure the addresses filed does not exceed 100 characters.

Beneficial Owner

8.13. Click on the **Beneficial Owner** tab as illustrated below:

8.14. This will display the screen illustrated below, which is to be used to populate the BO information of the legal person or legal arrangement.

8.15. Ensure that all mandatory information pertaining to Beneficial Owner is duly filled, as per below:

- **Role:** By default, select Beneficial Ownership

- **Title:** The title of the individual being the beneficial owner (i.e., Dr. / Mr. / Mrs. / Ms. / Miss.).

- **First Name:** The given names of the individual being the beneficial owner.

- **Last Name:** The last name or surname of the individual being the beneficial owner.

- **Birth Date:** The date of birth of the individual being the beneficial owner.

- **Date Become BO:** The date the individual became a beneficial owner, in the date format MM/DD/YYYY. E.g., 11/27/2020. If this information is not known please insert 28/08/2020 as the default date.

- **Unique Identifier Number:** National Identity Number of the individual being the beneficial owner.

- **Nationality:** The nationality of the individual being the beneficial owner.

- **Nature of interest held:** State the numerical value of interest held (if applicable, e.g., number, percentage and par value of shares), management position held (if applicable) or other forms of control (if applicable) held by the beneficial owner.

Address

8.16. Fill in the address of the beneficial owner in the address tab under Beneficial Owner tab. Note as per the BO Act, you are required to fill in the residential address and the service address of the beneficial owner. As such, you have the option to add multiple addresses by clicking the green plus (+), as per below.

- **Type:** Select Business from the available drop-down list. (This filed is mandatory).

- **Address:** The full physical address of the principal place of business in Seychelles of the legal person, to include details such as office/ room number, building name and street name. (This field is mandatory).[5]

- **Address (Line 2):** Long addresses may be split into the two address fields.

- **City:** Town or the respective district or area e.g., Victoria, Providence, Ile Perseverance, etc.

- **Country:** Select Seychelles. (This filed is mandatory).

- **State:** The Island e.g., Mahé, Praslin etc.

The **Comments** field is optional where you can include any information you believe is relevant to provide.

Once all the required fields have been completed, the navigator on the left will change colour from **red** to **green**.

Nominee/ Nominator

8.17. Every legal person have an ongoing duty under Section 5 (1) (e) of the BO Act to identify and maintain in its register, information on any nominee(s) and nominator(s) that holds interest on behalf of the beneficial owner.

8.18. Where there are nominee(s) and nominator(s), Resident Agents are required to - uploaded include the below details:

Nominee
- Full name;
- Residential address;
- Service address;

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[5] Ensure the addresses filed does not exceed 100 characters.

- Date of birth;

- Nationality; and

- Particulars and details of the interest held by the nominee

Nominator

- Full name of natural person: In the case where the nominator is a legal person, insert the full name of the natural person who ultimately owns or controls the nominator;

- Legal Person Name (if applicable): If the nominator is a legal person;

- Residential address;

- Service address;

- Date of birth; and

- Nationality

8.19. Both the Nominee and Nominator fields are optional.

8.20. Where there are no nominee and nominator, users are required to indicate "N/A" in both the nominee and nominator field.

8.21. The unmarked fields are also important to be completed to the best of your knowledge and where information is readily available. Once all the required fields have been completed, the navigator on the left will change colour from **red** to **green**.

9. Save and Preview

9.1 After you have completed the Web Report, you can save all entries and preview it before clicking on the submit button by clicking on located on the navigator on the left. This will

save a copy of the form under the **Drafted Reports** tab. (refer to Section 11 of this user guide)
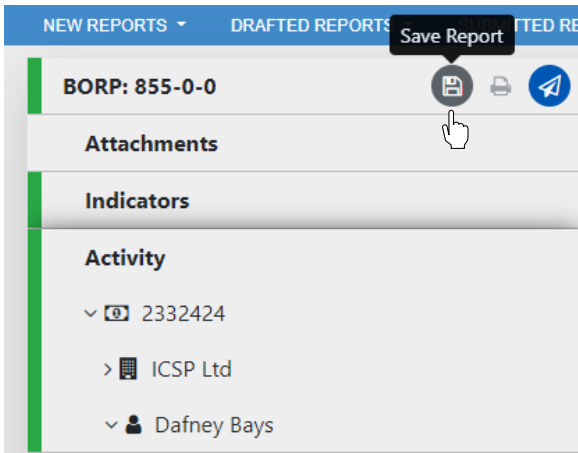
9.2 Once your report has been saved, you will have the option to preview your entries prior to submission, click on and your report will be generated as illustrated below:
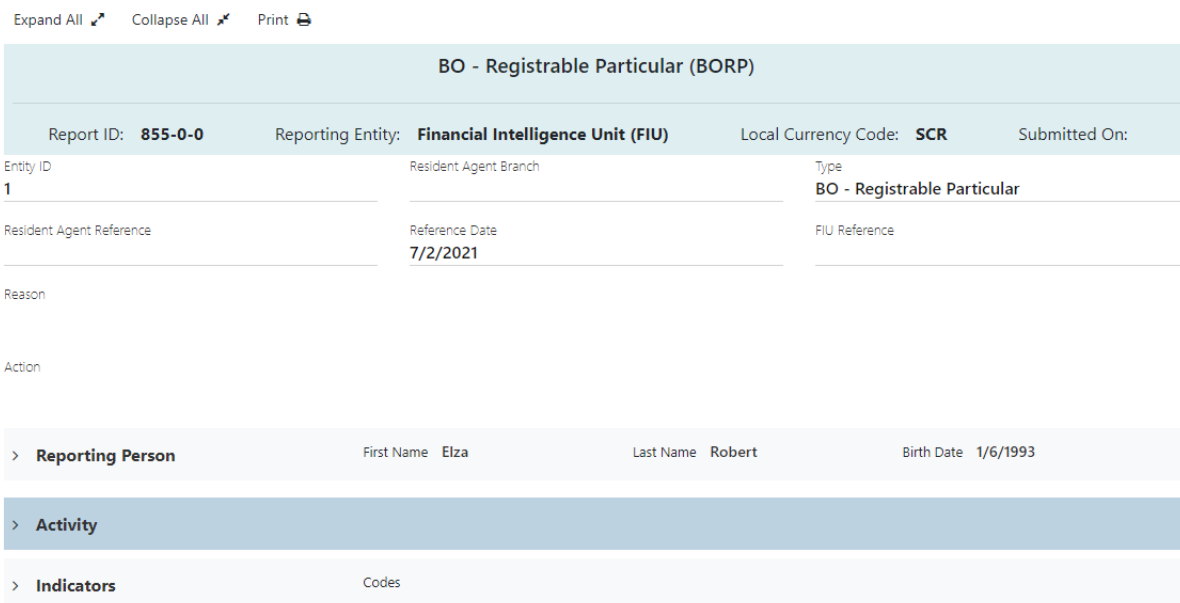

9.3 For submission of report, proceed to Section 13 of this user guide.

10. Drafted Reports

10.1 While working on the platform, you will most probably have a number of yet unfinished reports that are shown as a list. These reports can be viewed, resumed or deleted. Furthermore, the list view can be filtered, if necessary.

10.2   Reports saved as per paragraph 10.1 of this user guide will be stored under the **Drafted Reports** tab.
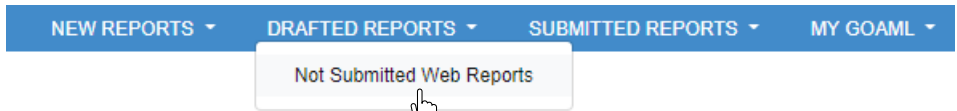
10.3   Select **Not Submitted Web Reports** under Drafted Reports. The list will appear as follows:

10.4   **Filter view**: You can filter the list of incomplete Web Reports view by selecting any of the given filter criteria Start Date and End Date. You can also filter by any of the columns provided if a column header is dragged and dropped in the area above columns.

10.5   **Resume editing a report**: To proceed with an unfinished report: Click on 🖊 icon or on the report's ID hyperlink.

10.6   **Preview report document**: To preview the document of an unfinished report as it would look right now click on preview 👁. Click on the Expand All link to see all the report in its entirety or you click on Collapse All link to see the abridged form.

10.7   **Delete a report**: To delete an unfinished report click on ✖ After a security check, the report is deleted.

11. Submit Web Report

11.1 After you have completed the Web Report and your information have been verified and is ready to be submitted, click on "**Submit Report**" link on the navigator on the left.
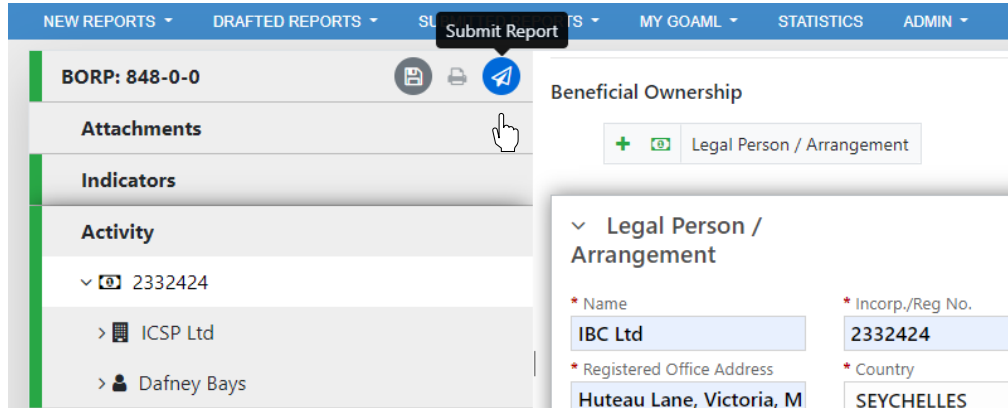
11.2 The following window will be displayed to confirm whether you want to proceed with submission of the report.
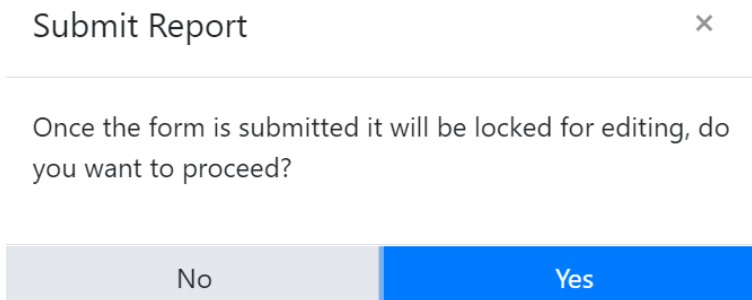
11.3   Select **Yes** to submit the report or **No** to cancel and continue editing.

11.4   Once the report has been submitted, a confirmation screen as per the below illustration will be displayed, confirming that the report has been successfully submitted and the report is added to the Submitted Report tab.

11.5 Upon submission of a report, an email confirmation will be issued notifying the Resident Agent that the report has been successfully submitted to goAML along with the Report ID number.
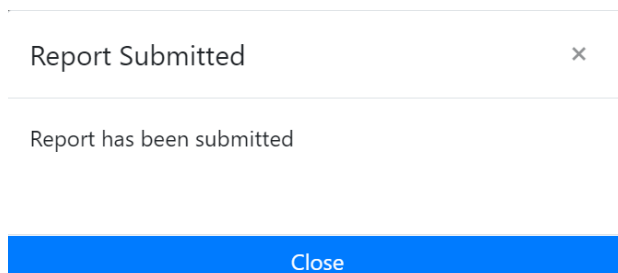
11.6 Subsequently, the FIU shall issue a confirmation report to the legal person through their respective Resident Agent, detailing the particulars populated onto the Seychelles BO Database.

12. Submitted Reports

12.1 Every resident agent can view his or her already submitted reports in their current state.

12.2 To view the submitted Web Reports and their current state, click **Submitted Reports** and select **Web Reports** from the menu bar. The list will display as follows:

13. Making Changes to BO Information on the BO Database

13.1. As per Section 10 (2) of the BO Act, where there are changes to the particulars of a submitted report, the Resident Agent is required to re-submit a report as detailed per Section 8 and 9 of this user guide.

13.2. In order to make changes to a submitted report, create a new report and fill in the **FIU Reference** field with the **Report ID** of the report you wish to amend. Note, if the report has nominee/nominator, the attachment must be re-attached in the new report regardless if there were changes. Refer to paragraph 14.3 for changes to the nominee/nominator details.

13.3. When there are changes to the nominee/nominator details, the file name must be in the following format:

- Report ID of the **new report** (e.g., **1065-0-0**)

Note: Given that the reference is linked to an existing report, the system will automatically merge the two information and only effect the changes when same have been approved by the FIU.

14. Message Board

14.1. The message board is the sole platform used by the FIU for submission of confirmation report(s) specified under paragraph 12.6.

14.2. The message board is an internal means of communicating which connects the Resident Agent with the FIU. This function is limited to exchanges between the Resident Agents and the FIU and does not allow for exchanges between Resident Agents. The advantage of this channel is for the two parties to securely communicate from within the system.

Load message board

14.3. To view your messages, select **Message Board** from the menu bar. The message board is loaded and the Inbox displayed:
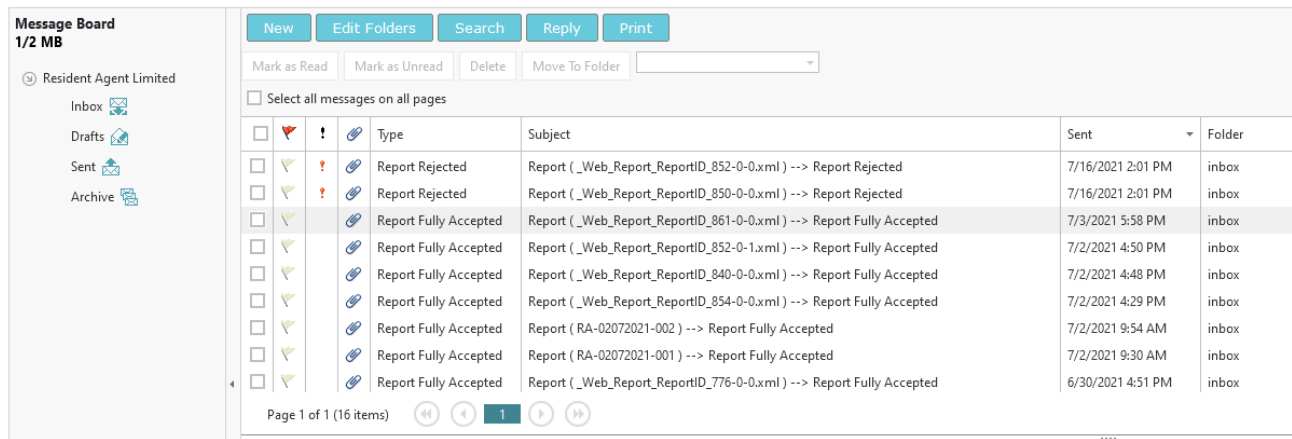
The user interface

14.4. The message board interface consists of navigation panels and a tabular list of messages. The navigation panels offer hyperlinks for the following views:

- **Inbox:** All incoming messages.

- **Drafts:** All outgoing messages which are ready or in preparation, but not yet dispatched.

- **Sent:** All already sent messages.

- **Archive:** Remove/Hide the messages from the Inbox view but keep them for future reference.

Note: The number in brackets indicates the number of unread messages in the inbox or the number of unsent drafts respectively.

14.5. Click on a link to load the corresponding view. The messages in the list provide the following information:

- **Check (☐):** The functional checkbox for the message (see below).

- **Flag (🚩):** An optical reminder you can set if you want to draw your attention to that message (no processing features).

- **Priority:** Can be either high, normal or low.

- **Attachment (📎):** Shows the paper clip icon, if the message contains an attachment.

- **Message Board Type:** Different view of automated messages regarding goAML reports in the inbox, filtering for different states i.e., Report fully accepted / Partially accepted / Rejected.

- **Subject:** The subject of the message. Automated messages regarding reports have a fixed subject structure Report– (attached file's name)– status.

- **Sent:** Time stamp when the message in the sent view was dispatched.

- **Folder:** in which folder the message is saved.

Read Message

14.6. To read a message, click on the message subject. The message is displayed below:

14.7. Click on **the attachment link(s)** to download and view the attachment(s).

Reply to Messages

14.8. To reply to an incoming message, click on Post a reply. An input form is loaded and displayed:

Send Message   ✕

To	Financial Intelligence Unit (FIU)
Priority	High ○ Normal ◉ Low ○ Type* Manual
Ref. Num.	Test
Subject*	RE: Test
Message*	This is a test reply message >> Test

Select attachments for upload...

Click here to browse files...	Browse...	Upload

Allowed file types: .doc, .docx, .xml, .png, .jpg, .pdf, .xls, .xlsx, .rtf
Maximum file size: 20480KB

Uploaded Files

[Send]   [Cancel]   [Save as Draft]

▪ Select the **Priority** of your reply (high– normal– low).

▪ Enter your reply into the text field.

▪ If you want to attach a file, click on **browse** and select the file, you want to send with the reply.

▪ Click on **Send** to dispatch the message or on **Save Draft** to save it for later use.

Write Message

14.9. To write a new message, click on New in the message board. An input window pops up:

- Select the **Priority** of your message (high– normal– low).

- Type a meaningful subject in to the field **Subject**.

- Enter your message into the text field **Message.**

- If you want to attach a file, click on **browse** and select the file you want to send with the message.

- Click on **Send** to dispatch the message or on **Save Draft** to save it for later use.

Search Message

14.10. Any message that has been written, sent or archived can be searched using the **Message Search** feature.

14.11. You can filter the search results by date, or by typing a word in the **search text** field.