



**Government of the Republic of Trinidad and Tobago**  
Office of the Attorney General and Ministry of Legal Affairs

**OFFICE OF THE REGISTRAR GENERAL**

## PUBLIC NOTICE

### New obligations of External Companies Registered under the Companies Act, Chapter 81:01

Recent legislative amendments have created new obligations for external companies, including the following requirements:

1. identifying the beneficial owners of the external company;
2. appointing an Authorised Officer;
3. verifying beneficial ownership information obtained;
4. ensuring that beneficial ownership information is, and remains, current and correct;
5. notifying the Registrar General of the beneficial owners of the external company;
6. notifying the Registrar General of changes to the shareholding or membership interests; and
7. maintaining a register of beneficial owners.

#### Timeline for compliance for beneficial ownership

Requirement	Timeframe	Governing Legislation
Filing the Form 50 - "Notice of Appointment of Authorised Officer of an External Company" with the Registrar General	14 days from the law coming into effect*	Companies Act sections 337B(10) and 337B(11)
Filing the Form 45 - "Return of Beneficial Ownership of a Company" with the Registrar General	45 days from the law coming into effect*	Companies Act sections 337B(2) and 337C(1)
Filing the Form 46 - "Return of Issuance, Purchase/Redemption or Transfer of Shares by Profit Companies or External Companies Limited by Shares" with the Registrar General	30 days from the date of the issuance, purchase/redemption or transfer of the shares	Companies Act sections 33(1B), (1C) and 332(6)
Filing the Form 47 - "Return of Issuance, Purchase/Redemption or Transfer of Membership Interest by Profit Companies or External Companies Limited by Guarantee" with the Registrar General	30 days from the date of the issuance, purchase/redemption or transfer of the membership interests	Companies Act sections 33(1B), (1C) and 332(6)

**\*NOTE:** The law came into effect on 14<sup>th</sup> October 2024.

You are advised to take all necessary steps to ensure that your External Company is in compliance with the obligations. The above information is not an exhaustive list, and you are encouraged to peruse the legislative amendments to become familiar with the full suite of obligations applicable to External Companies, and, where necessary, seek appropriate legal advice. It is in your interest to furnish the Registrar General with beneficial ownership and related information on an urgent and expeditious basis, in conformity with the law.

The Registrar General shall take action against defaulting External Companies for failure to comply with the new obligations, including the imposition of a late filing penalty of \$300.00 per month, or part thereof and suspension and cancellation of the registration of the External Company where the External Company is in contravention of the Companies Act.

**REGISTRAR GENERAL**

15<sup>th</sup> January 2025