

To:
European Commission
Bruxelles / Brussel
Belgium

Milan, 22 December 2025

**AIPB feedback to consultation on the Implementing Regulation Draft
on formats for submitting beneficial ownership information**

The Italian Private Banking Association (AIPB) respectfully submits the following comments in response to the public consultation on the Implementing Regulation Draft (“**IRD**”) on formats for submitting beneficial ownership information pursuant to Article 10(6) of Directive (EU) 2024/1640.

Primarily, AIPB wishes to express its sincere appreciation for the European Commission’s commitment to enhancing transparency and interoperability in beneficial ownership registers, as well as the endeavour to establish harmonised formats at European level for the submission of beneficial ownership information.

The IRD correctly emphasises that uniform formats for the submission of beneficial ownership data are essential to ensure a high and consistent quality of information and to foster interoperability among the central registers established in the Member States.

The systematic structuring of personal data of beneficial owners, the codification of the types of ownership and control, and the detailed definition of data relating to legal entities, legal arrangements and nominees represent all elements that are capable of materially facilitating the identification and verification of beneficial owners by both competent authorities and obliged entities across the Union.

Conversely, the objective of genuine harmonisation of formats and data structures needs to be well balanced with the need to preserve proportionality in the nature and volume of the requested information.

In this respect, certain provisions of the IRD appear to extend the scope of information collection beyond what is necessary for the purpose of ML/FT prevention.

References to narrative descriptions, detailed asset value classifications, comprehensive documentation of complex structures and nominee arrangements, and multiple file-upload requirements risk generating a level of information density that is not always commensurate with the concrete analytical needs of obliged entities or authorities.

This approach may lead to several unintended consequences, including a significant increase in the administrative and organisational burden on entities required to report and update beneficial ownership information. It may also exacerbate the risk of discrepancies between data held by obliged entities for customer due diligence purposes and data recorded in the central registers. Furthermore, it may complicate the design

and operation of digital interfaces with the registers, thereby undermining the effectiveness and usability of the system.

In light of these considerations, it appears appropriate that the final text of the implementing regulation be more explicitly and stringently anchored to the objectives and material scope of Regulation (EU) 2024/1624 and Directive (EU) 2024/1640, ensuring that the formats and data points required are demonstrably justified by AML/CTF needs.

In AIPB's view, this would involve giving priority to structured, standardised and readable fields for the core components of beneficial ownership (identity, type and extent of ownership or control, relevant dates), while limiting narrative fields, qualitative descriptions and supporting documentation to those situations where they are strictly necessary to adequately reflect complex structures or atypical control mechanisms.

These comments refer specifically to the data fields set out under Article 3 (*Formats for submission of data on legal arrangements*).

Objection to Valuation Requirement

We believe the value of assets is not included among the data required by Regulation (EU) 2024/1624, which appears to refer solely to the identification of assets held in or managed through legal arrangements, not their quantitative valuation.

Regulation (EU) 2024/1624 sets out the mandatory beneficial ownership information for legal arrangements under Articles 57 to 60. It does not stipulate quantitative valuation or categorisation by value thresholds.

Specifically, Article 58 requires the disclosure of the "*assets held by the legal arrangement or managed through it*" interpreted as a qualitative descriptor of asset types (e.g., real estate, securities, liquidity instruments) to map ownership and control chains, consistent with the Regulation's overarching focus on transparency of ultimate beneficial owners rather than economic scale.

We respectfully suggest that this may warrant reconsideration to uphold the principle of legal certainty and the non-derogation clause in Article 106 of Directive (EU) 2024/1640.

Furthermore, the multi-tiered brackets for the value of assets (Article 3(1)(e)) introduce an onerous requirement to monitor and classify asset values into narrow ranges.

In particular, the proposed level of granularity - spanning seven tiers from below EUR 1,000 to over EUR 50,000,000 - seems to exceed the prescriptive requirements of Regulation (EU) 2024/1624 and potentially contravenes the principle of data minimisation enshrined in Article 5(1)(c) of Regulation (EU) 2016/679.

This item is of sensitivity, given the constant fluctuation of asset values, which may lead to continuous variations in reported data. As a matter of fact, in accordance with EU regulations, intermediaries are obliged to declare any inconsistencies between register data and information obtained during the know-your-customer (KYC) process. The valuation of assets under management, which frequently comprise dynamic portfolios of securities, real estate, or financial instruments, involves recurrent fluctuations.

This renders point-in-time assessments inherently unreliable and administratively onerous. Absent standardised methodologies for such appraisals (e.g., mark-to-market, net asset value, or fair value under IFRS

13) means that reporting introduces scope for material inaccuracies, potentially undermining the reliability of central registers contrary to Article 1(2) of the IRD.

In order to achieve alignment with Regulation (EU) 2024/1624, we respectfully recommend that Article 3(1)(e) be amended by replacing value ranges with an array limited to predominant asset classes (e.g., real estate, securities, liquidity, mixed), or at minimum curtailing to three aggregated thresholds: (i) less than EUR 1,000,000; (ii) EUR 1,000,000 to EUR 10,000,000; and (iii) exceeding EUR 10,000,000.

Uploading Documentation Requirements

We also recommend reconsidering the requirement to upload the full trust deed or equivalent, along with all addenda and other binding documents (Article 3(1)(c)).

This obligation imposes a significant administrative burden, particularly for complex legal arrangements where voluminous documentation may span hundreds of pages.

The primary AML/CTF objective - identifying beneficial owners and grasping essential control mechanisms and asset profiles - can be effectively met through targeted, structured data fields already outlined in the Regulation, such as settlement type, governing law, revocability, settlor powers, protector duties, and beneficiary descriptions. Mandating full uploads risks deterring compliance, increasing errors, and overwhelming central registers, while raising data protection concerns under Regulation EU 2018/1725.

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In conclusion, AIPB believes that a calibrated approach would help to ensure that the obligations imposed on obliged entities and registered subjects remain proportionate, thereby avoiding unnecessary operational burdens and discrepancies, while simultaneously preserving - and indeed reinforcing - the predominant objective of establishing robust, reliable and interoperable central registers of beneficial ownership at the level of the EU. It would also reduce the incentive for Member States to introduce additional national data layers on top of the EU formats, thereby safeguarding the harmonising function of this implementing regulation.

AIPB would like to express its sincere gratitude for the opportunity to share these observations. It is hoped that this contribution could offer a constructive support to the esteemed endeavours of the European Commission in fortifying the architecture of beneficial ownership disclosure.