

Notification on direct and indirect ownership etc.

According to Art. 10 b of the Land Act, no. 81/2004

An obliged entity that has completed its annual disclosing obligation before, is permitted to submit a declaration confirming that no changes have been made to the entity's previously registered information. Same applies if changes to the previous registration are minimal but in that case the changes should be mentioned in the declaration and additional supporting documents provided if necessary. The declaration must be signed by the obliged entity's authorized signer, board member, manager or, if applicable, all partners of a partnership or a limited partnership. The Register of Enterprises can request for further information and/or documents if necessary.

Please submit this form along with documents confirming the information provided to Iceland Revenue and Customs before February 1st each year.

Name of the legal entity	
Address of the legal entity	
ID number	Legal entity's email address
Contact's name	Contact's email address
1 Real Estate	
	e(s) in question. Information on more than one real estate can be inserted in se use own separate form and attach it to this notice.
2 Direct and Indirect ownership Please describe the obliged entity's ownership structure, either i indirect owners. If preferred, a separate form may be used and a	in words or by making an organizational chart of the entity's direct and attached to this notice.

3 Information on direct and indirect owners, beneficial owners and board members of the obliged entity

Please insert the relevant information regarding each direct owner, indirect owner and beneficial owner of the obliged entity, and, where applicable, its board members and other managers. Please fill out this page in as many copies as necessary to identify all parties. A copy of this page can also be found on our website (https://www.skatturinn.is/fyrirtaekjaskra/eydublod-fyrirtaekjaskra/). If a direct or indirect owner is a trust or a similar entity, please also provide the requested information on page 5 regarding trusts and similar entities.

Please provide documents that confirm information on direct and indirect owners etc., e.g. annual accounts, share capital slips, memorandum of association, foreign certificates, shareholders' agreements, private agreements etc.

A Information on (please select all that apply): Direct owner Indirect owner Beneficial owner Board member or another manager (only applies to obliged entities domiciled	l in a foreign country or branches of foreign companies in Iceland)
B Name	
C Personal ID number (or other identification number or date of birth if personal id	dentification number is not available)
D Domicile (street, city, state, country)	
E Nationality	
F Ownership in legal entity in direct ownership (%) (only applies to direct and indirect owners)	G Voting rights in legal entity in direct ownership (%) (only applies to direct and indirect owners
H Type of ownership (only applies to beneficial owners)	
☐ 1 Direct ownership of share capital (only applies to private limited liability com ☐ 2 Direct ownership/direct ownership of initial capital (only applies to partners ☐ 3 Other (please specify the type of ownership here below):	
A Information on (please select all that apply): Direct owner Indirect owner Beneficial owner Board member or another manager (only applies to obliged entities domiciled	I in a foreign country or branches of foreign companies in Iceland)
B Name	
C Personal ID number (or other identification number or date of birth if personal id	dentification number is not available)
D Domicile (street, city, state, country)	
E Nationality	
F Ownership in legal entity in direct ownership (%) (only applies to direct and indirect owners)	G Voting rights in legal entity in direct ownership (%) (only applies to direct and indirect owners
H Type of ownership (only applies to beneficial owners) 1 Direct ownership of share capital (only applies to private limited liability com 2 Direct ownership/direct ownership of initial capital (only applies to partners 3 Other (please specify the type of ownership here below):	

A Information on (please select all that apply):	
☐ Indirect owner	
Beneficial owner	
☐ Board member or another manager (only applies to obliged entities domiciled	d in a foreign country or branches of foreign companies in Iceland)
B Name	
C Personal identification number (or other identification number or date of birth	if personal identification number is not available)
D Domicile (street, city, state, country)	
E Nationality	
F Ownership in legal entity in direct ownership (%)	G Voting rights in legal entity in direct ownership (%)
(only applies to direct and indirect owners)	(only applies to direct and indirect owners
H Type of ownership (only applies to beneficial owners)	
1 Direct ownership of share capital (only applies to private limited liability cor	
☐ 2 Direct ownership/direct ownership of initial capital (only applies to partner ☐ 3 Other (please specify the type of ownership here below):	rships or limited partnerships)
, , , , , , , , , , , , , , , , , , , ,	
A Information on (please select all that apply):	
☐ Indirect owner	
Beneficial owner	
☐ Board member or another manager (only applies to obliged entities domiciled	d in a foreign country or branches of foreign companies in Iceland)
B Name	
C Personal identification number (or other identification number or date of birth	if personal identification number is not available)
D Domicile (street, city, state, country)	
E Nationality	
F Ownership in legal entity in direct ownership (%)	G Voting rights in legal entity in direct ownership (%)
(only applies to direct and indirect owners)	(only applies to direct and indirect owners
H Type of ownership (only applies to beneficial owners)	
1 Direct ownership of share capital (only applies to private limited liability cor	
Direct ownership/direct ownership of initial capital (only applies to partner Other (please specify the type of ownership here below):	rships or limited partnerships)
A Information on (please select all that apply):	
☐ Indirect owner	
Beneficial owner	
☐ Board member or another manager (only applies to obliged entities domiciled	a in a foreign country or branches of foreign companies in iceland)
B Name	
C Personal identification number (or other identification number or date of birth	if personal identification number is not available)
D Domicile (street, city, state, country)	
E Nationality	
E Nationality	
F Ownership in legal entity in direct ownership (%) (only applies to direct and indirect owners)	G Voting rights in legal entity in direct ownership (%) (only applies to direct and indirect owners
F Ownership in legal entity in direct ownership (%)	G Voting rights in legal entity in direct ownership (%) (only applies to direct and indirect owners
F Ownership in legal entity in direct ownership (%) (only applies to direct and indirect owners) H Type of ownership (only applies to beneficial owners) 1 Direct ownership of share capital (only applies to private limited liability cor	(only applies to direct and indirect owners
F Ownership in legal entity in direct ownership (%) (only applies to direct and indirect owners) H Type of ownership (only applies to beneficial owners) 1 Direct ownership of share capital (only applies to private limited liability cor 2 Direct ownership/direct ownership of initial capital (only applies to partner	(only applies to direct and indirect owners
F Ownership in legal entity in direct ownership (%) (only applies to direct and indirect owners) H Type of ownership (only applies to beneficial owners) 1 Direct ownership of share capital (only applies to private limited liability cor	(only applies to direct and indirect owners

4 Signatures

Authorized signer, board member, manager or, if applicable, all partners of a partnership or a limited partnership confirm that the information provided is true and correct by signature.

Place and date	
Signature	
Signature	
Name	Identification number
Email address	
Name	Identification number
Email address	
Name	Identification number
Email address	
Name	Identification number
Email address	
Name	Identification number
Email address	
Name	Identification number
Email address	
Name	Identification number
Email address	
Name	Identification number
Email address	
Name	Identification number
Email address	
Name	Identification number
Email address	
Name	Identification number
Email address	

Information on Trusts and similar Entities

Please note that it is only necessary to fill out this page if a direct or indirect owner of an obliged entity is a trust or a similar entity. Please fill out this page in as many copies as necessary to identify all parties. A copy of this page can also be found on our website (https://www.skatturinn.is/fyrirtaekjaskra/eydublod-fyrirtaekjaskra/).

rust's or similar entity's name		
no.		
Information on the trustee, settlor, protector, beneficiaries or group of beneficiaries and other individuals who directly or indirectly control the trust or similar entity:		
A Name		
B Personal identification nu	mber (or other ID number or date of birth if personal ID number is not available)	
C Domicile (street, city, state	, country)	
D Nationality		
E Party's connection to the	trust or similar entity (please select all options that apply):	
1 Trustee 2 Settlor		
3 Protector (if applicable)	beneficiaries (if group of beneficiaries, please explain):	
_ 4 belieficiary of group o	belleticiaties (it group of beneficialies, please explain).	
☐ 5 Other type of direct or	indirect dominance of the trust or similar entity (please specify the type of dominance here below):	
Information on the true who directly or indirectly	ustee, settlor, protector, beneficiaries or group of beneficiaries and other individuals ctly control the trust or similar entity:	
who directly or indire	ustee, settlor, protector, beneficiaries or group of beneficiaries and other individuals ctly control the trust or similar entity:	
who directly or indire	ustee, settlor, protector, beneficiaries or group of beneficiaries and other individuals ctly control the trust or similar entity: mber (or other ID number or date of birth if personal ID number is not available)	
who directly or indire A Name 3 Personal identification nu	ctly control the trust or similar entity: mber (or other ID number or date of birth if personal ID number is not available)	
A Name B Personal identification nu C Domicile (street, city, state	ctly control the trust or similar entity: mber (or other ID number or date of birth if personal ID number is not available)	
who directly or indirectly or indirectly or indirectly or indirectly or indirectly and a Name B Personal identification nucleon of the Personal identification nucleon or indirectly or	ctly control the trust or similar entity: mber (or other ID number or date of birth if personal ID number is not available)	
who directly or indirectly or indirectly or indirectly or indirectly or indirectly and individual or	mber (or other ID number or date of birth if personal ID number is not available) , country)	
who directly or indirectly or indirectly or indirectly or indirectly or indirectly. A Name B Personal identification nutricular or indirectly, stated or indirectly. D Nationality E Party's connection to the or indirectly or indirectly.	mber (or other ID number or date of birth if personal ID number is not available) , country)	
who directly or indirectly or	mber (or other ID number or date of birth if personal ID number is not available) , country)	
who directly or indirectly or indirectly or indirectly or indirectly or indirectly and individual and individua	mber (or other ID number or date of birth if personal ID number is not available) , country) trust or similar entity (please select all options that apply):	
who directly or indirectly or indirectly or indirectly or indirectly or indirectly and individual i	mber (or other ID number or date of birth if personal ID number is not available) , country) trust or similar entity (please select all options that apply):	
who directly or indirectly or indirectly or indirectly or indirectly or indirectly and individual i	mber (or other ID number or date of birth if personal ID number is not available) , country) trust or similar entity (please select all options that apply):	
who directly or indirect. A Name B Personal identification nucleon. C Domicile (street, city, state.) D Nationality E Party's connection to the 1 Trustee 2 Settlor 3 Protector (if applicable) 4 Beneficiary or group o	mber (or other ID number or date of birth if personal ID number is not available) , country) trust or similar entity (please select all options that apply):	
who directly or indirect. A Name B Personal identification nucleon. C Domicile (street, city, state.) D Nationality E Party's connection to the 1 Trustee 2 Settlor 3 Protector (if applicable) 4 Beneficiary or group o	mber (or other ID number or date of birth if personal ID number is not available) , country) trust or similar entity (please select all options that apply): beneficiaries (if group of beneficiaries, please explain):	
who directly or indirect. A Name B Personal identification nucleon. C Domicile (street, city, state.) D Nationality E Party's connection to the 1 Trustee 2 Settlor 3 Protector (if applicable) 4 Beneficiary or group o	mber (or other ID number or date of birth if personal ID number is not available) , country) trust or similar entity (please select all options that apply): beneficiaries (if group of beneficiaries, please explain):	

Instructions

Which legal entities are obliged to disclose information?

According to Art. 10 b of the Land Act, no. 81/2004, legal entities that meet certain criteria (see below) are obliged to inform Iceland Revenue and Customs annually of their direct and indirect ownership, beneficial owners and, where applicable, board members and other managers.

A legal entity is only obliged to disclose information if it meets the following two conditions:

- The legal entity owns a real estate or real property rights which fall within the scope of Art. 3 of the Land Act, and
- The legal entity meets one of the following conditions in points a-c below:
 - Their headquarters or main business is located in another country, the entity is domiciled outside of Iceland according to its Articles of Association or it is a branch in Iceland.
 - it falls within the scope of Act no. 82/2019 on the Registration of Beneficial Owners and is at least in 1/3 part directly or indirectly owned by one or more foreign legal entities or controlled by one or more such entities.
 - c. it falls within the scope of Act no. 82/2019 on the Registration of Beneficial Owners and is at least in 1/3 part directly or indirectly owned by one or more foreign trusts or similar entities or controlled by one or more such entities.

The size of the real estate, or whether the obliged entity owns the real estate or the real property rights in full or part, is irrelevant.

The annual disclosure obligation must be completed before February 1st each year.

Filling in form RSK 17.31:

Item 1

Please insert the name and property ID-number of all real estates owned by the obliged entity, which fall within the scope of Art. 3 of the Land Act no 81/2004. This applies whether the legal entity owns the real estate(s) in full or part. If there is not enough room to list all real estates, please use own separate form to record the above and attach it to this notice.

Item 2

Please describe the obliged entity's ownership structure. This entails identifying all direct and indirect owners of the legal entity, and trace its owners from its direct owners to its indirect owners (e.g. by describing the entity's ownership in words or by making an ownership organisational chart, identifying all direct and indirect owners of the obliged entity). If preferred, a separate form may be used and attached to this notice.

As a general rule, companies and other legal entities shall not be listed at the top of the ownership chain except in cases where no natural person can be said to be the owner of the entity as such, e.g. in the case of organisations and foundations. This also applies to agencies and enterprises owned by the state or municipalities and to legal entities listed in a regulated market as defined in the Act on Stock Exchanges.

Item 3

Please insert the required information for each individual direct and indirect owner and beneficial owner of the obliged entity. Obligation to provide information on board members and other managers only applies to legal entities whose headquarters or main business is located in another country, the entity is domiciled outside of Iceland according to its Articles of Association or they are a branch in Iceland (cf. Art. 10. b, para. 1, point 1 of the Land Act).

Point A (Information on): Please select all that apply.

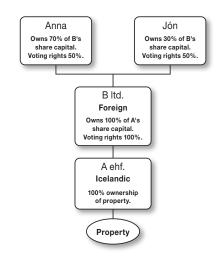
If a trust is a direct or indirect owner of an obliged entity, the trust should be listed as a direct/indirect owner. In that case please also submit accompanying form on page 5 on Trusts and Similar Entities, and provide the required information on the trustee, settlor, protector (if applicable), beneficiary or group of beneficiaries and other individuals who directly or indirectly control the trust or a similar entity.

Beneficial owner of a legal entity is the individual or individuals who in fact own or control the legal entity:

- Through direct or indirect ownership of more than 25% share capital in the legal entity,
- 2. Who control, directly or indirectly, more than 25% voting rights, or
- 3. By other means are deemed to exercise control of the legal entity.

In each legal entity a beneficial owner can be one or more individuals and the legal entities are themselves responsible for collecting information and registering their beneficial owner. Should it be impossible to determine a beneficial owner (for example because the ownership is too dispersed, no one owns or has control of the legal entity according to the Act on Beneficial Owners, or if the ownership is uncertain) the individual, one or more, who in fact have control of the operation of the legal entity, should be considered as the beneficial owner and registered as such.

Points F (Ownership in legal entity in direct ownership (%) and G (Voting rights in legal entity in direct ownership (%)). Only applies to direct and indirect owners of the obliged entity. Please insert the size of the share in direct ownership of each direct and indirect owner and their voting rights, in percentages.



Example: Company A ehf. is obliged to disclose information on its direct and indirect owners etc. according to the Land Act. Company A ehf. is 100% directly owned by the foreign Company B Itd. Company B Itd. is directly owned by Anna (70%) and Jón (30%). Anna and Jón own equal voting rights in Company B Itd. (50%). Company B Itd. is 100% direct owner of Company A ehf. Company B Itd. is 100% of Company A ehf. is therefore 100% (Point F). Furthermore, Company B Itd. also holds 100% of Company A ehf.'s voting rights (Point G). Anna directly owns 70% of Company B Itd. shares. Her ownership in Company B Itd. is therefore 70% (Point F). However, Anna only holds 50% of the voting rights in Company B Itd. (Point G). Jón directly owns 30% of Company B Itd.'s shares and his ownership in Company B Itd. is therefore 30% (Point F). As Anna and Jón hold equal voting rights, Jón's voting rights in Company B Itd. is 50% (Point G). As the example above demonstrates, points F and G refer to the ownership and voting rights in the entity which the party in question owns directly. Accordingly, one should e.g. insert Anna's and Jón's ownership and voting rights in Company B Itd. (clirect ownership), not in Company A ehf. (indirect ownership).

Point H (Type of Ownership): Only applies to beneficial owners. Please insert information on the type of ownership, i.e. the reason for which why a natural person is considered to be a beneficial owner of the obliged entity. According to Art. 3, point 4 of Act no. 82/2019, on the Registration of Beneficial Owners, type of ownership is defined as follows: Direct or indirect ownership of shares or other source of legal ownership, voting rights or other direct or indirect powers of decision, appointment of directors or other direct or indirect dominance or control of a registered entity according to Article 2.

If the registration of a beneficial owner is based on direct ownership of share capital in a private limited liability company or a public limited liability company, please check item 1. If the registration of a beneficial owner is based on the direct ownership (of initial capital) of e.g. a partnership or a limited partnership, please check item 2. If neither item 1 or 2 apply, please check "Other" and specify the type of ownership below (e.g. if a beneficial owner is registered on the grounds of indirect ownership of share capital, board membership or other type of dominance or control over the obliged entity).

Supporting documents

Information provided must be supported by documents which is possible to verify, i.e. documents that confirm the obliged entity's owner structure, ownership interests and beneficial owners. The duty to disclose and submit information and documents to Iceland Revenue and Customs lies with the obliged entity. Iceland Revenue and Customs can request for additional information and/or documents if necessary.

Supporting documents must be in Icelandic, English, Danish, Swedish or Norwegian or translated to any of these languages.

Following is a non-exhaustive list of documents which can be used to verify the information provided:

- Annual accounts
- Share capital slips
- Memorandum of Association
- Shareholders' agreement
- Register of shares
- Private agreements, e.g. purchase agreements
- Certificates from foreign Registers of Enterprises or equivalent authorities
- Documents confirming the trustee, settlor, protector, beneficiaries or group
 of beneficiaries and any other individuals exercising control over the trust
 by direct or indirect means or by other comparable arrangements.

Submission of forms and documents to the Directorate of Internal Revenue

This form and other documents can be summitted electronically to Icelandic Revenue and Customs by using SIGNET. Up to 20 documents in PDF, PNG, JPG and JPEG format can be uploaded at time and each individual file/document cannot be larger than 4MB. Please note, on order to use Signet one must have an Icelandic electronic ID. Once the documents have been uploaded, they must be signed electronically in Signet to complete submission. Documents can also be submitted by an email to eignarhald@skatturinn.is or to the Directorate of Internal Revenue and Customs, Tryggvagata 19, 101 Reykjavík.