

Annex

QUESTIONNAIRE ON BENEFICIAL OWNERSHIP INFORMATION

1.

1.1 The Law of the Brčko District of Bosnia and Herzegovina, which regulates the procedure for registering business entities in the Brčko District of Bosnia and Herzegovina (Law on the Registration of Business Entities of the Brčko District of Bosnia and Herzegovina), does not define the concept of beneficial ownership.

2.

2.1 Basic Court of the Brčko District of BiH: Information about legal entities is available to everyone, electronically, by phone or by asking at the counter in person. The Register of Enterprises and Entrepreneurs of the Basic Court of the Brčko District of BiH may, upon personal request, issue to anyone a current extract from the court register, which will contain data on the legal entity on the day of issue.

2.2 Basic Court of the Brčko District of BiH: Name of the entity, headquarters, form of organization, unique identification tax number, registration number of the business entity, data on the founders (legal or natural persons), authorized persons, registered capital, economic activities, predominant activity of the legal entity, and acts on the basis of which the establishment is entered or changes are made to existing data in business entities.

The Tax Administration of the Brčko District of BiH has its own register in which the personal data of the taxpayer is kept, which also includes legal entities.

This register contains the following data:

- The unique identification number assigned to the taxpayer by the Tax Administration
- Subject category

- Number of entry in the register
- Date of entry
- Date of change (amendment)
- Full name of the subject (legal entity)
- Address
- Phone
- Date of notification of change in statistics
- Type of activity
- Data on the founder (owner), domestic or foreign (if the founder is a legal entity, then we do not have data on the real owners of that entity, but only data on the person representing that legal entity)
- Data on the responsible person (name, surname, unique identification number)

2.3 Basic Court of the Brčko District of Bosnia and Herzegovina: YES

Tax Administration of the Brčko District of BiH: The Register of the Tax Administration of the Brčko District of BiH is not public, but at the written request of an individual, data on an individual taxpayer can be provided if they do not represent a tax secret.

Basic Court of the Brčko District of BiH: The register is publicly available via the link <https://bizreg.osbd.ba/>

3.*The term beneficial ownership is not defined by the Law on Registration of Business Entities of the Brčko District of BiH, nor does there exist a separate register of beneficial owners. Therefore, within the Register of Companies and Entrepreneurs of the Basic Court, a database is kept that contains data and documents on subjects of registration that are required to be registered in accordance with the provisions of the law, and consists of the *Register's Main Book* and the *Collection of Register's Documents*.

In this regard, in accordance with the principle of publicity anyone can, without proving a legal interest, inspect the data entered in the *Registry's Main Book* and public data from the *Collection of Register's Documents*, except for documents for which the application of the principle of publicity is limited by law, request to be issued an extract or transcript of public data from the Register's Main Book, unless the law stipulates that in order to obtain an extract from the *Collection of Register's Documents*, proof of legal interest is necessary.

If it is a natural person, it is the following data: name and surname of the owner, address of residence or place of stay, citizen's registration number (passport number if it is a foreigner), ID number, date of issuance of documents, function performed by the person in the legal entity and scope of authorization (if any), as well as subscribed share capital.

If the owner (founder) is a legal entity, then the name of the legal entity (domestic or foreign), the registered office of the legal entity, the ID number or the registration number with the competent body where the legal entity came from and the share capital are stored.

3.3. YES

Basic Court of the Brčko District of BiH: In case of foreign legal entities that enter as owners of legal entities in BiH, it is necessary to bring proof of a registered legal entity abroad along with notarized documentation, which essentially does not differ from the documentation that is also required for domestic legal entities.

Tax Administration of the Brčko District of BiH: Foreign legal entities and arrangements (funds, trusts, etc.) can acquire property, i.e. ownership of business entities that are organized as joint-stock companies through the stock exchanges in Sarajevo and Banja Luka with the mediation of financial institutions (stock brokers) for which records are kept in the securities registers organized in Sarajevo, Banja Luka and Brčko.

In accordance with the provisions of Article 7 of the Law on Prevention of Money Laundering and Financing of Terrorism, a financial institution or stockbroker is obliged to identify the client when receiving an order for the purchase of shares and draw up a written agreement with them on the provision of mediation services in the purchase of shares.

4.1. NO.

Number: 06-07-14-4971/22
Sarajevo, 26 July 2022

UNITED NATIONS OFFICE ON DRUGS AND CRIME

Subject: UNODC – Questionnaire on Beneficial Ownership Information
- Answer, submitted electronically to e-mail addresses:
javkhlan.yadamdorj@un.org and felipe.freitasfalconi@un.org

Reference - your act number: CU 2022/156(A)/DTA/CEB/CSS, dated 26 May 2022

By the letter of the Ministry of Security of Bosnia and Herzegovina number 08-2-04-4-3671-1/22 AD, dated 20 June 2022, the Ministry of Justice of Bosnia and Herzegovina was provided with the letter of the Ministry of Foreign Affairs of Bosnia and Herzegovina number 07/1-31-05-4-20841/22, dated 1 June 2022, which in its attachment contains the note of the UNODC, reference number CU 2022/156(A)/DTA/CEB/CSS, dated 26 May 2022, requesting the institutions in Bosnia and Herzegovina to complete the UNODC questionnaire related to the beneficial ownership, with the emphasis on the registries and transparency of relevant data.

After having read the content of the mentioned questionnaire, we consider it necessary to inform you of the following, whereby we expect that the competent authorities at the levels of the Entity and the Brčko District of Bosnia and Herzegovina will provide more detailed information, given the fact that most of the relevant activities related to this issue are carried out at these levels of government.

Registration of business entities in Bosnia and Herzegovina is governed by the laws on the registration of business entities at the level of the Entities of the Federation of Bosnia and Herzegovina and the Republic of Srpska, as well as the Brčko District of Bosnia and Herzegovina, with the obligation to register the business entities with the competent courts.

Data from all court registries in the Federation of Bosnia and Herzegovina and the Brčko District can be accessed through the online registries, while in the Republic of Srpska a collective online registry has been established at the Agency for Intermediary, IT and Financial Services as a "one-stop" registration system service provider.

The state level online collective registry of associations and foundations at the Ministry of Justice of Bosnia and Herzegovina provides access to the registered associations and foundations on the territory of Bosnia and Herzegovina. Considering that the registration of these subjects is possible at several levels (state level, Entity, Canton, Brčko District of BiH), the mentioned registry facilitates the review and search of data regardless of the competent authority that registered them and the law that was applied, as the data can be searched in one place.

International legal assistance is carried out in accordance with the Law on International Legal Assistance in Criminal Matters (Official Gazette of BiH, 53/09 and 58/13), with the note that Bosnia and Herzegovina is a signatory to all relevant international conventions that it applies and to which Article 1 of this Law refers as it follows: "The present Law governs the manner and

procedure of the provision of international legal assistance in criminal matters, unless otherwise stipulated in an international agreement or an international agreement does not exist”.

In accordance with the instruction contained in the mentioned UNODC note, we are sending this information electronically to the indicated e-mail addresses.

Sincerely yours,

SECRETARY GENERAL

Željko Bogut