

To facilitate the provision of information on legislation, policies, practices and institutions on promoting beneficial ownership information transparency, including existing registry(ies) and mechanism(s) to make requests for such information, the Secretariat has prepared the following questionnaire as a guide that States parties may wish to use.

Collecting the information for this questionnaire may require cooperation by several different agencies/authorities. States parties may wish to send the questionnaire to the following agencies/authorities, depending on their national system for obtaining and recording information on legal persons and legal arrangements in their country, e.g.:

- Company registry and any other relevant registry(ies)
- Agency(ies)/authority(ies)/body(ies) responsible for obtaining and maintaining beneficial ownership information
- National competent authorities responsible for international cooperation in criminal matters, including freezing and confiscation of criminal proceeds

Questionnaire on Beneficial Ownership Information

Contact Information

1. Definition of beneficial ownership & mechanisms for obtaining beneficial ownership information

1.1 Please provide the definition of “beneficial ownership” in your country for: (a) legal persons; and (b) legal arrangements, including the relevant legislation (if applicable). Please describe criteria and thresholds that are applied to determine beneficial ownership, including any criteria for exercising control without legal ownership (e.g. voting rights, right to appoint or remove board of directors).

*Art. 3 of Law no. 308/2017 on prevention and combating money laundering and terrorism financing, defines the **notion of beneficial ownership** as follows:*

– a natural person that ultimately owns or controls a natural or legal person or beneficiary of an investment company or manager of the investment company, or a person in whose name an activity is carried out or a transaction is performed and/or who owns, directly or indirectly, the right of ownership or control of at least 25% of the shares or of the voting rights of the legal person or of the goods under fiduciary administration.

According to art.14 par. (2) of the enunciated law, legal persons and individual entrepreneurs are obliged to obtain and hold of adequate, correct and up-to-date information on their beneficial owner, including details of interests generating benefits for them, to submit to the state registration authority the requested information regarding the beneficial owner and to inform immediately about change of their data. As well, according to the art. 14 of the same law, State registration authority, according to the established procedures, verifies, registries, records and updates the data regarding the beneficial owners of legal entities and individual entrepreneurs at their registration, at registration of modifications in incorporation documents of legal persons, at state registration of persons subject to reorganization and their removal from State register.

In the case in which, after the exhaustion of all possible means and provided that there are no grounds for suspicion, no person shall be identified as the beneficial owner, according to ert.5 para. (15) of Law no.308/2017, the natural person that holds the position of administrator of the customer shall be considered as beneficial owner (in accordance with the notion known internationally as "pseudo- UBO").

2. Access to basic information on legal persons

2.1 Please describe the **process** for obtaining *basic information* on legal persons created or registered in your country, including the role of the company registry.

The collection, verification and registration of data on legal persons in the State Register of legal entities is carried out by the Public Services Agency (PSA) (as an authority of state registration, responsible for maintaining the State Register of legal persons and individual entrepreneurs) on the basis of applications for registration and documents provided for in art.7 of Law no.220/2007 on the state registration of legal persons and individual entrepreneurs and special laws depending on the legal form of their organization, which necessarily include information about the beneficial owner/beneficial owners (according to the approved model and publicly available on the institution's website).

The responsibility for the authenticity and veracity of the data presented in the application for registration, as well as those contained in the documents attached to the application, is borne by the persons who submitted application concerned.

2.2 Please list the **categories** of *basic information* on legal persons that is obtained and recorded by the company registry (or other relevant registries), e.g. name of entity, date of incorporation, tax ID number, etc.

According to art.33 para. (1) of Law no.220/2007 on state registration of legal persons and individual entrepreneurs, the following data about the legal person are recorded in the State Register on legal persons:

- a) full and abbreviated name in the state language;*
- a1) branch name;*
- b) legal form of organization;*
- c) registration date and state identification number;*

- d) headquarters (postal address, telephone, fax, electronic address), including branches;
- e) legal entity (yes, no);
- f) the country of origin of the founders;
- g) the way of establishment (created or reorganized) and the data on the legal succession;
- h) types of activity and duration of activity, including branches;
- I) name, surname, personal identification number (IDNP), domicile, telephone number of founders (associates) and administrator-natural persons, state identification number, date of registration and headquarters (postal address, telephone, fax, electronic address) of founders (associates) - legal persons;
 - i1) the term for which the administrator is appointed;
 - i2) the name and surname of the person exercising the functions of managing the branch, its powers of attorney;
 - i3) name, surname, personal identification number (IDNP), domicile, telephone number of the beneficial owner (s), as defined in Law no. 308/2017 on preventing and combating money laundering and terrorist financing;
 - j) type of ownership and source of financing;
 - k) the size of the share capital and the participation shares of the founders (associates);
 - l) data from the annual financial situation (for commercial companies) - based on data provided by the National Bureau of Statistics;
 - l1) mention of the legislation of the state subject to which the foreign legal entity is located;
 - l2) registration number of the foreign legal entity;
 - l3) the legal form of organization, headquarters, types of activity and the size of the share capital of the foreign legal person;
 - l4) annual financial statement of the foreign legal person;
 - m) name, surname, identity card data, domicile, telephone number and other data of the trustee and / or insolvency administrator appointed by the court, as well as the nominal composition of the management, supervision and control bodies;
 - n) the date of registration of the amendments made in the founding documents, the essence of the amendments;
 - o) data on the commencement, suspension or termination of the reorganization procedure, on the initiation of the insolvency process, on the application of the plan procedure or on the dissolution, provided for by the legislation;
 - p) data on suspension and resumption of activity;
 - q) data on licences issued, suspended, withdrawn, cancelled (submitted by licensing authorities);
 - q2) prohibitions applied by courts or bailiffs;
 - q3) data on the opening, modification, suspension and closure of current bank accounts and on the debt to the national public budget;
 - r) the manner of termination of existence (by reorganization, liquidation or deregistration from the State Register on the basis of the ex officio decision of the state registration body);

- s) data about the liquidator-name, surname, domicile, ID number and personal identification number;
- t) data on passive and inactive legal entities;
- u) name, surname and position of the person who made the registration.

At the same time, according to art.33 para. (2) of Law no. 220/2007, the following data about the individual entrepreneur are entered in the State Register of individual entrepreneurs:

- a) name, surname, personal identification number, domicile, telephone;
- c) registration date and state identification number;
- C) types of activity;
- q) data on licences issued, suspended, withdrawn, cancelled (submitted by licensing authorities);
- d1) data on the opening, modification, suspension and closure of current bank accounts;
- e) the date and reason for the termination of the quality of individual entrepreneur (upon request, by court decision, death and others);
- u) name, surname and position of the person who made the registration.

The data are entered in the State Register on the basis of documents submitted for registration.

2.3 Is the company registry available publicly & online in your country? **YES / NO**
If **YES**, please provide links to the company registry and any other relevant registries of legal persons, or provide details about how the public can access them.

Yes, data from the State Register are publicly available at the address (link):
<http://www.asp.gov.md/ro/informatii-utile/date-statistice>, www.date.gov.md.

Under art.341 of Law no.220/2007 on state registration of legal persons and individual entrepreneurs, the Public Services Agency, as a state registration body, ensures the public viewing of information from the State Register on its official website.

The public information contains data on the name of the legal person, the legal form of organization, the state identification number (IDNO), the date of registration, the headquarters, the name and surname of the administrator, the name and surname or name of the founders (associates) and the size of their participation shares in the share capital, the status of the legal entity (passive, inactive, in the process of reorganization or deregistration, suspension of activity), as well as the name, surname, date of registration, state identification number (IDNO) of the individual entrepreneur and data on its deregistration, it also contains data on the name, surname, country of residence beneficial owner (s) of the legal person and of the individual entrepreneur.

The indicated data are available for establishment and viewing at any calendar date from the moment of registration until the deregistration of the legal entity or individual entrepreneur.

Viewing and accessing data mentioned in the State Register is carried out free, under the current legislation on data exchange and interoperability.

The information placed on the website of the state registration body is considered official information. The Public Services Agency assumes responsibility for the accuracy of the information placed.

3. Access to beneficial ownership information of legal persons

3.1 Through which mechanism(s) can competent authorities (such as law enforcement, police, financial intelligence unit and tax agencies) access *beneficial ownership information* on companies and other legal persons created or registered in your country.

Please select all that apply.

- Through a registry/registries with beneficial ownership information
- Through a different mechanism

3.1.A. Through a registry/registries with beneficial ownership information

According to art. 34¹ of Law no.220/2007 on state registration of legal persons and individual entrepreneurs, the Public Services Agency ensures public viewing on its official website of the information from the State Register on the name, surname, country of residence of the beneficial ownership/beneficial ownerships of the legal persons and individual entrepreneur.

At the same time, according to art. 37 para. (1) of Law no. 220/2007 on state registration of legal persons and individual entrepreneurs, the state registration body cooperates with public authorities and institutions, with other entities, concluding with them cooperation agreements on the exchange of information and establishing common procedures of activity, mainly online, in order to fulfil the duties established by law.

Thus, the Public Services Agency provides access, under a contract, to the competent authorities, through the SIC search system "web access", to the information on beneficial ownerships of legal persons and individual entrepreneurs, in accordance with the contractual provisions.

3.1.B. Through a different mechanism

According to art. 37 para. (2) of Law no. 220/2007 on state registration of legal persons and individual entrepreneurs, public authorities, upon request, the information is issued from the State Register and from the founding documents of legal entities, on paper or in electronic form.

According to art. 14 Para. (5) and (6) of Law No. 308/2017, the data accumulated by state registration authority, including those regarding the beneficial owners, are provided, upon request, to Office for Prevention and Fight against Money Laundering, to the authorities with supervision functions of the reporting entities and to the reporting entities provided in art. 4 of the Law cited only for the purpose of enforcing of present law, as well as to other persons in case of the existence of a legitimate interest.

The state registration authority shall ensure prompt and unlimited access to the held data, according to the established procedures, for the Office for Prevention and Fight against Money Laundering e, authorities with supervision functions of the reporting

entities and reporting entities provided in art.4 of Law no. 308/2017, without informing the accessed entity.

- Competent authorities do not currently have access to beneficial ownership information.

N/A

If **REGISTRY**, please provide further details on such registry(ies) including:

- Authority(ies)/agency(ies) responsible for obtaining and maintaining beneficial ownership information and for maintaining the register(ies). Please list if more than one;

The Public Services Agency is the only public authority authorized by law on state registration of legal persons, their branches and individuals - individual entrepreneurs and is the holder of the State Register of legal persons and the State Register of individual entrepreneurs.

Under art. 32 para. (5) and art. 35 para. (3) letter a) of Law no. 220/2007 on state registration of legal persons and individual entrepreneurs, the Public Services Agency (as state registration body) maintains the State Register of legal persons and the state Register of individual entrepreneurs.

Data on legal persons and individual entrepreneurs are entered in the State Register, and the current legislation is no exception to the general rule in relation to various legal forms of organization of legal entities.

Public Services Agency (as an authority of state registration), under art.14 Para. (1) of Law no.308/2017 on the prevention and combating of money laundering and terrorist financing, checks, records, maintains and updates data on beneficial owners of legal entities and individual entrepreneurs:

I) at their registration,

II) at registration of modifications in incorporation documents of legal persons,

III) at state registration of persons subject to reorganization and

IV) their removal from State register.

- Categories of beneficial ownership information (data fields) obtained, recorded and maintained on the registry(ies), e.g. name, nationality, date of birth, address, etc.;

According to art. 33 para. (1) letters ii) from Law no. 220/2007 on state registration of legal persons and individual entrepreneurs, the State Register of legal entities shall include the name, surname, personal identification number (IDNP), domicile, country of residence, telephone number of the beneficial owner (s), as defined in law no. 308/2017 on preventing and combating money laundering and terrorist financing.

According to the provisions of art.341 the Law no.220/2007, the state registration body ensures the public viewing of the information from the State Register on its official website (link: <http://www.asp.gov.md/ro/informatii-utile/date-statistice>).

*Viewing and accessing data from the State Register is carried out **free**, under the current legislation on data exchange and interoperability.*

- Types of legal entities covered within the scope of the beneficial ownership registry(ies), including any exempt entities;

In the State Register of legal persons and individual entrepreneurs, the data on the beneficial owners of limited liability companies, joint-stock companies (when constituted), non-commercial organizations, branches of foreign legal entities, individual entrepreneurs are entered.

Based on its functional competence, expressly provided in the legislation of the Republic of Moldova, the state registration body does not keep records of shareholders of Joint-Stock Companies, members of cooperatives, for this reason the data on their beneficial owners are not included in the State Register of legal persons and individual entrepreneurs.

- Details of the registry's(ies') access policy:

o Is the information on the registry(ies) available to the public? **YES** / **NO**

If **YES**, please include a link(s) to the registry(ies).

If **NO**, please list the authorities/agencies that have access to this information, or that can request access.

Data from the State Register are publicly available at the address (link): <http://www.asp.gov.md/ro/informatii-utile/date-statistice>, www.date.gov.md.

o Does accessing beneficial ownership information in the registry(ies) entail any costs?

Under art.341 of Law no.220/2007 on state registration of legal persons and individual entrepreneurs, the Public Services Agency, as a state registration body, ensures the public viewing of information from the State Register on its official website.

The public information contains data on the name of the legal person, the legal form of organization, the state identification number (IDNO), the date of registration, the headquarters, the name and surname of the administrator, the name and surname or name of the founders (associates) and the size of their participation shares in the share capital, the status of the legal entity (passive, inactive, in the process of reorganization or deregistration, suspension of activity), as well as the name, surname, date of registration, state identification number (IDNO) of the individual entrepreneur and data on its deregistration, it also contains data on the name, surname, country of residence beneficial owner (s) of the legal person and of the individual entrepreneur.

*Viewing and accessing data mentioned in the State Register is carried out **free**, under the current legislation on data exchange and interoperability.*

o Does the registry(ies) provide features to search information by different types of information, e.g. legal entity name, name of director, name of beneficial owner, by first or last name, by business address, by registered agent? Is it possible to search for a combination of information (Boolean searches)?

Yes, the State Register provides features to search for information by different types of information.

- Frequency of updates of information and triggers for updates;

Under art.341 of Law no.220/2007 on state registration of legal persons and individual entrepreneurs, the state registration body ensures the public viewing of information from the State Register on its official website.

The public information contains data on the name of the legal person, the legal form of organization, the state identification number (IDNO), the date of registration, the headquarters, the name and surname of the administrator, the name and surname or name of the founders (associates) and the size of their participation shares in the share capital, the status of the legal entity (passive, inactive, in the process of reorganization or deregistration, suspension of activity), as well as the name, surname, date of registration, state identification number (IDNO) of the individual entrepreneur and data on its deregistration, it also contains data on the name, surname, country of residence beneficial owner (s) of the legal person and of the individual entrepreneur.

The above information is updated every business day.

- Any mechanisms to verify beneficial ownership information submitted to the registry(ies) by legal persons or their representatives (if they exist).

According to art. 14 Para. (1) of Law no. 308/2017, the State registration authority, according to the established procedures, verifies, registries, records and updates the data regarding the beneficial owners of legal entities and individual entrepreneurs at their registration, at registration of modifications in incorporation documents of legal persons, at state registration of persons subject to reorganization and their removal from State register.

Under art.36 para. (2) of Law no.220/2007 on state registration of legal persons and individual entrepreneurs, the Registrar:

a) examines applications on the state registration of legal persons and individual entrepreneurs, as well as information about their beneficial owner (s), on the registration of changes made in the founding documents and in the data entered in the State Register, on the registration of reorganization, suspension or resumption of activity, as well as requests for deregistration from the State Register;

b) verifies the identity of natural persons - of the administrator and founders of the legal person, as well as of the individual entrepreneur, in accordance with the database of the State Population Register, also verifies the identity of the beneficial owner (s) of the legal person and of the individual entrepreneur.

According to art. 14 Para. (2) of Law no. 308/2017, the legal persons and individual entrepreneurs are obliged to obtain and hold of adequate, correct and up-to-date information on their beneficial owner, including details of interests generating benefits for them, to submit to the state registration authority the requested information regarding the beneficial owner and to inform immediately about change of their data.

3.2 Please describe any other sources (mechanisms) through which competent authorities/agencies can access beneficial ownership information in your country. In

each case, please describe how beneficial ownership information on companies and other legal entities is made available to authorities and/or the public (if applicable). *Examples may include through private-public partnerships (e.g. involving financial institutions, notaries and/or corporate service providers), through stock exchange or security exchange commission, or disclosure obligations for participation in public procurement processes, etc.*

-

3.3 Are foreign legal persons, foreign (express) trusts or foreign legal arrangements allowed to operate in/own assets/ and/or register in your country? **YES / NO**

If **YES**,

- how is basic information on these arrangements recorded (if at all)?
 - how is beneficial ownership information on these arrangements recorded (if at all)?
- Please provide details of the relevant legislation and practices.

According to art. 7 para. (1) letter f) of Law no.220/2007 on state registration of legal persons and individual entrepreneurs, the registration of data on the beneficial owner of the legal entity is carried out on the basis of the information submitted to the state registration body about the beneficial owner/beneficial owners, in accordance with Law no. 308/2017 on preventing and combating money laundering and terrorist financing. According to art. 14 Para. (2) of Law no. 308/2017, the legal persons and individual entrepreneurs are obliged to obtain and hold of adequate, correct and up-to-date information on their beneficial owner, including details of interests generating benefits for them, to submit to the state registration authority the requested information regarding the beneficial owner and to inform immediately about change of their data.

4. Access to basic information and beneficial ownership information of (express) trusts and other similar legal arrangements

4.1 Does your country recognize (express) trusts or other similar legal arrangements? **YES / NO**

- If **YES**, please provide a broad overview of your country's system and mechanisms for obtaining beneficial ownership information on (express) trusts and other similar legal arrangements created or registered in your country.
- If **NO**, please skip to question 5

4.2 How is *basic information* on (express) trusts and other legal arrangements obtained and recorded in your country?

4.3 How is *beneficial ownership information* on (express) trusts and other legal arrangements obtained and recorded in your country?

Through a registry/registries with beneficial ownership information

Through a different mechanism

Competent authorities do not currently have access to beneficial ownership information

If **REGISTRY**, please provide details on the registry(ies), authority(ies)/agency(ies) in charge of maintaining the registry(ies), type of information collected, and details on the access policy.

If **ALTERNATIVE MECHANISM**, please provide details on the mechanism, type of information collected, and details on the access policy.

Civil legislation of the Republic of Moldova does not expressly provide for the notion of trust.

Amendments to the Civil Code of the Republic of Moldova, operated by the Law on Modernization of the Civil Code and Amendments to certain Legislative Acts No 133/2018, which entered into force on 1 March 2019, aligned the national legislation with international trends. Along with many changes and additions, the introduction of trusts in national civil law is an important development.

At the same time, it is to be mentioned that the Civil Code of the Republic of Moldova to Ch.I of Title IV of Book III regulates in art. 2055 the word fiducia (confidence), which is a legal relationship in which a party (fiduciary) is obliged to become the holder of a patrimonial mass (fiduciary patrimonial mass), to administer it and dispose of it, in accordance with the conditions governing the report (trust conditions), for the benefit of a beneficiary or to promote a public benefit purpose.

Fiducia is regarded as a kind of activity practiced by the legal person.

The information on the beneficial owner is registered under the provisions of Law No.220/2007 on state registration of legal persons and individual entrepreneurs, as well as law no. 308/2017 on the prevention and combating of money laundering and terrorist financing (the procedure being described in the answers to the previous questions).

The introduction of trust in the Civil Code aimed to modernize the private law of the Republic of Moldova, to respond to practical needs in the increasingly complex civil and commercial circuit, but also to ensure the implementation of new features introduced by other amendments and completions operated by Law no. 133/2018.

The definition provided by the Civil Code allows to highlight the following particularities of trust:

- trust is a legal relationship;*
- the parties of this relationship are: the settlor, the trustee, the beneficiary and (optionally) the trust assistant;*
- the fiduciary assets do not represent a patrimony, but assets (consisting of patrimonial rights and obligations) that is part of the fiduciary patrimony – this approach of the legislator, inspired by French and Romanian law, maintains the theory of the uniqueness of the person's patrimony;*
- the fiduciary assets have a special regime of protection (this particularity results not only from the definition, but especially from other norms regarding the trust, but we mention it in this list, because of its importance for the trust), namely: fiduciary assets represent a patrimony distinct from the trustee's own patrimony (personal patrimony of the trustee) and from any other fiduciary assets whose holder is the trustee.*

5. Sanctions

5.1 Please describe the types of sanctions, sanctionable conduct, and targets of sanctions for non-compliance with beneficial ownership disclosure regulations (whether on the registry(ies) or through an alternative mechanism).

5.2 Please describe the powers available to the designated authority(ies)/agency(ies) to enforce sanctions for non-compliance with the beneficial ownership disclosure requirements, **including any statistics on enforcement of such sanctions.**

According to art. 14 Para. (3) of Law No. 308/2017 on the prevention and combating of money laundering and terrorist financing, it is prohibited the state registration of legal entities and individual entrepreneurs in the absence of data about the beneficial owner and/or if the presented information is untrue or incomplete.

This measure, in its essence, is a form of sanction of the legal person or individual entrepreneur that the state registration body is entitled to apply.

6. International Cooperation, asset recovery and challenges

6.1. Does your country make beneficial ownership information available to foreign competent authorities (directly or upon request)? Please provide details of the relevant legislative and regulatory framework in your country that allows for the international exchange of such information.

6.2. Please describe how foreign competent authorities may request or access beneficial ownership information on legal persons and legal arrangements formed in your country. Which agency(ies)/authority(ies) is/are responsible for receiving and responding to foreign requests? **Please provide contact information and instructions.**

6.3. In your opinion, what are the main challenges faced by *foreign competent authorities* to access beneficial ownership information held in your country?

6.4. In your opinion, what are the main challenges faced by *competent authorities of your country* to access/receive beneficial ownership information held in a foreign country?

6.5. Do you have any case studies or examples where the transparency of beneficial ownership has *enabled or enhanced the effective recovery and return of proceeds of crime in (or for) your country?*

According to art. 14 Para. (5) and (6) of Law no. 308/2017, the data accumulated by state registration authority, including those regarding the beneficial owners, are provided, upon request, to Office for Prevention and Fight against Money Laundering, to the authorities with supervision functions of the reporting entities and to the reporting entities provided in art. 4 of the Law cited only for the purpose of enforcing of present law, as well as to other persons in case of the existence of a legitimate interest.

The state registration authority shall ensure prompt and unlimited access to the held data, according to the established procedures, for the Office for Prevention and Fight against Money Laundering, the authorities with supervision functions of the reporting entities and reporting entities provided in art.4 of Law no. 308/2017, without informing the accessed entity.

The Criminal Assets Recovery Agency (CARA), an autonomous specialized subdivision within the National Anti-corruption Centre (NAC) of the Republic of Moldova,

according to the provisions of Law no. 48/2017 regarding the Criminal Assets Recovery Agency has the task to negotiate the repatriation of criminal assets and the international cooperation and exchange of information with foreign competent authorities.

CARA ensures the exchange of information through the secured channel SIENA, CARIN network or through the International Police Cooperation Division within the General Police Inspectorate of the Republic of Moldova, which is using the INTERPOL connection channel.

The information on beneficial ownership to foreign competent authorities is collected and provided only upon request using the mentioned channels.

7. Good Practices for Beneficial Ownership Transparency

7.1. Has your country implemented any specific good practices relating to Beneficial Ownership Transparency that you wish to highlight? *Examples could include good practices in verification, data format, searchability, use of technology, enforcement of sanctions, automatic red flagging, use or risk-based approach.*

Best practices of the Financial Action Task Force (FATF/FATF) notes that 24th recommendation of FATF sets out technical requirements for identifying the actual beneficial owner (s) behind legal persons. The FATF establishes that, where appropriate mechanisms are in place to identify beneficiaries, the use of legal persons for criminal purposes is effectively prevented, legal persons are sufficiently transparent and basic, accurate and up-to-date information on beneficial owners are available in real time.

According to this publication, the interpretative note to recommendation 24 indicates that countries should use one or more mechanisms (best practices) to ensure that information on the beneficial owner of a company is held by a competent authority and is available in a central register in their country, or can be determined otherwise in a timely manner. FATF notes that a multi-source approach is often the most effective in preventing the misuse of legal persons for criminal purposes and in implementing measures that make the beneficial ownership of legal persons sufficiently transparent. Among the best practices, also used in the Republic of Moldova, in the part related to Beneficial Ownership identification we can list:

7.1.A. The register-based approach - *this approach requires the registers of competent authorities to obtain and hold up-to-date information on beneficial owners of companies. This information is public, can be viewed on the website of the Public Services Agency (<https://www.asp.gov.md/ro/informatii-utile/date-statistice>), and facilitate access of financial institutions, enterprises and designated non-financial professions (DNFBPs) and other competent authorities to those data.*

Also, on 27.09.2018 the Public Services Agency concluded a cooperation agreement with the Service for Prevention and Combating Money Laundering, on the following areas:

- a) verification, registration, maintaining and updating of data on beneficial owners of legal persons and individual entrepreneurs;*

- b) *conducting information exchange on subjects resulting from joint activities of the parties;*
- c) *carrying out the information exchange in the context of the execution of the Government Decision no. 786/2017 on the acquisition of citizenship through investment assessment of the risks of money laundering and terrorist financing within the areas of competence of the parties;*
- d) *elaboration and updating of instructions, recommendations, guidelines and other normative acts in order to implement legislation on prevention and combating money laundering and terrorist financing;*
- e) *maintaining statistics related to measures to prevent and combat money laundering and terrorist financing;*
- f) *licensing in the field of organization and conduct of gambling;*
- g) *participation in the development and implementation of strategic policies and documents in the field of preventing and combating money laundering and terrorist financing;*
- h) *presentation of national progress in the field to international organizations;*
- i) *organizing and participating in trainings and other types of events organized by the parties addressing topics related to the prevention and combating of money laundering and terrorist financing;*

7.1.B. *Another practice also used in Moldova is:*

Good faith approach and transparency of companies - *under this approach, companies must obtain and hold up-to-date information on beneficial owners of companies or companies must take reasonable steps to obtain and hold up-to-date information on beneficial owners of companies. In this regard, as a good practice in Law no. 308/2017, a whole article (art.14) is dedicated to Transparency Rules, which are to be observed by companies, but also by the state registration body.*

8. Follow-up to the special session of the General Assembly against corruption

8.1. Please describe any other measures, if any, that your country may have taken to implement paragraph 161 of the political declaration adopted by the General Assembly at its special session against corruption held in June 2021.

At the time of filling in the questionnaire, the following measures are expected to be implemented within a foreseeable period:

- a) *placing information about beneficial owners on the official page of the Government of the Republic of Moldova;*
- b) *granting access to the information about the actual beneficiaries through the interoperability system, in this case through the Mconnect interoperability platform, which is the technological solution developed by the Government of the Republic of Moldova to ensure interoperability and data exchange between Information Systems.*