

In our <u>newsletter dated 25 September 2024</u>, we informed you of the new formalities for individuals to file their Luxembourg national identification number ("LNIN") with the Luxembourg Trade and Companies Register ("RCS"), being part of the Luxembourg Business Registers ("LBR").

1. A LOOK BACK AT THE REQUIREMENTS

Since 12 November 2024, all individuals registered or due to be registered with the LBR - whether as members of a management body, shareholders, permanent representatives, auditors or others - must:

- register their existing LNIN with the RCS, or
- request the creation of a LNIN from the RCS.

This requirement applies to both residents and non-residents of the Grand Duchy of Luxembourg.

2. END OF FREE REGISTRATION AND UPCOMING ACCESS RESTRICTIONSCCESS

At the launch of these new filing formalities, the LBR communicated that the filing or request of a LNIN will be free of charge for a transitional period which was not defined at that time. After the expiration of this transitional period, the filing or creation of a LNIN will be charged to the company and in addition, the non-compliance with the filing of the LNIN for any individual linked to a company will lead to the blocking of the entire file of a company by the LBR.

On 3 March 2025, the LBR announced the end of the transitional period to be 31 May 2025 for the free filing of the LNIN and that as from 1 October 2025 the files of non-compliant companies will be blocked from any filing with the LBR. Therefore, we would like to emphasize the importance of the following deadlines:

As from 1 June 2025:

- ▶ Any request for an update of a LNIN will be charged as any other filing;
- ▶ Where the obligation to communicate the LNIN to the LBR has not been fulfilled, the LBR reserves the right to restrict access to deposits for the entities concerned.

As from 1 October 2025:

Access restrictions will be fully operational and will only be released once the company has completed all LNIN filings.





INTERESTED?

Get in touch with:





Cornelia Mettlen

Partner

+352 45 123 708

cornelia.mettlen@bdo.lu

Anna Palzer

Senior Manager

+352 45 123 709

anna.palzer@bdo.lu

BDO IN LUXEMBOURG



Audit & Assurance



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