**Example 1:** Individual Shareholders and Beneficial Owners

**Company:**

EXAMPLE ONE LIMITED

Company No. 9000001

Single class of shares with one voting right each.

**Scenario:**

John Doe holds 800 shares

Peter Park holds 150 shares

Connie Chan holds 50 shares

**Analysis:**

The total number of issued shares is 1,000.

John Doe holds 80% of the issued shares and 80% of the voting rights. He is a beneficial owner.

Peter Park holds 15% of the issued shares and 15% of the voting rights. He is a beneficial owner.

Connie Chan holds 5% of the issued shares and 5% of the voting rights. She is not a beneficial owner.

**Instructions (by written form):**

ROMBO Confirmation Form for EXAMPLE ONE LIMITED:

* Tick A the entity is not exempt from ROM and BO Info filing

ROMBO Data Form – applicable sections:

|  |  |  |  |
| --- | --- | --- | --- |
| **Section** | **John Doe** | **Peter Park** | **Connie Chan** |
| A-1. Basic Information - Individual | Yes | Yes | Yes |
| A-2. Basic Information - Legal Entity (“LE”) | - | - | - |
| A-2a. Exempted Owner | - | - | - |
| B. Address | Yes | Yes | Yes |
| C. Shareholding | Yes | Yes | Yes |
| C-1. Mortgage and Charge | - | - | - |
| C-2. Nominator | - | - | - |
| C-3. Joint Shareholding | - | - | - |
| D. Ownership and Control | Yes | Yes | - |

**Instructions (by data file):**

ROMBO Exemption:

* No entry required. EXAMPLE ONE LIMITED is not eligible for exemption

ROMBO Data:

|  |  |  |  |
| --- | --- | --- | --- |
| **Columns (Section)** | **John Doe** | **Peter Park** | **Connie Chan** |
| A (Row Reference) | - | - | - |
| B (BC Number) | Yes | Yes | Yes |
| C to N (Individual) | Yes | Yes | Yes |
| O to S (Legal Entity) | - | - | - |
| T to Y (Address) | Yes | Yes | Yes |
| Z to AF (Member) | Yes | Yes | Yes |
| AG to AK (Mortgage/Charge) | - | - | - |
| AL to AO (Nominee/Nominator) | - | - | - |
| AP to AQ (Joint Holding) | - | - | - |
| AR to BE (Ownership/Control) | Yes | Yes | - |
| BF to BP (Exempted Owner) | - | - | - |

**Example 2:** Corporate Shareholder (non-BVI entity)

**Company:**

EXAMPLE TWO LIMITED

Company No. 9000002

Single class of shares with one voting right each.

**Scenario:**

SAMPLE HOLDINGS LIMITED (a non-BVI company) holds 1,000 shares

John Doe holds 95% of the shares in the corporate shareholder SAMPLE HOLDINGS LIMITED

Peter Park holds 5% of the shares in the corporate shareholder SAMPLE HOLDINGS LIMITED

**Analysis:**

The total number of issued shares is 1,000.

John Doe indirectly holds 95% of the issued shares and 95% of the voting rights. He is a beneficial owner.

Peter Park indirectly holds 5% of the issued shares and 5% of the voting rights. He is not a beneficial owner.

**Instructions (by written form):**

ROMBO Confirmation Form for EXAMPLE TWO LIMITED:

* Tick A the entity is not exempt from ROM and BO Info filing

ROMBO Data Form – applicable sections:

|  |  |  |  |
| --- | --- | --- | --- |
| **Section** | **SAMPLE HOLDINGS LIMITED** | **John Doe** | **Peter Park** |
| A-1. Basic Information - Individual | - | Yes | Not required |
| A-2. Basic Information - Legal Entity (“LE”) | Yes | - |
| A-2a. Exempted Owner | - | - |
| B. Address | Yes | Yes |
| C. Shareholding | Yes | - |
| C-1. Mortgage and Charge | - | - |
| C-2. Nominator | - | - |
| C-3. Joint Shareholding | - | - |
| D. Ownership and Control | - | Yes |

**Instructions (by data file):**

ROMBO Exemption:

* No entry required. EXAMPLE TWO LIMITED is not eligible for exemption

ROMBO Data:

|  |  |  |  |
| --- | --- | --- | --- |
| **Columns (Section)** | **SAMPLE HOLDINGS LIMITED** | **John Doe** | **Peter Park** |
| A (Row Reference) | - | - | Not required |
| B (BC Number) | Yes | Yes |
| C to N (Individual) | - | Yes |
| O to S (Legal Entity) | Yes | - |
| T to Y (Address) | Yes | Yes |
| Z to AF (Member) | Yes | - |
| AG to AK (Mortgage/Charge) | - | - |
| AL to AO (Nominee/Nominator) | - | - |
| AP to AQ (Joint Holding) | - | - |
| AR to BE (Ownership/Control) | - | Yes |
| BF to BP (Exempted Owner) | - | - |

**Example 3:** Nominee Shareholder

**Company:**

EXAMPLE THREE LIMITED

Company No. 9000003

Single class of shares with one voting right each.

**Scenario:**

NOMINEE SHAREHOLDER LIMITED holds 1,000 shares

The shares are held on behalf of John Doe. John Doe is the nominator and beneficial owner.

**Analysis:**

The total number of issued shares is 1,000.

NOMINEE SHAREHOLDER LIMITED is a nominee.

John Doe is the nominator and beneficial owner.

**Instructions (by written form):**

ROMBO Confirmation Form for EXAMPLE THREE LIMITED:

* Tick A the entity is not exempt from ROM and BO Info filing

ROMBO Data Form – applicable sections:

|  |  |  |
| --- | --- | --- |
| **Section** | **NOMINEE SHAREHOLDER LIMITED** | **John Doe** |
| A-1. Basic Information - Individual | - | Yes |
| A-2. Basic Information - Legal Entity (“LE”) | Yes | - |
| A-2a. Exempted Owner | - | - |
| B. Address | Yes | Yes |
| C. Shareholding | Yes (tick Acting as Nominee) | - |
| C-1. Mortgage and Charge | - | - |
| C-2. Nominator | - | Yes (enter NOMINEE SHAREHOLDER LIMITED as Nominee) |
| C-3. Joint Shareholding | - | - |
| D. Ownership and Control | - | Yes |

**Instructions (by data file):**

ROMBO Exemption:

* No entry required. EXAMPLE THREE LIMITED is not eligible for exemption

ROMBO Data:

|  |  |  |
| --- | --- | --- |
| **Columns (Section)** | **NOMINEE SHAREHOLDER LIMITED** | **John Doe** |
| A (Row Reference) | - | - |
| B (BC Number) | Yes | Yes |
| C to N (Individual) | - | Yes |
| O to S (Legal Entity) | Yes | - |
| T to Y (Address) | Yes | Yes |
| Z to AF (Member) | Yes | - |
| AG to AK (Mortgage/Charge) | - | - |
| AL to AO (Nominee/Nominator) | Yes (tick column AL) | Yes (select “9000003: NOMINEE SHAREHOLDER LIMITED” in column AM) |
| AP to AQ (Joint Holding) | - | - |
| AR to BE (Ownership/Control) | - | Yes |
| BF to BP (Exempted Owner) | - | - |

**Example 4:** Joint Shareholders

**Company:**

EXAMPLE FOUR LIMITED

Company No. 9000004

Single class of shares with one voting right each.

**Scenario:**

Joe Doe and Peter Park jointly holds 1,000 shares. The type of joint holding is Joint Ownership.

**Analysis:**

The total number of issued shares is 1,000.

Joe Doe and Peter Park are both shareholders of 100% of the issued shares and 100% of the voting rights. Both are beneficial owners.

Joe Doe, being the first person named in a joint shareholding relationship, is the primary holder.

**Instructions (by written form):**

ROMBO Confirmation Form for EXAMPLE FOUR LIMITED:

* Tick A the entity is not exempt from ROM and BO Info filing

ROMBO Data Form – applicable sections:

|  |  |  |
| --- | --- | --- |
| **Section** | **John Doe** | **Peter Park** |
| A-1. Basic Information - Individual | Yes | Yes |
| A-2. Basic Information - Legal Entity (“LE”) | - | - |
| A-2a. Exempted Owner | - | - |
| B. Address | Yes | Yes |
| C. Shareholding | Yes | - |
| C-1. Mortgage and Charge | - | - |
| C-2. Nominator | - | - |
| C-3. Joint Shareholding | Yes (select Joint Ownership, and enter Peter Park as Joint Shareholder) | Yes (select Joint Ownership, and enter John Doe as Joint Shareholder) |
| D. Ownership and Control | Yes | - |

**Instructions (by data file):**

ROMBO Exemption:

* No entry required. EXAMPLE FOUR LIMITED is not eligible for exemption

ROMBO Data:

|  |  |  |
| --- | --- | --- |
| **Columns (Section)** | **John Doe** | **Peter Park** |
| A (Row Reference) | - | - |
| B (BC Number) | Yes | Yes |
| C to N (Individual) | Yes | Yes |
| O to S (Legal Entity) | - | - |
| T to Y (Address) | Yes | Yes |
| Z to AF (Member) | Yes | - |
| AG to AK (Mortgage/Charge) | - | - |
| AL to AO (Nominee/Nominator) | - | - |
| AP to AQ (Joint Holding) | Yes (select “Joint Ownership” in column AP) | Yes (select “9000004: Doe John” in column AQ) |
| AR to BE (Ownership/Control) | Yes | - |
| BF to BP (Exempted Owner) | - | - |

**Example 5:** Multiple classes of shares

**Company:**

EXAMPLE FIVE LIMITED

Company No. 9000005

The company is authorized to issue two classes of shares, Ordinary shares with one voting right each and Preference shares with no voting rights.

**Scenario:**

Joe Doe holds 10 Ordinary shares.

Peter Park holds 900 Preference shares.

Connie Chan holds 90 Preference shares.

**Analysis:**

The total number of issued shares is 1,000.

Joe Doe holds 1% of the issued shares and 100% of the voting rights. He is a beneficial owner.

Peter Park holds 90% of the issued shares and 0% of the voting rights. He is a beneficial owner.

Connie Chan holds 9% of the issued shares and 0% of the voting rights. She is not a beneficial owner.

**Instructions (by written form):**

ROMBO Confirmation Form for EXAMPLE FIVE LIMITED:

* Tick A the entity is not exempt from ROM and BO Info filing

ROMBO Data Form – applicable sections:

|  |  |  |  |
| --- | --- | --- | --- |
| **Section** | **John Doe** | **Peter Park** | **Connie Chan** |
| A-1. Basic Information - Individual | Yes | Yes | Yes |
| A-2. Basic Information - Legal Entity (“LE”) | - | - | - |
| A-2a. Exempted Owner | - | - | - |
| B. Address | Yes | Yes | Yes |
| C. Shareholding | Yes | Yes | Yes |
| C-1. Mortgage and Charge | - | - | - |
| C-2. Nominator | - | - | - |
| C-3. Joint Shareholding | - | - | - |
| D. Ownership and Control | Yes | Yes | - |

**Instructions (by data file):**

ROMBO Exemption:

* No entry required. EXAMPLE FIVE LIMITED is not eligible for exemption

ROMBO Data:

|  |  |  |  |
| --- | --- | --- | --- |
| **Columns (Section)** | **John Doe** | **Peter Park** | **Connie Chan** |
| A (Row Reference) | - | - | - |
| B (BC Number) | Yes | Yes | Yes |
| C to N (Individual) | Yes | Yes | Yes |
| O to S (Legal Entity) | - | - | - |
| T to Y (Address) | Yes | Yes | Yes |
| Z to AF (Member) | Yes | Yes | Yes |
| AG to AK (Mortgage/Charge) | - | - | - |
| AL to AO (Nominee/Nominator) | - | - | - |
| AP to AQ (Joint Holding) | - | - | - |
| AR to BE (Ownership/Control) | Yes (100% Voting Rights) | Yes (90% Share Holding) | - |
| BF to BP (Exempted Owner) | - | - | - |

**Example 6:** No Individual holding 10% or more of the issued shares

**Company:**

EXAMPLE SIX LIMITED

Company No. 9000006

Single class of shares with one voting right each.

**Scenario:**

There are 11 shareholders holding 100 shares each.

John Doe is the director of the company and does not hold any share.

**Analysis:**

The total number of issued shares is 1,100.

No individual is holding 10% or more of the issued shares or voting rights of the company.

John Doe is the Senior Management Official of the company

**Instructions (by written form):**

ROMBO Confirmation Form for EXAMPLE SIX LIMITED:

* Tick A the entity is not exempt from ROM and BO Info filing

ROMBO Data Form – applicable sections:

|  |  |  |
| --- | --- | --- |
| **Section** | **Each of 11 Shareholders** | **John Doe** |
| A-1. Basic Information - Individual | Yes | Yes |
| A-2. Basic Information - Legal Entity (“LE”) | - | - |
| A-2a. Exempted Owner | - | - |
| B. Address | Yes | Yes |
| C. Shareholding | Yes | - |
| C-1. Mortgage and Charge | - | - |
| C-2. Nominator | - | - |
| C-3. Joint Shareholding | - | - |
| D. Ownership and Control | - | Yes (tick Senior Management Official) |

**Instructions (by data file):**

ROMBO Exemption:

* No entry required. EXAMPLE SIX LIMITED is not eligible for exemption

ROMBO Data:

|  |  |  |
| --- | --- | --- |
| **Columns (Section)** | **Each of 11 Shareholders** | **John Doe** |
| A (Row Reference) | - | - |
| B (BC Number) | Yes | Yes |
| C to N (Individual) | Yes | Yes |
| O to S (Legal Entity) | - | - |
| T to Y (Address) | Yes | Yes |
| Z to AF (Member) | Yes | - |
| AG to AK (Mortgage/Charge) | - | - |
| AL to AO (Nominee/Nominator) | - | - |
| AP to AQ (Joint Holding) | - | - |
| AR to BE (Ownership/Control) | - | Yes (tick Senior Management Official) |
| BF to BP (Exempted Owner) | - | - |

**Example 7:** Trust (Non-BVI)

**Company:**

EXAMPLE SEVEN LIMITED

Company No. 9000007

Single class of shares with one voting right each.

**Scenario:**

John Doe is the trustee of the trust and holds 1,000 shares.

Peter Park is the settlor of the trust

Connie Chan is the beneficiary of the trust

Bill Banner is the protector of the trust

**Analysis:**

The total number of issued shares is 1,000.

John Doe, Peter Park, Connie Chan and Bill Banner are beneficial owners

**Instructions (by written form):**

ROMBO Confirmation Form for EXAMPLE SEVEN LIMITED:

* Tick A the entity is not exempt from ROM and BO Info filing

ROMBO Data Form – applicable sections:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Section** | **John Doe** | **Peter Park** | **Connie Chan** | **Bill Banner** |
| A-1. Basic Information – Individual | Yes | Yes | Yes | Yes |
| A-2. Basic Information – Legal Entity (“LE”) | - | - | - | - |
| A-2a. Exempted Owner | - | - | - | - |
| B. Address | Yes | Yes | Yes | Yes |
| C. Shareholding | Yes | - | - | - |
| C-1. Mortgage and Charge | - | - | - | - |
| C-2. Nominator | - | - | - | - |
| C-3. Joint Shareholding | - | - | - | - |
| D. Ownership and Control | Yes, 100% shares, 100% voting rights, Trustee | Yes, Settlor of Trust | Yes, Beneficiary of Trust | Yes, Protector of Trust |

**Instructions (by data file):**

ROMBO Exemption:

* No entry required. EXAMPLE SEVEN LIMITED is not eligible for exemption

ROMBO Data:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Columns (Section)** | **John Doe** | **Peter Park** | **Connie Chan** | **Bill Banner** |
| A (Row Reference) | - | - | - | - |
| B (BC Number) | Yes | Yes | Yes | Yes |
| C to N (Individual) | Yes | Yes | Yes | Yes |
| O to S (Legal Entity) | - | - | - | - |
| T to Y (Address) | Yes | Yes | Yes | Yes |
| Z to AF (Member) | Yes | - | - | - |
| AG to AK (Mortgage/Charge) | - | - | - | - |
| AL to AO (Nominee/Nominator) | - | - | - | - |
| AP to AQ (Joint Holding) | - | - | - | - |
| AR to BE (Ownership/Control) | Yes, 100% shares, 100% voting rights, Trustee | Yes, Settlor of Trust | Yes, Beneficiary of Trust | Yes, Protector of Trust |
| BF to BP (Exempted Owner) | - | - | - | - |

**Example 8:** Exemption from Beneficial Ownership Information Filing – All shares held by a Trustee under BVI Bank and Trust Companies Act

**Company:**

EXAMPLE EIGHT LIMITED

Company No. 9000008

Single class of shares with one voting right each.

**Scenario:**

SAMPLE BVI TRUST LIMITED is the trustee licensed under the BVI Bank and Trust Companies Act and holds 1,000 shares.

Peter Park is the settlor of the trust, Connie Chan is the beneficiary of the trust, Bill Banner is the protector of the trust.

**Analysis:**

The total number of issued shares is 1,000.

Shares of the company are held by a trustee licensed under the BVI Bank and Trust Companies Act. It is exempted from the filing of Beneficial Ownership Information. But, it is still required to file Register of Members.

**Instructions (by written form):**

ROMBO Confirmation Form for EXAMPLE EIGHT LIMITED:

* Tick B2, and enter the name of the BTCA Trustee. The entity is exempt from BO Info filing. However, the entity is not exempt from ROM filing

ROMBO Data Form – applicable sections:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Section** | **SAMPLE BVI TRUST LIMITED** | **Peter Park** | **Connie Chan** | **Bill Banner** |
| A-1. Basic Information - Individual | - | Not required | Not required | Not required |
| A-2. Basic Information - Legal Entity (“LE”) | Yes |
| A-2a. Exempted Owner | - |
| B. Address | Yes |
| C. Shareholding | Yes |
| C-1. Mortgage and Charge | - |
| C-2. Nominator | - |
| C-3. Joint Shareholding | - |
| D. Ownership and Control | - |

**Instructions (by data file):**

ROMBO Exemption:

* EXAMPLE EIGHT LIMITED is exempt from filing BO Info. Complete columns A, B, R (BTCA Trustee)

ROMBO Data:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Columns (Section)** | **SAMPLE BVI TRUST LIMITED** | **Peter Park** | **Connie Chan** | **Bill Banner** |
| A (Row Reference) | - | Not required | Not required | Not required |
| B (BC Number) | Yes |
| C to N (Individual) | - |
| O to S (Legal Entity) | Yes |
| T to Y (Address) | Yes |
| Z to AF (Member) | Yes |
| AG to AK (Mortgage/Charge) | - |
| AL to AO (Nominee/Nominator) | - |
| AP to AQ (Joint Holding) | - |
| AR to BE (Ownership/Control) | Yes |
| BF to BP (Exempted Owner) | Yes |

**Example 9:** Exempted Owner – Shares held by Listed Company

**Company:**

EXAMPLE NINE LIMITED

Company No. 9000009

Single class of shares with one voting right each.

**Scenario:**

SAMPLE LISTED COMPANY LIMITED, a company listed in a recognized stock exchange, holds 1,000 shares.

**Analysis:**

The total number of issued shares is 1,000.

SAMPLE LISTED COMPANY LIMITED is an exempted owner

**Instructions (by written form):**

ROMBO Confirmation Form for EXAMPLE NINE LIMITED:

* Tick A the entity is not exempt from ROM and BO Info filing

ROMBO Data Form – applicable sections:

|  |  |
| --- | --- |
| **Section** | **SAMPLE LISTED COMPANY LIMITED** |
| A-1. Basic Information - Individual | - |
| A-2. Basic Information - Legal Entity (“LE”) | Yes |
| A-2a. Exempted Owner | Yes |
| B. Address | Yes |
| C. Shareholding | Yes |
| C-1. Mortgage and Charge | - |
| C-2. Nominator | - |
| C-3. Joint Shareholding | - |
| D. Ownership and Control | Yes (100% Shares, 100% Voting Rights) |

**Instructions (by data file):**

ROMBO Exemption:

* No entry required. EXAMPLE NINE LIMITED is not eligible for exemption

ROMBO Data:

|  |  |
| --- | --- |
| **Columns (Section)** | **SAMPLE LISTED COMPANY LIMITED** |
| A (Row Reference) | - |
| B (BC Number) | Yes |
| C to N (Individual) | - |
| O to S (Legal Entity) | Yes |
| T to Y (Address) | Yes |
| Z to AF (Member) | Yes |
| AG to AK (Mortgage/Charge) | - |
| AL to AO (Nominee/Nominator) | - |
| AP to AQ (Joint Holding) | - |
| AR to BE (Ownership/Control) | Yes (100% Shares, 100% Voting Rights) |
| BF to BP (Exempted Owner) | Yes (Listed Company) |

**Example 10:** Exemption from Beneficial Ownership Information Filing – Subsidiary of a BVI Parent

**Company:**

EXAMPLE TEN LIMITED

Company No. 9000010

Single class of shares with one voting right each.

**Scenario:**

SAMPLE BVI PARENT LIMITED, a company incorporated in the BVI, holds 850 shares.

John Doe holds 150 shares

**Analysis:**

The total number of issued shares is 1,000.

The company is a subsidiary of a BVI parent entity. It is exempted from the filing of Beneficial Ownership Information. But, it is still required to file Register of Members.

**Instructions (by written form):**

ROMBO Confirmation Form for EXAMPLE TEN LIMITED:

* Tick B1 the entity is exempt from BO Info filing. It is required to file ROM

ROMBO Data Form – applicable sections:

|  |  |  |
| --- | --- | --- |
| **Section** | **SAMPLE BVI PARENT LIMITED** | **John Doe** |
| A-1. Basic Information - Individual | - | Yes |
| A-2. Basic Information - Legal Entity (“LE”) | Yes | - |
| A-2a. Exempted Owner | - | - |
| B. Address | Yes | Yes |
| C. Shareholding | Yes | Yes |
| C-1. Mortgage and Charge | - | - |
| C-2. Nominator | - | - |
| C-3. Joint Shareholding | - | - |
| D. Ownership and Control | - | - |

**Instructions (by data file):**

ROMBO Exemption:

* EXAMPLE TEN LIMITED is exempt from filing BO Info. Complete columns A, B, O to Q (Subsidiary)

ROMBO Data:

|  |  |  |
| --- | --- | --- |
| **Columns (Section)** | **SAMPLE BVI PARENT LIMITED** | **John Doe** |
| A (Row Reference) | - | - |
| B (BC Number) | Yes | Yes |
| C to N (Individual) | - | Yes |
| O to S (Legal Entity) | Yes | - |
| T to Y (Address) | Yes | Yes |
| Z to AF (Member) | Yes | Yes |
| AG to AK (Mortgage/Charge) | - | - |
| AL to AO (Nominee/Nominator) | - | - |
| AP to AQ (Joint Holding) | - | - |
| AR to BE (Ownership/Control) | - | - |
| BF to BP (Exempted Owner) | - | - |

**Example 11:** Exemption from Register of Members and Beneficial Ownership Information Filing – Listed Company

**Company:**

EXAMPLE ELEVEN LIMITED

Company No. 9000011

Single class of shares with one voting right each.

**Scenario:**

The shares of EXAMPLE ELEVEN LIMITED are listed in a recognized stock exchange

**Analysis:**

The company is exempted from the filing of Register of Members and Beneficial Ownership Information.

**Instructions (by written form):**

ROMBO Confirmation Form for EXAMPLE ELEVEN LIMITED:

* Tick C1 the entity is exempt from ROM and BO Info filing

ROMBO Data Form: Not required

**Instructions (by data file):**

ROMBO Exemption:

* EXAMPLE ELEVEN LIMITED is exempt from filing ROM and BO Info. Complete columns A, B, J to N (Listed Company)

ROMBO Data: Not required