

Ireland Update: New CRO Requirement to Provide Directors' PPSNs

Directors of Irish Companies will be required to provide their personal public service numbers ("PPSNs") when completing certain Companies Registration Office ("CRO") filings.

Background

The Companies (Corporate Enforcement Authority) Act 2021 (the "2021 Act") commenced in July 2022. Section 35 of the 2021 Act that outlines this new provision to provide directors' PPSNs is expected to be operational in the latter half of Q1 2023.

New Filing Requirement

The CRO will require a director's PPSN in order to:

- Incorporate a new company (Form A1);
- File an annual return (Form B1); and
- Notify a change of director (Form B10).

Directors' PPSNs will be required for validation purposes only and will not be publically available.

The provision of PPSNs will assist with identification of directors and the prevention of fraud and identity theft.

Non- Irish Resident Directors

In cases where a director does not hold a PPSN, the director will be required to apply for a "CRO filing number". The process for obtaining a CRO filing number has yet to be confirmed however it is likely to be a similar, but separate process to that involved in obtaining a Register of Beneficial Ownership ("RBO") Transaction Number.

Practical Guidance

Companies are advised to take action now and start collating details of their directors' PPSNs.

Companies should also review directors' details currently held by the CRO to identify any discrepancies between the information held on CRO records and the details under which the PPSN is registered and held by the Department of Employment Affairs and Social Protection ("DEASP").

Details provided on the CRO form must correspond with the details that are linked to the director's PPSN held by DEASP. The director's date of birth must be an exact match but minor name spelling variations will be accepted.

How the Maples Group Can Help

We will continue to monitor the practical effects of this new filing requirement. In the meantime, please do not hesitate to contact your usual Maples Group contact should you wish to discuss the implications of this development.

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