

TABLE OF CONTENTS

TABLE OF CONTENTS.....	4
GLOSSARY	7
INTRODUCTION.....	8
PURPOSE AND CONTENT	11
EXECUTIVE SUMMARY.....	12
TECHNICAL EVALUATION	17
PRINCIPLE 1: BENEFICIAL OWNERSHIP DEFINITION	18
PRINCIPLE 2: IDENTIFYING AND MITIGATING RISK.....	20
PRINCIPLE 3: ACQUIRING ACCURATE BENEFICIAL OWNERSHIP INFORMATION.....	21
PRINCIPLE 4: ACCESS TO BENEFICIAL OWNERSHIP INFORMATION	22
PRINCIPLE 5: TRUSTS	23
PRINCIPLE 6: COMPETENT AUTHORITIES' ACCESS TO TRUST INFORMATION	24
PRINCIPLE 7: DUTIES OF FINANCIAL INSTITUTIONS, OTHER BUSINESSES AND PROFESSIONS	25
PRINCIPLE 8: DOMESTIC AND INTERNATIONAL COOPERATION.....	26
PRINCIPLE 9: TAX AUTHORITIES	27
Access to information at national level	27
Access to information at international level	28
PRINCIPLE 10: BEARER SHARES AND NOMINEES	29
Bearer shares.....	29
Nominee shareholders and directors.....	29
EFFECTIVENESS EVALUATION.....	30
LEGISLATIVE PROCESS, DISCUSSIONS, DEBATES AS WELL AS POLITICAL DYNAMICS	30
Background on the legislative process.....	30
Comment – discussions, debates and political dynamics.....	33

UNDERSTANDING RISKS	34
Risk assessment will be executed on three levels...	34
National Risk Assessment.....	35
GUIDANCE AND TYPOLOGIES, THE NEW POLICY DEVELOPMENTS	36
FIU.....	36
Law enforcement authority - National Centre against Organized Crime (NCOC).....	37
ACCESS TO BENEFICIAL OWNERSHIP INFORMATION ON LEGAL PERSONS AND ARRANGEMENTS - COMMERCIAL REGISTER, REGISTER OF THE BENEFICIAL OWNERS.....	38
Commercial Register.....	38
Register of the beneficial owners	40
DO LEGAL PERSONS AND ARRANGEMENTS MAINTAIN ADEQUATE, ACCURATE AND UP-TO-DATE BENEFICIAL OWNERSHIP INFORMATION?...	44
ACCESS TO TRUSTS INFORMATION.....	45
TRUSTS AND AML ACT	48
FINANCIAL INSTITUTIONS AND DESIGNATED NON-FINANCIAL BUSINESSES AND PROFESSIONS TO IDENTIFY AND VERIFY BENEFICIAL OWNERSHIP OF THEIR CUSTOMERS.....	49
What about the obliged entities?	49
What does the FIU say about it?	50
INTERNATIONAL AND DOMESTIC COOPERATION..	51
a) Domestic cooperation	51
Criminal Procedure (Act).....	51
AML Act	52
Tax Procedure.....	52
b) International cooperation.....	53
FIU.....	53
Police of the Czech Republic	54
CASE STUDIES	56
THE PRINCIPLE OF A HYBRID.....	56
OWNERS UNKNOWN FOR A LONG TIME	59
THE NEST OF THE MINISTER OF FINANCE.....	63

BIBLIOGRAPHY	68
COOPERATING SUBJECTS AND INSTITUTIONS.....	69
METHODOLOGY - TECHNICAL EVALUATION	70
Current situation.....	70
Future plans	71
ANNEX.....	73
TECHNICAL QUESTIONNAIRE	73