



ACRA Central RORC: Keep the Two Registers in Step

Description

A change in a company's registrable controller can trigger a central RORC update well before the next annual compliance review. Unless exempt, an entity must maintain its private Register of Registrable Controllers and file the matching information with ACRA's Central RORC. ACRA says an update to the Central RORC is due within two business days after the private RORC is updated, with no extension available.

For a singapore company, foreign company or llp officer maintaining beneficial-ownership records, the immediate job is to keep the private RORC and ACRA Central RORC aligned within the statutory sequence.

Which compliance path applies?

New entity incorporated from 16 June 2025

Enter Central RORC information on the same day through registration.

A controller detail is confirmed as changed

Update private RORC, then Central RORC within two business days.

No controller can be identified after reasonable steps

Record the enquiries and apply ACRA's executive-control reporting rule.

The entity is exempt or status is uncertain

Document the legal basis before omitting the register or filing.

The central RORC filing is not a once-a-year administrative memory test. A company needs a trigger log that records when it obtained or should have obtained the information about a registrable controller. That date starts the practical response sequence and should be visible to the company secretary and responsible officers.

Keep the company's private register and the central filing aligned, but do not treat them as interchangeable copies. The internal record supports how the conclusion was reached; the central filing satisfies the statutory submission route. A dated reconciliation catches a change recorded in one place but missed in the other.

Separate discovery from filing

A cap-table change is a trigger to investigate, but confirmed controller particulars drive the register entry. The controlling details used here are on [ACRA Central RORC filing guide](#).

Open a case record with the event date, notice, response and confirmation date.

Update the private register first

ACRA's two-register system requires the entity record and the central filing to match.

Record the private entry timestamp before starting the Bizfile submission.

Count business days correctly

The deadline is two business days after the private update, not two days after a monthly compliance meeting.

Calculate the date immediately and assign a backup filer.

Trace control beyond direct shares

Registrable control can arise through ownership, voting or other rights.

Diagram each entity layer and save official extracts or constitutions used for the conclusion.

Use notices as evidence

ACRA's guidance encourages documented notices and replies when identifying controllers. The related condition is explained in [ACRA RORC guidance for companies](#).

Store delivery evidence, response, follow-up and the reason a person was included or excluded.

Protect restricted data

Central RORC details are not public, but they include sensitive identity and residential information.

Limit working files and never place full identifiers in ordinary email subject lines.

Reconcile acknowledgements

A successful central filing does not prove the private register is complete.

Compare names, dates, identification fields and cessation records after filing.

How the case works in practice

If a controller confirms a changed residential address on Tuesday and the company updates its private RORC that day, the company should calculate the next two business days from that private update. Waiting until the annual review would miss the sequence.

Two controls that make the filing reproducible

- a trigger-to-confirmation-to-filing timeline for each controller change
- a two-register reconciliation that compares every sensitive field without exposing it

Make the decision auditable

Build the trigger log from events the company can observe: a share transfer, new agreement, voting arrangement, appointment right, trust change or information received in response to a notice. The log should state why the event may change controller status and who is responsible for analysing it. A quarterly reminder is useful for discovery, but it does not replace action when the company already knows of a change.

For an individual controller, verify identifying particulars against an appropriate source and record the date of confirmation. For a legal entity, keep the registry extract and ownership path used. Limit access because the internal analysis can contain personal data and sensitive ownership information. The central submission should contain what the law requires, not the entire due-diligence file.

After filing, compare the Bizfile acknowledgement with the company's private register. Confirm name, identification or registration number, nature of control and effective dates. Record any rejected or pending transaction. A company that delegates filing to a corporate service provider still needs an officer who can see whether the instruction was complete and the filing actually became effective.

One more check before acting

The company's annual compliance calendar should include a periodic confirmation, but the questions must reach people who know about control arrangements, not only the filing team. Directors, shareholders and relevant legal or finance owners can be asked whether agreements, rights or

beneficial ownership changed. A nil response should be dated and attributable. When the analysis concludes that no new registrable controller exists, record why. That negative conclusion can be important later, especially where an event appeared relevant but did not cross the applicable test.

Controller analysis may require looking through ownership, voting, appointment and significant-influence facts. A shareholder percentage alone does not decide every case. Record the evidence considered, unresolved questions and notices sent so that the conclusion can be reviewed rather than asserted.

Where no extension is available for the stated update window, escalation must happen before the deadline expires. The useful escalation note names the missing information, who controls it, the last contact attempt and the officer who will decide the next compliant step.

What to have ready

- Identify the change trigger
- Send and retain the required notice
- Confirm the controller particulars
- Update the private RORC
- File Central RORC within two business days
- Save the Bizfile acknowledgement
- Reconcile both registers

The Companies Act, ACRA guidance and entity-specific exemptions control. Obtain professional advice for complex ownership chains.

Continue the task on LBRD

For an adjacent decision, [run the wider annual controller-identification check](#). You can also [compare the separate nominee-register deadline](#).

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Author

rachelng