Register of Registrable Controllers: An Annual Check

Description

Most companies, foreign companies and limited liability partnerships that are not exempt must maintain a private Register of Registrable Controllers and lodge controller information in ACRAâ??s central register. The annual review is an active identification exercise: send notices where required, resolve responses and update both records.

register of registrable controllers Singapore: the decision table

Situation	What to do
Ownership chain is simple	Still document the identification basis
Nominee or corporate shareholder appears	Trace control beyond the immediate name
Controller details change	Update private and central records promptly
No change is reported	Retain the annual notice and response evidence

Control is not only share percentage

Review voting rights, appointment rights and other actual influence using ACRAâ??s tests rather than relying on the cap table alone.

Trace corporate chains to natural persons

For each entity shareholder, document the chain, jurisdiction and evidence used until the registrable controller conclusion is supported.

Keep two records aligned

The private RORC and the information lodged with ACRA serve different access arrangements. A correction in one should trigger a check of the other.

Annual notices create evidence

Maintain the notice, delivery proof, response, follow-up and decision. â??No change knownâ?• is weaker than a completed review.

Treat uncertainty as a case to resolve

Set an owner and deadline for missing documents or disputed control. Do not leave a placeholder indefinitely.

Worked example

A company has one corporate shareholder. Its administrator draws the chain through two holding companies to the individuals with ultimate control, attaches official registry extracts and sends the annual notice. A later change in voting arrangements triggers an update even though the immediate shareholder name remains unchanged.

Turn the example into a decision record

The worked example is useful only if its inputs are replaced with the readerâ??s actual dates, amounts, documents or observations. For this taskâ??keep the private and central registers current and evidence the annual identification processâ??keep the decision and its supporting record on the same line. That exposes a missing input before the action becomes difficult to reverse.

Trigger or question	Current action	Evidence to retain
1. Ownership chain is simple	Still document the identification basis	Save the dated input, confirmation or advice that supports this choice.
2. Nominee or corporate shareholder appears	Trace control beyond the immediate name	Save the dated input, confirmation or advice that supports this choice.
3. Controller details change	Update private and central records promptly	Save the dated input, confirmation or advice that supports this choice.
4. No change is reported	Retain the annual notice and response evidence	Save the dated input, confirmation or advice that supports this choice.

Record where each answer came from and when it was checked. If a live service, signed document or professional opinion conflicts with a general webpage, preserve both and resolve the difference with the body responsible for the decision. Do not silently substitute a convenient number or date.

Action checklist

1. Confirm exemption status
2. Export the current RORC
3. Map ownership and control chains
4. Send annual notices
5. Resolve discrepancies
6. Update the private register
7. File central updates and retain receipts

Two practical tools to keep

A beneficial-control chain map. Put the controlling dates, amounts or observations in one place and attach the evidence beside each input. This makes the decision reproducible if a family member, colleague or adviser needs to check it later.

An annual notice and evidence register. Test the ordinary case and the failure case before money, a filing or a booking becomes irreversible. Mark calculations as calculations and leave uncertain fields unresolved until an authority or qualified professional confirms them.

What the primary sources establish

Primary source	Claim used here
ACRA RORC guidance	Who must maintain registers, central filing and annual notice process.
ACRA company information registers	Relationship with other statutory registers and update obligations.

The links sit beside the claims they support. Live services, formal notices and individual facts can change the outcome, so re-open the controlling page immediately before acting.

Continue with the next useful step

For the adjacent task, read the ACRA XBRL filing requirements. If the decision moves into a different stage, continue with how to run the two GST registration tests.

Errors that change the outcome

- Checking only direct shareholders
- Treating no response as no change
- Updating only one register
- Ignoring control rights outside shares
- Keeping no delivery evidence

Keep dated records, confirmations and advice used for the decision. This article explains public information for a general fact pattern; it does not determine an individual legal, tax, medical, investment, employment or contractual outcome.

A final challenge before acting

The intended reader is a company officer or corporate administrator maintaining controller records. Before closing the task, challenge the file against the common failure points below. A â??not applicableâ?• answer should still have a reason, especially where a deadline, eligibility rule, payment, booking or safety decision is involved.

- **Have you ruled this out?** Checking only direct shareholders. Write down the fact or document that answers it; an assumption is not a completed check.
- **Have you ruled this out?** Treating no response as no change. Write down the fact or document that answers it; an assumption is not a completed check.
- **Have you ruled this out?** Updating only one register. Write down the fact or document that answers it; an assumption is not a completed check.
- **Have you ruled this out?** Ignoring control rights outside shares. Write down the fact or document that answers it; an assumption is not a completed check.
- **Have you ruled this out?** Keeping no delivery evidence. Write down the fact or document that answers it; an assumption is not a completed check.

Escalate any unresolved consequential point to the named authority or an appropriately qualified professional. The aim is not to collect more material; it is to identify the one missing fact that could change the result.

Questions readers ask

Is every company required to maintain an RORC?

ACRA lists exemptions; confirm the entityâ??s status against the current rules.

Is the central register public?

Access is restricted under the statutory framework.

Does an annual review replace event-driven updates?

No. Changes should also be handled when they occur.

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