



**LIMITED LIABILITY PARTNERSHIPS ACT 2012: PRACTICE NOTE  
NO. 5/2025**

**LODGEMENT OF BENEFICIAL OWNERSHIP INFORMATION  
UNDER THE LIMITED LIABILITY PARTNERSHIPS ACT 2012  
THROUGH e-BOS LLP**

1. This Practice Note is issued pursuant to section 20C of the Companies Commission of Malaysia Act 2001 and subsection 20B(7) of the Limited Liability Partnerships Act 2012.

**OBJECTIVE**

2. The objective of this Practice Note is to provide the procedures for the lodgement of beneficial ownership information pursuant to subsection 20B(7) of the Limited Liability Partnerships Act 2012 and related matters.

**LODGEMENT OF BENEFICIAL OWNERSHIP INFORMATION  
PURSUANT TO SUBSECTION 20B(7) OF THE LIMITED  
LIABILITY PARTNERSHIPS ACT 2012**

3. Part IIIA of the Limited Liability Partnerships Act 2012, which has been enforced on 31 January 2025, provides a

comprehensive beneficial ownership reporting framework clarifying the requirement for limited liability partnerships (including foreign limited liability partnerships) to obtain, identify, verify, record and maintain the beneficial information in the register of beneficial owners kept by limited liability partnerships. Further, limited liability partnerships are also required to lodge such information with the Registrar within fourteen (14) days after the information was recorded in the register of beneficial owners.

4. With the coming into operation of Part IIIA, limited liability partnerships are given a three (3) months' *transitional* time frame starting from 1<sup>st</sup> February 2025 until 30<sup>th</sup> April 2025 where during this period, limited liability partnerships should do the exercise in determining the beneficial owner at the limited liability partnerships level and record it in the limited liability partnership's beneficial owner's Register kept at the registered office.

5. Once the transition period is over, limited liability partnerships has to lodge the beneficial ownerships information with SSM. Limited liability partnerships are given six (6) months period starting from 1<sup>st</sup> May 2025 until 31<sup>st</sup> October 2025 to update and lodge the beneficial ownership information with the Registrar. The Registrar may extend this period if he deems necessary to do so.

6. The six (6) months' time frame is necessary to allow all limited liability partnerships to fully comply with the requirements under subsection 20B(7). This time frame is also an opportunity given to limited liability partnerships which were previously exempted on the basis that they had similar reporting obligations with other regulators based on the respective written laws as provided under the previous "Guideline for the Reporting

Framework for Beneficial Ownership of Legal Persons” to lodge the beneficial ownership information with the Registrar. At the moment, the new beneficial ownership reporting framework introduced under the new Part IIIA provides no exemption to any class of limited liability partnerships.

7. Unless otherwise allowed by the Registrar, the lodgement of beneficial ownership information must be made through the Electronic Beneficial Ownership System (e-BOS LLP).

8. No fees will be imposed for the lodgement of beneficial ownership information including the updating of changes to any particulars of the beneficial ownership information during this period.

9. However, application for rectify any beneficial ownership information that was lodged with the Registrar will be treated pursuant to section 71 of the Limited Liability Partnerships Act 2012. Please refer to Practice Note No. 1/2019 (PN1/2019) issued on 27 December 2019 (link: [PN - Limited Liability Act 2012 PN No. 1-2019.pdf](#) ) for guidance.

10. Notwithstanding paragraphs 4, 5 and 8 above, the following shall apply during the six (6) months’ time frame:

- (a) Limited liability partnerships may lodge and update the beneficial ownership information with the Registrar anytime during the six (6) months’ period without the need to adhere to the fourteen (14) days lodgement period required under subsection 20B(4) of the Limited Liability Partnerships Act 2012.

- (b) Limited liability partnerships which have lodged the beneficial ownership information and have the need to rectify any particular of the beneficial ownership information previously lodged with the Registrar may do so through the e-BOS LLP without any rectification fee being imposed; and
- (c) No late lodgement will be imposed.

11. Limited liability partnerships must ensure accurate and up to date information is submitted to the Registrar. Taking cognizance of the new framework and the importance of accuracy of information, application to rectify the information must be made in the event there is a need certain or all to rectify any information that is incorrect or erroneous.

12. This Practice Note reiterates the importance of lodging beneficial ownership information in accordance with Part IIIA of the Limited liability Partnerships Act 2012 and the "Guideline for the Reporting Framework for Beneficial Ownership of Limited liability partnerships".

**REGISTRAR OF LIMITED LIABILITY PARTNERSHIPS**  
**COMPANIES COMMISSION OF MALAYSIA**  
**31 January 2025**