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Newsflash | Oktober 2024

## New requirement by the Luxembourg Trade and Companies Register: providing the Luxembourg National Identification Number (LNIN)

Starting November 12, 2024, companies and individuals registered with the Luxembourg Trade and Companies Register (RCS) must comply with a new requirement: providing the Luxembourg National Identification Number (LNIN) for all natural persons listed in their filings.



Below are the key details on how this change affects your filings and the steps you need to take to ensure compliance.

### 1. Who is impacted by this new requirement?

- All individuals registered with the Luxembourg Trade and Companies Register (“RCS”) must provide their Luxembourg national identification number (“LNIN”).

However (i) judicial agents appointed in a procedure registered with the RCS and (ii) legal representatives of a foreign company having opened a branch in the Grand Duchy of Luxembourg are exempt from providing their LNIN.

### 2. What if a natural person does not already have a LNIN?

- In case an individual does not have an LNIN, one will be created for them during the RCS registration process. This involves submitting specific personal data.

#### 2.1. What information must be provided during registration?

- Name, first names, date, place, and country of birth;
- Nationality;
- Gender (male, female, unknown); and
- Private domicile (number, street, postal code, locality, country).

## 2.2. What supporting documents are required?

- For identity:
  - A valid identity card or passport.
- For private address (if not indicated on the identity document):
  - A residence certificate from the municipality, or an utility bill (not older than 6 months), or another official document. A simple translation is required if the document is in a language other than English, French, or German.

## 2.3. How is the LNIN communicated?

- After the LNIN is created, it will be sent by mail to the individual's private domicile. Alternatively, the applicant may receive the LNIN if the person concerned has authorised this during the registration process by ticking the appropriate box on the application form.

## 3. When does this new requirement come into effect?

Starting November 12, 2024, all natural persons registered with the RCS must provide the LNIN during initial registrations, modifications, and updates.

If a modification filing does not directly involve a natural person (e.g., changing the company's registered address or capital structure), this filing can still proceed even if the LNIN for certain natural persons is missing. However, during this period, the applicant can voluntarily update missing LNIN information as part of the filing.

During a transitional period, persons already registered with the RCS may voluntarily submit the LNIN.

However, after this period, the submission of the LNIN will become mandatory, regardless of whether a filing involves a

natural person or not. If the LNIN is not provided at that time, it will not be possible to finalise the filing process.

To ensure a smooth transition and proper compliance with this new requirement, we encourage you to contact us for assistance.

Our team is available to help you prepare and update your filings, including the accurate provision of necessary information such as the LNIN, during the transitional period and beyond.

We are here to help and support you through this process. If you have any questions at all, please don't hesitate to reach out to us.

## Your contacts



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