

COMMENT LETTER

August 1, 2023

ICI Global Comment Letter to SEBI re FPI BO and SMO Requirements

The undersigned asset and fund management associations, on behalf of our respective members, would like to share with SEBI the issues and challenges that we have with SEBI's recent directions for Foreign Portfolio Investors ("FPIs") in relation to disclosures of the details of their beneficial owner(s) ("BO") and senior managing official(s) ("SMO").

These directions follow the issuance of the Prevention of Money Laundering (Maintenance of Records) Amendment Rules, 2023 ("PMLA Rules") on 7 March 2023, which, inter alia, lowered the threshold for identification of BO from 25% for company structures and 15% for trust structures to 10% for both companies and trusts, while retaining 15% for partnership firms and unincorporated associations or bodies of individuals.

Read more in the [comment letter](#).