



Account Officers

Guidance for Licence Applicants

April 2026

1. Overview

To ensure transparency and accountability, the Gambling Regulatory Authority of Ireland (GRAI) requires all licence applicants to identify specific individuals who own, manage, or control their operations. These individuals are considered **Account Officers**.

Under [Section 76 of the Act](#), individuals identified as Account Officers may be held personally liable if an offence is committed with their consent, connivance, or wilful neglect.

2. What are the types of Account Officers?

Account Officers are classified into two categories:

- A. Beneficial Owners
- B. Relevant Officers

For the purposes of a licence application, where an individual meets both definitions, they should be recorded as a Beneficial Owner.

For the avoidance of doubt, this is without prejudice to any obligations that apply to that individual as a Relevant Officer or a Beneficial Owner.

A. Beneficial Owners

In the case of corporate entities, beneficial owners are defined as:

The individual(s) who ultimately owns or controls a legal entity through direct or indirect ownership of a sufficient percentage of the:

1. Shares or,
2. Voting rights or,
3. Ownership interest in that entity (including through bearer shareholdings) or,
4. Through control via other means:
 - i.* A shareholding of more than 25% (25% plus one share) in the licensee held by an individual shall be an indication of beneficial ownership.
 - ii.* A shareholding of more than 25% (25% plus one share) in the licensee held by a corporate entity, which is under the control/ownership of an individual(s), or by multiple corporate entities, which are under the control/ownership of the same individual(s), shall be an indication of beneficial ownership.
 - iii.* Control by other means is where an individual, who does not hold more than 25% or more of the shares or voting rights or ownership interest of the licensee but still exercises significant control or influence over the licensee.

Examples of "control by other means" include, but are not limited to:

- **Board Control:** The power to appoint or remove a majority of the board of directors.
- **Veto Rights:** Possession of veto powers over strategic decisions or constitutional changes.
- **Shareholder Agreements:** Dominant influence exerted through legal agreements or personal/family connections.
- **Financial Control:** Providing primary financing that grants significant influence over operations.

If no such individual is identified, the individual(s) who holds the position of senior managing official(s) must be recorded as the beneficial owner(s).

B. Relevant Officers

In the case of corporate entities, the following non-exhaustive categories describe individuals who may be considered Relevant Officers:

- **Statutory Control:** Anyone who exercises control over the body corporate, as defined under [Section 11](#) or [432](#) of the Taxes Consolidation Act 1997.
- **Corporate Officers:** This includes any Director or Company Secretary or other officer of the entity.
- **Board Leadership:** All members of the Board of Directors, including the Chairperson.
- **Executive Leadership:** High-level executives such as the Chief Executive Officer (CEO), Managing Director, Money Laundering Reporting Officer, or any individual performing these duties, regardless of their formal title.
- **Acting Personnel:** Any person who purports to act in any of the above capacities (e.g., an interim CEO or shadow director).

Identifying Account Officers in other business structures

If the applicant is not a corporate entity, the following table provides an indicative guide in respect of a non-exhaustive list of organisational structures for identifying Beneficial Owners and Relevant Officers.

Organisational Structure	Beneficial Owner(s)	Relevant Officer(s)
Partnerships	<ul style="list-style-type: none"> Individual Partner(s) with direct or indirect control/ownership of more than 25% of the partnership. 	<ul style="list-style-type: none"> Managing partners or individuals exercising control.
Limited Partnerships	<ul style="list-style-type: none"> Individual(s) with direct or indirect control/ownership of more than 25% of the General Partner and/or the Limited Partner of the Limited Partnership. 	<ul style="list-style-type: none"> Individual(s) Managing Partners or individual(s) exercising control.
Sole Trader	<ul style="list-style-type: none"> The sole trader 	<ul style="list-style-type: none"> The sole trader
Trusts	<ul style="list-style-type: none"> Individual who serves as a Settlor, Trustee, Protector, Appointor, Beneficiary(es) as well as any other individual exercising ultimate effective control over the trust. 	<ul style="list-style-type: none"> Individual(s) exercising control (although it is not necessary to record them separately in the application if they are already captured as Beneficial Owners)
Unincorporated Associations or Clubs	<ul style="list-style-type: none"> Individuals who ultimately control the organisation or its activities. 	<ul style="list-style-type: none"> Committee members, chairperson, secretary, treasurer, or equivalent officers.

Personal Identification Requirements

Once identified as a Relevant Officer /Beneficial Owner, we will need you to provide acceptable proof of identity and proof of address documents.

Please ensure your proof of address document shows your name as it appears on your ID. Your proof of address documents must be addressed to the residential address provided in your application and have been issued within the past 6 months.

1. Identification

To verify your identity, please upload a copy of **one** of the following **photo ID** documents:

- Current Valid Passport
- Current Valid Passport Card
- Current Valid EU/European Economic Area (EEA) Driving Licence – must contain photograph
- Current EU National Identity Card

Please note the ID must be in date and photo and expiry date must be clearly visible.

2. Suitable Proof of Address:

To verify your address, please upload a copy of **one** of the following **address** documents:

- Fixed utility bill e.g. telephone, gas, electricity (mobile phone and waste utility bills not acceptable).
- Correspondence from a regulated financial institution (Bank Statement, Insurance / Assurance Co., Building Society, Credit Union, Credit Card Company).
- Correspondence from a solicitor confirming your residential address.
- Correspondence from a Government Department / body. Correspondence issued by a Government Department must show evidence of an existing relationship between the customer and the relevant Government Department.

Summary of key points for applicants

- Accurate identification of Account Officers is mandatory.
- Personal liability may arise under the Gambling Regulation Act 2024.
- Where a person is both a Beneficial Owner and Relevant Officer, record them as a Beneficial Owner.

NOTE: This information is provided for guidance only; applicants should seek independent legal advice where uncertainty exists