

## Instructions on reporting information on contractors and subcontractors, beneficial owners and beneficiaries

In accordance with the [stipulation of the State Treasury](#) and the [RRF Regulation](#) and for the purpose of audit and control and to provide comparable information on the use of funds, the Academy of Finland must collect and store information on RRF-funded projects and beneficiaries into an RRP information system ([act on the administration, supervision and inspection of the EU Recovery and Resilience Facility \(537/2022\), section 12, in Finnish](#)). If the beneficiary is a contracting entity within the meaning of section 5 of the Finnish Act on Public Procurement and Concession Contracts (1397/2016) that purchases goods or services for its project, the Academy of Finland must, in accordance with the EU RRF Regulation (Regulation (EU) 2021/241 of the European Parliament and of the Council establishing the Recovery and Resilience Facility), collect certain information on the supplier of the services or goods (contractor) related to the project of the contracting entity and its possible subcontractors.

Information on contractors and subcontractors is collected from suppliers of services and goods directly related to the project (material and equipment costs, equipment purchases, purchased services and other costs), excluding suppliers of ancillary services relating to indirect personnel and overhead costs (e.g., administrative services) and travel-related services. If procurements can be considered the measure's core activities, the information on contractors and subcontractors must also be collected for small procurements, i.e., also for procurements that do not exceed the national or EU thresholds defined in the Procurement Act.

In accordance with the RRF Regulation, the Academy of Finland must collect and store the first names and surnames and dates of birth of the beneficial owners of the contractors as well as the subcontractor's company name and tax identification number. Beneficiary information of Finnish entities has been collected in the Trade Register maintained by the Finnish Patent and Registration Office (PRH), and the Academy of Finland may, with the permission of PRH, use its information on beneficial owners for the monitoring and reporting purposes of RRF funding. Beneficial owners are defined in the EU's Anti-Money Laundering Directive and the Finnish Act on Preventing Money Laundering ([Finnish Patent and Registration Office's instructions on Obligations under the Act on Preventing Money Laundering](#)).

With the [Toimeksisaaja- ja alihankkijatietojen ilmoitus \(FI\)/Notification of a Finnish contractor and subcontractor \(EN\)](#) form, you can provide information on the Finnish organisation supplying the goods or services (i.e., the contractor) and the contractor's subcontractors. The Academy of Finland will acquire the information on beneficial owners from the register maintained by PRH.

The PRH register does not contain all beneficiary information, which means that the Academy of Finland may need to request additional information from the beneficiaries. The information on



the beneficial owners of the Finnish organisations are reported with the [Edunsaajatietojen ilmoitus \(FI\)/Notification of a beneficiary \(EN\)](#) form.

With the [Notification of a foreign contractor \(EN\)](#) form, you can provide information on the non-Finnish organisation supplying the goods or services (i.e., the contractor) and the contractor's subcontractors. The information on the beneficial owners of the non-Finnish organisations is reported with the same form.

**The Academy of Finland instructs RRF-funded projects to inform the contractors about the information collection already during the procurement process.** To learn more about how the collected data will be protected and processed, please see the [Privacy Statement for Academy of Finland's RRF research funding](#). The links to the forms can also be sent to the contractor to fill in. Questions related to the information collection can be sent by email to [rrf@aka.fi](mailto:rrf@aka.fi).

With these forms, you can provide information related to purchases that have been made as of 1 January 2023, either when the purchase has been confirmed or when submitting the payment request. The Academy of Finland will check the information three times a year concurrently with the payment requests. You can also report complementary information on purchases that have been made before 1 January 2023 and included in previous payment requests. Failure to report may lead to the recovery of funding (RRF funding conditions, section 4).

The guidelines and forms are available on the Academy of Finland [RRF website](#).