

**Private and Confidential**

Ms. Maureen O’Sullivan  
Registrar of Companies  
Companies Registration Office  
Bloom House  
Gloucester Place Lower  
Dublin 1

18 March 2020

Dear Ms. O’Sullivan

**The Chartered Governance Institute**

The Chartered Governance Institute is the qualifying and membership body for company secretaries and governance practitioners, in all sizes of organisations across private, public and charity sectors. Established in 1891 we have over 13,000 members and students worldwide including 800 in the Republic of Ireland.

We represent our members’ interests by working with government and regulators to bring a practitioner perspective and to influence change. We develop our members with a wide range of qualifications, training and events to ensure that they have the best preparation for their work and career progression.

**Filing of documentation to the Companies Registration Office**

We are writing to you in relation to the unprecedented situation triggered by the Coronavirus Pandemic. As you are aware many businesses have closed their offices and instructed their staff to remote work. Company Secretaries and other professionals who are responsible for the filing of documentation at the Companies Registration Office (CRO) are struggling to have statutory documentation signed and returned to them. Failure to deliver originally signed documentation to the CRO on time will result in late penalties or the rejection of the documentation delivered.

We are proposing that for the duration of the office closures / remote working required by the Coronavirus outbreak, that the CRO accept electronic copies of signed documentation. As you are aware, some filings are more urgent and time sensitive than others and we are proposing that the following are accepted in soft copy:

- Annual Return certification pages;
- Summary Approval Procedure documentation
- Voluntary Strike Off documentation
- New incorporation documentation

The Coronavirus Pandemic has already had an incredibly damaging impact on Irish business. By allowing the above documentation to be filed in soft copy, Irish companies will have a better chance of:

- avoiding late filing penalties
- losing audit exemptions
- avoid having to prepare additional sets of financial statements

On behalf of our members, we would urge you to temporarily agree to accept soft copies of the documentation listed above under these exceptional circumstances.





The Chartered  
**Governance**  
Institute

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If you have any queries in connection with the foregoing, please do not hesitate to contact the undersigned. I might suggest that email is the best way to get me (jburns@icsa.org.uk).

Yours sincerely,

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John Burns  
**Business Development Manager**  
**The Chartered Governance Institute, Irish Region**

