



June 08, 2020.

Notice of Update of Partners or Shareholders

Dear Clients and Friends:

Article 27 of the Federal Fiscal Code ("CFF"), in its section B, subsection VI, establishes those obligations that taxpayers must comply with with respect to the Federal Taxpayers Registry ("RFC"), among which one stands out in particular, consisting of the obligation that legal entities have to file a notice in the RFC, through which they inform the name and code in the RFC of the partners or shareholders, each time any modification or incorporation is made with respect to these (the "Notice").

The Notice in question must be filed in accordance with processing form 295/CFF "Notice of update of partners or shareholders", contained in Annex 1-A, of the Miscellaneous Tax Resolution for 2020 ("RMF"), within thirty business days following the one in which the modification or incorporation is made, as the case may be.

For its part, the forty-sixth transitory article of the RMF establishes that legal entities that do not have updated information of their partners or shareholders before the RFC, must file the Notice no later than June 30, 2020.

The main purpose of this obligation is that the Tax Administration Service ("SAT") may have full knowledge of the "current" partners or shareholders of a legal entity and, if applicable, establish a joint and several liability of the partners or shareholders of a legal entity, with respect to the taxes that may have been caused in connection with the activities carried out by the company when they had such status, in the terms established in article 26, section X, of the CFF.

It is important to point out that legal entities that fail to comply with the obligation to file the Notice under study on time will be deemed to have committed the infringing conduct set forth in Article 79, Section III, of the CFF, and as a precautionary measure, the SAT may temporarily restrict the use of digital seal certificates for the issuance of digital tax receipts through the Internet, pursuant to the provisions of Article 17-H Bis, Section IX, of the CFF.

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Therefore, we recommend that all legal entities keep an efficient control of the modifications or incorporations of their partners or shareholders. Likewise, in order to avoid the imposition of penalties by the SAT, we suggest to those legal entities that do not have updated the information of their partners or shareholders before the RFC, to file the Notice in question, with the information corresponding to the structure with which they are at the moment, no later than June 30, 2020.

For further information, please contact:

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