

**Note Verbale No: 135/2023/PRUN-GVA**

The Permanent Mission of the Republic of Malta to the United Nations Office and Other International Organizations in Geneva presents its compliments to the United Nations Office of the High Commissioner for Human Rights – Special Procedures Branch and has the honour to refer to the Joint Communication from Special Procedures dated 6<sup>th</sup> November 2023 with reference AL MLT 1/2023.

In this connection, the Permanent Mission has the honour to enclose herewith the official reply of the Government of the Republic of Malta to Joint Communication AL MLT 1/2023, within the set time limit of 60 days since receipt of the notification.

The Permanent Mission of the Republic of Malta to the United Nations Office and Other International Organizations in Geneva avails itself of this opportunity to renew to the United Nations Office of the High Commissioner for Human Rights – Special Procedures Branch the assurance of its highest consideration.

14<sup>th</sup> December 2023



**UN OFFICE OF THE HIGH COMMISSIONER FOR HUMAN RIGHTS  
SPECIAL PROCEDURES BRANCH  
GENEVA**



## Joint Communication from Special Procedures

### Ref: AL MLT 1/2023

Date: 12 December 2023

---

Special Procedures Branch  
OHCHR  
Geneva, Switzerland

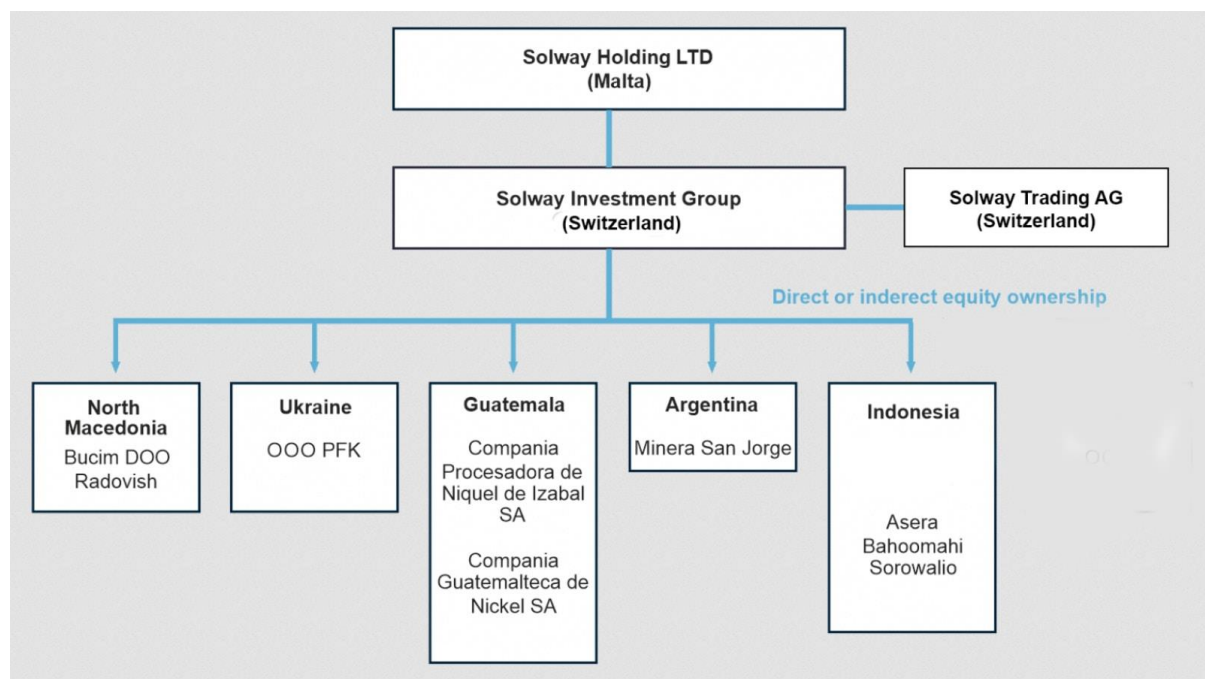
Please find, as requested, a reply to your communication dated 6 November 2023.

From an overview of the names of entities indicated in your letter with reference quoted above, the following transpires:

- i. An entity with the name *Solway Holding Ltd.* (the Company) is registered in Malta with company registration number C 70817 bearing a registered office address of Level 1, Tagliaferro Business Centre, Gaiety Lane c/w High Street, Sliema SLM 1551
- ii. The Company has been so registered since 28 May 2015
- iii. The share capital of the company is composed of 610,338,920 authorised shares, which equates to the amount of issued shares, having a value of USD1.0896 per share
- iv. The issued share capital is subscribed by four (4) shareholders, all of which are corporate entities, namely:
  - a. Calistara Corporation Limited
  - b. Runestone Management S.A.
  - c. Sarabo S.A.
  - d. Francis Data Ltd.all registered in Saint Vincent and the Grenadines
- v. The secretary of the Company has informed the Registrar and filed ultimate beneficial owner forms (UBO Forms) which indicate two (2) German individuals as the beneficial owners of the Company, namely:
  - a. Christian Bronstein, resident in Great Britain, month and year of birth being June 1991, with an extent of beneficial ownership of 60%, being indirect via certain shareholder/s of Solway Holding Ltd.
  - b. Dan Bronstein, resident in Switzerland, month and year of birth being January 1977, with an extent of beneficial ownership of 40%, being indirect via certain shareholder/s of Solway holding Ltd.
- vi. The foregoing information was filed in January 2021 and confirmed every year since
- vii. Therefore, it transpires that from the information received and recorded by the Registrar, there is no definite link or data connecting the Company with Solway Investment Group



- viii. Upon an online search related to Solway Investment Group<sup>1</sup> the following corporate structure chart can be found, with no other links or information to explain such chart:



- ix. From the foregoing graphic it may be observed that the shareholders of the Company do not correspond with those shown in this corporate structure chart.

The Government of Malta remains at your disposal for any further exchanges which you may require on the subject.

<sup>1</sup> <https://solwaygroup.com/corporate-structure/> accessed on 21 November 2023