

The transparency register

*Dr Alexander Ressos, TEP
Attorney-at-Law (Switzerland), Solicitor (Hong Kong),
Solicitor (England & Wales)*

The Federal Act on the Transparency of Legal Entities and the Identification of Beneficial Owners introduces new obligations for legal entities and creates a central federal register of beneficial owners. This register, kept by the Federal Department of Justice and Police, will give the competent authorities rapid access to reliable information, while a control authority attached to the Federal Department of Finance will verify its accuracy, completeness and currency, with access reserved to the authorities concerned and to persons subject to the Anti-Money Laundering Act.¹

The register will not be public.² Foundations and associations were exempted from the registration obligation in the final vote of 26 September 2025.³ The Act covers legal entities under Swiss private law, certain legal entities under foreign law active in Switzerland, and trusts; controlling shareholders and members must notify the company of the information enabling the beneficial owner to be identified, within one month of acquiring control.⁴ If the beneficial owner cannot be established, the most senior member of the management body is deemed to be the beneficial owner (Art. 4 para. 2 LTPM).⁵

The Federal Council published the implementing ordinance on 12 June 2026, and the date of entry into force of the regime was set at 1 October 2026.⁶ Existing companies should benefit from a transitional period to bring themselves into compliance.⁷ For Geneva practitioners, the entry into force of this regime, a few days after the date at which this book is closed, calls for immediate work of identification, documentation and notification for the companies they administer or advise.

Element of the transparency register	Content
Adoption of the Act	26 September 2025

The transparency register

Element of the transparency register	Content
Entry into force of the regime	1 October 2026
Keeping of the register	Federal Department of Justice and Police
Control	authority attached to the Federal Department of Finance
Access	competent authorities and persons subject to the Anti-Money Laundering Act
Exempted entities	foundations and associations
Fallback rule	the most senior member of management is deemed to be the beneficial owner

Caution. The transparency register enters into force on 1 October 2026. Companies, the trusts concerned and their advisers must check without delay their identification and notification obligations, as well as the applicable transitional periods, which must be verified in the implementing ordinance.

1 Notes

1. Federal Council, press release of 15 October 2025, cited above. ↩
2. JuriUp, 17 June 2026, cited above. ↩
3. “Les fondations et associations suisses sont définitivement dispensées de s’inscrire dans un registre de transparence” (Swiss foundations and associations definitively exempted from registration in a transparency register), SwissFoundations, 2 October 2025. ↩
4. “Newsletter juin 2026 – Transparence des personnes morales : rappel et tour d’horizon” (June 2026 newsletter – Transparency of legal entities: reminder and overview), Bonnard Lawson, 26 June 2026. ↩
5. “Le registre suisse de transparence et ses conséquences pour les sociétés et leurs actionnaires” (The Swiss transparency register and its consequences for companies and their shareholders), Centre Patronal and RSM, May 2026. ↩
6. Bonnard Lawson, June 2026, cited above. ↩

7. Centre Patronal and RSM, cited above. ↩

For general information only. This article does not constitute legal or tax advice, does not replace advice on an individual case and creates no lawyer-client relationship. It reflects the legal position as of September 2026.

Online version: helveticaregister.com/geneva-the-transparency-register