

From 1 October 2026: the transparency register and the revised Anti-Money Laundering Act

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On 1 October 2026 the Federal Act on the Transparency of Legal Entities and the revision of the Anti-Money Laundering Act enter into force. Swiss companies must register their beneficial owners in a new federal register, and advisers who form or administer companies are brought within the scope of the anti-money laundering rules. Foreign groups with Swiss subsidiaries are affected by both.

1 The federal register of beneficial owners

The new federal register of beneficial owners is not public. It is accessible to the authorities and, within limits, to financial intermediaries and other obliged persons for their due diligence.

The following must register:

- companies limited by shares (AG);
- limited liability companies (GmbH);
- cooperatives;
- foreign legal entities with a registered branch, their effective administration or real estate in Switzerland.

2 Who is a beneficial owner

A beneficial owner is a natural person who holds, directly or indirectly, at least 25 per cent of the capital or voting rights, or who controls the company in another way. In a Chinese or other foreign group, the ownership chain must be traced through every holding level to the natural persons at the top.

3 Deadlines and fines

New entries and changes must be reported within one month. Violations are punishable by a fine of up to CHF 500,000.

4 The revised Anti-Money Laundering Act

The revision extends the Act to certain advisory activities. It covers the formation and structuring of companies abroad, the administration of non-operating entities, capital contributions and distributions in such structures, and domiciliary services lasting six months or more.

An adviser acts on a professional basis once he exceeds one of the thresholds: annual turnover of CHF 50,000 from such activities, twenty clients a year, or a transaction volume of CHF 2 million. Advisers who are covered must join a self-regulatory organisation and carry out the due diligence prescribed by the Act, in particular identifying the client and the beneficial owner and clarifying the source of funds.

5 What foreign groups should do now

- Establish the beneficial owners of each Swiss company up to the natural persons and prepare the documents that prove the ownership chain.
- Make the first registration within the deadline and put in place a routine for reporting changes within one month.
- Expect more detailed questions from Swiss advisers, directors and fiduciaries about ownership and the source of funds, and prepare the answers once for all of them.
- Review token payments and other unusual payment flows, which require a documented review of the source of funds, as explained in the article on [stablecoins in the trade between Africa and China](#).

Swiss banks already apply these standards when opening accounts, as described in the article on [bankability](#). A resident director who is personally responsible for the registration will ask for the same information; the article on [professional directorships](#) explains the role.

6 How Ressos Legal helps

I help foreign groups establish and document the beneficial ownership of their Swiss companies, make the registrations and adapt their structures and payment flows to the revised anti-money laundering rules. [Contact me](#) for a first conversation.

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.

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