New Transparency Register

Who Needs to Take Action and By When?

WHAT IS IT ABOUT?

With the new Federal Act on the Transparency of Legal Entities (TJPG), which enters into force on **1 October 2026**, Switzerland is introducing a register of beneficial owners. Contrary to common concerns, this register will not be publicly accessible. The reporting obligation will apply to a large proportion of companies registered in Switzerland.

WHO IS AFFECTED?

Switzerland is introducing a central register containing information on the beneficial owners of legal entities. The new rules apply to public limited companies (AG), limited liability companies (GmbH), partnerships limited by shares, cooperatives and collective investment schemes under the Collective Investment Schemes Act (CISA), as well as certain foreign entities with a connection to Switzerland. Listed companies and their subsidiaries that are more than 75% directly or indirectly owned by one or more listed companies are generally exempt from the scope of the new legislation.

WHO CAN ACCESS THE INFORMATION?

Importantly, the Transparency Register is **not publicly accessible**. Access is limited to, among others, criminal prosecution and tax authorities, anti-money laundering supervisory authorities, and financial intermediaries, to the extent required for the performance of their statutory duties (Art. 25-29 TJPG). Furthermore, Art. 46 para. 4 TJPG explicitly states that the Federal Act on Freedom of Information does not apply to the data held in the register.

WHAT MUST BE REPORTED AND HOW?

Companies must report the natural persons who ultimately control them. A beneficial owner is generally any individual who directly or indirectly holds at least 25% of the share capital or voting rights, or who otherwise exercises control over the company.
If no individual meets these criteria, for example, in the case of a widely dispersed shareholder structure, the most senior member of the governing body (in the case of a Swiss corporation, typically the chairperson of the board of directors) is deemed to be the beneficial owner.

The reporting must be submitted electronically via **EasyGov**, an online portal of the Swiss government, to the Transparency Register. The following information must be reported for each beneficial owner: First name and surname, date of birth, nationality, place and country of residence and information on the nature and extent of the control exercised (e.g. shareholding or voting interest)

BY WHEN MUST THE INFORMATION BE REPORTED?

The following transitional deadlines apply to existing entities:

- **30 September 2028:** Legal entities where **all beneficial owners are already registered in the Commercial Register** as shareholders, quotaholders or corporate officers
- **31 December 2026:** Public limited companies (AG) subject to an ordinary Audit
- **31 January 2027:** Other entities subject to an ordinary Audit
- **28 February 2027:** Public limited companies (AG) not subject to an ordinary Audit
- **31 March 2027:** Other entities and legal persons

PROVIDA

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For **newly incorporated entities**, as well as for companies that register a **change in the Commercial Register after 1 October 2026**, the beneficial ownership information must be reported **within one month**. The same deadline applies to any subsequent changes to information recorded in the Transparency Register.

WOULD YOU LIKE ASSISTANCE WITH YOUR TRANSPARENCY REGISTER DECLARATION?

We would be pleased to assist you in identifying the beneficial owners of your company and can submit the electronic filing to the Transparency Register via EasyGov on your behalf.

YOUR PROVIDA CONTACTS

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https://www.fedlex.admin.ch/eli/fga/2025/2900/de Art. 4, 9, 25-29, 46 Abs. 4 sowie Art. 51 TJPG.