Swiss Transparency Register – New reporting obligations for legal entities as of 1 October 2026

What is it about?

With the **Transparency Register**, Switzerland is introducing a central register of the **beneficial owners** of legal entities. The register is **not publicly** accessible; access is reserved for the audit unit, certain authorities and financial intermediaries – for the performance of the tasks assigned to them by law.

The **Federal Act on the Transparency of Legal Entities and the Identification of Beneficial Owners** (TJPG) underlying the Transparency Register enters into force on 1 October 2026.

Does the reporting obligation apply to you?

The reporting obligation applies in particular to:

- public limited companies (AG), limited liability companies (GmbH), partnerships limited by shares, cooperatives, investment companies with variable capital (SICAV), investment companies with fixed capital (SICAF), limited partnerships for collective investment; and
- legal entities that have a branch registered in the Commercial Register in Switzerland, whose effective place of management is in Switzerland, or that own real estate in Switzerland.

Who qualifies as a "beneficial owner"?

A "beneficial owner" within the meaning of the TJPG is any natural person who ultimately controls a company by holding, **directly or indirectly**, alone or in concert with third parties, at least **25% of the capital or the voting rights** in that company, or who controls it by other means.

→ If no person meets these criteria, the most senior member of the managing body is deemed, on a subsidiary basis, to be the beneficial owner.

What information is required for the report?

The following details must be reported for each beneficial owner:

- Name
- Date of birth
- Nationality
- Address and country of residence
- Nature and extent of control.

Where and how is the report submitted?

The Transparency Register is maintained electronically by the Federal Office of Justice (www.transpareg.admin.ch). Registration is generally carried out via **EasyGov**, an online platform of the Confederation for businesses, using a personal **AGOV login**, Switzerland's official government login service. It is advisable to set up the relevant accounts in good time.

Who is responsible for the report?

Responsibility for the reports lies with the most senior member of the managing body. Delegation within the company or to third parties is permitted but does not release them from responsibility for proper reporting.

Which deadlines apply?

For **existing companies**, the following staggered transitional deadlines generally apply for submitting the report:

Deadline	Who / What
3 months (1 January 2027)	Public limited companies subject to an ordinary audit
4 months (1 February 2027)	Other companies subject to an ordinary audit
5 months (1 March 2027)	Public limited companies not subject to an ordinary audit
6 months (1 April 2027)	Other companies and foreign legal entities

If, before these deadlines expire, a **change to the Commercial Register entry** is made, the entry must already be submitted within **one month** of that change. After the transitional phase, the company must submit reports within **one month** of each change (or new incorporation).

What sanctions apply?

Intentional breaches of the reporting or disclosure obligations are punishable by fines of up to CHF 500,000.

How can Grant Thornton support you?

- Assessment of the reporting obligation and the applicable deadline
- Identification of your beneficial owners
- Initial registration and reporting in the Transparency Register on your behalf
- Ongoing updates: reporting of changes

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