

Swiss Transparency Register (TJPG): operational impacts and practical challenges

> Which foreign legal entities must provide information to the Swiss transparency register?

> Chains of ownership: when should they be documented in the register, and how?

> Investigating discrepancies: objectives, methods, examples

Olivier Maes,
Executive Director,
GRC, Head Regulatory Compliance
and Financial Crime,
Forvis Mazars, Switzerland and
Liechtenstein

Dr. Vera Naegeli,
LL.M. (Harvard), Partner,
Bär & Karrer Ltd., Zurich

Andrea Desiree Steffen,
Senior Manager, Financial Services,
PWC Zurich

David Nikita Drakopoulos,
Senior Associate, Compliance and
Regulation,
PWC Zurich

Thomas Hulmann,
Partner, Stv. Leiter Regulatory &
Compliance, MLaw / Rechtsanwalt,
Grant Thornton Advisory AG, Zurich

8.40 The TJPG in banks: practical issues, governance and operational impacts

- Adaptation of the internal control framework: governance, internal procedures, roles and responsibilities;
- Identification of clients and entities subject to the TJPG : scope of application and impact on the client base;
- Verification of register information: organization of the initial check and periodic monitoring of data;
- Managing discrepancies: contacting clients and the duty to report;
- Integration into KYC and AML processes: required documentation, traceability of controls and best practices.

Olivier Maes

FOREIGN LEGAL ENTITIES / SWISS NEXUS

9.30 Which foreign legal entities must provide information to the Swiss transparency register?

- **Scope of application:** Overview of the foreign legal entities covered by the Swiss transparency register under the Federal Act on the Transparency of Legal Entities and the Identification of Beneficial Owners (TJPG),
i) branches registered in the commercial register,
ii) place of effective management in Switzerland,
iii) real estate in Switzerland.
- **Swiss nexus:** Key connecting factors that may trigger reporting obligations for foreign legal entities, including the concept of effective management in Switzerland and the additional duties in art. 18 TJPG.
- **Exemptions and limitations:** Relevant exemptions, exceptions and thresholds, and their practical implications for foreign corporate groups.
- **Practical implications:** Key compliance considerations, including registration deadlines, ongoing update obligations and potential consequences of non-compliance.

Dr. Vera Naegeli

10.20 Coffee break

CONTROL CHAINS

10.40 Which UBOs and which entities in the control chain must be included in the register?

- Obligation to identify and report the beneficial owners of the corporate settlor, corporate protector, corporate trustee and corporate beneficiary; difference from the CDB
- Reporting obligation even for non-clients: practical examples
- Control by other means (COM) – When an ADE of this kind is identified in the register, should one verify only that person, or carry out a comprehensive, wide-ranging search for other persons holding COM?

- Chains of ownership: when should they be documented in the register, and how?

- Special cases – A legal entity owned by both exempt and non-exempt legal entities – A legal entity with shareholders acting in a fiduciary capacity – Can a legal entity be treated differently depending on whether or not it carries out commercial activities? – The implications of a shareholders' agreement

Andrea Desiree Steffen and David Nikita Drakopoulos

DISCREPANCIES AND ANNOTATIONS

11.30 Reporting discrepancies: challenges, practical insights from observed practice

- Before reporting a discrepancy, the client must be contacted and given a reasonable period to resolve it, in particular by notifying the register of the correction: therefore, can or should one refrain from reporting a discrepancy if the client provides a convincing explanation?
- Investigating discrepancies: objectives, methods, examples
- Scope of the duty to report discrepancies: should discrepancies concerning an entity that is not a client but appears in the chain of control between our client and the UBO at the top be reported?
- What about discrepancies between the Swiss register and another register relating to the same entity; should these be reported to the Swiss registry authorities?
- What is the scope of the financial intermediary's duty of care in identifying discrepancies: must they only take into account information of which they are aware, or is there also a duty to investigate and verify?

Thomas Hulmann

12.00 Should notes made by the authority on the basis of reports be processed and followed up, and if so, how?

- Should the reason for the note and the points raised in it be clarified?
- Is it prudent to contact the client, given that since the annotation was made, they may have clarified their situation with the registry authority?
- If the analysis of the annotation concludes that there is either disagreement or agreement with the doubt expressed in the annotation, should this be communicated to the authority?
- When should annotations be investigated: at the time of onboarding? During a periodic review? When checking for discrepancies?
- Can the registry annotation be taken into account in the client's risk scoring?

Thomas Hulmann

12.30 End of the seminar

Swiss Transparency Register (TJPG)

PRACTICAL INFORMATION

Venue

Zurich Sheraton Hotel
Pfingstweidstrasse 100, Zurich

Visio conference on Zoom

The Zoom link and the documentation will be sent to the participants on 17 November in the afternoon. Academy & Finance provides technical assistance during the conference.

How to register

by phone: +41 (0) 22 849 01 11
by e-mail: info@academyfinance.ch
by post: Academy & Finance SA
3 rue Neuve-du-Molard, CH-1204 Geneva
www.academyfinance.ch

Fees

620 CHF (+ VAT 8.1%)
Additional registrations from the same company: - 50%

Registration and payment

Payment is made by bank transfer or by credit card. Credit card payments will be debited immediately upon receipt of card details. In any case, we will send you an invoice by email.

Substitution & cancellation policy

Substitutions from the same company are accepted at any time. Cancellation requests must be received in writing, by fax or by post up to the following dates end of business:

- 11 November refund of 90%
- after 11 November no refund will be made for cancellation.

REGISTRATION FORM

I register for the seminar "Swiss Transparency Register (TJPG)" in Zurich on 18 November 2026.

☐ I will attend in the conference room

☐ I will attend online on Zoom

FIRST PARTICIPANT

Full name.....

Position.....

E-mail.....

SECOND PARTICIPANT (-50%)

Full name.....

Position.....

E-mail.....

Company.....

Address.....

Postcode..... City.....

Tel Mobile.....

Person to which the invoice must be sent for payment:

Name..... Email.....

Bank transfer ☐ Mastercard ☐ VISA ☐

Credit card No : ____/____/____/____ Expiry date : ____/____

Cardholder.....

Date Signature.....