

Amendments to Bermuda's Beneficial Ownership Act

Briefing Summary: The Beneficial Ownership Amendment Act 2025 came into effect on 30 December 2025, introducing changes to the Beneficial Ownership Act 2025 (the “**Act**”); these changes are as follows.

Service Area: Regulatory

Location: Bermuda

Created Date: 08 January 2026

In addition to certain clarifying amendments, the most significant change is the full repeal of section 16 of the Act, which previously required prior approval from the Registrar of Companies (the “**Registrar**”) before a person could become a beneficial owner of an in-scope entity. This requirement has now been removed.

While prior approval is no longer required, in-scope entities remain obligated to establish and maintain a beneficial ownership register containing adequate, accurate, and up-to-date information and to file the minimum required beneficial ownership information with the Registrar for inclusion on Bermuda’s central register of beneficial ownership information.

The Registrar is continuing to develop Regulations and Guidance Notes to provide practical direction on compliance obligations under the Act. Draft Regulations and Guidance Notes were issued for public consultation on 22 December 2025, with feedback due by 30 January 2026. If you have any questions regarding your obligations under the amended regime, or if you would like to provide feedback on the draft Regulations and Guidance Notes, please contact your usual Carey Olsen attorney or corporate services manager.

For background on the original Act, please see our earlier alert: [Bermuda's New Beneficial Ownership Act 2025 – what you need to know](#).

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