



Ogier Global in the Cayman Islands offers a comprehensive suite of beneficial ownership services designed to assist clients in navigating the complex regulatory environment associated with ownership transparency.

These services are fundamental in today's global business landscape, where understanding and complying with beneficial ownership requirements are essential for legal and operational integrity. Ogier Global's expertise in this area ensures that clients can meet their regulatory obligations efficiently and effectively, minimising risks and safeguarding reputations.

At the core of Ogier Global's beneficial ownership services is the commitment to providing tailored assistance that aligns with specific jurisdictional requirements and client needs. This includes the establishment and maintenance of beneficial ownership registers, a core component for entities looking to comply with international standards and local laws.

We help our clients navigate the complex regulatory environment, while effectively mitigating regulatory risk.

Frequently Asked Questions

Our form is dynamic and may be used for both a single entity and a group of entities. Our form requires completion and submission in one session. Users are unable to partially complete the form and return to it later.

Please ensure that you submit every record that you have completed prior to closing your browser or shutting down your PC. Any data that has not been submitted will be lost and will have to be re-entered into the form by you. The group form can only be completed from one device.

Guidance in the Beneficial Ownership online form does not constitute legal advice.

If you require legal assistance, please reach out to your Ogier legal contact directly or [contact us](#) and we will make an introduction to the relevant Ogier legal team.

Alternatively, you can request legal assistance at any time during the completion of our form.

If you require information which may be held by Ogier Global (Cayman) Limited (referred to as Ogier Global throughout) or require assistance with the completion of our form, please feel free to [contact us](#).

Yes, Ogier Global has utilised sophisticated technology and a robust testing framework to secure the information provided in the Beneficial Ownership form.

Anyone who is authorised to do so by the Legal Person, noting that a Legal Person who is required to report beneficial ownership information should ensure that it has first complied with any obligation to serve notice in writing on the registrable beneficial owners it has identified and obtained confirmation from those persons of their registrable beneficial ownership status and their required particulars in accordance with the requirements of the Beneficial Ownership Transparency Act, 2023 (the Act).

Currently, beneficial ownership registers maintained in the Cayman Islands are not accessible to the general public.

The Cayman Islands Government has stated that it will move towards a publicly accessible beneficial ownership register in line with evolving global standards, best practices and in a proportionate manner; and this could include the provision of access to certain beneficial ownership information by members of the public who have a legitimate interest in seeking such information for the purposes of preventing, detecting, investigating, combatting and/or prosecuting money laundering and/or terrorist financing.

Please subscribe to [Ogier's client mailing list](#) to ensure that you receive any updates regarding the Cayman Islands beneficial ownership regime.

Information provided to Ogier Global through the Beneficial Ownership online form will firstly be processed and deposited into Ogier Global's system where it will be securely stored. Personal data provided will be processed in accordance with Ogier's [Privacy Policy](#).

Once verified by Ogier Global, confirmation of the Legal Person's category and the required particulars relevant to the Legal Person's category will be reported to the Cayman Islands Competent Authority in accordance with the Act. To the extent there is a change to any information that has been provided to Ogier Global through the Beneficial Ownership online form,

the Legal Person must ensure that it promptly notifies Ogier Global of such change (and, if required, provides updated required particulars) in accordance with the applicable requirements and timeframes set out in the Act.

If you require any assistance including the provision of information maintained by Ogier Global, please do not hesitate to [contact us](#).

Legal Person FAQs

This field has been populated by Ogier Global with the name of the Legal Person that our records indicate you are responsible for. If this field does not display the correct information, please do not hesitate to [contact us](#).

As provided in the 'information' button in the Beneficial Ownership online form, the Act provides that a Legal Person is:

- i. a company
- ii. a limited liability company
- iii. a limited liability partnership
- iv. a limited partnership
- v. a foundation company
- vi. an exempted limited partnership

Only Cayman Islands Legal Persons are subject to the Act. Trusts and registered foreign companies continue to be out of scope of the Cayman Islands beneficial ownership regime.

The Act widened the scope of persons required to comply with the Cayman Islands beneficial ownership regime. Cayman Islands persons that were previously 'out of scope' may now be required to provide information. Previously available exemptions have also been amended and all Legal Persons are now required to be 'categorised' under and pursuant to the Act. The information which is now required to be reported in the Cayman Islands varies based on a Legal Person's category.

Legal Persons that were in scope of the previous regime will continue to have beneficial ownership reporting requirements under the Act. Such Legal Persons may need to review their previous beneficial ownership analysis to confirm that nothing further is required under the new requirements of the Act. For example, the applicable definition of 'beneficial owner' has been amended; and the Act now requires a Legal Person to report certain additional information including (i) the nationality of beneficial owners and (ii) the nature of ownership or control of such beneficial owners.

Category of a Legal Person FAQs

The Act requires each Legal Person to provide its corporate service provider with (i) a written confirmation of its 'category' and (ii) the required particulars relevant to the applicable category.

The required particulars relevant to each category of Legal Person are provided in our Beneficial Ownership online form and are in accordance with the Act.

Category A - listed, or is a subsidiary of a listed entity, on the Cayman Islands Stock Exchange or an approved stock exchange.

Category B - licenced under a regulatory law.

The Legal Person must hold a "licence" (and not simply be registered) under one of the Cayman Islands regulatory laws provided in the 'information' button in the Beneficial Ownership online form.

Category C - Cayman Islands mutual or private funds registered with the Cayman Islands Monetary Authority.

A fund that is registered under the Mutual Funds Act (Revised) or the Private Funds Act (Revised) may (i) elect to establish and maintain a beneficial ownership register and report required particulars of its registrable beneficial owners or (ii) appoint a Contact Person (instead of maintaining a beneficial ownership register) and report the required particulars of such Contact Person, who will act as a liaison between the Cayman Islands Competent Authority and the registered fund in respect of any beneficial ownership information requests made by the Competent Authority.

Category D - exempted by the Cabinet by virtue of the Act.

Category E - all other 'in scope' Legal Persons and Legal Persons electing to file beneficial ownership information.

A Legal Person that does not qualify for any other category, or elects to be categorised within Category E, must, amongst other things, identify all of its beneficial owners and reportable legal entities and obtain certain required particulars in respect of these registrable beneficial owners for filing with its corporate service provider.

Where Ogier Global is appointed as a Contact Person of a registered fund, Ogier Global will be required to provide the Competent Authority with requested beneficial ownership information within 24 hours of a request for such information being made by the Competent Authority (or at any other time as the Competent Authority may reasonably stipulate).

As Contact Person, Ogier Global is not required to establish or maintain a beneficial ownership register for the registered fund. However, Ogier Global must have access to the registered fund's beneficial ownership information or have a process in place with the registered fund whereby Ogier Global will be provided with the necessary beneficial ownership information should a request for information be made.

The Beneficial Ownership online form contains the terms that apply where Ogier Global is appointed as a registered fund's Contact Person. Notwithstanding the appointment by a registered fund of a Contact Person, a registered fund will remain liable under the Cayman Islands beneficial ownership regime for any failure (including any failure by the appointed Contact Person) to comply with a Competent Authority request for information within the stipulated timeframe. As such, efforts should be made by registered funds to ensure that all of their registrable beneficial owners have been identified and that the required information will be available on request.

For so long as it remains registered under the Mutual Funds Act (Revised) or the Private Funds Act (Revised), the registered fund would not:

- i. be required to provide required particulars of its registrable beneficial owners to its corporate services provider for filing with the Competent Authority; or
- ii. have to comply with certain specific statutory obligations that would otherwise apply to it under the Act (including the issue of notices etc).

Yes, the registered fund may instead elect to file beneficial ownership information (see "Category E" from the categories question) and, in that instance, would be required to comply with all obligations that a Legal Person who was not eligible for an alternative route to compliance would

be subject to under and in accordance with the Act.

Subsidiaries of listed entities (Category A) can take advantage of the alternative route to compliance available under Category A. Please refer to the Act for the applicable definition of 'subsidiary'. Subsidiaries of a Legal Person which falls within Category B or C cannot utilise an alternative route to compliance, unless such a subsidiary itself meets the requirements of Category B or C in its own right.

If there is any doubt regarding the Legal Person's categorisation, you should seek legal advice. Ogier's legal team would be happy to assist.

Beneficial ownership register FAQs

Each "information" button in the Beneficial Ownership online form provides information to assist our clients and facilitate efficient collection of required particulars.

If there is any doubt regarding who the Legal Person's registrable beneficial owners are or who should appear on the Legal Person's beneficial ownership register, you should consider seeking legal advice. Ogier's legal team would be happy to assist.

If the Legal Person:

- i. is in the process of taking steps to identify all the required particulars of the registrable beneficial owner(s) in relation to the Legal Person; or
- ii. has identified a registrable beneficial owner in relation to the Legal Person but all the required particulars of that beneficial owner have not yet been confirmed by the Legal Person (or verified by Ogier Global)
- iii. a "pending" note will be filed in the Legal Person's beneficial ownership register

Please be advised that the Legal Person is legally obliged to collect and provide Ogier Global with adequate, accurate and current information. A "pending" status will be filed in the beneficial ownership register where information for any registrable beneficial owner is incomplete. A pending status for an uninterrupted period of three (3) or more calendar months, will be treated as a presumed breach of the Cayman Islands beneficial ownership requirements.

Non-compliance / breach FAQs

If a Legal Person does not comply with its legal obligation to provide Ogier Global with written confirmation of its category and the required particulars under the Act, the Legal Person will be in breach of its legal obligations to do so as set out under the Act. Pursuant to Ogier Global's terms and conditions, Ogier Global reserves the right terminate its relationship with any Legal Person which is in breach of its Cayman Islands legal obligations.

Next Steps FAQs

Ogier Global is under a specific obligation pursuant the Act to review the required particulars provided by a Legal Person and to take reasonable measures to verify the identity of each relevant beneficial owner and/or reportable legal entity, using information from reliable sources, prior to reporting such information to the Competent Authority.

As provided in the Beneficial Ownership online form, a member of Ogier Global's team will be in touch shortly to collect the relevant due diligence.

Useful links

The enhanced Cayman Islands beneficial ownership transparency regime came into effect on 31 July 2024.

In summary, the Cayman Islands enhanced Beneficial Ownership regime has commenced, bringing thousands of entities within its scope. Enforcement relating to the new requirements in the Beneficial Ownership Transparency Act is expected to begin from 1 January 2025.

We have published a [briefing outlining the confirmed changes and how this may impact you](#).

[The Ministry of Financial Services and Commerce has announced that enhancements to the Cayman Islands beneficial ownership transparency regime have come into force with the commencement of the Beneficial Ownership Transparency Act and the passage of the Beneficial Ownership Transparency Regulations.](#)

The relevant "alternative route to compliance" provided for under the Beneficial Ownership Transparency Act (**BOT Act**) will require Cayman Islands investment fund vehicles to provide the corporate service provider that maintains their beneficial ownership register in the Cayman Islands (typically, the registered office) with details of a "Contact Person" at:

- a licensed fund administrator or

- another person in the Cayman Islands that is licensed or registered under a regulatory law for providing beneficial ownership information

Such Contact Person may be required to provide the Registrar of Companies with requested beneficial ownership information within 24 hours of a request for such information being made.

Ogier Global is able to act as the Contact Person for registered funds taking the "alternative route to compliance" referred to above and has established policies and procedures designed to assist funds in responding to Registrar requests for beneficial ownership information.

For more information, contact [Jayde Johnson](#) or [Daisy Valdez](#).

Jurisdiction-specific advice

Ogier Global works closely with Ogier's legal teams who can provide expert advice tailored to the specific beneficial ownership requirements of different jurisdictions.

Up-to-date information

Ogier Global keep clients informed of the latest changes in beneficial ownership regulations globally, ensuring ongoing compliance.

Regulatory and Compliance services

In addition to the core directorship and corporate administration services provided by Ogier Global, our experienced team draws on its deep knowledge and experience in the complementary areas of law, fund governance, corporate administration, regulatory advisory services and dispute resolution.

In these areas, our team provides advice for our clients' Anti-Money Laundering (AML), Combating the Financing of Terrorism (CTF) systems, including the provision of suitably qualified and experienced individuals to act as AML Officers of Cayman Islands financial Services providers in compliance with their obligations under the AML Regulations.

[Read more on our regulatory and compliance services.](#)