



## **Subject: Implementation of FATF Recommendation 24 Nominee Transparency Requirements**

Uploading of Nominee Information – Reminder to Regulated Entities

### **1. Background**

As previously communicated in our Industry Briefing held on **Wednesday, 10th December 2025**, and in our earlier correspondence (copy attached for your reference), The Bahamas has implemented enhanced nominee transparency requirements under the Companies (Amendment) Act, 2025, the International Business Companies (Amendment) Act, 2025, and the Register of Beneficial Ownership (Amendment) Act, 2025.

These requirements aim to ensure that nominee arrangements are transparent and comply with Financial Action Task Force (FATF) Recommendation 24.

### **2. Effective Date**

The new nominee transparency requirements took effect on **Monday, 19th January 2026**.

### **3. Obligations of Registered Agents (RAs)**

Regulators are reminded to advise all persons/entities providing Registered Agent/nominee services to commence uploading nominee information into the BOSSs promptly.

#### **• Existing Nominee Arrangements:**

All existing nominee arrangements must be uploaded within **six (6) months** of the Effective Date. The deadline for completing this upload is therefore **19<sup>th</sup> June 2026**.

#### **• New Nominee Arrangements:**

Any nominee arrangements established after this period must be uploaded within **fifteen (15) days** of creation, in accordance with section 8 of the Register of Beneficial Ownership (Amendment) Act, 2025.

### **4. Assistance and Compliance**

We appreciate your support in ensuring that regulated entities comply with these requirements. Your cooperation is critical to the successful implementation of this important legislative initiative.