SWISSCOMPLY

Regulatory Update

Topic	**AMLA revision in connection with the subordination of advisers**
Content	The revision extends the scope of application of the Anti-Money Laundering Act to include advisors (e.g. lawyers, trustees, real estate consultants), provided that they carry out activities that can typically be used to structure assets or companies (e.g. formation of companies, structuring of shareholdings, real estate transactions). Similar to financial intermediaries, newly subordinated advisors must identify risks, identify beneficial owners, check transactions and implement organisational measures to prevent money laundering and sanctions evasion. The revision is part of a broader package (including a transparency register for beneficial owners) with which Switzerland is strengthening international requirements and making it more difficult to abuse corporate structures to conceal assets.
Source	Anti-Money Laundering
Entry into force	The revision of the AMLA will enter into force on 1 October 2026.
Types of institutions affected	Numerous service providers, such as in the areas of M&A advice, real estate, tax advice, fiduciary services, notaries and lawyers, are now also to be subject to specific anti-money laundering obligations. The focus is not on traditional FINMA licence holders, but on professional groups that have not yet been subordinated. Lawyers and notaries remain exempt from these obligations insofar as their activities are related to judicial, criminal, administrative or arbitration proceedings. All newly subordinated advisers must join a self-regulatory organisation (SRO).
Legal reference	Art. 2 nGwG (Scope of application) - English version not available
Need for action	All newly subordinated advisers must join a self-regulatory organisation (SRO).
Implementation deadline	--