

# FINNIUS

## **Amendment Act limiting access to UBO registers entered into force**

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22 July 2025

 2 MINUTES

On 16 July 2025, the Amendment Act limiting access to UBO registers (the **Amendment Act**) entered into force (see [link](#)). The Amendment Act regulates that authorized parties can again gain access to the UBO register, after information provision from the UBO register was suspended in November 2022 following a ruling by the Court of Justice of the European Union (see for example our [news flash](#) from November 2022).

The Amendment Act ensures that access to the UBO register is limited to the following groups:

1. the FIU and other competent authorities such as the AFM and DNB;
2. obliged entities that perform customer due diligence pursuant to the Anti-Money Laundering and Anti-Terrorist Financing Act (Wet ter voorkoming van witwassen en financieren van terrorisme, **Wwft**);
3. financial undertakings that are obliged under the Sanctions Act 1977 to ensure that they have measures in place to ensure compliance with sanctions regulations;
4. any natural person or legal entity that can demonstrate a legitimate interest;
5. parties that are registered in the UBO register insofar as it concerns their own data; and
6. government bodies with a government task for which it is necessary to identify UBOs due to legal obligations.

## **Legitimate interest**

What is to be understood by “legitimate interest” will be further explained in lower regulations. The new sixth anti-money laundering directive ([Directive \(EU\) 2024/1640](#), **AMLD6**) identifies a number of categories that are considered to have a legitimate interest, namely journalists and civil society and scientific organizations engaged in preventing and combating money laundering, terrorist financing and related crimes. Natural persons and legal entities who intend to enter into a business transaction with a counterparty are also mentioned. Based on AMLD6, this group must have access to the UBO register by 10 July 2026 at the latest. The legislator has shared the expectation that the general order that further elaborates on the concept of “legitimate interest” will be submitted to the market for consultation in the summer of 2025.

## **Access to UBO register**

However, the entry into force of the Amendment Act does not immediately restore access to the UBO register. The Chamber of Commerce has announced that it will restore access to the UBO register in phases (see [link](#)). In the meantime, parties registered in the UBO register can request

their own data and, if desired, share it with, for example, Wwft institutions. In such cases, the reporting obligation also applies. However, in some cases it is not possible to request a UBO extract, for example in case of a complicated holding structure or if a natural person does not have DigiD. In such cases, we would argue that one should fall back on the arrangement as described in a [Parliamentary letter from April 2022](#), and in those cases the obligation to report back is also not applicable (see also the [BFT](#) website on this point).

It is important that Wwft institutions take note of these developments in their policies, including the possibility that no (recent) extract from the UBO register can be requested. It is also advisable to follow developments regarding the (definitive) interpretation of “legitimate interest” especially for those parties that could fall under this category in the future.

## Specialists



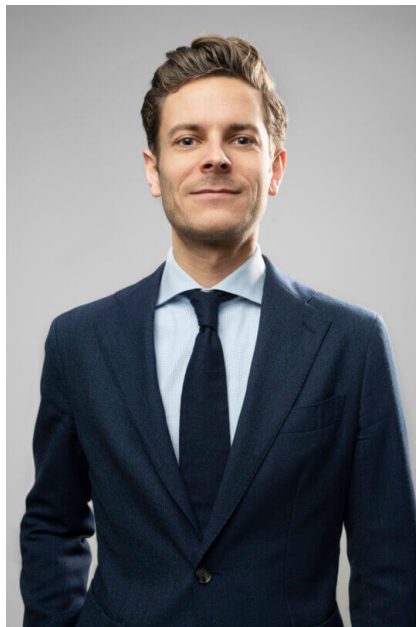
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