JUNE 2025

GLOBAL FINANCIAL INTEGRITY

Beneficial Ownership Registries in Latin America and the Caribbean

CURRENT STATUS, CHALLENGES, AND PERSPECTIVES

Executive Summary

Global Financial Integrity

Executive Summary

Purpose

The Report “Beneficial Ownership Registries in Latin America and the Caribbean: Current Status, Challenges, and Perspectives” was developed to map and assess the legal status of Beneficial Ownership (BO) registry frameworks across 38 countries and jurisdictions in Latin America and the Caribbean. In doing so, it aims to provide a clear and comparative overview of the progress made, the challenges that persist, and how legal reforms align with international transparency standards.

In addition to the regional legal mapping, the report presents two in-depth case studies, Belize and Colombia, to illustrate the nuances of implementation in contrasting national contexts. These countries were selected due to their recent BO policy developments and GFI's direct engagement in both jurisdictions. The case studies provide grounded insight into how different institutional frameworks, political conditions, and regulatory strategies influence BO transparency outcomes. Together, the regional overview and the country-specific analysis aim to support informed policymaking, promote dialogue among stakeholders, and guide future reforms that balance privacy, enforcement, and accountability.

Scope

The scope of this study is based on “the registry approach.” It reviews only those countries and jurisdictions that have passed and published national-level legislation mandating the creation of a centralized BO registry. This means that countries that have a BO definition and ownership threshold, but are identifying beneficial owners with some other approach, like the “corporate approach” or the “existing information approach” only, are not being analysed under this assessment. The emphasis on establishing legally binding frameworks for the collection and maintenance of accurate BO information underscores the central role of national governments in fostering transparency, improving institutional coordination, and strengthening accountability, regardless of whether access models are public, partially public, or private. The focus is on ensuring that in any model adopted, the legal infrastructure enables effective oversight and deters misuse of corporate vehicles.

Methodology

This report reflects an independent legal review conducted between November 1, 2024, and March 15, 2025, examining the state of BO registry frameworks across 38 jurisdictions in Latin America and the Caribbean. The jurisdictions assessed include 22 in the Caribbean, including both sovereign nations and British Overseas Territories (BOTs) such as Montserrat and the Cayman Islands, Mexico, six countries in Central America, and nine in South America. Venezuela, French Guyana, and the Dutch and US Overseas Territories were not included in the report.

The analysis focused exclusively on enacted legal frameworks that mandate the establishment of BO registries. Our approach did not evaluate broader anti-money laundering (AML) or customer due diligence frameworks. We took a strict "registry approach," meaning we assessed only those systems where a legal obligation exists to collect, store, and regulate BO data through a centralized registry maintained by a designated authority.

This methodological lens brings both clarity and necessary limitations. Jurisdictions, that are in the process of drafting BO registry legislation but have not yet passed or published it, are being tagged as "no BO registry." Likewise, the report does not account for informal mechanisms, unpublished administrative practices, or proposed bills not yet codified into law. As such, while this narrows the scope, it ensures that every finding is based on legally enforceable, publicly available documentation, an essential benchmark for comparative policy analysis.

Regional Key Findings

Across the 38 jurisdictions reviewed, only a small number maintain fully operational BO registries. In the Caribbean, 14 out of 22 jurisdictions have established private registries, with Montserrat standing out as the sole jurisdiction with a publicly accessible BO registry. In Mexico, Central America, and South America, the picture is similarly fragmented. Countries such as Argentina, Colombia, and Costa Rica have established centralized systems, but their levels of functionality and accessibility vary widely. While countries like Mexico have taken legislative steps to mandate BO collection through regulatory bodies like the tax administration, the data is not stored in a dedicated BO registry, nor is it easily accessible. Several jurisdictions have yet to operationalize registry systems despite having legal mandates in place, highlighting a clear implementation gap.

Thresholds for identifying beneficial owners differ significantly across the region, ranging from 5% to 25%. The majority of countries, particularly in Central America, adhere to the 25% threshold recommended by the Financial Action Task Force (FATF), which remains the global standard. Most countries in South America vary between ownership thresholds of 10% to 15%. However, a few jurisdictions in the region, such as Saint Kitts and Nevis, Antigua and Barbuda, and Colombia (all with a 5% or more ownership threshold), have adopted lower thresholds, reflecting a risk-based approach intended to capture more granular ownership and control relationships. These variations underscore the uneven application of risk principles in the region's BO frameworks.

A key limitation across most jurisdictions is the lack of robust verification mechanisms. While nearly all reviewed countries require entities to submit BO information, very few verify the accuracy of these disclosures through systematic or independent processes. Enforcement mechanisms, where they exist, tend to rely on self-reporting and reactive penalties, rather than proactive audits or cross-agency checks. This might significantly diminish the utility of the registries for law enforcement, financial intelligence units (FIUs), and tax authorities, which depend on reliable data to detect and investigate financial crimes.

Despite the growing recognition of BO data as a tool for financial crimes, the integration of BO information into public procurement systems remains minimal. Most jurisdictions do not require companies bidding for government contracts to disclose their beneficial owners. As a result, the region might miss a critical opportunity to prevent conflicts of interest, detect people related to past criminal activities, politically exposed persons (PEPs), and increase accountability in the allocation of public funds.

Access to BO registries is highly restricted across the region. Most registries are accessible only to designated state authorities, with only a handful permitting access based on a "legitimate interest" standard. Full public access is the exception, not the rule. This might restrict the ability of civil society, investigative journalists, and oversight institutions to scrutinize BO data, particularly in sectors vulnerable to abuse. The report highlights the potential of differentiated access models as a viable compromise, balancing privacy rights with transparency imperatives.

Another significant gap lies in the inconsistent treatment of non-legal persons and foreign entities. Trusts, foundations, and cross-border structures, often used to obscure ownership, are not systematically covered in BO reporting frameworks. This omission is especially problematic in jurisdictions with elevated risks of environmental crime, land grabbing, and human trafficking, where complex legal vehicles are routinely exploited to hide illicit activity. Ensuring these entities fall within the scope of BO legislation is essential to closing critical loopholes and strengthening enforcement.

Case Studies

Belize's experience illustrates the steady progress a small jurisdiction can make through targeted legal reform and institutional engagement. The 2023 amendment to the Belize Companies Act marked a major step forward, introducing mandatory BO disclosure across multiple legal entity types and centralizing data collection under the Belize Companies and Corporate Affairs Registry (BCCAR). Belize has also put in place administrative and criminal sanctions to reinforce compliance, but challenges persist. Notably, the registry remains accessible only to select authorities, and verification mechanisms are still in progress. While the government has embraced a risk-based approach to enforcement, resource constraints within key institutions like the FSC and FIU hinder systematic inspections. Importantly, the registry remains isolated from public procurement and tax systems—two areas where BO integration could significantly curb abuse and increase fiscal accountability. GFI's support in Belize has focused on bridging these gaps, including efforts to promote broader stakeholder engagement, particularly among civil society actors. While progress is tangible, the next phase of reform must strengthen verification protocols, expand inter-agency data sharing, and explore practical pathways for introducing legitimate interest access.

In contrast, Colombia's rollout of the Single Registry of Beneficial Owners (RUB for its Spanish acronym) offers a compelling example of how a political and fiscal reform window can be leveraged to institutionalize BO transparency. Anchored in the 2021 tax reform and the 2022 Anti-Corruption Law, the RUB is administered by the National Tax and Customs Directorate (DIAN for its Spanish acronym) and includes a 5% or more of ownership threshold, one of the lowest in the region. Colombia's decision to mandate BO reporting by both legal and non-legal entities, including foreign companies and structures, reflects a strong alignment with FATF standards. The implementation was supported by DIAN's robust technical infrastructure and further amplified through strategic outreach to obligated entities. However, since the initial BO information report deadline concluded in July 2023, important challenges surfaced. Opportunities remain to enhance verification of data quality, harmonizing registries across oversight institutions, and incorporating BO information into Colombia's otherwise advanced public procurement system. Although inter-agency access to the RUB is in place, strengthening coordination and improving reporting consistency could enhance its effectiveness in supporting criminal investigations. The Colombian case highlights the importance of sustained institutional coordination and adequate sanctioning capacity. It also shows the potential for a BO registry to serve broader state functions—including fiscal oversight, anti-corruption efforts, and international cooperation—when supported by the right mix of political leadership, technical capacity, and regulatory follow-through.

Innovations

This report introduces several important innovations that advance the regional conversation on BO transparency. First and foremost, it is one of the few regional studies to date that systematically includes the BOTs, jurisdictions such as the Cayman Islands, Bermuda, and the British Virgin Islands, which, despite their global financial relevance, are often excluded from Latin American and Caribbean assessments. Their inclusion not only fills a critical gap in comparative analysis but also strengthens the report's credibility as a tool for regional and international engagement.

It also analyses the issue from a "registry approach," a structured framework that evaluates progress based on whether a country or jurisdiction has enacted legislation to establish a centralized BO registry. This allows for more consistent benchmarking across diverse legal systems, separating aspirational commitments from enforceable legal mandates. Through focusing strictly on registry-based frameworks and their legal foundations, the report avoids conflating broader AML disclosure practices with the more rigorous demands of BO transparency.

Finally, the report breaks new ground by drawing clear connections between BO transparency and other governance priorities, including environmental justice, anti-trafficking efforts, and public procurement integrity. It highlights how opaque corporate structures can facilitate illegal logging, land acquisition, and human trafficking, especially in high-risk sectors where shell companies and legal arrangements are routinely misused. In doing so, the report positions BO transparency not as an isolated technical reform, but as a strategic enabler of broader anti-corruption and human rights goals.

Recommendations Overview

To strengthen the integrity and impact of BO frameworks across Latin America and the Caribbean, this report puts forward a series of pragmatic, evidence-based recommendations tailored to the region's current gaps and policy opportunities.

First, countries might consider exploring lowering ownership and control thresholds, particularly in high-risk sectors such as extractives, real estate, and public contracting. While the 25% threshold remains the international baseline, it has proven insufficient in contexts where illicit actors deliberately structure ownership to avoid disclosure. Moving toward a 10% or even 5% threshold for specific sectors might allow authorities to better detect influence and control hidden beneath the surface of corporate structures.

Second, verification and enforcement mechanisms must be significantly strengthened. BO data that is collected but not verified has limited utility for law enforcement or oversight bodies. Jurisdictions should establish mandatory cross-checks between registries and tax, licensing, or procurement databases. Independent audits or risk-based inspections should also be introduced to ensure compliance and deter false filings.

Third, governments should integrate BO disclosure into public procurement systems. This remains one of the most underutilized areas of reform. Requiring companies that bid on government contracts to disclose and update BO information, particularly for high-value or high-risk tenders, would serve as a frontline defense against corruption, favoritism, and abuse of state resources.

Fourth, the report recommends adopting differentiated access models that strike a balance between protecting privacy and advancing transparency. While not all jurisdictions are in a position to implement fully public registries, allowing access based on a clearly defined "legitimate interest," especially for journalists, civil society watchdogs, and international partners, might significantly enhance accountability in certain contexts.

Ultimately, there is a pressing need to deepen regional cooperation, particularly through existing frameworks such as the Caribbean Community (CARICOM) and the Escazú Agreement (Regional Agreement on Access to Information, Public Participation and Justice in Environmental Matters in Latin America and the Caribbean). Harmonizing legal definitions, thresholds, and access standards would reduce jurisdiction shopping and support more effective cross-border investigations. The Escazú Agreement, in particular, offers an opportunity to link BO transparency to environmental governance and uphold the right to access information in areas vulnerable to land grabbing, resource exploitation, and environmental crime.

These recommendations are not exhaustive but are intended to guide policymakers, regulators, and civil society advocates in shaping the next phase of reform, one that aligns BO transparency with broader development, accountability, and justice agendas.