# Measures for the Administration of Identification of Beneficial Owners of Customers of Financial Institutions

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The Measures for the Identification of Beneficial Owners of Customers of Financial Institutions, which were deliberated and adopted at the 18th Executive Meeting of the People's Bank of China on December 12, 2025, are hereby promulgated and shall take effect on January 20, 2026.

Pan Gongsheng, Governor of the People's Bank of ChinaDecember 19, 2025

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## Chapter I — General Provisions

Article 1 — These Measures are formulated in accordance with the Anti-Money Laundering Law of the People's Republic of China, the Counter-Terrorism Law of the People's Republic of China and other legal provisions, for the purposes of preventing and curbing money laundering and terrorist financing activities, implementing the customer due diligence requirements for financial institutions, and regulating the identification and verification of beneficial owners.



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Article 2 — These Measures apply to institutions that are required to perform customer due diligence obligations as prescribed by the Measures for the Administration of Customer Due Diligence and the Preservation of Customer Identity Information and Transaction Records of Financial Institutions (issued by Order No. 11 of 2025 of the People's Bank of China, the National Financial Regulatory Administration and the China Securities Regulatory Commission).

Article 3 — When conducting customer due diligence, financial institutions shall, according to the organizational form and risk status of the customer, identify and take reasonable measures to verify the beneficial owners of non-natural-person customers, so as to enhance their understanding of the customer and its risk status, and fully apply the results of such identification and verification to money laundering risk management.

Article 4 — Financial institutions shall conduct the identification and verification of beneficial owners in accordance with the following principles:

(1) the risk-based principle. Financial institutions shall, in accordance with the risk-based principle, adopt differentiated measures commensurate with the degree of risk to identify and verify the beneficial owners of customers.

(2) the reasonableness principle. Financial institutions shall exercise due diligence, understand the ownership and control structure of the customer through reasonable means, and identify and take reasonable measures to verify beneficial owners, so as to be satisfied that they understand the identity information and rights status information of the customer's beneficial owners.

(3) the reliability principle. Financial institutions shall identify and verify beneficial owners through reliable supporting materials, data or information, and comprehensively consider the overall reliability of such supporting materials, data or information from different sources after mutual corroboration.

Financial institutions shall not obtain beneficial owner information solely by querying the Beneficial Owner Information Inquiry and Administration System of the People's Bank of China (hereinafter referred to as the Beneficial Owner Information Inquiry and Administration System), nor directly substitute necessary risk judgment and beneficial owner identification and verification with batch, automated or other auxiliary means.

Article 5 — In conducting beneficial owner identification and verification, financial institutions shall properly balance the relationship between managing money laundering risks and optimizing financial services, adopt measures commensurate with the risk status, and shall not adopt measures that clearly exceed the necessary limit or "one-size-fits-all" measures.

Article 6 — The People's Bank of China may guide financial institutions in conducting beneficial owner identification and verification by issuing regulatory guidelines, guidance, cases and other means.

Article 7 — Financial institutions shall, in accordance with the law, keep confidential the relevant information obtained in the course of conducting beneficial owner identification and verification.

## Chapter II — Standards for Identifying Beneficial Owners

Article 8 — A natural person who satisfies any of the following conditions is the beneficial owner of a legal person or unincorporated organization:

(1) ultimately owning, directly or indirectly, 25% or more of the equity, shares or partnership interests of the legal person or unincorporated organization;

(2) although not satisfying the standard in Item (1), ultimately enjoying 25% or more of the income rights or voting rights of the legal person or unincorporated organization;

(3) although not satisfying the standard in Item (1), exercising actual control over the legal person or unincorporated organization, individually or jointly.



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The "actual control" referred to in Item (3) of the preceding paragraph includes, but is not limited to, the exercise of control through agreement arrangements, closely related persons or other means, such as deciding the appointment and removal of the legal representative, directors, supervisors, senior management or executive partners, deciding the formulation or execution of major operational and management decisions, deciding financial revenue and expenditure, and actually controlling and using important assets or major funds over a long period.

Where none of the three circumstances set out in paragraph 1 exists, the person responsible for the day-to-day operation and management of the legal person or unincorporated organization shall be identified as the beneficial owner.

Article 9 — For branches of domestic legal persons or unincorporated organizations, financial institutions shall generally identify the beneficial owner of the legal person or unincorporated organization as the beneficial owner of the branch. Where the legal person or unincorporated organization is already a customer of the financial institution and the financial institution has conducted customer due diligence on it in accordance with provisions, the financial institution may reuse the existing beneficial owner information.

For branches of foreign companies, in addition to identifying the beneficial owner of the foreign company to which the branch belongs in accordance with Article 8 of these Measures, financial institutions shall also identify at least one senior manager of the branch as a beneficial owner.

Article 10 — Financial institutions may be exempted from identifying the beneficial owners of the following legal persons or unincorporated organizations:

(1) state organ legal persons and the dispatched organs and temporary organs exercising their functions on their behalf, including Party organs, people's congress organs, CPPCC organs, administrative organs, supervisory organs, judicial organs, military organs and the like, and the dispatched organs and temporary organs exercising their functions on their behalf;

(2) public institutions;

(3) legal persons of grassroots self-governing mass organizations, including residents' committees and villagers' committees;

(4) legal persons of rural collective economic organizations;

(5) intergovernmental international organizations, foreign governments, and organizations and institutions such as foreign embassies, consulates and offices in China;

(6) other legal persons or unincorporated organizations prescribed by the People's Bank of China.

Article 11 — For the following legal persons or unincorporated organizations, financial institutions may, on the basis of fully assessing their money laundering and terrorist financing risks, adopt simplified identification measures commensurate with the risk status:

(1) for professional service institutions without legal person status, such as law firms, accounting firms, asset appraisal institutions and partnership patent agency institutions, where there is no higher-risk circumstance, the person in charge of the institution may be identified as the beneficial owner;

(2) for legal persons of urban and rural cooperative economic organizations, including specialized farmers' cooperatives and the unions of specialized farmers' cooperatives, beneficial owners shall be identified with reference to Article 8 of these Measures; where there is no higher-risk circumstance, the legal representative may be identified as the beneficial owner;

(3) for sole proprietorship enterprises, where there is no higher-risk circumstance, the investor may be identified as the beneficial owner;



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(4) for qualified foreign investors, where there is no higher-risk circumstance, the legal representative, authorized representative or the person in charge of the qualified foreign investor's business may be identified as the beneficial owner;

(5) for permanent representative offices of foreign enterprises, beneficial owners shall be identified with reference to paragraph 2 of Article 9 of these Measures; where there is no higher-risk circumstance, simplified identification measures may be adopted according to the risk status;

(6) for social organizations such as social groups, foundations and social service institutions, where there is no higher-risk circumstance, simplified identification measures may be adopted according to the risk status;

(7) for wholly state-owned companies, state-controlled companies, enterprises owned by the whole people, collectively owned enterprises and jointly operated enterprises, their legal representative may be identified as the beneficial owner;

(8) for companies with state participation, when identifying beneficial owners in accordance with Article 8 of these Measures, the beneficial owner of the state-owned capital portion need not be further identified;

(9) other legal persons or unincorporated organizations prescribed by the People's Bank of China.

Article 12 — The beneficial owners of a trust include:

(1) the parties to the trust, namely the settlor, trustee, beneficiary and supervisor (if any);

(2) other natural persons who exercise ultimate effective control over the trust.

Where a party to the trust listed in Item (1) of the preceding paragraph is a non-natural person, financial institutions shall trace, one by one and layer by layer, back to the natural person who exercises ultimate effective control over the trust, and identify such person as the beneficial owner. The "ultimate effective control" referred to in Item (2) of the preceding paragraph includes, but is not limited to, disposing of trust property, deciding the investment of trust property, deciding the trust distribution plan, changing or terminating the trust, changing beneficiaries (or the conditions of beneficiaries), and appointing or changing trustees.

Where no specific beneficiary is clearly identified when the trust is established or during the existence of the trust, financial institutions shall identify and record the scope of beneficiaries (such as the categories of beneficiaries, or potential beneficiaries within the scope of the power of designation).

Article 13 — When providing services for wealth management service trusts and public welfare and charitable trusts, financial institutions shall identify beneficial owners in accordance with Article 12 of these Measures. For asset service trusts other than wealth management service trusts, where the ownership and control structure is simple and the money laundering and terrorist financing risks are low, financial institutions may adopt simplified measures to identify beneficial owners when providing services for them.

When providing services for civil trusts and foreign trusts, financial institutions shall identify beneficial owners in accordance with Article 12 of these Measures.

Where a trust company, in the course of conducting trust business, engages professional service personnel or institutions such as investment advisers, legal advisers and accountants, it shall also obtain and retain the basic information of such professional service personnel or institutions.

Article 14 — For asset management products such as asset management trusts, financial institutions shall, in accordance with the risk-based principle and according to the specific circumstances of the asset management product, identify its beneficial owners with reference to Article 8 of these Measures.

For asset management products where a financial institution is the manager or trustee, where the asset management product is publicly offered or issued and is filed or registered in accordance with relevant provisions, such as publicly offered wealth management products of banks and publicly offered fund



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products, financial institutions may, when providing financial services such as fund custody, adopt simplified measures and identify the natural person who manages the asset management product as the beneficial owner.

For other asset management products, other than those in the preceding paragraph, where a financial institution is the manager or trustee, financial institutions may, when providing financial services such as fund custody, on the basis of fully assessing their money laundering and terrorist financing risks, determine the extent and specific manner of beneficial owner identification and verification measures according to the risk status. For low-risk asset management products, such as asset management products established for enterprise annuities and occupational annuities of government organs and public institutions, financial institutions may adopt simplified measures and identify the natural person who manages the asset management product as the beneficial owner.

Article 15 — Where a trust company acts as trustee of a trust, it shall, when establishing business relationships with non-trust financial institutions such as banks, securities companies and futures companies and during the existence of such relationships, provide information and materials relating to the beneficial owners of the trust.

For business trusts other than wealth management service trusts, where banks, securities companies, futures companies and other non-trust financial institutions provide financial services such as fund custody and securities brokerage for a trust, and are able to be satisfied that the trust company's anti-money laundering and counter-terrorism financing systems are sound and able to effectively perform anti-money laundering and counter-terrorism financing obligations, they may accept the beneficial owner information provided by the trust company. Where there are obvious doubts about the beneficial owner information provided by the trust company, or obvious defects in the trust company's beneficial owner identification and verification measures, banks, securities companies, futures companies and other non-trust financial institutions may require the trust company to re-identify and verify beneficial owners and provide relevant information and materials.

Where a trust company fails to cooperate in providing necessary information and materials, or has serious violations or major risks, or exposes obvious systemic defects in anti-money laundering and counter-terrorism financing, banks, securities companies, futures companies and other non-trust financial institutions shall, according to the circumstances, take necessary money laundering risk management measures.

The provisions of the preceding paragraphs of this Article apply, by reference, to business cooperation between trust companies in trust business, business cooperation between managers of asset management products and other financial institutions, and business cooperation between trust companies or managers of asset management products and specific non-financial institutions.

## Chapter III — Requirements for Identifying and Verifying Beneficial Owners

Article 16 — Financial institutions shall understand the ownership and control structure of non-natural-person customers through reliable supporting materials, data or information, identify the beneficial owners of customers, and take reasonable measures to verify beneficial owner information according to the risk status.

The supporting materials, data or information referred to above may come from government departments or from other channels, such as public information, information discovered by financial institutions, and information provided by customers themselves.

Article 17 — Financial institutions shall, combining the beneficial owner information provided by customers with the following supporting materials, data or information, understand the ownership and control structure of customers and thereby identify the beneficial owners of customers:



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(1) supporting materials, data or information relating to legal persons, including but not limited to the business license (registration certificate) or other documents that can verify the identity of the legal person, the articles of association, the list of directors, senior management and shareholders, the number of shares held by shareholders and the types of shareholding (including the relevant types of voting rights);

(2) supporting materials, data or information relating to partnerships, including but not limited to the business license or other documents that can verify the identity of the partnership, the partnership agreement, the list of partners, the manner in which each partner bears liability, and the proportion of partnership interests held by the partners;

(3) supporting materials, data or information relating to branches of foreign companies, including the information and materials of the foreign company specified in Item (1) of this paragraph, as well as the business license and senior management information of the branch of the foreign company;

(4) supporting materials, data or information relating to trusts, including but not limited to the trust contract, establishment announcement (if any), trust registration certificate (if any) or similar written documents, the registration records of trust beneficial interests held by the trustee (if any) or other documents that can prove the interests of the parties to the trust; the list of settlors, trustees, beneficiaries and supervisors (if any) and the information of other natural persons who exercise ultimate control over the trust; where a party to the trust is a non-natural person, the basic identity information and beneficial owner information of the party to the trust;

(5) supporting materials, data or information relating to asset management products, including but not limited to the asset management product contract or similar written documents, the asset management product prospectus, the register of product unit holders or other documents that can prove the interests of investors, and the information of the asset management product manager and the natural persons who manage the asset management product.

For customers to whom the simplified identification standards of these Measures apply, or other clearly low-risk circumstances, where financial institutions are able to identify beneficial owners through part of the above supporting materials, data or information, they may obtain only the relevant part of the supporting materials, data or information, and record the identification process and reasons.

Article 18 — The customer beneficial owner information that financial institutions shall identify and retain includes the following:

(1) the identity information of the beneficial owner, including name, gender, nationality, date of birth, and the type, number and validity period of the identity document or identity proof document;

(2) the rights status information of the beneficial owner, including the type of beneficial ownership relationship and the time of its formation and termination (if any).

For customers with high transparency and sufficient information disclosure, such as listed companies and those verified through official information and confirmed to be wholly state-owned companies, state-controlled companies or enterprises owned by the whole people, the beneficial owner identity information identified and retained by financial institutions shall at least include name, gender, nationality, date of birth, and a photograph usable for identity identification.

Where the circumstance in Item (1), paragraph 1 of Article 8 of these Measures exists, the rights status information of the beneficial owner shall also include the proportion of equity, shares or partnership interests held by the beneficial owner; where the circumstance in Item (2), paragraph 1 of Article 8 exists, the rights status information of the beneficial owner shall also include the proportion of income rights and voting rights held by the beneficial owner; where the circumstance in Item (3), paragraph 1 of Article 8 exists, the rights status information of the beneficial owner shall also include the manner of actual control by the beneficial owner.



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Article 19 — Financial institutions shall, in accordance with the risk-based principle, take reasonable measures to verify the beneficial owner information identified.

The authenticity of beneficial owner identity information shall be verified through public channels of the Chinese government, or through information officially certified by foreign government agencies, international organizations and the like; where verification cannot be done through the above channels, it may be verified through the originals or copies or photocopies of the valid identity documents or other identity proof documents of the beneficial owner, supplemented by other materials provided by the customer. For customers with high market transparency, such as listed companies and those verified through official information and confirmed to be wholly state-owned companies, state-controlled companies or enterprises owned by the whole people, financial institutions may verify the beneficial owner's name, gender, nationality, date of birth and photograph through official public information.

The rights status of beneficial owners shall be verified on the basis of the supporting materials, data or information provided by customers, and where necessary, in combination with information from multiple channels such as government department information, public information and information discovered by financial institutions, so as to comprehensively judge whether the rights status is consistent with the customer's ownership and control structure and risk status, thereby improving the accuracy of beneficial owner information. Where the customer and its conduct are indeed low-risk, financial institutions may directly accept the beneficial owner rights status information provided by the customer. Where the customer and its conduct fall under the circumstances specified in Article 20, financial institutions shall, according to the circumstances, adopt the enhanced measures specified in Article 21.

Article 20 — When identifying and verifying beneficial owners of customers, where any of the following special circumstances exists, financial institutions shall adopt corresponding enhanced measures according to the circumstances:

(1) specific risks exist, such as the customer or transaction coming from a high-risk country or region;

(2) the customer's ownership or control structure is complex, such as the ownership structure involving overseas shareholding whose registration information cannot be verified, circular nesting, cross-shareholding, agreement-based control or nominee holding;

(3) abnormal changes occur in the customer's ownership or control, such as frequent replacement of the legal representative, senior management or beneficial owners without reasonable grounds;

(4) the authenticity or reliability of the beneficial owner information previously obtained by the financial institution is doubtful, such as the financial institution discovering a material discrepancy as specified in Article 28 of these Measures;

(5) there are reasonable grounds to suspect that the customer and its transactions are suspected of money laundering or terrorist financing.

Article 21 — Where the special circumstances specified in Article 20 exist, financial institutions shall, according to the circumstances, adopt one or more of the following enhanced measures commensurate with the circumstances:

(1) further obtaining more comprehensive identity information of the beneficial owner, including name, gender, nationality, date of birth, habitual residence or work unit address, contact information, and the type, number and validity period of the identity document or identity proof document;

(2) further verifying the customer's ownership and control through additional independent and reliable information;

(3) requiring the customer to provide additional relevant supporting materials, such as nominee holding agreements and similar documents with legal effect;



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(4) visiting the customer again, and where necessary conducting an on-site visit to the customer, to further understand the customer's ownership and control, property and source of funds, and the purpose and nature of the business relationship;

(5) strengthening monitoring of customer transactions, paying attention to fund flows with non-shareholders, enterprise employees, business partners and other persons, and further understanding the purpose and nature of the business relationship;

(6) adopting identification standards stricter than those in Article 8 of these Measures, such as setting the threshold for identifying equity, shares and partnership interests at 10%;

(7) increasing the frequency of review and updating of information on the customer and its beneficial owners;

(8) requiring the approval of senior management for establishing or maintaining a business relationship with the customer, or handling business for the customer.

Where, after adopting the above enhanced measures, financial institutions genuinely need to manage the money laundering or terrorist financing risks of the customer, they may impose reasonable restrictions on the customer's transaction methods, transaction scale, transaction frequency and types of business handled; where they consider that the customer's money laundering or terrorist financing risks exceed their risk management capability, they shall refuse to handle the business or terminate the established business relationship.

Article 22 — Where a financial institution discovers that a natural-person customer's conduct or transactions present a relatively high money laundering or terrorist financing risk, it shall, according to the circumstances, screen all non-natural-person customers of the institution for which the natural person is a beneficial owner, conduct association analysis, and at the same time adopt necessary customer due diligence or money laundering risk management measures.

Article 23 — In the course of verifying beneficial owners, for customers that satisfy Article 2 of the Measures for the Administration of Beneficial Owner Information (issued by Order No. 3 of 2024 of the People's Bank of China and the State Administration for Market Regulation), financial institutions shall query and check the identified beneficial owner information against the beneficial owner filing information kept in the Beneficial Owner Information Inquiry and Administration System.

Article 24 — During the existence of the business relationship with a customer, financial institutions shall continuously pay attention to and assess the customer's overall situation and transactions. Where any of the following circumstances occurs, financial institutions shall review and, where necessary, update beneficial owner information:

(1) material changes in the equity (partnership interests), income rights, voting rights or control of a non-natural-person customer that may affect beneficial ownership;

(2) material changes in the legal representative, directors or senior management of a non-natural-person customer that may affect beneficial ownership;

(3) changes in the parties to a trust, such as changes in the scope of beneficiaries or the loss or determination of beneficiaries' qualifications;

(4) continuous due diligence measures are adopted for a non-natural-person customer and it is genuinely necessary to identify or verify the beneficial owner again;

(5) other circumstances that may affect beneficial ownership.

Article 25 — Financial institutions shall, in accordance with these Measures, accurately judge whether a non-natural-person customer satisfies the conditions for adopting simplified or exempted measures. Where an accurate judgment cannot be made, financial institutions shall not adopt simplified or exempted



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measures; where a non-natural-person customer falls under the circumstances specified in Article 20, simplified or exempted measures shall not be adopted.

## Chapter IV — Obligations to Report Discrepancies

Article 26 — When querying and checking the identified beneficial owner information against the filing information kept in the Beneficial Owner Information Inquiry and Administration System, where financial institutions discover that the beneficial owner information is erroneous, inconsistent or incomplete, they shall report the discrepancy in accordance with provisions, so as to accurately verify the beneficial owner.

Financial institutions shall establish and improve a discrepancy reporting system, clarify the workflow for discrepancy analysis, judgment and reporting and the relevant work requirements, and effectively handle and report the results of querying and checking beneficial owner information.

Article 27 — Where financial institutions discover a discrepancy after querying and checking, they shall communicate with and verify with the customer as necessary. Where financial institutions have reasonable grounds to believe that the discrepancy is caused by their own inaccurate identification, they shall correct their identified beneficial owner information. Where financial institutions have reasonable grounds to believe that the discrepancy is caused by inaccurate filing information and the discrepancy is material, they shall submit a discrepancy report through the Beneficial Owner Information Inquiry and Administration System within 30 working days from the date of discovering the discrepancy, record and retain the reasons for the report and the process of confirming the discrepancy, and provide relevant supporting materials.

Where financial institutions discover a material discrepancy in querying and checking beneficial owner information, they may first establish or maintain a business relationship with the customer provided that the money laundering and terrorist financing risks are controllable.

The content of the discrepancy report elements, the report format and the filling requirements shall be separately prescribed by the People's Bank of China.

Article 28 — After querying and checking, any of the following circumstances constitutes a material discrepancy:

(1) the beneficial owners do not match, for example, the beneficial owners kept in the Beneficial Owner Information Inquiry and Administration System are more than, fewer than, or otherwise inconsistent with, those identified, affecting the identification of beneficial owners;

(2) the key identity information elements of the beneficial owner are inconsistent, such as, for the same beneficial owner, inconsistencies in the person's name, gender, nationality, date of birth, the type of identity document or identity proof document, and the number of the same identity document or identity proof document kept in the Beneficial Owner Information Inquiry and Administration System;

(3) material inconsistencies exist in the rights status information of the beneficial owner, such as, for the same beneficial owner, inconsistencies in the proportion of equity (partnership interests), income rights or voting rights, the manner and content of actual control, and the position held, kept in the Beneficial Owner Information Inquiry and Administration System, that affect the final determination of the type of beneficial ownership relationship, or differences in the year and month of the formation or termination of beneficial ownership;

(4) other substantive discrepancies affecting the identification of beneficial owners.

Article 29 — After querying and checking, any of the following circumstances constitutes a non-material discrepancy, and financial institutions need not submit a discrepancy report:

(1) for the same beneficial owner, inconsistency in the writing of a non-Chinese-character name due to spelling, abbreviation or other reasons;



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(2) non-material inconsistencies in the rights status information of the beneficial owner, such as, for the same beneficial owner, inconsistencies in the proportion of equity (partnership interests), income rights or voting rights, the manner and content of actual control, and the position held, kept in the Beneficial Owner Information Inquiry and Administration System, that do not affect the final determination of the type of beneficial ownership relationship;

(3) financial institutions adopt beneficial owner identification standards stricter than those in Article 8 of these Measures, resulting in information inconsistency, such as identifying a natural person holding less than 25% of the equity, shares, partnership interests, voting rights or income rights of a legal person or unincorporated organization as the customer's beneficial owner;

(4) other discrepancies that do not affect the identification of beneficial owners.

Where financial institutions determine a discrepancy to be non-material, they shall, within 30 working days from the date of discovering the discrepancy, record the situation of information comparison, analysis and verification, the reasons for not reporting, and the measures adopted, and shall at the same time remind the customer of the relevant discrepancy.

Article 30 — When querying and checking the identified beneficial owner information against the filing information kept in the Beneficial Owner Information Inquiry and Administration System, where financial institutions discover that a customer should have filed but has not filed beneficial owner information, they shall communicate with the customer in an appropriate manner, reminding it to file the beneficial owner information; where the customer still fails to file, a discrepancy report shall be submitted.

Article 31 — Where financial institutions discover, in conducting discrepancy analysis, that the matter is related to criminal activities such as money laundering or terrorist financing, they shall submit a suspicious transaction report in accordance with provisions.

Where a matter falls within both the circumstances requiring a discrepancy report and those requiring a suspicious transaction report, financial institutions shall submit the discrepancy report and the suspicious transaction report separately, and the discrepancy report submitted shall not mention the situation of the suspicious transaction report.

## Chapter V — Legal Liability

Article 32 — Where a financial institution falls under any of the following circumstances, the People's Bank of China or its dispatched organ at or above the level of a districted city shall, in accordance with Article 53 of the Anti-Money Laundering Law of the People's Republic of China, order it to make corrections within a prescribed time limit, and may give a warning or impose a fine of not more than RMB 200,000:

(1) the reliability or sufficiency of the supporting materials, data or information on the basis of which beneficial owners are identified and verified is clearly insufficient;

(2) the reasons for identifying and verifying a beneficial owner are clearly unreasonable;

(3) failing to review or update beneficial owner information during the existence of the customer business relationship as required;

(4) discovering, or being required to discover, the circumstances specified in Article 20 of these Measures, but failing to adopt the corresponding measures specified in paragraph 1 of Article 21 of these Measures, or the measures adopted being clearly unreasonable;

(5) failing to query and check the identified beneficial owner information against the beneficial owner filing information kept in the Beneficial Owner Information Inquiry and Administration System as required;

(6) failing to complete the identification and verification of customer beneficial owners within the prescribed time limit;



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(7) other violations of beneficial owner identification and verification requirements.

Article 33 — Where a financial institution falls under any of the following circumstances, it constitutes a serious circumstance as specified in Article 53 of the Anti-Money Laundering Law of the People's Republic of China, and the People's Bank of China or its dispatched organ at or above the level of a districted city shall, in accordance with Article 53 of the Anti-Money Laundering Law of the People's Republic of China, impose a fine of not less than RMB 200,000 and not more than RMB 2 million:

(1) failing to conduct, or failing to substantively conduct, beneficial owner identification and verification;

(2) the simplified or exempted beneficial owner identification measures adopted being clearly inconsistent with its risks;

(3) having committed the violations specified in Article 32 of these Measures, and being determined as serious after comprehensively considering factors such as the financial institution's business scale, degree of due diligence, degree of harm and rectification situation;

(4) other serious circumstances.

Article 34 — Where a financial institution violates paragraph 2 of Article 21 or Article 22 of these Measures and fails to adopt, or clearly improperly adopts, the corresponding money laundering risk management measures that it should have adopted, it shall be penalized in accordance with Article 54 of the Anti-Money Laundering Law of the People's Republic of China.

Article 35 — Where a financial institution falls under any of the following circumstances, the People's Bank of China or its dispatched organ at or above the level of a districted city shall, in accordance with Article 53 of the Anti-Money Laundering Law of the People's Republic of China, order it to make corrections within a prescribed time limit, and may give a warning or impose a fine of not more than RMB 50,000:

(1) after querying and checking, failing to discover an obvious material discrepancy that should have been discovered;

(2) discovering a material discrepancy but failing to submit a discrepancy report within the prescribed time limit;

(3) the analysis reasons in the submitted discrepancy report being clearly incomplete, insufficient or unconvincing, or the supporting materials being clearly insufficient to support the analysis conclusion, and the same problem recurring despite urging;

(4) submitting a discrepancy report for a non-material discrepancy, and the same problem recurring despite urging;

(5) failing to record the situation of information comparison, analysis and verification of non-material discrepancies and the reasons for not reporting;

(6) failing to retain, as required, working records and other materials reflecting the discrepancy analysis and internal handling;

(7) failing to effectively perform other discrepancy reporting obligations prescribed by these Measures.

Article 36 — Where a financial institution's violations specified in Articles 32 through 35 of these Measures are caused by defects in its corresponding internal control system, the defects in the internal control system shall be penalized in accordance with Article 52 of the Anti-Money Laundering Law of the People's Republic of China.

Article 37 — Under any of the following circumstances, the penalties prescribed by these Measures may be lighter or reduced according to the circumstances:



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(1) continuously submitting high-quality discrepancy reports that directly assist in verifying beneficial owner filing information;

(2) assisting customers in accurately filing or updating beneficial owner filing information with remarkable results;

(3) continuously and accurately identifying beneficial owners in complex circumstances, with major reference value for improving the industry's level of beneficial owner identification;

(4) other circumstances making major contributions to the State's improvement of the accuracy of beneficial owner information.

## Chapter VI — Supplementary Provisions

Article 38 — These Measures require financial institutions to identify and take reasonable measures to verify the beneficial owners of non-natural-person customers, and the non-natural-person customers involved do not include individual industrial and commercial households.

Article 39 — For existing non-natural-person customers with which a business relationship has been established or transactions conducted before the implementation of these Measures, where the relevant beneficial owner identification standards or identification and verification requirements of these Measures are not satisfied, financial institutions shall complete the beneficial owner identification and verification of existing customers at relatively higher risk or above within 6 months from the date of implementation of these Measures, and complete the beneficial owner identification and verification of all existing customers within 2 years from the date of implementation of these Measures. For existing long-term dormant accounts (such as dormant accounts and sleeping accounts of banking institutions), or customers that have been subject to strict restrictive measures such as suspension of non-counter transactions, the beneficial owner identification and verification may be extended until the customer applies for account activation or business handling.

Article 40 — The People's Bank of China shall be responsible for interpreting these Measures.

Article 41 — These Measures shall take effect on January 20, 2026. The Notice of the People's Bank of China on Matters Relating to Strengthening Anti-Money Laundering Customer Identity Identification (Yinfa [2017] No. 235) and the Notice of the People's Bank of China on Matters Relating to Further Improving Beneficial Owner Identity Identification (Yinfa [2018] No. 164) shall be repealed simultaneously. Where the provisions on beneficial owner identification and verification that existed before the implementation of these Measures are inconsistent with these Measures, these Measures shall prevail.

Disclaimer: This translation is provided for reference and informational purposes only. In the event of any discrepancy, the official Chinese text promulgated by the People's Bank of China shall prevail. This translation does not constitute legal advice.