Who Verified the Beneficial Owner?

Consulted. Confirmed. Unverified. — what a beneficial-ownership register check actually proves

A reporting entity can consult the right register, find the right name — and still not know whether anyone verified it, or when it was last confirmed.

CorpCentre's research measures the gap.

The answer: the federal register verifies the filer, not the filing. Beneficial-ownership information is fresh where annual returns are filed and absent where they are not: 95.9% to 99.6% of corporations two or more returns behind show none. A registry check on every one of them succeeds.

Verification attaches to the filer, not the name

Every user of Corporations Canada's filing centre verifies personal identity, and registered intermediaries verify the persons for whom they file. No provision verifies the individual named in the ISC block at entry. Content is audited afterwards on a risk basis, by selecting on declarations already made — so the audit cannot reach a corporation that has filed none.

A fresh block is a fresh assertion. The registry receives the result, not the evidence.

Currency follows the annual return

ISC information is confirmed with the annual return and, in practice, on no other occasion. Among corporations that have never filed a return, 709 of the 760 listed records were supplied at incorporation and never confirmed since. Across the lapsed population, the share of records consistent with the 15-day change channel is 0.86%. Counted across every lapsed and never-filed corporation, 98.62% of those with no contact with the register since the obligation began show no individual listed, against 6.97% of those with contact. The regime works where the registrar controls the occasion: 94.68% of corporations formed since the obligation began name an ISC, and 71.41% are current on the annual return the confirmation rides on.

> *"Who verified the name in the block?"*

Information is captured once, at formation. Confirmation has to be remembered a year later — and where the return stops, the block stops with it.

The register records its own gaps

About 24,300 active corporations declare that no individual meets the significant-control test, and about 2,300 have filed that they are unable to identify their own. A fourth gap is counted, not estimated: 17,973 active corporations for which no ISC information has ever appeared. Overall, 8.19% of active corporations with a return due show no ISC visible.

These are declarations, not blanks. A file that records them as a clean check has discarded the most informative thing the register produces.

It cannot be consulted at scale

The ISC block exists page by page only: not in the bulk datasets, not in the Federal Corporation API, and not searchable by an individual's name. Reading it for a population took 276,172 page retrievals. A programme can look up one client; it cannot re-screen a book.

A register can confirm a risk rating. Page by page, it can never inform one.

What would close the gap

The remedies are registry-side: publish the confirmation date of each ISC block; carry the block in the bulk data and the API; give confirmation an occasion of its own, or enforce the 15-day change obligation; verify the named individual's identity at the registry, as Québec does for directors; and state, as regulator guidance, what a clean check establishes. Canada's FATF evaluation asks for the same risk-sensitive verification and cross-checking: the convergence is in the remedy, not in the evidence.

A clean consultation establishes that a record exists and what it last said — not that anyone verified it, and not that it is current.

If you want to know what the register holds for your corporate portfolio, we can tell you. CorpCentre works with corporations and their advisors on the upstream side of this problem.

BY THE NUMBERS

94.1% of current filers show beneficial-ownership information; 95.9–99.6% of corporations two-plus returns behind show none

0.86% — share of lapsed corporations whose ISC information is consistent with a change filing

17,973 active corporations for which no ISC information has ever appeared — counted, not estimated

94.68% v 71.41% — post-2024 corporations naming an ISC, against those current on the annual return

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Report 11 — The Validation Paradox. Published 15 September 2026.

Bulletin — Banking While Dissolved. When the registers disagree about who exists.

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Research note. Figures are from a preregistered, record-by-record sample of 5,000 active federal corporations (Corporations Canada extract of 4 August 2026; protocol frozen before fieldwork) and a full-population census of 276,172 corporation records (register of 7 September 2026). Full methodology, confidence register and limitations are in Report 12. Contains information licensed under the Open Government Licence — Canada.

Disclosure. Prepared by Lionel J. Perez, CEO of CorpCentre, which provides the corporate compliance services described above, is a registered intermediary with Corporations Canada, and participated in the 2025 Department of Finance consultation on company service providers; readers should weigh that interest. No allegation is made that any filed record is false.