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Quebec Ultimate Beneficiary vs Federal ISC: Registry Guide

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Executive Summary

For an owner of a **Canada Business Corporations Act (CBCA)** company registered in Quebec, the practical answer is **two distinct disclosure tracks**. Quebec's Registraire des entreprises du Québec (REQ) collects information about *bénéficiaires ultimes* of covered enterprises registered there, including enterprises formed elsewhere. Corporations Canada requires a CBCA corporation to maintain its own **individuals with significant control (ISC)** register and file ISC information federally. The Quebec obligation began on **March 31, 2023**; the federal public filing obligation began on **January 22, 2024**. Filing one record does not update the other. (www.quebec.ca) (ised-isde.canada.ca) (www.quebec.ca) (www.canada.ca)

Both regimes use **25%** tests involving votes and fair market value, but their statutory wording, entity scope and treatment of arrangements are not interchangeable. An individual can qualify through indirect interests, joint action or **control in fact** without personally holding a quarter of ordinary shares. A simple **40%/40%/20%** ownership table normally identifies the two 40% holders under the share tests and requires a separate check for the 20% holder's other rights. A trust shareholder needs a look through its decision makers and beneficiaries under each regime's own rules. The two resulting lists can differ. (www.legisquebec.gouv.qc.ca) (laws-lois.justice.gc.ca) (www.legisquebec.gouv.qc.ca) (laws-lois.justice.gc.ca)

Timing is the operational difference most likely to be missed. Quebec's current update is generally due within **30 days** after a change. Federally, the corporation must record new ISC information within **15 days** after becoming aware of it, then file the change within **15 days** after entering it in its own register. The federal annual filing accompanies the annual return, normally within **60 days** after the corporate anniversary. Quebec also requires an annual update, even with no change. These are separate calendar tasks. (www.quebec.ca) (laws-lois.justice.gc.ca) (ised-isde.canada.ca) (ised-isde.canada.ca)

Address choices affect public visibility but do not erase the residential-address collection requirement. Quebec requires the home address and hides it from ordinary public view when a **valid professional address**, meaning the person's principal work or business location, is declared. Federally, a supplied **address for service** is displayed instead of the home address. A mailbox subscription alone should not be assumed to meet Quebec's principal-location test. This report gives a side-by-side filing crosswalk, five worked ownership

patterns, an address choice table and an annual verification log for screening straightforward private corporations. Complex trust terms, veto rights and layered ownership need a documented, fact-specific review. (www.quebec.ca) (www.quebec.ca) (ised-isde.canada.ca)

Introduction and Background

The first question is jurisdiction, not the shareholder percentage. A corporation created under the CBCA can operate in Quebec and register there as an extra-provincial enterprise. The federal incorporation and the Quebec registration then generate different ownership-disclosure obligations. Quebec's rules extend beyond Quebec corporations to other covered entities registered to do business there; the federal ISC regime is tied to the CBCA corporation. A Quebec-incorporated company with no CBCA status applies the Quebec track addressed here, while a CBCA corporation operating outside Quebec still has its federal track. (www.canada.ca) (www.canada.ca) (www.osler.com)

The registers also serve different records. Quebec places declared ultimate-beneficiary information in the enterprise register. Federally, the corporation keeps a detailed ISC register with its corporate records and files prescribed information with Corporations Canada; some filed fields are public. A conventional shareholder list is an imperfect shortcut because the named holder may be another company or trust. This article treats the corporate registry duties only; the separate client-verification process that may use registry data is outside this comparison. (gazette.gc.ca) (fintrac-canafe.canada.ca)

The crosswalk below is a **screening tool**, dated **October 2, 2026**, for small private corporations with direct owners and recognizable voting arrangements. It is not a determination that a particular person controls a complex structure. “Ultimate beneficiary” and “ISC” are retained as separate legal labels. The relevant records should be reviewed whenever share rights, shareholder agreements, trust terms or management powers change, even where the cap table still looks identical. That limitation is material: Quebec's guidance calls for consideration of all relevant circumstances in a control-in-fact inquiry, and the federal law separately recognizes direct or indirect influence. (www.quebec.ca) (laws-lois.justice.gc.ca) (www.lavery.ca)

Quebec Ultimate Beneficiary Regime

Capabilities

The Quebec *bénéficiaire ultime* disclosure attaches to specified enterprises required to register under Quebec's legal-publicity regime, whether formed in Quebec, elsewhere in Canada or abroad. For this report, the relevant entity is a private corporation registered in Quebec. Quebec's wider list also includes sole proprietorships, partnerships and trusts operating a commercial enterprise; those entity types are a scope distinction, not subjects of the worked corporate examples. The official exemption list includes nonprofit legal persons and reporting issuers, plus named categories of banks, financial institutions and trust companies. Administrators should check the actual category before treating an entity as exempt. (spiegelryan.com)

For a corporation, a natural person may qualify through the ability to exercise **25% or more of voting rights**, or through interests corresponding to **25% or more of fair market value**. The statute also addresses coordinated voting and influence that would produce control in fact. The equity analysis therefore needs both

votes and value, not just issued common-share count. Quebec's reporting regulations express qualifying percentages in bands: **25% to 50%**, **more than 50% to 75%**, and **more than 75%**. A band is a disclosure category; it is not a substitute for the threshold analysis. (www.legisquebec.gouv.qc.ca) (www.legisquebec.gouv.qc.ca) (www.legisquebec.gouv.qc.ca) (www.legisquebec.gouv.qc.ca) (cdn-contenu.quebec.ca)

- **Direct holding:** Check registered and beneficial rights attached to each share class.
- **Indirect chain:** Trace a natural person through corporate holders to the Quebec registrant.
- **Voting arrangement:** Read any agreement to exercise votes jointly.
- **Other influence:** Record rights that might amount to control in fact.
- **Trust shareholder:** Examine trustee status and trust-beneficiary rules separately. (www.legisquebec.gouv.qc.ca) (www.legisquebec.gouv.qc.ca)
- **Evidence:** Keep the documents and inquiries that support the conclusion; Quebec says the steps to trace and verify identity exceed merely reasonable steps.

Adoption

Quebec's disclosure rules have applied since **March 31, 2023**. A new enterprise supplies ultimate-beneficiary information in its registration, initial or re-registration declaration. An already registered enterprise uses an annual or current update in the REQ's process. The public nature of the Quebec record matters for a founder who has used a residential address elsewhere in corporate documents. A separate professional address can affect what an ordinary visitor sees, but the residential address itself remains a required filing field. (www.quebec.ca) (www.quebec.ca) (www.quebec.ca) (www.publicationsduquebec.gouv.qc.ca)

Strengths and Limitations

The Quebec register captures many enterprises that the federal CBCA registry does not, so it is the relevant public-facing ownership record for a Quebec-registered provincial corporation. The scope does not make the classification automatic: a shareholder with **20%** may still qualify through coordinated voting or control in fact, while some trust structures require document-level analysis. The official identification guidance explicitly asks users to consider all relevant circumstances. (www.osler.com) (www.legisquebec.gouv.qc.ca) (www.quebec.ca)

Federal Individuals With Significant Control Regime

Capabilities

The federal track applies to corporations incorporated or continued under the **CBCA**. The statute defines a significant number of shares by at least **25%** of votes attached to outstanding voting shares or at least **25%** of all outstanding shares measured by fair market value. Registered or beneficial ownership, and direct or indirect control or direction over shares, can matter. Federal law separately reaches joint holders, joint or concerted exercise of rights and influence that would result in control in fact. These provisions should be worked through as federal rules; a Quebec beneficiary label does not automatically settle the ISC determination. (www.budget.canada.ca) (laws-lois.justice.gc.ca) (laws-lois.justice.gc.ca) (laws-lois.justice.gc.ca) (laws-lois.justice.gc.ca)

- **Share test:** Calculate voting and fair-market-value measures independently.
- **Aggregation:** Add the same individual's direct and indirect holdings where relevant.
- **Agreement test:** Identify rights exercised jointly or in concert, not only shares held jointly. (cba.org)
- **Control test:** Review influence outside the cap table, including material management veto rights.
- **Trust test:** When a trust owns or controls at least a quarter of shares, identify people controlling the trust.
- **No identified ISC:** Record that conclusion and the steps taken to reach it in the corporate register. (gazette.gc.ca)

Adoption

Most CBCA corporations had to keep an internal ISC register from **2019**, while the requirement to file ISC information with Corporations Canada began **January 22, 2024**. Current federal guidance describes exclusions for certain reporting issuers, exchange-listed corporations, Crown corporations and specified wholly owned subsidiaries. Even an excluded CBCA corporation must make the filing that confirms its excluded status. A Quebec corporation incorporated only under provincial law is outside this CBCA filing track, although it may have its Quebec obligation. (ised-isde.canada.ca) (ised-isde.canada.ca) (ised-isde.canada.ca) (www.budget.canada.ca)

Strengths and Limitations

The internal ISC register creates a dated record of identity, control basis and verification work. Corporations Canada supplies a simple template but permits a corporation to use its own register. That flexibility is useful for a small company with a spreadsheet; it also means the company must maintain the record deliberately, not assume the public filing is its only record. Federal guidance describes annual information requests as a reasonable step, and the regulations identify requests to known ISCs, shareholders and others believed to have relevant information. (gazette.gc.ca) (laws-lois.justice.gc.ca)

The federal public view is narrower in search method than an unrestricted name lookup. Corporations Canada's public search works from corporation information, and its guidance says an ISC's name cannot be used as the search key. The federal file nonetheless exposes name, ISC dates, description of control and a displayed address. A birth date, citizenship countries and tax-residency countries are filed but kept from public display. The federal address for service is therefore a practical field to decide before filing, not an afterthought. (www.parl.ca)

Feature Comparison

The two regimes overlap in purpose but differ in entity scope, wording, filing destination and operational clocks. *Table 1* is the working crosswalk for a private corporation that may be subject to both. Each column describes its own legal track; the same person can appear in both, one, or neither after full analysis. (www.lavery.ca) (www.lavery.ca)

Decision point	Quebec REQ: bénéficiaire ultime	Federal: individual with significant control
Entity scope	Covered Quebec-registered enterprises, including federal corporations doing business there. (www.quebec.ca)	CBCA corporations; specified excluded categories still confirm excluded status.
Share tests	Ability to exercise at least **25%** of votes or interests worth at least **25%** of fair market value. (www.legisquebec.gouv.qc.ca) (www.legisquebec.gouv.qc.ca)	Shares carrying at least **25%** of outstanding voting rights or worth at least **25%** of all outstanding shares. (laws-lois.justice.gc.ca) (laws-lois.justice.gc.ca)
Beyond direct shares	Joint voting agreement, indirect rights and control in fact require review.	Joint or concerted rights, indirect control/direction and control in fact require review. (laws-lois.justice.gc.ca)
Trust holder	Analyze trustee and qualifying beneficiary rules under Quebec provisions. (www.legisquebec.gouv.qc.ca)	Identify individuals controlling a trust that owns or controls at least a quarter of shares.
Record and destination	Declare through REQ registration or update; percentage bands are reported where applicable. (www.quebec.ca) (cdn-contenu.quebec.ca)	Keep corporate ISC register and file prescribed information with Corporations Canada.
Public address	Professional address if valid and declared; otherwise home address. Home address still filed. (www.quebec.ca) (www.quebec.ca)	Address for service if supplied; otherwise residential address public.
Update clock	Current update generally within **30 days** of changed registered information. (www.quebec.ca)	Register within **15 days** of awareness, federal filing within **15 days** of register entry. (laws-lois.justice.gc.ca) (ised-isde.canada.ca)
Annual work	Annual update even without change.	Annual verification steps plus ISC filing with annual return. (laws-lois.justice.gc.ca)

The crosswalk's key inference is procedural: one corporate event can start two clocks, and the federal clock itself has two stages. A founder should record the date the company learned of a change, the date entered in its federal ISC register and the date each regulator filing was submitted. A Quebec declaration should be checked for the correct percentage band and public address, while the federal return should be checked for the current description of control. (cdn-contenu.quebec.ca)

Five matched ownership scenarios

The following examples assume a private operating corporation with one class of voting common shares, equal economic and voting rights, no hidden agreement except where stated, and a Quebec registration; federal conclusions apply only if that corporation is a CBCA corporation. The percentages are illustrative inputs, not evidence of an actual company. *Table 2* shows the initial screening result and the document that can change it. Every conclusion is conditional on the two official tests. (www.legisquebec.gouv.qc.ca) (laws-lois.justice.gc.ca) (www.legisquebec.gouv.qc.ca) (laws-lois.justice.gc.ca)

Hypothetical example	Quebec screen	Federal ISC screen	What to verify
1. Sole shareholder, 100%	The individual meets both share tests. (www.legisquebec.gouv.qc.ca)	The individual meets both federal share tests. (laws-lois.justice.gc.ca)	Confirm legal and beneficial title, share class and address fields.
2. Family, 40%/40%/20%	Two 40% owners qualify by share rights; assess the 20% holder for other rights. (www.legisquebec.gouv.qc.ca)	Two 40% owners qualify by shares; the 20% holder requires separate agreement/control review. (ised-isde.canada.ca)	Share register, shareholder agreement, side letters and vote/value calculation.
3. Joint or concerted, 12% + 15%	If an agreement combines voting rights above 25%, each may be a beneficiary. (www.legisquebec.gouv.qc.ca)	A qualifying joint or concerted arrangement can make each an ISC. (laws-lois.justice.gc.ca) (cba.org)	Actual voting agreement and whether rights cover the necessary shares.
4. Trust owns 30%	Trace trustee and qualifying trust beneficiaries under Quebec's provisions. (www.legisquebec.gouv.qc.ca) (www.legisquebec.gouv.qc.ca)	Identify people controlling the trust under federal guidance. (ised-isde.canada.ca)	Trust deed, appointment powers, trustee decisions and beneficiary rights.
5. Owner has 10% plus management veto	Share test alone is below 25%; assess control in fact.	Share test alone is below 25%; a management veto can matter to control in fact. (ised-isde.canada.ca)	Veto scope, practical effect and other surrounding facts.

The **40/40/20** scenario mirrors a federal template example, but even that apparently simple structure requires checking rights outside ordinary shares. The **12% + 15%** and trust scenarios show why a numerical cap table cannot be the final legal conclusion. Quebec and federal descriptions of a trust or influence can produce different identified-person lists, as cross-regime commentary explicitly observes. The escalation point is the uncertain right, not a desire to force both lists to match. (ised-isde.canada.ca) (www.legisquebec.gouv.qc.ca) (ised-isde.canada.ca) (www.lavery.ca)

Performance and Benchmarks

There is no meaningful speed benchmark comparing these registries as if they were software products. For an administrator, the useful performance measures are **filing latency**, **public exposure**, and **record completeness**. An internal workflow can measure each of these without implying that the regimes have identical legal thresholds. The relevant official clocks provide a quantitative benchmark: Quebec's **30 days** for a current update, and federally **15 days** to record new ISC information after awareness followed by **15 days** to file after recording. If a change is discovered late, the discovery date and the underlying transaction date should both be recorded; the official federal text keys its register clock to awareness. (www.quebec.ca) (laws-lois.justice.gc.ca) (ised-isde.canada.ca) (www.parl.ca)

Public exposure is a second measure. Quebec's professional address must be the individual's **principal place of work or business**; Quebec allows one registered professional address per person across enterprises and does not accept a post-office box. The residence is still supplied to the REQ and can be published if a

purported professional address is rejected and the requested correction is not made. Federally, the filed address for service becomes public instead of the residential address. These mechanisms are similar in effect but their qualification language is distinct. (www.parl.ca)

Table 3 compares address choices that a Montreal founder may consider. It includes a commercial mailbox option because a real receiving address can have an operational role, but no provider's sales description resolves statutory eligibility for a person's professional address or address for service. (www.quebec.ca) (ised-isde.canada.ca)

Address choice	What is documented	Quebec professional-address screen	Federal address-for-service screen
Principal office or actual work location	A location where the individual principally works or conducts business.	Can fit the stated principal-location condition when accurate.	Assess whether it is an address at which service can actually be received.
Home address	Mandatory private input in both tracks; public if no qualifying alternate address is supplied.	Public if no valid professional address is declared.	Public if no address for service is supplied. (www.parl.ca)
2727 Coworking business mailbox	Montreal street-address mailbox plans start at **$35 per month**; terms limit standard letter mail and do not include forwarding. (2727coworking.com) (2727coworking.com)	A mailbox subscription alone does not establish the individual's principal place of work or business; verify actual use before declaring it. (www.quebec.ca)	Confirm the chosen plan and real service-receipt arrangement before using it as an individual's address for service. (ised-isde.canada.ca)
Private office or regular workspace	Workspace may provide an actual place of work; availability and use must be documented. (2727coworking.com)	Evaluate where the individual principally works, not the product label.	Verify that documents addressed to the individual can be received.

The practical distinction is between an **enterprise's business address**, a **person's professional address**, and a **person's address for service**. They may coincide, but should be recorded as separate decisions. A founder can purchase a mailbox for corporate mail without assuming that the mailbox is a professional address for every beneficiary. Quebec's current official guidance is especially explicit about principal place of work or business and about one declared professional address per natural person. (www.blg.com)

Data Analysis and Evidence

This topic's quantitative evidence is statutory and procedural rather than a market survey. The most informative figures are the **25%** qualification thresholds, the **30/15/15-day** update sequence, annual filing windows, and public-address rules. These numbers come from legislation and current regulator pages. The federal law measures voting rights against outstanding voting shares and fair-market value against all outstanding shares; Quebec's text instead frames the ability to exercise voting rights and the value of relevant shares or interests. Although both use **25%**, the denominators and rights being tested deserve separate calculation. (www.lavery.ca) (www.legisquebec.gouv.qc.ca) (laws-lois.justice.gc.ca) (www.quebec.ca) (laws-lois.justice.gc.ca) (ised-isde.canada.ca)

- **Quebec start date:** Beneficiary declaration requirements took effect **March 31, 2023**. (www.quebec.ca)

- **Federal filing start date:** CBCA ISC filing began **January 22, 2024**. (ised-isde.canada.ca) (www.canada.ca)
- **Quebec current change:** The registered enterprise has **30 days** to submit a current update. (www.quebec.ca)
- **Federal internal entry:** Record new ISC information within **15 days** of awareness. (laws-lois.justice.gc.ca)
- **Federal external filing:** File within **15 days** after the register change is recorded. (www.parl.ca)
- **Federal annual filing:** File with the annual return within **60 days** after the relevant anniversary. (ised-isde.canada.ca)
- **Quebec annual update:** File even when no information changed; for many legal persons not combining with a tax return, the annual period is **May 15 to November 15**. (www.quebec.ca) (www.quebec.ca)
- **Published online federal annual-return fee: $12** as shown on the current Corporations Canada page. (ised-isde.canada.ca)
- **Ordinary Quebec current-update fee:** The REQ says this filing carries **no fee**, apart from optional priority treatment.

The hypothetical family table above illustrates the threshold's limits: **40%** plus **40%** owners pass their share tests, but **20%** does not by that share fact alone. Yet a **12%** and **15%** pair can be relevant when rights are exercised together, and a **10%** holder's veto may warrant control-in-fact analysis. Those are different pathways, not arithmetic exceptions. The federal template's own **40/40/20** pattern is a useful check that the simple share result is unsurprising; the statute and agreements still govern the real filing. (ised-isde.canada.ca) (laws-lois.justice.gc.ca) (ised-isde.canada.ca) (www.assnat.qc.ca)

The small number of dates and percentages should not be inflated into a claim that either registry has better accuracy or coverage. No public, like-for-like audit of the correctness of filed beneficial-owner identities was identified in the sources used here. A more defensible operational metric is whether the company can reconstruct each submitted fact from a dated share register, rights agreement, trust instrument and inquiry record. Federal regulations specifically recognize information requests as reasonable steps; Quebec's guidance asks registrants to go further than merely reasonable steps in tracing and verifying ultimate beneficiaries. (gazette.gc.ca) (www.cfib-fcei.ca)

Practical Filing and Verification Workflow

A small corporation can keep one evidence packet while making two jurisdiction-specific decisions. The packet is not a combined filing. It should preserve the share register, rights agreements, ownership chart, trust documents if applicable, replies from people asked for information, address evidence and submission confirmations. Corporations Canada offers both a register template and a request-for-information template; a company may use its own register if it contains the required information. The Quebec registration and update process is separate.

- **1. Identify the entity:** Confirm whether it is a CBCA corporation, Quebec-registered enterprise, or both. (ised-isde.canada.ca) (www.quebec.ca)

- **2. Freeze the cap table:** Date the list of outstanding classes, votes, fair-market-value assumptions and owners.
- **3. Map indirect rights:** Trace holding companies, nominees and trusts to natural persons. (gazette.gc.ca)
- **4. Read agreements:** Check joint voting, veto rights, appointment powers and practical influence.
- **5. Apply each legal test:** Prepare separate Quebec-beneficiary and federal-ISC conclusions.
- **6. Collect required fields:** Obtain the person's identity, status dates, control description and residential address; capture alternate address evidence when used. (www.quebec.ca)
- **7. File at the right destination:** Submit Quebec registration or update and, for a CBCA corporation, federal ISC information. (www.quebec.ca)
- **8. Archive the result:** Keep copies of filed values, timestamps and confirmation numbers beside the internal ISC register. (laws-lois.justice.gc.ca)

Blank annual verification log

Copy this log for each annual review. A completed log should say what was inspected, whom the corporation asked and why a person was included or excluded. Federal law requires reasonable verification steps at least once each financial year; Quebec's necessary-steps language warrants an equally explicit record for the Quebec conclusion.

- **Review period and reviewer:** _____
- **Corporation and registration numbers:** _____
- **Share register and valuation date checked:** _____
- **Agreements and trust instruments checked:** _____
- **People contacted, request date and reply date:** _____
- **Quebec ultimate beneficiaries and basis:** _____
- **Federal ISCs and basis:** _____
- **No-ISC explanation and search steps, if relevant:** _____
- **Professional-address evidence and service-address evidence:** _____
- **Quebec update filed and confirmation date:** _____
- **Federal register entry, filing date and confirmation:** _____
- **Next annual review and unresolved questions:** _____

Implications and Future Directions

The working implication for a federally incorporated Quebec founder is administrative separation. The corporate secretary or owner needs two identification decisions, two filing destinations and a calendar that starts from actual changes, not just annual-return season. Quebec's broad registration scope and the CBCA's incorporation-based scope make this especially relevant when a federal corporation opens or continues business in Quebec. Independent legal commentary expressly notes that a federally incorporated business doing business in Quebec can have both obligations and that the two acts can identify different people. (www.canada.ca)

The second implication is data minimization within the rules. A home address must still be collected, but eligible alternate addresses can change what ordinary users see. Quebec's professional-address test is tied to an individual's principal work or business location and to one such declared address across enterprises. The federal service-address option follows federal filing fields. An address service should therefore be assessed by the actual individual's use and receipt arrangements, not by a provider's product name. These decisions belong in the evidence packet before either public filing. (www.blg.com)

For future changes, the best trigger is a **rights-event review**: new shares, transfers, changed voting agreements, trustee replacements, trust amendments or revised veto rights. A director can then run the two tests in parallel, update the internal federal register promptly, and file where needed. When the documents are layered or the practical control picture is unclear, the log should name the uncertainty and seek a tailored analysis before representing a conclusion as settled. Quebec's guidance demands all relevant circumstances; federal control-in-fact guidance also looks beyond the formal power to appoint the board.

Frequently Asked Questions (FAQs)

Does a federal corporation registered in Quebec file twice?

Generally, yes, when it is a covered Quebec registrant and a CBCA corporation. It reports Quebec ultimate beneficiaries through REQ and keeps and files ISC information federally. The two sets of people may differ because the definitions are not identical. A federal corporation operating only outside Quebec does not acquire a Quebec filing merely from its federal charter; the Quebec registration/business facts matter.

Are the two 25% ownership tests identical?

No. Both consider votes and fair-market value, but the statutes phrase the relevant rights and denominators differently. Both also consider arrangements and control beyond a direct shareholding. An administrator should calculate each test independently and document share classes, indirect interests and agreements.

Must the 20% family shareholder be reported?

The **20%** stake alone is below the ordinary **25%** share threshold in the illustrated equal-rights company. It is still necessary to check agreements, indirect holdings and control in fact. The federal official register example uses **40%/40%/20%** ownership; it should not be read as a universal exemption for a minority shareholder with unusual rights. (ised-isde.canada.ca) (www.legisquebec.gouv.qc.ca) (laws-lois.justice.gc.ca)

Can a business mailbox hide an owner's home address?

Quebec requires the home address in the filing but suppresses public display if a valid professional address is declared. That address must be the individual's principal work or business location, so a mail-only subscription alone is not proof. Federally, an address for service may replace the displayed residential address. Actual service arrangements should be confirmed before submitting an address.

When should each record be updated?

Quebec's current update is generally due within **30 days** of a change. Federally, the company enters new ISC information within **15 days** after awareness, files within **15 days** after recording the register change, and includes ISC information with the annual return. It should also perform annual verification steps. (www.quebec.ca) (laws-lois.justice.gc.ca) (ised-isde.canada.ca) (ised-isde.canada.ca) (laws-lois.justice.gc.ca)

Conclusion

For a private corporation with Quebec registration and a CBCA charter, the reliable working model is **two parallel determinations and two filings**. Quebec asks who is an ultimate beneficiary of the registered enterprise; federal law asks who is an individual with significant control of the CBCA corporation. Both start with votes and value, then require attention to joint rights, indirect interests, trusts and influence. The result should be a documented person-by-person conclusion in each jurisdiction, not a copied list.

A simple company can implement this with a dated ownership chart, an agreement check, separate filing checklists and one evidence log. The most consequential calendar distinction is Quebec's **30-day** current update against the federal **15-day** internal-register step and **15-day** filing step. The most consequential privacy distinction is Quebec's **principal work or business** requirement for a professional address against the federal address-for-service field. Both require careful collection of residential-address information even when a different address is displayed publicly. (www.quebec.ca) (laws-lois.justice.gc.ca) (ised-isde.canada.ca) (www.quebec.ca) (ised-isde.canada.ca)

The scenario tables are suitable for screening direct ownership and spotting when a less obvious right matters. A layered ownership chain, discretionary trust or disputed practical influence calls for deeper review of the actual documents and conduct. The purpose of that escalation is an accurate filing in each registry, supported by a record that can be revisited when the company's ownership or control changes.

Source links

Links cited in this article, in order of first appearance. Full addresses are provided for readers using extracted text.

1. https://www.quebec.ca/entreprises-et-travailleurs-autonomes/demarrer-entreprise/immatriculer-constituer-entreprise/nouvelles-obligations-transparence/declarer-beneficiaire-ultime/qui-doit-declarer
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About 2727 Coworking

2727 Coworking is a Montreal workspace and business-address provider. We serve people who need a place to focus, meet, run a small business or establish a professional mailing presence. Our website offers English and French information about workspace options and services, alongside educational resources for operating a business in Canada.

A workspace that fits the day

Our workspace options include private offices, day passes and desks, and a conference room. These formats help individuals and teams compare a dedicated office with more flexible ways to work or hold a meeting. Prospective members can explore the virtual tour, review current pricing and book a visit before choosing a workspace.

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2727 Coworking provides business-address and virtual-mailbox services. Our resources explain the documents and practical questions involved, including guidance for people outside Canada. Service eligibility, included features, availability and access arrangements should be confirmed on the applicable service page or with our team.

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We publish guides, research and planning tools about workspace decisions, business addresses and starting a business in Canada. Our incorporation research includes information for people inside Canada and abroad, with jurisdiction-specific material to help readers identify the next questions to investigate. These educational resources complement our workspace and address services; they are not individualized legal, tax or immigration advice.

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Explore private offices, day passes and desks, the conference room, business addresses and virtual mailboxes. Book a visit or contact the team to discuss your needs.

A business address alone does not establish tax residence, immigration status, banking approval or eligibility for a government program.

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