

PH-EIT Beneficial Ownership Roadmap*

RECOMMENDATIONS	OBJECTIVE	ACTIVITIES	OUTPUTS	PERSONS RESPONSIBLE	TIME FRAME	COST AND FUNDING	
Definition of beneficial ownership (BO) and institutional framework for BO disclosure	Create a clear definition of BO within the Philippine context Set baseline data as basis for implementation of BO disclosures Create a clear definition of BO within the Philippine context Enable institutionalization of BO disclosure	Engage a technical consultant to conduct scoping study on BO disclosure, including review of existing definitions and policies related to BO and Politically Exposed Persons (PEP) vis 4-vis international standards	Published study on BO disclosure in the Phillippine context Recommendations on how to implement BO disclosure in accordance with the ETTI Standard Multi-Stakeholder Group (MSG)-agreed definition of BO and PEP	MSG and Secretariat	Q1-Q4 2017	Professional fee of the consultant/ lawyer - PHP 660,000 (EGPS/World Bank) Budget for meetings - PHP 480,000 (EGPS/World Bank)	- Clark
		Propose the inclusion of a provision on BO disclosure in the EITI bills pending in Congress	Position paper proposing the inclusion of BO disclosure in the filed ETTI bills (SB 1125 and HB 4116)				1
Consider links between BO and national reform priorities	Harmonize BO initiatives with national reform agenda on: -transparency -accountability -fiscal reforms	Identify a national champion/s on BO disclosure Create a multi-stakeholder Technical Working Group on BO disclosure Conduct an inter-agency forum on BO disclosure (including Anti-Money Laundering Council [AMLC] as participant)	Agreed action plan on how to integrate BO disclosure in national reform priorities	PH-EITI and partner agencies	Q1-Q2 2017 Q1 2017 Q3 2017	Budget for meetings (EGPS/ World Bank)	th.
3. Reporting obligations for PEP	Ensure transparency and accountability of public officials who have interest in extractives	Develop an action plan to establish mechanism for disclosing PEPs within legal bounds, including requiring official documents as evidence/ support	Action plan/ strategy on PEP disclosure	MSG and Secretariat (with assistance from EITI International Secretariat)	Q1-Q4 2017 (parallel with the conduct of the scoping study)	Budget for meetings (EGPS/ World Bank)	
4. Level of detail to be disclosed	Ensure that the information disclosed are relevant, complete, and verifiable	MSG to meet and agree on materiality threshold for disclosure/reporting based on the findings of the scoping study Coordinate with the Securities and Exchange Commission (SEC), AMLC, and other relevant government agencies regarding disaggregation of available data	Agreed materiality threshold of data to be disclosed Agreed level of data disaggregation and sectors covered	MSG	Q1-Q4 2017	Budget for scoping study (EGPS/ World Bank) Budget for meetings (EGPS/ World Bank)	
5. Data collection	Develop a system for reporting BO data Collect information on BO from extractive companies and government agencies	Coordinate with SEC to make information on BO publicly available and free of charge Develop reporting templates for BO disclosure Pilot test BO templates (2 - 3 companies and relevant government agencies) Finalize the templates Develop online reporting system for BO (based on the approved templates, streamlined with existing ETI online reporting systems) Pilot test and roll-out the online system (training of users)	Published SEC data on BO Draft reporting templates on BO Revised templates based on the inputs from testing the templates Final BO templates for roll-out Online reporting tool based on the BO templates Accomplished BO templates	MSG and Secretariat MSG (with inputs from the scoping study consultant) BIR, MGB, DOE, SEC Consultant/ web development firm Secretariat, participating companies and government agencies	Q1-Q2 2018 Q1-Q2 2018 Q3 2018 Q4 2018 Q1-Q4 2019 Q1-Q4 2020	Budget for meetings (EGPS/ World Bank) Professional fee of the consultant/ web development firm - PHP 792,000 (EGPS/ World Bank) Pilot testing and roll-out activities - PHP 264,000 (EGPS/ World Bank)	Qie V
Assuring the accuracy of the data	Ensure that data are accurate, validated, and reliable	Hire a third party researcher to gather data from SEC and relevant government agencies, generate a list of beneficial owners, and compare the same with data from the companies	Independent study to further validate disclosures made by companies and agencies	PH-EITI Secretariat	Q1-Q4 2020	Professional fee of the researcher - PHP 430,000 (EGPS/World Bank)	Holb
7. Data timeliness	Ensure that companies and relevant government agencies (SEC, Bureau of Internal Revenue, Philippine Stock Exchange) report/ submit data on time	Send letters (signed by PH-EITI Focal Person) to companies and relevant government agencies requesting them to submit accomplished BO templates on time and diligently follow up Integrate BO disclosure in the data collection for the annual EITI Country Report	Published EITI Country Report with data/ information on BO	MSG, Secretariat and Independent Administrator (IA)	Q2 2020 Q3-Q4 2020	Budget for the Independent Administrator (GOP)	
8. Data accessibility	Ensure that all relevant stakeholders have access to information on BO	Disseminate data gathered from the online system to stakeholders	Information, education and communication (IEC) materials, including the EITI Country Report, disseminated during LGU roadshows and other outreach activities	MSG and Secretariat	Q4 2020 onwards (after the establishment of the online system)	Funds for IEC (GOP)	



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	Duration of Activities																
Recommendations	2017					2018	2019				2020						
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
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