

Case study series

Implementation of COSP Resolution 10/6

on Enhancing the Use of Beneficial Ownership
Information to Strengthen Asset Recovery



United Nations
Office on Drugs and Crime

**Open
Ownership**



Norway

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Background and introduction

Anonymously owned companies are used to move, often across multiple jurisdictions, the proceeds of corruption and illicit financial flows (IFFs) and conceal links with the individuals who benefit from them. Beneficial ownership transparency (BOT) helps bring to light which individuals own, control and benefit from companies, trusts and other legal vehicles (that is, their beneficial owners), and therefore is essential to strengthening asset recovery efforts.

The Conference of the States Parties to the United Nations Convention against Corruption (CoSP), recognizing these challenges and the power of BOT to address them, adopted back-to-back resolutions on this important topic: resolution 9/7 on “[Enhancing the Use of Beneficial Ownership Information to Facilitate the Identification, Recovery, and Return of Proceeds of Crime](#),” adopted at its ninth session in December 2021, and resolution 10/6 on “[Enhancing the Use of Beneficial Ownership Information to Strengthen Asset Recovery](#),” adopted at its tenth session in December 2023.

As mandated by those resolutions, the United Nations Office on Drugs and Crime (UNODC) Corruption and Economic Crime Branch produced a series of analyses based on information provided by States Parties across a number of topics: [examples of good practices in promoting beneficial ownership \(BO\) information transparency to facilitate the recovery and return of assets, and financial disclosure requirements for public officials](#);¹ and [information on States Parties that maintain a registry or alternative mechanism on BO information, together with information on to make requests for such information](#). It also gathered key actors involved in BOT across Africa, Latin America and the Caribbean and [South-East Asia](#), in partnership with the Stolen Asset Recovery Initiative, Open Ownership and national authorities, to further explore these issues from a regional perspective throughout 2024.

Resolution 10/6 also mandated UNODC to convene an intergovernmental meeting with the participation of relevant experts, in close coordination with States Parties, to identify and share best practices and challenges in the use of BO information, including on how the recovery and return of assets could be facilitated by BO information, and develop case studies for States Parties on best practices and challenges identified. Informed by the regional dialogues held across 2024, the [Intergovernmental Meeting on Enhancing the Use of Beneficial Ownership Information to Strengthen Asset Recovery](#) was held in Vienna, Austria, from 14 to 15 April 2025, and brought together over 70 participants from across all regions.²

¹ Based on voluntary information provided by 55 States Parties. Further papers include: [Promoting beneficial ownership transparency to facilitate asset recovery \(September 2025\)](#); [Good practices and challenges in leveraging synergies between beneficial ownership transparency and financial disclosure for asset recovery \(September 2025\)](#); [A reference document on good practices, challenges and lessons learned with respect to beneficial ownership transparency \(June 2024\)](#); [Conference room paper on enhancing beneficial ownership transparency: a study of beneficial ownership registration systems \(December 2023\)](#); [Good practices and challenges with respect to the establishment of effective financial disclosure systems for appropriate public officials and how they can facilitate the recovery and return of proceeds of crime \(September 2023\)](#); [Good practices and challenges with respect to beneficial ownership and how it can foster and enhance the effective recovery and return of proceeds of crime \(November 2022\)](#).

² UNODC is grateful for the Government of Denmark’s generous contribution in making this event possible, and for the Government of Norway’s long-term support of UNODC’s work on BOT.

To ensure full implementation of the mandate in resolution 10/6, UNODC, in partnership with Open Ownership, is developing a series of case studies on best practices and challenges in using BO information as outlined in paragraph 20, bringing together the specific good practices and challenges identified as a result of the April 2025 global intergovernmental meeting, as well as further national experiences that may prove helpful in guiding States Parties to operationalize the commitments set out in resolution 10/6 and more broadly, to implement effective BO regimes in their countries and across borders.

Chile's approach to beneficial ownership transparency implementation

Strengthening laws and institutions to tackle corruption in public procurement, and paving the way for more use cases

This case study largely draws on a [publication](#) developed by Open Contracting Partnership (OCP) and Open Ownership to summarize Chile's approach to implementing the resolution 10/6 provision, which urges States parties to take measures to facilitate access to BO information for domestic public procurement authorities. It also highlights ongoing efforts of the Chilean government to build on lessons from applying BOT in procurement, to inform the creation of a BO register for the full economy in the near future.

Situation

The Government of Chile recognizes the importance of BOT to help reach its national priorities. Both its [national public integrity](#) and [anti-money-laundering](#) strategies highlight BOT's role in tackling criminal activities and related money laundering, tax abuse and conflicts of interest, as well as a range of practices that hinder fair competition and affect consumer rights. In the [Open Government National Action Plan](#) (2018-2020), the government committed to developing a proposal for a national BOT reform, and [Chile's Mutual Evaluation Report \(2021\)](#) by the Financial Action Task Force (FATF) of Latin America provided recommendations to support its effectiveness.

Addressing conflicts of interest, anticompetitive practices and fraudulent activities, which are particularly detrimental to **public procurement integrity**, has been at the top of Chile's political agenda [for decades](#). Conflicts of interest were targeted from the early 2000s, with [legal provisions](#) applying to senior executives and mandating companies participating in public procurement processes to disclose legal ownership information (shareholders) to the competent authority – ChileCompra. However, this approach provided a partial understanding of companies' ownership and did not allow for identifying who ultimately owned, controlled and benefitted from companies taking part in Chile's public procurement, especially where these companies were part of networks of multiple legal entities. As such, while authorities could easily see whether a bidding company was owned by another company, and understand who managed that company, it was harder to identify relationships between a bidding company and multiple layers of other legal vehicles that linked its ultimate beneficial owner. This partial picture limited the public procurement agency's ability to prevent and detect potential conflicts of interest, where, due to the identity of its beneficial owner, a company may not have been legally allowed to take part in a bidding process. [The use of](#)

[BO information in procurement processes](#) facilitates the detection of undisclosed or hidden **conflicts of interest** and helps identify red flags for **collusion** and **bid rigging**. This increases the likelihood of quality service delivery, helps manage risk effectively, ensures value for money and increases trust in government.

The reform of the public procurement law of 2023 addressed this issue by incorporating [BOT provisions into Chile's Public Procurement Law](#). The same year, the President of the Republic also [announced a bill](#) to establish a national BO register. This legislative progress towards establishing a national register is expected to unlock the benefits of BOT by applying ownership transparency provisions from approximately 90,000 companies in the public market to approximately 1.5 million companies nationwide. This expansion in coverage is expected to reach a broader set of domestic policy goals, including combating corruption and organized crime, preventing money laundering and terrorist financing, avoiding the misuse of legal entities to commit fraud, and supporting compliance with tax and other legal obligations.

Actions and results

Making beneficial ownership disclosure a mandatory incentive for business opportunities with the State

Chile reformed its public procurement law to expand the definition of conflict of interest and include under its scrutiny not only senior executives but also any public officer, their relatives and companies through which they hold interest. As such, under **Law no. 21634**, it became illegal for a company or other legal vehicle beneficially owned by a public official or close relatives to supply goods or services to the public agency where that individual held office during their tenure and for one year after leaving office. To enable authorities to enforce this law, any legal entity taking part in public procurement became legally required to register in **ChileCompra's Supplier Registry** and to disclose information not only about its legal owners but also its beneficial owners.

To support **compliance**, ChileCompra followed a two-fold approach focused on favoring incentives over coercion:

- Before the law came into effect, ChileCompra organized a large **awareness and training campaign** to introduce the upcoming reform to those expected to be the most direct users of the Supplier Registry – that is, companies interested in getting public contracts and public officers tasked with using newly disclosed BO information to realize national strategies. The campaign also targeted a broader range of actors, widely communicating the government's commitment to tackling corruption as an important component of the expected **preventive effect** of the new measures.
- ChileCompra aimed to design a process that was as **user friendly** as possible for companies taking part in procurement. For example, they collaborated with the national revenue authority to enable users to access a pre-filled declaration form based on information already disclosed via tax processes. When the information was inconsistent or outdated, ChileCompra directed suppliers to update their records with the national revenue authority. This enabled greater **data reliability**, benefiting both the authorities in charge of collecting accurate information and data users who require a high level of confidence in the data in order to control for any potential conflicts of interest. The user-friendly approach also included **streamlining the BO declaration process into broader business processes** on the public procurement platform Mercado Público – such as disclosing BO

information when submitting a quotation – instead of keeping it only as a stand-alone formality.

Prospective suppliers were required to respect their obligations from late December 2024, and three months later, ChileCompra [reported](#) a 59 per cent rate of compliance with new BO disclosure measures.

Supporting beneficial ownership data use by public procurement authorities to detect potential conflicts of interest

As part of its digital strategy, ChileCompra adopted the [Open Contracting Data Standard](#) (OCDS), developed by OCP, to publish procurement data in a structured, standardized and open format, covering all stages of the public procurement process. This means that all procurement data – including information about companies involved in a tendering process, details of public contracts awarded, and payments related to the implementation of these contracts – can be [accessed](#) in a structured format. This approach enhances the ability of users to analyze this data and to link it with other datasets, especially if they also have well-structured data. The structured and machine-readable format of OCDS facilitates interoperability, making it easier to connect procurement data with other sources and to enable the development and use of tools for automated analysis and systems for red-flag detection in public procurement. In recognition of these efforts, ChileCompra received the [Impact in Open Contracting](#) award in 2020 from the World Commerce and Contracting Association and OCP.

The unit in charge of detecting irregularities in public procurement processes at ChileCompra – The Observatory – has been working to develop a **red-flagging system**, to which BO information proactively contributes. As of 2025, ChileCompra reported having developed a 24-month work plan to ensure data cross-checking across the systems of various government agencies to support this analysis.

Three main indicators of potential risks of conflict of interest were defined in the Chilean context:

- The beneficial owner(s) of a company bidding for a public contract holds an active “buyer” online account on the public procurement platform. The online account is associated with the procuring entity managing the same bid, and a purchase order has been issued to this applicant company.
- The beneficial owner(s) of a company bidding for a public contract is also a member of the evaluation committee in charge of overseeing the tendering process.
- The beneficial owner(s) of a company that was awarded a public contract is also in charge of the process, payment or contract execution.

Any of the above indicators triggers an alert to the person in charge of the process. As ChileCompra’s **institutional powers** were strengthened by Law no. 21634, its officers can then request information from the public institution involved, and, if unable to resolve the issue within five business days, forwards the case to The Observatory, which can then refer the case to relevant bodies, such as the Office of the Comptroller General, the Public Prosecutor’s Office, and the National Economic Prosecutor’s Office.

“What’s interesting here is that we’re not just talking about rules and regulations written into the new legislation, but that it has been implemented and is being applied immediately in a live electronic system, where business is being conducted between the state and the private sector for more than \$17 billion,” [reports](#) Verónica Valle, the Director of ChileCompra.

The Observatory also adopted a complementary approach to proactive red-flag identification by acting upon **confidential reporting** from external actors who bring any irregularity to their attention. In addition, it monitors broader trends on the public procurement platform and publicly discloses its findings, demonstrating a commitment to transparency and reinforcing the government's efforts to prevent and address misconduct. Although this does not directly relate to the use of BO information, it illustrates Chile's intentional approach to embedding the use of BO information as part of a comprehensive set of anti-corruption tools to reach its objectives.

While a range of factors are at play, these provisions may have contributed to a [reported](#) 69 per cent decrease in conflicts of interest detected each month by The Observatory during the first few months following the procurement reform. While a decline in the number of detected conflicts of interest does not necessarily indicate a reduction in actual conflicts of interest, it may reflect a deterrent effect, signaling greater accountability and discouraging potential misconduct, as well as a broader shift away from impunity.

Opting for open dialogue to enable a wider range of use cases

In addition to its efforts to prevent and detect potential conflicts of interest, ChileCompra has opened dialogue, including with members of the nonprofit sector, to explore how to maximize the potential of BOT for additional use cases. For example, ChileCompra and [the Global Legal Entity Identifier Foundation](#) (GLEIF) have initiated conversations on leveraging Legal Entity Identifier (LEI) data to improve procurement oversight. With more than 1,500 Chilean companies currently holding an LEI according to GLEIF statistics, this potential collaboration aims to explore how integrating LEI data could strengthen transparency and support better risk assessment in public procurement.

The government of Chile has also convened a variety of actors, including the Financial Intelligence Unit or Unidad de Análisis Financiero (UAF), the Revenue Authority or Servicio de Impuestos Internos, ChileCompra and civil society actors such as Chile Transparente and the Fundación Observatorio Fiscal, to identify important provisions to prepare for the **creation of a national BO register**. The creation of this register has been mandated by the President of the Republic to prevent and tackle infractions and crimes, promote fair competition, support tax compliance and enable Chile to contribute to much needed international cooperation to tackle transnational crime. As part of this collaborative effort led by UAF, the Government of Chile sought to ground the future BOT reform into public opinion and ensure domestic drivers were strong. To do so, they carried out a [public consultation](#) which resulted in all participants [confirming](#) they would find it useful to have a BO register in Chile and a large majority agreeing with some more specific recommendations, such as the importance of retaining BO information for up to 10 years even if a legal entity is no longer in business. Although at the time of writing, the bill to move the reform forward is [still in the Senate](#), UAF has been taking action that will likely accelerate BOT implementation when the law is ready. For example, with [Circular no. 62](#), UAF has expanded BO disclosure obligations from the financial sector to 55 sectors of the economy.

Conclusion and next steps

By promoting a culture of transparency and impunity and showcasing how the use of BO information in public procurement processes can advance domestic goals, the Government of Chile is likely setting a favorable foundation for the planned expansion of BOT implementation across all sectors of the economy. Public consultation has been providing domestic buy-in from the national population, which may provide a solid basis for reform sustainability, and multi-stakeholder

collaboration can provide key avenues to understand the variety of potential use cases that BO information can support. For example, BO information could help ensure that [Chile's commitment to gender equity in public procurement](#) is effectively implemented by applying the concept of BO to support the participation of not only women-led but also women-owned businesses in public procurement. Given the prominence of Chilean mining and its strategic role in the energy transition, exploring how lessons from Chile's BO data use in public procurement may be applied to the [BO data use for an accountable energy transition](#) also provides a range of possible avenues for BOT's impact in the country.

As lawmakers in Chile take necessary steps to advance the BO register bill, it will be essential to ensure that pioneer efforts led by ChileCompra, including implementation challenges and insights from Chilean data users, can add to [existing data use evidence](#) and inform the development of the national law and future register. [Academics](#) and [nonprofit organizations](#) in other parts of the world have also produced important resources, which can continue to support red-flagging work in public procurement.

Nigeria: Leveraging beneficial ownership transparency for enhanced asset recovery

Context

Recognizing global challenges with illicit financial flows, Nigeria demonstrated early leadership by proactively addressing transparency gaps in corporate structures, particularly in extractive and public procurement sectors. Like many developing economies, Nigeria faced challenges with complex corporate structures obscuring ultimate beneficial ownership. Sustained pressure from civil society, international partners and Nigeria's commitments under the EITI and OGP catalyzed comprehensive reforms toward corporate transparency.

Nigeria pioneered global efforts by launching the first public BO register for extractive companies in 2019. This register is in alignment with EITI requirements.³ The Nigeria Extractive Industries Transparency Initiative (NEITI) oversees compliance across oil, gas and mining sectors, disclosing ownership information for 232 extractive licenses covering companies responsible for over 90 per cent of sector revenues by 2023.⁴ This positioned Nigeria as a leading global pilot in sectoral BOT.

Building on EITI leadership, Nigeria achieved another milestone in 2020 with the comprehensive Companies and Allied Matters Act (CAMA 2020), establishing one of Africa's most robust BO legal frameworks.⁵ The reform created the first statutory obligation requiring corporate entities to submit adequate, accurate and up-to-date information on ultimate beneficial owners to the Corporate Affairs Commission (CAC). Complementing CAMA 2020, Nigeria enacted the Proceeds of Crime (Recovery and Management) Act 2022, strengthening Economic and Financial Crime Commission's (EFCC) mandate and the mandate of other relevant Law Enforcement Agencies to trace and manage assets while recognizing the role of BO data in confiscation proceedings.⁶ The Money Laundering (Prevention and Prohibition) Act 2022 reinforced obligations on financial institutions and designated non-financial businesses to obtain BO data, aligning reforms with FATF standards.⁷

³ Nigeria Extractive Industries Transparency Initiative. (2019). Available: <https://bo.neiti.gov.ng>.

⁴ EITI. (2023). "Progress on beneficial ownership transparency in Nigeria." Available: https://eiti.org/sites/default/files/2023-05/Nigeria_Beneficial_ownership_infographic_-_Nigeria_2023.pdf.pdf.

⁵ Federal Republic of Nigeria. (2020). "Companies and Allied Matters Act 2020." Available: <https://www.cac.gov.ng/wp-content/uploads/2020/12/CAMA-NOTE-BOOK-FULL-VERSION.pdf>.

⁶ Federal Republic of Nigeria. (2022). "Proceeds of Crime Act 2022." Available: <https://placng.org/i/wp-content/uploads/2022/05/Proceeds-of-Crime-Recovery-and-Management-Act-2022.pdf>.

⁷ Federal Republic of Nigeria. (2022). "Money Laundering Act 2022." Available: <https://placng.org/i/wp-content/uploads/2022/05/Money-Laundering-Prevention-and-Prohibition-Act-2022.pdf>.

By January 2023, the CAC's Beneficial Ownership Register had collected comprehensive data on over 318,983 companies, representing one of Africa's most extensive databases.⁸ Nigeria became the first African country to adopt the Beneficial Ownership Data Standard (BODS), which enables high-quality structured data and international interoperability.⁹ The central register, through which BO data is publicly accessible through bor.cac.gov.ng, also provides authorized access to more detailed information to competent authorities including the EFCC, the Nigerian Financial Intelligence Unit (NFIU) and the Federal Inland Revenue Service (FIRS).¹⁰

This reform framework aligned Nigeria with FATF Recommendation 24, EITI standards and United Nations Convention against Corruption (UNCAC) commitments while establishing regional leadership. Reforms deepened inter-agency collaboration, with BO data systematically shared across CAC, EFCC, NFIU, FIRS, NEITI and other authorities, promoting operational use rather than siloed information management.

Distinctive features of Nigeria's model

- **Legal backbone:** CAMA 2020 provides comprehensive statutory mandate with 5 per cent ownership threshold and foundation for Persons with Significant Control Regulations 2022.¹¹
- **Central register:** CAC manages a national register using international standards, evolving toward broader public access with security protocols.
- **Practical application:** Nigeria pioneered operational use in corruption investigations, linking shell companies to officials and enabling asset recovery.
- **Interagency synergy:** Law enforcement, financial intelligence and tax authorities maintain systematic access, ensuring operational integration.
- **Asset recovery focus:** Information explicitly integrated into asset tracing, forfeiture and restitution under UNCAC Article 57.
- **International leadership:** Nigeria co-sponsored the December 2023 resolution 10/6 adopted by the Conference of the States Parties to UNCAC entitled "Enhancing Beneficial Ownership information to Strengthen Asset Recovery"¹² and Resolution 9/7 entitled "Enhancing the use of Beneficial Ownership information to facilitate the identification, recovery and return of proceeds of crime" in 2021.

Actions and results

Nigeria's framework has generated substantial results. The extractive sector demonstrates strong compliance, with comprehensive filing by companies representing majority sector activity. Nigeria successfully utilized BO information to expose nominee arrangements, strengthen tax compliance and support international asset recovery. The framework includes monetary penalties under CAMA

⁸ Open Ownership. (2023). "Nigeria adopts Beneficial Ownership Data Standard." Available: <https://www.openownership.org/en/news/nigeria-adopts-beneficial-ownership-data-standard-for-its-new-national-register/>.

⁹ Ibid.

¹⁰ Corporate Affairs Commission. (2023). Available: <https://bor.cac.gov.ng>.

¹¹ Corporate Affairs Commission. (2022). "Persons with Significant Control Regulations 2022."

¹² UNODC. (2023). "Nigeria leads international community." Available:

<https://www.unodc.org/coniq/en/stories/nigeria-leads-international-community-towards-enhancing-the-use-of-beneficial-ownership-information-in-support-of-stolen-asset-recovery.html>.

2020, personal liability for officers and exclusion from government contracting for persistent offenders.¹³

Demonstrating transformative value, EFCC investigations successfully traced and recovered assets worth over NGN 2.2 billion (~USD 5 million) in a landmark 2016-2019 case involving multiple shell companies. Initially appearing legitimate, CAC records and BO analysis revealed ultimate control linking entities to a senior federal ministry official. Financial forensic analysis enabled comprehensive asset tracing, recovering educational institutions, hospitality facilities and manufacturing assets. The framework enabled the EFCC to obtain final forfeiture orders, and the recovered assets have been repurposed for educational and community benefit.¹⁴

Ongoing development and challenges

While achieving significant milestones, Nigeria continues enhancing its framework to address evolving challenges. Current priorities include strengthening verification mechanisms, as false declarations and nominee arrangements require continued vigilance. Law enforcement requires enhanced real-time access, particularly for fast-moving financial crime cases.

Cross-border asset tracing presents ongoing complexity, as officials frequently transfer funds internationally through various legal entities. Nigeria is addressing this through enhanced international cooperation and bilateral information-sharing agreements while developing technical capacity for digital integration within financial intelligence systems.

Conclusion and next steps

Nigeria's experience demonstrates BOT as a powerful operational instrument for law enforcement, litigation and asset restitution. Through systematic inter-agency collaboration, Nigeria has successfully dismantled sophisticated corruption schemes and recovered substantial stolen assets.

Nigeria continues expanding its verification and enforcement capacity while pursuing digital integration within financial intelligence systems. The country actively promotes reciprocal international access through bilateral and multilateral frameworks. Nigeria scored 72 overall in 2024 EITI validation, with strong outcomes and impact performance (92 points), reflecting practical effectiveness.¹⁵ Through these measures, Nigeria deepens its African leadership role while strengthening global anti-corruption contributions.

Nigeria's experience provides a model for jurisdictions implementing effective BO frameworks delivering tangible asset recovery and corruption prevention results.

¹³ Companies and Allied Matters Act 2020, Section 120.

¹⁴ EFCC. (2024). Internal case documentation; TVC News. (2025). "EFCC secures 4111 convictions." Available: <https://www.tvcnews.tv/efcc-secures-4111-convictions-biggest-asset-recovery-in-2024/>; EFCC. (2024). "Single Largest Asset Recovery." Available: <https://www.efcc.gov.ng/efcc/news-and-information/news-release/10562-efcc-makes-single-largest-asset-recovery-till-date>.

¹⁵ Order Paper. (2025). "Nigeria scores high in EITI assessment." Available: <https://orderpaper.ng/nigeria-scores-impressively-high-in-eiti-assessment/>.

Beneficial ownership reform in the Philippines

An adaptive and user-informed approach to beneficial ownership transparency implementation

The Philippines' case provides a valuable example of how domestic priorities, such as combating corruption, strengthening investigations, and preventing economic setbacks, combined with strong leadership, international assessments, and the integration of BOT into procurement law, can drive momentum for BO reforms designed to fulfill clear domestic policy goals.

Policy drivers of beneficial ownership transparency reform

The Philippines has grappled with IFFs, with an estimated USD 9.3 billion leaving the country annually between 2002 and 2012. In 2000, the Financial Action Task Force (FATF) placed the Philippines on its risk lists, prompting reforms including the creation of the Anti-Money Laundering Council (AMLC), the passage of the Anti-Money Laundering Act (AMLA) in 2001, the passage of the Terrorism Financing Suppression Act in 2012, the Casino Law, and succeeding amendments to various laws. It remained under scrutiny due to persistent weaknesses in BOT, particularly around corporate anonymity. The Philippines [exited the FATF grey list](#) in February 2025 after it was placed there in 2021.

The urgent need to exit the FATF grey list was a key driver of beneficial ownership (BO) reform. The Philippines sought to restore foreign investment and international credibility, both of which had been severely affected by the greylisting. In addition, the greylisting negatively impacted the economy and its citizens. Remittances are a vital source of income for many Filipino households, and greylisting led to increased bank fees for sending money home. This created a financial burden on ordinary citizens. These economic consequences were a primary reason behind the strong national incentive to exit the grey list and accelerate BOT reforms. The FATF's decision to greylist the Philippines in 2021 triggered a country-level 18-point action plan to address strategic anti-money-laundering/combating the financing of terrorism deficiencies. Among the key priorities was improving transparency of BO, with particular emphasis on the timeliness, adequacy and accuracy of BO information.

A second driver was the growing demand from domestic law enforcement agencies, such as the AMLC, Bureau of Internal Revenue (BIR) and National Bureau of Investigation (NBI), for reliable BO data. Financial intelligence units and investigative authorities increasingly rely on timely BO data to support asset recovery and combat tax fraud, human trafficking and organized crime.

A third driver was the institutional leadership of the Securities and Exchange Commission (SEC), which prioritized BO data as a critical tool for combating financial crime. Championed by its dedicated anti-money-laundering office, the SEC advanced reforms to ensure that BO information would be used not just for regulatory compliance but also for proactive investigations. As part of

this effort, the Commission formalized 24 data-sharing agreements (DSAs) with key government agencies to enable secure, timely access to BO information for investigative purposes.¹⁶

A fourth driver was the Philippines' engagement in global transparency initiatives, such as the Extractive Industries Transparency Initiative (EITI) and the Open Government Partnership, which elevated BOT as a national reform priority. This momentum was further reinforced by targeted technical assistance from Open Ownership, UNODC and the Asian Development Bank, which helped build institutional capacity and align reforms with international standards.

Philippines' approach to implementing beneficial ownership transparency reforms

Legal and institutional reform

The Philippines has implemented several legal reforms to enhance its BOT regime, with a focus on promoting compliance. Since 2019, the SEC has issued a series of Memorandum Circulars (MCs) requiring corporations to disclose BO information: [SEC MC No. 15 \(2019\)](#), [SEC MC No. 30 \(2020\)](#), [SEC MC No. 01 \(2021\)](#) and [SEC MC No. 10 \(2022\)](#). These regulations align with FATF Recommendation 24 and require mandatory BO declarations based on FATF definitions. The SEC is currently in the process of conducting public consultations for a consolidated BO policy.

To enforce compliance:

- [Administrative fines](#) were significantly increased, up to PHP 2 million (approximately USD 37,000).
- Nonmonetary sanctions, such as the disqualification of directors and the revocation of corporate registration, were introduced.

A positive approach to incentivizing compliance

To incentivize positive compliance, the Philippines launched an innovative [amnesty program](#) to help companies fix reporting issues and make doing business easier. The program allowed non-compliant, suspended or revoked entities to update their filings – including BO disclosures – at reduced fixed fees, avoiding additional penalties. This proactive measure encouraged voluntary compliance and regulatory updating, with over 70,000 companies participating. The initiative improved administrative efficiency and supported the national goal of enhancing transparency and moving out of the FATF grey list.

Stakeholder outreach and strengthening partnerships on beneficial ownership data use

Recognizing the importance of building awareness and knowledge around the collection and use of BO information, the SEC launched extensive stakeholder outreach and capacity-building activities.

¹⁶ See examples including <https://pheiti.dof.gov.ph/dsa/>; <https://www.pna.gov.ph/articles/1229169>; <https://www.unodc.org/roseap/what-we-do/anti-corruption/topics/2023/12-dsa-signing.html>; <https://ngpa.gppb.gov.ph/other-key-activities>.

These targeted both companies with an obligation to submit a BO declaration and data users, such as AMLC, BIR and procurement authorities. Key outreach initiatives included:

- Training programs for law enforcement and competent authorities on accessing and verifying BO data
- Focus group discussions with companies to better understand compliance challenges
- Public education campaigns, including an infomercial in both English and Tagalog, that were disseminated via SEC social media platforms
- Online and in-person seminars to clarify BO reporting obligations
- Capacity-building for the SEC's regional extension offices to support public-facing implementation

The SEC has signed at least [24 DSAs](#) with enforcement and oversight bodies to ensure secure and timely access to BO data. They also aim to foster closer collaboration between the corporate registry and major data users. Over time, these DSAs have served as a foundation for institutional partnerships that are now central to driving policy reforms and enhancing the use of BO information across government. This strategic approach to partnership building and awareness raising was intentional. As Atty. Daniel Luis Macalino, Assistant Director of the SEC, noted: *"When we started, we were the only ones who knew what BOT was, which wasn't a good thing. We wanted everyone to be an expert in BO and its use in their own field."*

Embedding beneficial ownership in procurement reform

In July 2024, the Philippines enacted the [New Government Procurement Act \(Republic Act No. 12009\)](#), which mandates BO disclosure by all bidders and contractors and public access to this data. The law also integrates BO checks into the government's electronic procurement platforms to prevent collusion, identify shell companies and promote accountability.

Allowing public access to extractive companies' beneficial ownership data

The Philippines EITI has been maintaining the only publicly accessible BO portal in the country, containing extractive companies' BO data obtained through a voluntary reporting mechanism under EITI. In September 2025, the Philippines enacted the Enhanced Fiscal Regime for Large-Scale Metallic Mining Act (Republic Act No. 12253), which includes BO in the list of extractive-related data that could be made publicly available.

Outcomes and policy impact

The Philippines is beginning to see early results from its *adaptive, user-informed and homegrown approach* to BO reforms:

Removal from the Financial Action Task Force grey list and European Union high-risk list

In February 2025, the FATF officially removed the Philippines from [its grey list](#), having determined that the country had met all requirements under its action plan. FATF commended the Philippines

for establishing one of the world's strongest BO regulatory frameworks. Similarly, in June 2025, the European Union (EU) removed the Philippines from its [high-risk list](#). Increased awareness and cross-sector engagement with BO reforms led to broader institutional buy-in and contributed to the Philippines' successful removal from the FATF grey list.

The greylisting had real economic consequences. For example, the remittance fees that are vital for many low-income Filipino families will potentially reduce transaction costs for [remittances](#) following the country's removal from the list, easing the financial burden on households and restoring trust in the Philippine financial system.

Effective use of beneficial ownership data in investigations

BO data from the SEC is now routinely used by Philippine enforcement and regulatory agencies to uncover the real individuals behind legal entities, especially in cases involving money-laundering, investment fraud and the misuse of corporate vehicles for illicit activities.

BO data supports case development by helping analysts trace control structures, link entities and identify incorporators and beneficial owners involved in complex criminal schemes. Notable examples include:

- [Human trafficking and electoral fraud](#): A foreign national who ran for mayor was identified as the beneficial owner of multiple shell companies involved in illegal online gambling and human trafficking.
- [VAT refund scam](#): BO data exposed one individual behind 100 companies used to fraudulently claim tax refunds, enabling a successful prosecution. (See Box 1.)
- [Flood control corruption scandal](#): Criminal charges for graft, malversation of public funds and violation of procurement laws were filed against government officials as well as beneficial owners of company contractors involved in "ghost" or substandard flood control projects.

Improved compliance

The amnesty program and other reforms by the Philippine government led to a significant improvement in compliance. According to an SEC advisory, over 70,000 of the approximately 600,000 registered firms applied for the amnesty as a result of these and other reforms, the SEC reported a significant improvement in [compliance rates](#) – from 26 per cent in 2021 to 69 per cent in 2024 – for the BO disclosure of active and registered companies.

Box 1. Using beneficial ownership data to uncover a PHP 50 billion tax fraud scheme

[A major VAT tax refund scam](#), allegedly costing the Philippine government an estimated PHP 50 billion (approximately USD 886 million) in unpaid taxes, was recently uncovered by authorities. The NBI charged a syndicate led by a businessperson alleged to have orchestrated a long-running scheme involving at least 103 shell companies, alongside dozens more still under investigation. The syndicate was suspected of using these dummy corporations to issue fake invoices and receipts, thereby fraudulently claiming VAT refunds.

Crucially, investigators used **BO information** to reveal that the same individual ultimately owned the different companies. By tracing the real owners behind each entity, authorities exposed the individual exercising ultimate effective control to orchestrate the network and were able to

demonstrate a coordinated conspiracy. The alleged individual and co-conspirators were [indicted for tax fraud, falsification of commercial documents and related offences](#).

This case highlights how the use of BO data can be used in tackling tax evasion crimes. The BIR and NBI were able to match ownership records across numerous shell firms, exposing a single individual at the center of the fraud.

Conclusion and next steps

The Philippines' experience demonstrates how strong leadership, a locally adapted reform strategy and a focus on positive incentives and cross-sector engagement can meaningfully advance BOT. Rather than applying a one-size-fits-all model, the SEC tailored its approach to national priorities, combining legal reforms with public awareness campaigns, interagency collaboration and non-punitive measures, such as the BO amnesty program. This case demonstrates that building shared ownership of reforms and enabling the practical application of BO data, particularly in investigations and procurement, can significantly enhance implementation and yield tangible impact in the real world.

Looking ahead, three critical next steps will be key to sustaining momentum:

1. Improve access to BO data and ensure that it remains relevant, accurate and up-to-date through systems that are designed based on user needs.
2. Promote the use of BO data by providing training, guidance and resources to data users and DSA partners.
3. Continue improving the BO disclosure regime and communicating the benefits for implementation through monitoring and evaluation, and development of measurement tools and strategies.

Beneficial ownership reform in Zambia

A participatory, inclusive and adaptive approach to beneficial ownership transparency implementation

Zambia's case provides a valuable example of how domestic priorities, combined with international assessments, can generate substantial momentum for action, resulting in significant legal and institutional advancements. This study examines how Zambia is addressing issues related to the access, verification and use of BO data in investigations.

Policy drivers of beneficial ownership transparency reform

Corruption has been a significant challenge in Zambia, and the misuse of companies to facilitate IFFs, including money laundering, procurement fraud and tax evasion, has [contributed to the prevalence of corruption](#) in the country. According to the [Financial Intelligence Centre's \(FIC\) 2022 Trends Report](#), ZMW 5.97 billion (approximately USD 223 million) in suspicious transaction reports were linked to the abuse of opaque ownership structures. Zambia recognizes the need for transparency in company ownership as a means to reduce corruption and tackle IFFs to support domestic resource mobilization. These have been primary drivers of BOT reform in the country. Zambia began tackling this challenge with the passing of the Companies Act in 2017. Subsequently, further revisions to this law have taken place to address implementation challenges.

A key driver for continued investment in and improvement of BO reform in Zambia is the need to improve timely access to accurate, adequate and up-to-date BO data for investigators. Over 80 per cent of financial crime investigators rely on BO data for investigations, yet 85 per cent of investigators still access this information manually.¹⁷ At the time of the FIC study, investigators often faced delays of up to two weeks in accessing BO data, which hindered time-sensitive investigations. Since then, Zambia has made progress in reducing turnaround times to under a week, and plans are underway to introduce an Application Programming Interface that will allow real-time information exchange. The demand for timely access to BO data, particularly for competent authorities, is also a critical element of Recommendations 24 and 25 of the FATF, and this has created a strong motivation for digitising the BO register.

A second driver of continued efforts to improve the effectiveness of reforms is the need to strengthen compliance with BO disclosure requirements. Zambia's compliance rate for BO disclosure remains low, with only about **38 per cent of companies submitting BO information**. This is a result of a combination of factors, including lack of adequate sensitization and awareness among declaring companies and complexity in the forms used to declare BO information. However, government officials note that this figure relates primarily to companies incorporated before the

¹⁷ Zambia Financial Intelligence Centre, "A study on the availability and access to BO information for law enforcement investigations in Zambia," 2024.

operationalization of the Companies Act of 2017. For companies incorporated after 2017, compliance stands at 100 per cent, since no company can be registered without declaring BO information. The Patents and Companies Registration Agency (PACRA), the lead implementing agency, has drawn valuable lessons from its implementation journey, and as part of its efforts to strengthen compliance, is revising the **Companies Act of 2017 and the Beneficial Ownership Regulations (Statutory Instrument)**. These reforms aim on one hand to improve the data collection forms and, on the other, to strengthen enforcement by introducing administrative penalties and empowering the Registrar to strike off non-compliant companies after six months.

Another key driver is the issue of citizens being declared as company owners when, in reality, ownership lies with foreigners, which is against Zambian law. For example, in public procurement, regulations require a minimum level of citizen participation in bidding companies, yet in practice, Zambian citizens are often used as ‘fronts’ while undisclosed non-citizens exercise real control. Similarly, in land administration, the law mandates a specified threshold of citizen shareholding to own land. However, investigations have revealed several instances where citizens are listed only on paper, while foreign individuals ultimately control the land through opaque structures. This has been an important driver of BOT reform, reflected in legislation requiring BO disclosure in procurement.

Zambia’s BOT reform agenda is also motivated by the need to align with regional and international standards, including assessments by the Eastern and Southern Africa Anti-Money Laundering Group and the risks associated with being greylisted by FATF. Zambia’s experience demonstrates how the needs of domestic law enforcement agencies and the drive to improve compliance, enhance domestic resource mobilization, and meet international obligations are driving BO reforms that are designed to fulfill clear domestic policy goals.

This section outlines key features of Zambia’s approach that are helping deliver effective policy implementation:

1. Incorporating an inclusive and adaptive legal reform process

Zambia has employed a multistakeholder approach to developing its legal framework for BOT, consulting widely with users and providers of BO data, including the private sector and civil society actors, to ensure that reforms are grounded in user needs and address enforcement gaps. This approach has supported Zambia’s efforts to address initial implementation challenges, particularly those related to compliance, accuracy and enforcement. For example, [Zambia is currently reviewing its Companies \(Amendment\) Bill, 2025](#), which incorporates several compliance-focused reforms aimed at strengthening enforcement, enhancing data quality and ensuring a sustainable impact.

This bill seeks to make specific amendments in response to implementation challenges that have come to light through Zambia’s eight years of experience advancing BOT reforms:

- **Stronger sanctions to incentivize higher compliance:** Companies that fail to submit, update or verify BO information may face **daily administrative penalties** and, ultimately, **de-registration** (Sections 21A, 317 and 369A).
- **Improved discrepancy reporting mechanisms to increase the accuracy of BO data:** Competent authorities and reporting entities must report discrepancies between BO data held by companies and independently sourced information within **15 days** (Section 346B). PACRA is empowered to request clarification, and failure to respond can result in escalating penalties and enforcement actions.
- **More detail on ownership relationships to facilitate better use of data:** The amendments update the legal **definition of a beneficial owner** to include those who directly or indirectly control more than 5 per cent of a company’s shares or voting rights

(Section 3). They also require full disclosure of **nominee relationships** (Sections 30 and 31) and ban the use of **bearer shares and share warrants** (Section 157A).

These legal reforms are complemented by **executive policy action** in specific areas, such as public procurement. In August 2024, the Secretary to the Treasury issued a **circular requiring all legal persons bidding for public contracts** to submit **certified, accurate and up-to-date BO information**. Through this combined legal and policy approach, Zambia is positioning itself as a reformer that **tests, learns and adapts**.

2. Strengthening coordination to enable use of BO information

Zambia is strengthening institutional coordination to ensure that BO information is effectively used. Examples of this include:

- **Formalized inter-agency collaboration:** The FIC and PACRA have a Memorandum of Understanding to regularly share BO data for investigative purposes.
- **Inter-agency cooperation framework to support data use:** Zambia established the Inter-Agency Framework on Collaboration and Cooperation, which brings together law enforcement agencies and relevant government institutions to facilitate coordinated action against IFFs and related activities. Within this framework, member agencies, including PACRA, share information in line with their respective mandates. PACRA provides access to BO information, which is used by law enforcement and intelligence agencies for investigations and decision-making. This mechanism enables the use of BO data and supports coordinated asset recovery efforts.
- **Establishing a BO Unit to improve quality and use of data:** Zambia plans to establish a dedicated Beneficial Ownership Unit within PACRA to oversee verification efforts, ensure compliance, facilitate cross-agency coordination and manage stakeholders.

These efforts are building a more connected institutional framework for using BO data as a tool for accountability and financial integrity.

3. Adopting a user-centered approach to implementing BO reforms

Zambia has recognized the importance of moving to a fully digitized BO registry to collect high-quality BO data and ensure it is available and usable to actors who need it. PACRA is leading this effort and is taking a user-centered approach to designing its future digital BO register.

PACRA conducted a comprehensive review of existing IT systems and user needs, incorporating consultations with investigators, regulators and businesses to inform the development of the register. Placing users at the center of registry development ensures that the registry is well-tailored to meet user needs, which will help improve data quality, enhance access and increase compliance through more accurate and reliable reporting. PACRA is actively exploring partnerships and mobilizing resources to support the full development and rollout of the register.

Outcomes and policy impact

Zambia is beginning to see early results from its **flexible, user-informed and coordinated approach** to BO reforms:

- **Strengthened institutional coordination on the use of BO data** through the establishment of the Inter-Agency Framework on Collaboration and Cooperation

- **An improved understanding of user needs shaping the design of Zambia's future digital BO register** to enhance data quality, accessibility and compliance
- **Integration of BO requirements into procurement systems**, with Treasury policy circulars now requiring enhanced BO verification in public contracting processes

Most significantly, there is clear evidence that the above is enabling BO data to support asset recovery, led by Zambia's Inter-Agency Framework on Collaboration and Cooperation.

In one case, [authorities used BO data to trace and seize assets allegedly purchased with misappropriated public funds](#). BO information helped uncover hidden ownership structures in an alleged procurement corruption case, leading to the [seizure of two helicopters](#). (See case study below.)

The outcomes of Zambia's adaptive, iterative reform approach, grounded in institutional coordination and shaped by both domestic priorities and learning from other jurisdictions, underscore the effectiveness of the country's approach to BO reforms. Looking forward, Zambia seeks to continue to apply BO data in asset recovery efforts and further domestic revenue mobilization and anti-corruption objectives.

Helicopter scandal – Example of BO data use in asset recovery

In a high-profile corruption case, Zambian authorities investigated the involvement of politically exposed persons in the alleged misuse of public funds to purchase assets including two helicopters: a Bell 430, valued at approximately USD 1.4 million, and a Bell 206 JetRanger, valued at around USD 700,000. Investigations through the Inter-Agency Framework on Collaboration and Cooperation suspected the involvement of hidden ownership structures.

As a multi-agency coordination mechanism that enhances collaboration on serious offences and asset recovery, this framework enables data sharing among agencies, including the use of BO information for investigations. In this case, data sharing between agencies enabled investigators to trace financial transactions and uncover the real owner of the helicopters. The collaborative efforts led to the identification and seizure of the helicopters as suspected proceeds of crime, expected to be permanently forfeited to the state. Two individuals implicated in the scandal have been sentenced, marking one of the most significant milestones in Zambia's anti-corruption efforts in recent years.

This case exemplifies the effectiveness of leveraging interagency collaboration in combating complex financial crimes. By leveraging BO data and using existing frameworks, Zambia is efficiently investigating and taking steps to recover stolen assets.

Conclusion and next steps

Zambia is adopting a **flexible, user-informed and coordinated approach** to advance the implementation of BO transparency. By leveraging existing structures, such as the Inter-Agency Framework on Cooperation and Collaboration, to facilitate BO data use without creating multiple overlapping systems, the Zambian case demonstrates the value of coordination, learning and adapting, and employing a whole-of-government approach to achieve policy goals. Two critical next steps will be key to sustaining momentum:

1. The **enactment of amendments to the Companies Act**, which will further strengthen the legal foundation for BO implementation

2. The **consistent and structured use of the inter-agency collaboration framework** to guide the development of the BO register and other reform components

Together, these steps will reinforce Zambia's trajectory toward a more transparent and effective BO regime.

Verification of beneficial ownership data in Austria, Germany and Slovakia

Overview

The case studies below are in line with paragraph one of CoSP resolution 10/6, which called on States Parties to ensure access to adequate, accurate and up-to-date BO information of legal persons and legal arrangements, and paragraph 5, which similarly encourages States Parties to collect and maintain adequate, accurate and up-to-date BO information so that domestic competent authorities may obtain and access BO data in a timely manner.

While the establishment of registers or alternative mechanisms are foundational steps for BOT, they remain less effective for anti-corruption without a robust system for ensuring that the data they collect and maintain is accurate. As defined by the [FATE](#), “verification is a combination of checks and other processes that a country should adopt at the various stages to ensure that... beneficial ownership data is accurate.”¹⁸

Verification is an essential process for ensuring that BO information is used as an effective corruption and money-laundering risk management tool. Without adequate checks in place, BO filings may be outdated, inaccurate or deliberately obfuscated. This limits the power of BO data and risks distrust in the accuracy of the information collected, making it less likely that law enforcement authorities, public procurement bodies and others will seek to use BO information as part of their anti-corruption and anti-money-laundering efforts.

Effective verification systems combine a system of checks at the point data is declared to validate that declared information is plausible, verify identity and cross-check information against other domestic and foreign databases. After submission, verification continues through targeted and often risk based reviews of anomalies or red flags in order to further confirm the accuracy of information that has been declared. Applying a risk-based approach to verification of BO information of legal entities is also required under FATF Recommendation 24.

However, despite significant progress, challenges persist, including resource constraints, poor data interoperability and legal and privacy limitations on accessing data for the purposes of verifying BO information, particularly across countries. Authorities maintaining BO registers have a key role to play in ensuring the information they contain is accurate. Registers, or alternative mechanisms implemented, need adequate legal mandates, funding and resources, including well-trained staff, to establish and undertake verification processes.

The case studies set out below – Austria, Germany and Slovakia – illustrate a variety of tools and approaches in use to verify BO information. They demonstrate that verification does not require a singular approach and instead may include a combination of mechanisms, including discrepancy

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<https://www.fatf-gafi.org/content/dam/fatf-gafi/guidance/Guidance-Beneficial-Ownership-Legal-Persons.pdf.coredownload.pdf>.

reports, automated report selection based on risk indicators, the use of professional service providers and manual and judicial review.

Austria's approach to verifying beneficial ownership information

Austria adopted a dedicated BO law in 2017 (last amended in 2024), establishing a central Register for Companies and Other Legal Persons and the Register for Trusts in line with the fourth and fifth EU Anti-Money Laundering Directives (AMLD4 and AMLD5). The Federal Ministry of Finance published an updated comprehensive decree in September 2025 concerning the identification, verification and reporting of beneficial owners.

Actions and results

The Beneficial Ownership Registry Authority under the Ministry of Finance undertakes verification of declared BO information on a monthly basis.

As of 2025, Austria has approximately 400,000 legal entities and arrangements, all of which must declare and report their BO information to the central register. Between 15,000 and 20,000 reports are entered into the register each month. Due to the limited number of staff in the Registry Authority and the sheer volume of reports that come in, Austria has implemented a two-step verification system: an automated case selection system as a first step combined with manual verification by trained staff.

The automated case selection system creates an initial short list of all incoming reports per month, selecting one-third of reports that come in randomly and the remaining two-thirds on the basis of currently 30 risk indicators. Austria derived its risk indicators from its national risk assessments on legal entities and trusts as well as lessons learned from verification experience. The aim of the automated system is to identify incorrect reports, as well as reports that may be connected to legal entities that are more likely to engage in money-laundering. The system reviews each report, applying risk points, and those that receive the highest number of points are more likely to become part of the short list to be reviewed manually by registry staff.

Registry staff undertake visual inspections of those on the short list, cross-checking identification documents and information across other domestic datasets and information service providers. The Registry Authority is empowered to refer cases to domestic authorities and can request documentation from the legal entity, which is required by law to retain all documents needed to verify its beneficial owners, such as trust deeds or share certificates. Legal entities may be sanctioned up to EUR 200,000 for incorrect reports.

Austria indicated that a key challenge with verification is access to and understanding foreign sources, as each country may permit different types of legal entities and arrangements. By compiling information on registers that are accessible, the types of legal forms permissible and the documentation required to prove ownership, Austria's Registry Authority has created a quick-sheet to help overcome this challenge. In addition, two of the 30 risk indicators detect if an ownership chain is in part located abroad or whether a high-risk country is involved, making it more likely that trained staff will look more closely at such reports.

Conclusion and next steps

Austria's risk-based, two-step verification system demonstrates how automation and targeted manual review can be combined to manage high reporting volumes while still ensuring accuracy and compliance. The approach not only strengthens the integrity of the register, but provides a model for balancing efficiency with risk sensitivity. It demonstrates that the size of a team does not determine the success of verification measures.

Germany's approach to verifying beneficial ownership information

Germany established its central register for BO information in June 2017 as part of broader reforms under the Anti-Money Laundering Act, but early reliance on substitute registers proved insufficient as authorities required more comprehensive and timely information on beneficial owners. Legislative amendments in 2021 transformed the register into a one-stop-shop, mandating direct filings by all relevant entities. Germany's reform has also been driven by international standards, including EU anti-money-laundering directives, as well as domestic concerns over foreign-controlled shell companies acquiring assets.

Actions and results

Germany's Transparency Register operates as a centralized "one-stop shop" integrating BO information from multiple legal registers. Legal persons, registered associations and trusts are obliged to disclose the natural persons who ultimately own or control them, with special obligations for foreign entities acquiring real estate. Required data includes pre- and surnames, dates of birth, residence, nationalities and the nature and extent of ownership interests.

Access is granted on a staggered basis: full access for competent authorities, functional access for obliged entities (e.g. banks, insurers, lawyers, notaries) to meet their know-your-customer obligations, and limited access for the public, with the requirement that a member of the public or non-governmental organization demonstrate a legitimate interest in the information as required following a decision by the European Court of Justice in November 2022.¹⁹ Information available to the public includes documents from the commercial register, partnership register, cooperative register, association register and company register. All users, including authorities, must pre-register online and identify themselves before gaining access to the system. Since 2023, automated access via an application programming interface (API) has been introduced for privileged obliged entities (banks, insurance companies, notaries) and all public authorities, enhancing efficiency and integration into compliance systems. A specialized API with broader search possibilities (e.g. reverse search by the beneficial owner) is also available for certain authorities engaged in law enforcement or supervision. (e.g. law enforcement, supervision).

Germany undertakes an initial plausibility check on BO that has been filed in the Transparency Register. A discrepancy reporting mechanism was introduced in 2020, requiring authorities and obliged entities to flag inconsistencies between registry data and independently sourced information in three key circumstances: if beneficial owners could be determined but those beneficial owners were different from the BO information within the transparency register; if no beneficial owners could be determined; or if the legal entity could not be found. All obliged entities and certain authorities are required to file discrepancy reports without undue delay. The

¹⁹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:62020CJ0037>.

Transparency Register can then seek clarification from the legal entity or escalate the discrepancy to the Federal Office of Administration.

While essential for efforts to ensure that BO information contained in the register is accurate, discrepancy reports can be challenging, as a high number of incoming reports generates a significant time pressure to respond. This also requires well-trained staff capable of handling complex procedures and resolving reports quickly. The register has responded by streamlining processes, investing in scalable IT solutions and developing robust training programs for staff. The register uses event-driven processing software to identify low complexity reports that can be addressed through automatic processing, combined with manual processing for complex cases, and quality assurance for all reports. These measures have allowed the register to improve responsiveness while maintaining legal certainty for reporting entities. Legislative reforms have also gradually expanded obligations to cover more legal forms, including partnerships under the 2024 MoPeG law, reinforcing the register's comprehensiveness.

The register also maintains historical records, ensuring that previously submitted information remains accessible.

Case study – Use of beneficial ownership information in real estate transactions

One area where Germany's BO register has had immediate impact is in the real estate sector. Under § 20, foreign legal persons (additional to domestic legal persons) acquiring property in Germany – whether directly through an asset purchase or indirectly through share deals – are obliged to disclose their beneficial owners in the central register. This requirement was introduced in response to concerns about the misuse of opaque corporate structures to conceal ownership of high-value assets. By mandating BO disclosure as a condition for property acquisition, Germany has created a preventive mechanism that deters the use of shell companies for money-laundering or corruption. Authorities, notaries and financial institutions involved in real estate transactions can verify ownership structures more effectively, ensuring compliance with anti-money-laundering obligations.

Conclusion and next steps

Germany's experience demonstrates how a mature institutional framework can support progressive improvements in BOT. The Transparency Register combines extensive filing obligations with a tiered access system and discrepancy reporting, enhancing both preventive oversight and investigative capacity.

Looking ahead, Germany will align its system with the EU's 2024 Anti-Money Laundering Regulation and AMLD6, which requires registers to verify BO information and establishes a unified access regime across Member States. These developments are expected to strengthen the reliability and usability of BO data for both domestic enforcement and international cooperation. Germany's incremental yet consistent reform trajectory provides a valuable model of adaptive implementation, balancing national integrity goals with evolving European and global standards.

Slovakia's approach to verifying beneficial ownership information

Corruption in public procurement and in the provision of different types of subsidies has long been recognized as a major governance challenge in Slovakia. Cases of undisclosed connections between political leaders and public officers on one side and winning bidders or awarded

companies on the other, often through shell companies incorporated offshore, undermined public trust and highlighted systemic vulnerabilities.²⁰

In response, Slovakia became the first EU Member State in 2015 to introduce a BO register for companies participating in public procurement. However, the initial system faced criticism for its limited scope, weak verification mechanisms and ineffective sanctions. Public pressure and the need to align with evolving EU anti-money-laundering standards drove the Government to adopt more comprehensive measures.

The turning point came in 2017 with the effective implementation of the Law on the Register of Public Sector Partner, or the Anti-Shell Companies Act, which created the *Register of Public Sector Partners* (RPSP).²¹ The Act established that only entities that disclose and register their beneficial owners can engage in business with the state or benefit from public funds. Its scope was deliberately broad, covering not only public procurement but also state aid, concessions, subsidies, EU funds and other forms of public-private commercial relations. This functional approach ensured that both Slovak and foreign entities, including offshore companies, must register their beneficial owners before accessing public resources.

A distinctive feature of Slovakia's model is the reliance on professional service providers or "authorized persons" such as lawyers, notaries, auditors, banks and tax advisors, to verify and register BO information. The legislator designated these gatekeepers, given their status and experience as obliged persons under the anti-money-laundering legal framework, with the goal of guaranteeing a professional standard in the identification of beneficial owners. Authorized persons must act independently when identifying beneficial owners and, crucially, as a result they assume co-liability for the accuracy of the data. Authorized persons must prepare and publish verification documents that transparently outline the ownership and control chain and serve as a snapshot of the situation at a given time, making subsequent manipulation of the ownership or management structure difficult.

Verification is required annually and prior to specified events (e.g. before a private entity receives a payment under a public contract exceeding EUR 1 million within a 30-day period).²² Compliance is further reinforced through a special court mechanism, which can initiate proceedings when there are reasonable doubts about the correctness, completeness and accuracy of registered data on its own initiative or upon a qualified motion. If such proceedings are initiated, the burden of proof rests on the public sector partner under review to provide sufficient proof that the BO data in the register is correct. The public sector partner is thereby compelled to demonstrate substantial evidence, including foreign official or private documents that would otherwise not be accessible to the Slovak courts, confirming the accuracy of its BO records to preserve its registration.

Access to the RPSP is free, open to everyone online, in real time and in a machine-readable format. It operates in parallel to Slovakia's Register of Legal Entities that collects information on beneficial owners of all Slovakian companies and other legal persons as required under AMLD5. As of July 2025, public access to BO data contained in the Register of Legal Entities was suspended as a response to the 2022 judgment of the European Court of Justice. Access is currently limited to public authorities, obliged entities and European and national authorities competent in combating money-laundering.

It is worth noting that the respective 2022 judgment of the European Court of Justice implicitly left room for such an interpretation that public access to BO data could be compliant with EU law as

²⁰ [Fighting money laundering must go hand in hand with transparency of beneficial ownership - Groupe d'études géopolitiques.](#)

²¹ Act no. 315/2016 Coll. on the Register of Public Sector Partners and Amendments to Certain Acts, [315/2016 Z.z. - Zákon o registri partnerov verejného sektora a o zmene a doplnení niektorých zákonov.](#)

²² § 11(2).

long as the purpose of the regulation is public oversight of efficient public spending (as this is the case of the Anti-Shell Companies Act).²³

Actions and results

Sanctions under the Anti-Shell Companies Act are significant. Companies that fail to disclose accurate BO risk fines up to EUR 1 million, disqualification from being able to register in the RPSP for two years (effectively excluding them from public procurement or, generally, the receipt of public funds) and bans on executives from holding directorial positions.²⁴

In addition, executives may be subject to fines of up to EUR 100,000, with payment of the fine guaranteed by the authorized person, unless the authorized person demonstrates that they acted with professional diligence.²⁵ The enforceability of sanctions is ensured by the requirement that authorized persons have their registered seat in Slovakia. This guarantees that fines imposed on executives are always secured by local entities, which are subject to the jurisdiction and risk not only financial loss but also reputational damage in the market. A separate fine may also be imposed on the authorized person if the prohibition of conflict of interest is breached.²⁶

Combined with Slovakia's effective sanction regime, the RPSP has proven to be a deterrent against the misuse of anonymous ownership structures. By 2020, over 31,000 entities had registered, including many offshore companies previously used as vehicles for opaque transactions. Of all registered entities, 13 companies were based in high-risk jurisdictions. In addition, there were 16,500 ultimate beneficial owners abroad (according to their residence address), including 21 individuals in high-risk jurisdictions. Statistical reviews showed that the measures have dramatically improved ownership transparency among companies participating in public procurement: in 2018 and 2019, only 40 public contracts worth EUR 15.5 million lacked registered beneficial owners, compared with around EUR 29 billion in compliant contracts.²⁷ The following year, only 25 contracts worth EUR 5.5 million lacked BO disclosure.

Conclusion and next steps

By combining mandatory disclosure, robust verification measures by professional service providers, and judicial oversight with a reversed burden of proof, Slovakia has created a system that actively deters the misuse of anonymously owned companies in public procurement. It shows that embedding strong verification mechanisms and liability structures not only improves compliance but also restores public trust and levels the playing field for fair competition.

²³ Judgment of 22 November 2022, WM and Sovim SA v Luxembourg Business Registers, C-37/20 and C-601/20, EU:C:2022:912, para. 54.

²⁴ [315/2016 Z.z. - Zákon o registri partnerov verejného sektora a o zmene a doplnení niektorých zákonov](#) § 13 Sanctions; § 13a – Consequence of Deletion.

²⁵ § 13(5).

²⁶ § 13(4).

²⁷ [Kažimír podpísal zmluvy s ratingovými agentúrami bez zápisu do protischránkového registra - Transparency International Slovensko - \(blog.sme.sk\)](#).

Tracing beneficial ownership networks across borders

Understanding the links between national beneficial ownership transparency reforms, data usability and international data-sharing

This case study demonstrates insights in line with operative paragraph 2 of resolution 10/6, in which the Conference urged States Parties “to cooperate closely with one another, bearing in mind the need to provide one another the widest measure of international cooperation, in accordance with the United Nations Convention against Corruption and domestic law, to facilitate the efficient exchange of adequate, accurate and up-to-date beneficial ownership information in a timely manner.”

Understanding beneficial ownership data usability to unlock beneficial ownership transparency’s impact within and across borders

Lack of appropriate, effective and timely access to BO information has been one of the main challenges identified by Member States in analyses undertaken by UNODC in [2023](#) and [2024](#), and during the [Intergovernmental Meeting on Enhancing the Use of Beneficial Ownership Information to Strengthen Asset Recovery](#), which was held from 14 to 15 April 2025 in Vienna, Austria.

Many countries have legal provisions that only allow domestic competent authorities and limited additional categories of domestic actors to directly access their BO registers. In doing so, governments may seek to minimize infringements on rights to privacy, protect national security or align with data protection laws. Governments can design various safeguards in line with [principles of necessity and proportionality](#) to achieve these legitimate aims. Yet, when such measures are not carefully designed, they may prevent the effective use of BO information, ultimately undermining other important goals shared by governments, such as tackling crime and generating public revenue by tracing IFFs across borders, identifying those who benefit from the profits and assets derived from illicit activities.

It is important to ensure these safeguards do not unduly prevent the effective use of BO information. Countries can draw on [evidence about BO data use](#) to develop legal frameworks that enable access to BO information and design data systems that facilitate the effective processing of such information.

Individuals and agencies who use BO information to analyze criminal activity and investigate and trace the proceeds of crime and IFFs often require following leads and studying patterns across

multiple types and sources of information, and across jurisdictions. Many users face barriers to accessing information in a timely manner or accessing it at all. High costs to using BO data due to diverging details and formats of information across sources, as well as limited options to search and process information, further complicate efforts.

There are several key features that ensure that those using access points for BO information, such as central BO registers for legal vehicles, can retrieve the information they need and undertake essential analyses. These include:

- Effective and relevant search features, such as searching by the names of beneficial owners
- Provision of data in bulk, i.e. simple downloads of large volumes of data
- Availability of data via application programming interfaces (APIs), i.e. tools to allow different systems to communicate and access each other's data

Collecting and storing BO data in a [structured way](#) is a basis for these features. Providing **supporting documentation** also helps users better understand and interpret the data they can access. **Well-structured data** that is organized into separate fields and available in a machine readable format also facilitates [verification](#). This makes data more reliable for users by improving its accuracy.

These data and system characteristics improve data usability and should be considered in both domestic BO registers and the transnational mechanisms that aim to facilitate information-sharing across borders.

Processing BO information from different jurisdictions, as well as across other relevant information sources such as sanctions and politically exposed persons lists, to **understand the networks of relationships between individuals, legal vehicles and assets – or BO networks** – also requires ways to connect and make sense of information held in various places. For example, it means being able to **understand if records from different sources of information refer to the same person or legal vehicle (entity resolution)**. When different sources use [reliable identifiers](#), such as tax identification, company incorporation and social security numbers, or open license identifiers such as the [LEIs](#), to distinguish between different legal vehicles and individuals, it supports systems interoperability and simplifies entity resolution. Such identifiers for individuals are less likely to be used across borders due to their privacy-sensitive nature. Using a standardized way to structure [sufficiently detailed information](#) – including widely used data formats for common types of fields – reduces the amount of resources required to append and join information sources and makes it easier, faster and cheaper to identify links across and between them.

Understanding these features of BO data usability is essential to support effective data-use on a domestic level while also working towards enabling the effective use of information across borders. Aligning domestic BOT provisions across countries also supports users' understanding of transnational ownership networks. Evidence-based frameworks exist to guide BOT implementing countries in identifying broad principles for effective [laws](#) and [policies](#).

Data-sharing mechanisms and beneficial ownership data usability

In most countries implementing BOT reforms, the legal obligation to disclose certain information only applies to legal vehicles governed under domestic laws. Some countries also collect information about foreign entities and arrangements that have “sufficient links” with their

jurisdictions – as per FATF Recommendations 24 and 25. For example, a number of countries have BO registers of foreign legal entities that own certain types of assets considered to have a high risk of money-laundering, such as the United Kingdom's (UK) [Register of Overseas Entities](#). As of 2025, no authoritative inter-governmental mechanism exists that combines BO information with other relevant datasets and information about people, legal entities and assets across borders at the global level. To address this gap and support anti-financial crime actors to build a comprehensive understanding of transnational BO networks, a number of mechanisms have emerged.

Access-upon-request means untimely access to information, hindering investigation

Access to information upon request

From [mutual legal assistance](#) in criminal matters to global and regional networks, mechanisms and agencies like the [GlobE Network](#), the [Egmont Group](#), the [Asset Recovery Inter-Agency Networks](#) or [INTERPOL](#) and regional equivalents, many multilateral mechanisms are open to law enforcement, judicial and investigative authorities and allow access to information from a large number of countries, which can be used as evidence in court or as cross-border intelligence. They are based on an access-upon-request model, and many provide electronic systems to streamline requests and securely exchange emails and documents. They also help authorities identify relevant contact points and information sources. For example, the GlobE Network with over 240 anti-corruption and law enforcement authorities from 132 Member States at the time of writing, offers its members tools such as the [Directory of Member Authorities](#) and [Directory of Open Source Registries](#) including BO registers, enabling members to identify competent counterparts, request information securely and access open-source data relevant to financial and corporate transparency for anti-corruption and law enforcement authorities. While the Network does not maintain its own databases, it provides a trusted operational platform for direct authority-to-authority communication.

While highly valued as collaboration channels and having led to [impactful cases](#), authorities continue to report gaps in international measures to comprehensively meet their needs. Consultations with authorities have pointed to requests sometimes taking weeks or months to receive responses. As concluded by UNODC in [2024](#), “insufficient cooperation efforts, channels and mechanisms hinder the collection and exchange of BO data across jurisdictions.” Many international mechanisms are enabled by agreements, conventions and treaties that often include articles listing reasons for refusing assistance, which, although legitimate (e.g. national security), can hinder information-sharing. At the same time, some jurisdictions have also [reported](#) needing inter-agency agreements and written requests to access information in their own countries, thereby impacting their ability to fulfill international cooperation duties in a timely manner. Some smaller scale initiatives have addressed the timeliness issue of access-upon-request by developing tailored bilateral arrangements. For example, the “[exchange of notes](#)” between the UK and the British Overseas Territories empower law enforcement from these jurisdictions to receive responses within 24 hours, but is limited to a small number of jurisdictions.

Automatic exchange of information

The tax sector includes mechanisms that cover a large number of countries and is a unique example of the automatic exchange of large sets of information on a global scale. The Organisation for Economic Co-operation and Development's (OECD) [Automatic Exchange of Information \(AEOI\)](#) mechanism requires tax authorities, who all receive information from financial institutions, to automatically share this information annually with counterparts in countries where

bank accounts holders are tax residents. **This automatic exchange of information allows authorities to receive information directly and is done in bulk to enable large-scale analysis.** Exchanges occur through the Common Transmission System, a secure, encrypted platform that ensures confidentiality, data protection and technical interoperability between participating jurisdictions. **However, this mechanism has also been [criticized](#) for its lack of inclusivity in countries with lower financial resources and technical capacity.** The information received is also not uniformly up-to-date due to exchanges occurring annually, at different points in time for different jurisdictions. While only accessible to participating tax authorities, the design of this mechanism and its usability features offers a valuable model to consider solutions for the international exchange of BO for broader cooperation purposes such as to tackle corruption.

Direct and indirect access to information

Some mechanisms allow for **direct access** to national BO registers without needing to request specific information or set up legal agreements. **Primary examples of this are central BO registers that make information publicly accessible and freely searchable**, such as in [Nigeria](#) and the [UK](#). When making structured information available in bulk or through APIs, these public registers allow data to be **integrated into data-sharing platforms**. [Open Ownership's prototype global register](#) standardized and connected data from public registers and provided tools to support users in analyzing data from four jurisdictions. However, it only ever covered four countries, and the significant overhead associated with this work made it hard for a non-profit organization to sustain and scale up progress. A similar approach was suggested by Heads of States calling for a global BO register in their [outcome document](#) ahead of the 2025 Financing For Development Conference, and by other parties supporting the development of a [global asset register](#). However, only a minority of countries make information available in ways that allow such integration into a transnational platform. Some commercial providers ingest BO data from publicly accessible registers even where these do not provide information in a structured format (e.g. through scraping²⁸), but they can be unaffordable to many users. The [OECD has proposed](#) hosting a similar platform and connecting this information to real estate information for tax purposes as an alternative to the exchange of information.

The [EU's AMLD6](#) also provides a model of regional access, where a large range of anti-financial crime actors – from EU and national authorities, to obliged entities, non-governmental organizations (NGOs), academics and investigative journalists, can **directly access BO information based on their legitimate interest** to do so. While the EU develops further specifications which may clarify whether a single point of access to BO information from multiple Member States' register will include entity resolution or not, it has stated that access will be to “the interconnected central [BO] registers,” which appears to be the [Beneficial Ownership Registers Interconnection System](#) (BORIS). EU authorities have “immediate, unfiltered, direct and free access” to all EU members' BO information, and once civil society actors demonstrate their legitimate interest, they are able to access EU registers directly for three years. Access by these actors is particularly important to support the work of authorities. [Research](#) points to law enforcement's insights highlighting that “officers involved in investigating grand corruption ... recogniz[e] that ... collaboration among much wider networks that include law enforcement, NGOs and the private sector” is critical.

²⁸ Scraping involves extracting data from its original source and turning it into a more structured format that can then be combined and ingested onto another platform. For example, comparative websites often rely on this technique.

Existing mechanisms have complementary strengths but more is needed to significantly lighten costs to users linking data across borders

Existing mechanisms include promising practices to support effective BO data use, but still have legal, technical and operational gaps which affect different aspects of data usability, including making advanced searches and analyses and performing entity resolution.

While global upon-request mechanisms offer valuable systems to **streamline information requests**, **securely exchange information** and **support collaboration**, they fall short in providing timely direct access to multiple datasets, necessary for effective BO data use. While only limited to the tax sector, the OECD's Common Report Standard (CRS) offers valuable lessons by setting out a detailed and **standardized way** to structure the information exchanged under the AEOI and provides **guidance** to help users interpret it. The EU's 2024 anti-money-laundering package states that BO information needs to be collected in a **structured** way, in a format defined by the EU institutions, standardized across jurisdictions and available in **machine-readable** format. While the AEOI facilitates the exchange of **bulk** data, the AMLD6 does not include specific requirements for data access in bulk or via **APIs**, and most of the upon-request global mechanisms only allow access to a single – or sometimes a batch of – records at a time. Effective **search features** also support various analyses, but many BO registers still have gaps in this area. For example, many do not allow searching by the names of beneficial owners, although broadly considered as highly valuable by users.

A lack of **sufficiently detailed information**, even in more sophisticated systems like AEOI, can make entity resolution more difficult to perform. For example, while providing satisfactory details on individuals and entities, certain attributes, such as dates of birth and tax identification numbers, are not mandatory in the CRS. The EU's legitimate interest access regime plans for access to **historical information**, and its [regulation](#) mandates the collection of information on intermediary vehicles through which a beneficial owner exercises their interest on a legal vehicle, which suggests that information on wider BO networks may also be accessible. As of now, no plans have been published to interconnect EU registers by incorporating entity resolution processes for legal entities and people. Under AMLD5, data users who accessed BO data through the [BORIS](#) system had to undertake entity resolution themselves using other identifying attributes. Doing so requires standardizing information from different sources and often in different formats, which has been the biggest added value of many data-service providers given the time and cost associated with this process. Emerging discussions on how artificial intelligence may impact BOT reforms also emphasizes how machine learning algorithms can help contextualize and analyze data from BO registers and other datasets, while not being a replacement for investing in data quality at source.

The experience of federal administrations trying to join data organized differently at the sub-national level illustrates an alternative approach to commercial offerings in this area. For example, the federal governments of Canada and Mexico have seen value in using **open standards** – such as the [Beneficial Ownership Data Standard](#) – as guides to understand what usable datasets may look like, and explore contextualization for their jurisdictions.

While ensuring various datasets use common [reliable identifiers](#) is one element of standardization, which greatly supports their **interoperability**, examples of cross-border mechanisms that heavily invest in this are scarce. Initiatives such as the [European Digital Identity Wallet](#) offer harmonized **identity verification** to support entity resolution for individuals.

Conclusion

While global policy standards exist, BOT is implemented at the national level, and modalities of collecting and accessing BO information significantly vary across countries for a range of reasons, including diverging legal contexts. Unaddressed tensions between various national policy objectives such as anti-financial crime, national security and data protection mean that timely access to information is still a challenge for many data users. When data is available, in the absence of free, affordable and centralized access points to standardized BO information from multiple jurisdictions, investigative authorities and other anti-corruption and crime experts also spend considerable amounts of time and resources trying to piece information together. **Ensuring national BOT reform and cross-border data-sharing initiatives are designed with data user needs in mind can guide decisions on how to ensure safeguards do not unduly limit BOT's impact and design systems that enable the effective processing of BO data from multiple sources to understand transnational BO networks.** A number of initiatives outlined in this document include promising and complementary features – such as cross-border trust, streamlined processes and direct access to structured and standardized data for a range of relevant actors – which could form a basis for testing more direct data-sharing approaches on a sub-regional or tailored basis.

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