



Recommendations	Duration of Activities																
	2017				2018				2019				2020				
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
Definition of beneficial ownership (BO) and institutional framework for BO disclosure	Engage a technical consultant to conduct scoping study on BO disclosure, including review of existing definitions and policies related to BO and Politically Exposed Persons (PEP) vis-à-vis international standards																
	Propose the inclusion of a provision on BO disclosure in the EITI bills pending in Congress																
Consider links between BO and national reform priorities	Identify a national champion/s on BO disclosure																
	Create a multi-stakeholder Technical Working Group on BO disclosure																
			Conduct an inter-agency forum on BO disclosure (including Anti-Money Laundering Council (AMLC) as participant)														
Reporting obligations for Politically Exposed Persons	Develop an action plan to establish mechanism for disclosing PEPs within legal bounds																
Level of detail to be disclosed	MSG to meet and agree on materiality threshold for disclosure/reporting based on the findings of the scoping study																
	Coordinate with the Securities and Exchange Commission (SEC), AMLC, and other relevant government agencies regarding disaggregation of available data																
Data Collection					Coordinate with SEC to make information on BO publicly available and free of charge												
					Develop reporting templates for BO disclosure												
							Pilot test BO templates (2 - 3 companies and relevant government agencies)										
								Finalize the templates									
									Develop online reporting system for BO (based on the approved templates, streamlined with existing EITI online reporting systems)								
												Pilot test and roll-out the online system (training of users)					
Assuring the accuracy of the data													Hire a third party researcher to gather data from SEC and relevant government agencies, generate a list of beneficial owners, and compare the same with data from the companies				
Data timeliness													Send letters (signed by PH-EITI Focal Person) to companies and relevant government agencies requesting them to submit accomplished BO templates on time and diligently follow up				
															Integrate BO disclosure in the data collection for the annual EITI Country Report		
Data accessibility																Disseminate data gathered from the online system to stakeholders	