



# CONSIDERATIONS ON IDENTIFYING AND REPORTING PEPs IN MONGOLIA

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**REGIONAL WORKSHOP: ADVANCING BENEFICIAL OWNERSHIP  
TRANSPARENCY IN ASIA AND THE PACIFIC  
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# Updates on legal regime for BO disclosure



## Progresses

- 2018 - Mandatory reporting requirement for extractive companies and land permissions
- 2019 - Requirements for all legal entities including businesses and non businesses
- 2021 - Public Information Law, requires disclosure BO register.
- Disclosure of legal owners of corporate entities in 2018.



## Challenges

- Impacts of privacy protection on BO transparency
- Verification
- Use of data

# PEPs in the BO reporting

## Identification and reporting of PEPs

- No requirements of identification and reporting of PEPs in the BO reports under tax and registration laws
- EITI reporting template only asks whether BOs are PEPs or not
- Only 919 (34 %) companies reported their BO in 2020 EITI report
- Asset and Income Declaration of PEPs is the only source of PEPs and their connection to the businesses
- Only summary is publicly available and not in open data format.

## **Verification**

- IAAC- tight supervision on deadline, random check on accuracy, full investigation on suspicious cases
- No verification at the Registration Agency
- No exchange of information between IAAC and Registration Agency
- EITI has no official verification and no information exchange

## **Definition of PEPs**

- Not fully comply with international best practices.
- Does not cover PEPs in foreign countries.
- Does not cover high officials of political parties except election candidates



# Recommendations

- To improve data management of the government: capacity building, clear guidance, technical solutions
- Exchange of information between different databases.
- Support and capacity building of demand side: investigative journalists and CSOs
- Create mechanisms to use BO and PEPs information in the core decision making