

**FROM LEGISLATION TO IMPLEMENTATION:**

**REPORT ON:**

**STAKEHOLDER WORKSHOP TO ESTABLISH A FRAMEWORK FOR  
THE IMPLEMENTATION OF BENEFICIAL OWNERSHIP  
PROVISIONS IN THE AMENDED COMPANIES ACT**

**DATE: THURSDAY, 30<sup>TH</sup> MARCH, 2017 AT ALISA HOTEL, NORTH  
RIDGE, ACCRA.**

**SUPPORTED BY:**

**INTERNATIONAL EITI SECRETARIAT**

**AND**

**GOVERNMENT OF GHANA**

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## LIST OF ABBREVIATIONS

A-GD	–	Attorney-General’s Department
BOD	–	Beneficial Ownership Disclosure
CHRAJ	–	Commission on Human Rights and Administrative Justice
CSOs	–	Civil Society Organizations
DFID	–	Department for International Development
EITI	–	Extractive Industries Transparency Initiative
FATF	–	Financial Action Task Force
FIC	–	Financial Intelligence Centre
FIC	–	Financial Intelligence Centre
GHEITI	–	Ghana Extractive Industries Transparency Initiative
GIABA	–	Inter-Governmental Action Group against Money Laundering in West Africa
ISODEC	–	Integrated Social Development Centre
LLPs	–	Limited Liability Partnerships
MoF	–	Ministry of Finance
NRGI	–	Natural Resource Governance Institute
OGP	–	Open Governance Partnership
PEP	–	Politically Exposed Persons
PSCs	–	Persons with Significant Control
PWYP	–	Publish What You Pay
R-GD	–	Registrar-General’s Department
RSD	–	Real Sector Department
STAAC-Ghana	–	Strengthening Action Against Corruption – Ghana
UK	–	United Kingdom
UKAID	–	United Kingdom Aid
USAID	–	United States Agency for International Development

## 1.0 EXECUTIVE SUMMARY

Ensuring availability and Access to Beneficial Ownership (BO) information is an obligation that States Parties to the United Nations Convention against Corruption must discharge.

Article 12 (1) and (2) ( c) “Private sector” provides that “Each State Party shall take measures, ... to prevent corruption involving the private sector, ... and, where appropriate, provide effective, proportionate and dissuasive civil, administrative or criminal penalties for failure to comply with such measures” .

The measures that may be taken include promoting transparency among private entities regarding “...the identity of legal and natural persons involved in the establishment and management of corporate entities” .

In this regard, Ghana has ratified a number of international treaties like the Open Governance Partnership (OGP) and the Inter-Governmental Action Group Against Money Laundering in West Africa (GIABA). As part of meeting our international obligations with regards to these treaties, Ghana has to establish a beneficial ownership regime by January 2020. Again during the Anti-Corruption Summit held in London in May last year, Ghana made a number of commitments including establishment of the beneficial ownership regime by January 2020.

Since 2016, Beneficial Ownership Disclosure (BOD) has moved from being optional to mandatory and countries have been tasked to give a roadmap on BOD legislation by 2017 and to operationalise it by 2020. These new requirements include; establish and maintain a publicly available register of the beneficial owners of the corporate entity that bid for, operate or invest in extractives assets, including the identity of their beneficial owners and the level of ownership.

To take the implementation process forward, the Ministry of Finance and the Ghana Extractive Industries Transparency Initiative (GHEITI) in collaboration with the Registrar-General’s Department invited stakeholders to this workshop to discuss the establishment of a framework to support the Registrar-General’s Department implement beneficial ownership disclosure regime in Ghana.

The workshop was sponsored by the Extractive Industries Transparency Initiative (EITI) International Secretariat, UKaid, Natural Resource

Governance Institute (NRGI) and Strengthening Accountability Against Corruption (STAAC-Ghana).

The objectives of this workshop were to:

- identify what the key implementation issues will entail, based on a framework with clear timelines;
- support the Registrar-General's Department (RGD) to develop the regulations for the Companies' Amendment Act to facilitate the creation of a BO register; and
- assist the RGD to explore ways to seek financial support for BO implementation.

It was agreed to implement the current portions of the Companies Act on BO provisions which do not meet international requirements (especially FATF) whilst steps are taken to have a more detailed amended Companies Act, 1963 (Act 179) integrating world-class BOD requirements before the 2020 deadline.

Participants were divided into three (3) working groups to brainstorm on how to help the R-GD to fully implement the current BO provisions. They agreed on the following:

- Establish a Working Group to meet and identify relevant agencies for consultation in the public and private sectors to facilitate implementation of the BO provisions in the amended law. The implementation Working Group was drawn from the OGP, GHEITI, FIC, donor partners, and other relevant stakeholders. The Working Group would be convened by the R-GD.
- Establish sub-committees of the Working Group to coordinate institutional support. For instance, Ministry of Finance will coordinate donor support from Department for International Development (DFID), Strengthening Action against Corruption (STAAC-Ghana) etc; the technical sub-committee will deal with the experts Working Group and also the legal sub-committee will deal with legal issues.
- Establish a Steering Group to supervise the operations of the Working Group and to handle high level political issues. Suggested membership of this group should include the Attorney-General (suggested to be chair) or his representative, the Minister of Finance or his representative, Minister for Business Development, Private Enterprise Federation, the Association of Ghana Industries, Civil Society Organisations, Registrar-

General, representatives of the extractives sector as well as the Ministries, Departments and Agencies (MDAs).

- Leverage on existing projects by sourcing information from companies and learn from techniques adopted by the Minerals Commission, Petroleum Commission and the Bank of Ghana.
- Ensure BOD legislation covers business partnerships and other legal arrangements in the Beneficial Ownership Disclosure requirements.
- Learn from foreign projects such as the "Open Ownership Register" on implementation of BO legislation.
- Demonstrate commitment to strictly implement the current BO provisions in the amended Companies Act in order to court donor support for a more rigorous future BOD legislation.
- Work with relevant key stakeholders and collect their views on BO provisions to be integrated into the new amendment legislation. These stakeholders include the Committee of Experts, the A-G's office, CSOs, Parliament etc.
- R-GD should learn from the Singapore and UK experiences in putting in place a world-class BOD regime.
- Sanctions regime should be put in place to ensure that companies that fail to comply are sanctioned as a means of revenue generation.
- Conduct needs assessment to determine the kind of infrastructure that will be required to implement the amended Act.
- The Working Group should determine the form of implementation and implementation challenges that are likely to crop up. It should give timeline within which new companies should comply with particular BO provisions based on stages.
- Public sensitization of companies should be embarked upon nationwide so businesses know the type of information they need to include in their BOD.
- The R-GD should look at the current software to make it easily accessible to the public at affordable fee. Only basic information should be accessible to the public but not to make the register public since it has security implications.
- The new BO legislation should also facilitate company registration and not necessarily for exacting sanctions.
- In terms of the exact cost for the new BOD legislation, the Working Group was tasked to work on that.

The discussion on the draft terms of reference was referred to the Working Group for study before further action.

A resource person from the United Kingdom (UK), Mr. Andrew Death shared the UK's experiences in implementing BOD legislation. Mr. Death gave an overview of UK's transparency and trust measures initiated by former Prime Minister David Cameron since 2013 resulting in the passage of a legislation in 2015 which requires UK companies to keep a register of individuals with significant control over the company (PSCs) and this applies to all kinds of UK companies and LLPs. The benefits of the UK PSC register is that it enhances transparency and trust issues and enable people to be confident to deal with that company.

## **2.0 WORKSHOP PROCEEDINGS**

### **2.1 INTRODUCTION**

The meeting which started at 9:20am, was chaired by Prof. Bondzi-Simpson, a member of the Committee of Experts and Dean of the Faculty of Law of the University of Cape Coast (UCC). Other members of the Committee of Experts were equally present including Prof. Justice Date-Bah.

### **2.2 REMARKS BY ACTING REGISTRAR-GENERAL, MRS. JEMIMA OWARE**

Mrs. Oware welcomed participants to the meeting. She noted that Ghana during the London Anti-Corruption Summit in May 2016, committed to implementing Beneficial Ownership Disclosure (BOD) provisions in the Companies Act , 1963 (Act 179) by 2020 in order to fight corruption. She said amendments of certain provisions in the Companies Act started ten years ago and at the time, BOD provisions were not brought to the fore. BOD concerns/agitations became an issue after these amendments had been made and efforts were made to integrate them. She said the country is committed to fighting corruption and thanked participants for coming to support this worthy cause.

Mrs. Oware said the Registrar-General's Department (R-GD) has developed a database software that houses a central public register capable to update information on companies operating in Ghana. According to her, the task is huge and urged participants to support the R-GD to fully implement the new BOD provisions. She said the Department has committed staff but need training in this new area of company regulation.

She noted that at the moment, only the United Kingdom (UK) and a few Asian countries have BOD provisions in place, and so Ghana is setting a pace in this domain in Africa and deserves to be commended. She appealed for clear timelines to be set in order to achieve BOD provisions target by 2020.

### **2.3 WELCOME ADDRESS BY HON. KEN OFORI-ATTA, MINISTER FOR FINANCE**

Hon. Mrs. Abena Asare, Deputy Minister for Finance represented the Minister for Finance. She extended the Minister's regrets and delivered the speech on his behalf. This speech is attached as appendix three.

She welcomed the participants to the workshop especially Mr. Andrew Death who came from the UK to facilitate the workshop.

Hon. Asare was grateful to the UKAID and DFID for supporting the R-GD to come out with amended Companies Act provisions on BO legislation.

In her view, in order to protect the international finance system, there is the need to fight illicit wealth. She also assured that the Government is committed to fighting corruption and to prevent revenue leakage.

Hon. Asare thanked the EITI International Secretariat, UKAID, DFID, NRG1, GHEITI and all stakeholders for organizing this important workshop.

### **2.4 PRESENTATION BY DR. STEVE MANTEAW (ISODEC/PWYP) ON GHANA BENEFICIAL OWNERSHIP DISCLOSURE PROCESS SO FAR**

Dr. Steve Manteaw of the Integrated Social Development Centre / Publish What You Pay (ISODEC/PWYP) took participants through Ghana's BOD process since February 2016 to date. The presentation is attached as appendix IV.

He noted that it was the Extractive Industries Transparency Initiative (EITI) that pushed for contract transparency in Ghana and formed the initial efforts at BOD in the country. EITI advocacy ensured that BOD moved from being operational to mandatory requirement.

Since 2003, when Ghana signed up to the EITI, it opened up transparency in the extractives sector. He said EITI takes a much broader view of transparency in the extractives sector since the global conference of EITI was held in Sydney in 2013.



Ghana integrated BOD in its 2013 Ghana Extractive Industries Transparency Initiative (GHEITI) reporting. He noted that in the past, the information that was collected by the R-GD had to do with the directors and shareholders but not actual owners of the company.

Since 2016, BOD moved from being optional to mandatory and countries have been tasked to develop their respective roadmaps on BOD by December 2016 and to operationalise it by 2020. These new requirements include; establish and maintain a publicly available register of the beneficial owners of the corporate entity that bid for, operate or invest in extractives assets, including the identity of their beneficial owners and the level of ownership.

### **Financial Action Task Force (FATF) Requirements**

This requires us to know who owns and controls the company. The information should be adequate, accurate and current. Competent authorities are allowed to have access to this information and not everybody is allowed free access. This is one of the flaws in the amended companies act of Ghana.

Both the EITI and FATF require certain information to be publicly accessible.

Ghana in 2012 went through a peer review under GIABA and failed the review because we did not have BO legislation in place. This accounted for credit cards users from Ghana being unable to use their cards abroad as well as visa refusal by the G8 countries. Dr. Manteaw therefore, urged that at the next review, Ghana should be able to demonstrate that it has BO legislation in place.

**Political leadership and collaborative efforts:** A working group hosted by the Natural Resource Governance Institute (NRGI) with membership from GHEITI, the Open Governance Partnership (OGP), the Financial Intelligence Centre (FIC), and a few Civil Society Organisations (CSOs) decided to work together to come out with BOD legislation for consideration by the Executive.

The Presidency also hosted a similar meeting in 2016 chaired by the Deputy Chief of Staff, Hon. Johnny Osei Kofi in preparation for the London Summit in May 2016. Both the Presidency and the NRGI partners agreed legislation was the way to go. At the time, the new Companies Bill was laid in Parliament but did not have BOD provisions. Similarly, the Petroleum Exploration Bill was also before Parliament but did not equally have BOD provisions.

The Presidency persisted to have the Companies Act amended, following a working group that was established by the Deputy Chief of Staff to include CHRAJ, FIC, R-GD, Attorney-General's Department (A-GD). The Act was finally amended in August, 2016.

## **2.5 PRESENTATION BY MR. EMMANUEL KUYOLE ON ANALYSIS OF THE COMPANY AMENDMENT ACT – GAP ANALYSIS**

Mr. Emmanuel Kuyole, Deputy Director, Africa for the Natural Resource Governance Institute (NRGI) identified gaps / flaws in the Companies (Amendment) Act, 2016 (Act 920) and recommended the following:

- There should be public disclosure of the Central Register and it should be available for inspection at a small fee – the disclosure should not be restricted to only “competent authorities”.
- Reduce the exceptions in the BOD provisions.
- Specify guidance, timing and format for disclosures
- Politically Exposed Persons (PEP) should include family members, close associates of domestic officials. The current law in the 1<sup>st</sup> schedule applies to only foreign officials.
- BOD should not be an exception to members/subscriber status but rather proactively required.

The full presentation is attached as appendix V.

## **2.6 DISCUSSIONS**

This session was facilitated by Dr. Steve Manteaw.

- It was felt that section 100 of the Companies Act, 1963 (Act 179) only requires one to indicate what shares he owns in a company. Legal owners and not any other interest is demanded. So there is conflict regarding BOD provisions and people with shares in a company.
- Section 77 of the Act dealing with prospectus talks of shares and so a kind of BOD provisions is inherent. We need to look at the current law and do not just assume is only people who are Politically Exposed Persons (PEPs) that should disclose. However, there is some form of disclosure under this session.
- When stakeholders are organising events, they need to involve relevant people with expertise to contribute. It was felt that if EITI had been factored into the passage of the amended Companies Act, the last minute

backtracking to integrate BO provisions would have been avoided. This should serve as a learning experience.

- The Companies Bill should be a practicable legal regime to address a number of concerns and not necessarily an anti-graft agenda. For this reason, we should think of passing a bill that will stand the test of time.
- The Companies Act exists to regulate the existence of companies and not necessarily to punish companies – Wide consideration should be given in integrating BO provisions. In this regard, there is the need for institutional harmonisation, verification and sanctions regime.
- It was agreed we implement the current legislation in its present form and later integrate a more comprehensive BO provisions in the new legislation before 2020. This is because, it was felt this meeting cannot fully address the deficiencies on BO provisions in the amended Companies' Act.
- There is potential for conflict whereby the disclosure requirement under BO provisions do not affect companies formed based on Partnerships under the Companies Act, 1963.
- Ghana is not working in isolation as far as BO provisions are concerned but has obligations under various global international laws and so must not pass a law that falls short of these requirements as far as fighting money-laundering, corruption etc are concerned.

## **2.7 PRESENTATION BY MR. ANDREW DEATH ON UPDATE ON INTERNATIONAL PROCESSES ON DISCLOSURES OF BENEFICIAL OWNERSHIP (PRACTICAL STEPS AND EXPERIENCES FROM IMPLEMENTING BO – OPPORTUNITIES, BENEFITS, RISKS AND CHALLENGES – THE JOURNEY SO FAR**

Mr. Death who works in the Business, Energy and Industrial Strategy Department, is responsible for business development and growth in the United Kingdom (UK). He was invited as a resource person to share the UK's experiences in implementing BOD legislation. Mr. Death gave an overview of UK's transparency and trust measures initiated by former Prime Minister David Cameron.

These began in June 2013, at the G8 Summit in London, where Mr. Cameron committed to take action to increase transparency in company ownership and control. This required companies to obtain information on who owns and

controls them; the establishment of a central registry of beneficial ownership; other measures including bearer shares, nominee directors and corporate directors. The Small Business, Enterprises, Employment Act 2015 came to amend the Companies Act 2006 to implement these proposals.

Since 6<sup>th</sup> April, 2016, UK companies have been required to keep a register of Persons with significant control over the company (PSCs) and this applies to all kinds of UK companies and LLPs. Some UK companies (and some non-UK listed companies) may also be recorded in the register. The benefits of the UK PSC register is that it enhances transparency and trust issues and enable people to be confident to deal with that company. The UK register is one of the most comprehensive in the world.

The PSC Register – The obligations under the PSC Register apply to both the companies and the PSCs. Companies must take reasonable steps to identify their PSCs. A person who is a PSC must also inform the company of his status in the company. Companies have broad powers to obtain information from a PSC and restrictions can be imposed on shares if information is not provided. There is also a protection regime to suppress information from public disclosure if there is a serious risk of violence or intimidation. However, failure to comply with these obligations is a criminal offence. Guidance on the operation of the new rules is published on the [www.gov.uk](http://www.gov.uk).

The full presentation is attached as appendix VI.

## **2.8 DISCUSSIONS – QUESTIONS AND ANSWERS**

- The process is really engaging. How long will it take to bring BO legislation into place? Mr. Death said he is unable to tell the length of time but the UK started in 2013 with just a policy statement but the details were not available. This was later followed with brainstorming sessions, drafting of legislation and passing the legislation. It took more than 18 months to implement BO legislation in the UK.
- What does it mean a company is on a protection regime? How many companies are on this regime? This means a company's information will not be made public. About 204 companies are on the protection regime which is not much.
- Whose duty is it to disclose the PSC? It is the company that has the responsibility to disclose the PSC.

## **2.9 BREAK OUT SESSION (GROUP WORK)**

This session sought to help the R-GD to fully implement the BO provisions. Participants were divided into three (3) groups to brainstorm on specific issues.

### **2.10 GROUP 1 – WHAT ARE THE KEY BO IMPLEMENTATION ISSUES, THEIR FINANCIAL AND LOGISTICAL IMPLICATIONS, AS WELL AS ROLES AND RESPONSIBILITIES OF RELEVANT STAKEHOLDERS? – FACILITATOR – MR. EMMANUEL KUYOLE, NRG**

- The group identified legal and practical issues and examined how both the legal and practical issues could be better coordinated in Ghana. These were zeroed in to include:
- Establish a Working Group to meet and identify relevant agencies for consultation in the public (Ministry of Finance, Financial Intelligence Centre, Economic and Organised Crime Office, Ghana Revenue Authority, Petroleum Commission, Minerals Commission, Office of Parliament ) and private (Private Enterprise Federation, Ghana Bar Association, Civil Society Organisations) sectors to facilitate implementation.
- Leverage on existing projects by sourcing information from companies and learn from techniques adopted by the Minerals Commission, Petroleum Commission and the Bank of Ghana.
- Ensure legislation covers business partnerships and other legal arrangements in the Beneficial Ownership Disclosure requirements.
- Learn from foreign projects such as the "Open Ownership Register".
- Establish sub-committees of the Working Group to coordinate institutional support. For instance, Ministry of Finance will coordinate donor support from Department for International Development (DFID), Strengthening Action Against Corruption (STAAC-Ghana) etc; the technical sub-committee will deal with the experts Working Group and also the legal sub-committee will deal with legal issues.
- Establish a Steering Group to supervise the operations of the Working Group and to handle high level political issues. Suggested membership of this group should include the Attorney-General (suggested to be chair) or his representative, the Minister of Finance or his representative, Minister for Business Development, Private Enterprise Federation, the Association of Ghana Industries, Civil Society Organisations, Registrar-General, representatives of the extractives sector as well as the Ministries, Departments and Agencies (MDAs).

## **2.11 GROUP 2 – EXAMINED TWO RELATED QUESTIONS**

**a. IN WHAT WAYS CAN THE REGISTRAR-GENERAL'S DEPARTMENT/AG'S OFFICE BE SUPPORTED TO DEVELOP THE REGULATIONS FOR THE COMPANIES' AMENDMENT ACT?**

**b. WHAT OPPORTUNITIES EXIST TO LEVERAGE FINANCIAL ASSISTANCE FOR BO IMPLEMENTATION IN GHANA – FACILITATOR – MR. KORIEH DUODU – STRENGTHENING ACCOUNTABILITY AGAINST CORRUPTION (STAAC- GHANA)**

- It was recognised that the road map on the implementation of the amended Companies Act to include BO provisions was not up to scratch to meet the FATF requirements. There is therefore the need to get the future amendment on BOD legislation right and get it in place as quickly as possible to meet the 2020 deadline.
- Demonstrate commitment to strictly implement the current BO provisions in the amended Companies Act in order to court donor support for a more rigorous future BOD legislation. Potential donors include the UK's Department for International Development (DFID), United States Agency for International Development (USAID) etc.
- Work with relevant key stakeholders and collect their views on BO provisions to be integrated into the amendment legislation. These stakeholders include the Committee of Experts, the A-G's office, CSOs, Parliament etc.
- R-GD was also urged to learn from the Singapore and UK experiences in putting in place a world-class BOD regime.
- Sanctions regime should be put in place to ensure that companies that fail to comply are sanctioned as a means of revenue generation.

## **2.12 GROUP 3 – IDENTIFY THE CRITICAL STEPS TO BE TAKEN TO FULLY IMPLEMENT BO PROVISIONS IN THE AMENDED COMPANIES' ACT – FACILITATOR – MR. ANDREW DEATH, UNITED KINGDOM**

The group identified the following:

- Conduct needs assessment – Participants acknowledged the fact that the current law has some gaps and since the R-GD is preparing a new bill, we can take advantage to do needs assessment in terms of the kind of infrastructure that will be required to implement the amended Act. Two (2) weeks deadline for the needs assessment was agreed. Implementation of the current law must start whilst steps are taken to have a more

detailed amended Companies Act, 1963 (Act 179) integrating world-class BOD requirements.

- Formation of a Working Group – It was agreed to form an implementation Working Group to determine the mode of implementation and implementation challenges that are likely to crop up. The Working Group should give timeline within which new companies should comply with particular BO provisions based on stages.
- Public sensitisation– Public sensitization of companies should be embarked upon nationwide so businesses know what type of information they need to include in their BOD.
- The R-GD was urged to look at the current software to make it easily accessible to the public at affordable fee. Only basic information should be accessible to the public but not to make the register public since it has security implications.
- The new BO legislation should also facilitate company registration and not necessarily for exacting sanctions.
- In terms of the exact cost for the new BOD legislation, the Working Group was tasked to work on that.

## **2.13 DISCUSSION ON THE DRAFT TERMS OF REFERENCE – FACILITATOR – MR. KORIEH DUODU, STAAC**

It was agreed that this be referred to the Working Group for study before further action.

## **2.14 FORMATION OF BO IMPLEMENTATION WORKING GROUP DRAWN FROM OPEN GOVERNANCE PARTNERSHIP, GHEITI, FIC, DONOR PARTNERS, AND OTHER RELEVANT STAKEHOLDERS.**

The Working Group would be convened by the R-GD.

## **2.15 CLOSING REMARKS/ NEXT STEPS – MR. FRIMPONG KWATENG-AMANING , DIRETOR, RSD, MoF.**

Mr. Kwateng-Amaning said the session was rewarding and the enthusiastic participation by participants showed the determination to fully implement BO provisions in Ghana. He noted that a lot more remains to be done within the next two (2) years and thanked the facilitators and participants for gracing

the occasion. He also urged them to continue with the conversation on B0 provisions both formally and informally.



## 2.1 APPENDICES:

### Appendix I: Ghana' s Beneficial Ownership Disclosure (Bod) Project- from Legislation to Implementation

#### STAKEHOLDER WORKSHOP ON SUPPORTING THE REGISTRAR-GENERAL' S DEPT. TO DEVELOP AN IMPLEMENTATION FRAMEWORK FOR BOD REGISTER IN GHANA

ALISA HOTEL, ACCRA- 30<sup>TH</sup> MARCH, 2017

#### AGENDA

TIME	ACTIVITY	FACILITATOR
30 <sup>th</sup> March, 2017 8:00 - 9:00 am	Registration	GHEITI Secretariat
9:00 - 9:05 am	Remarks	Ag. Registrar- General, RGD
9:05 - 9:15am	Welcome Address	Hon. Ken Ofori- Atta Minister for Finance
9:15 - 9:45am	<b>1<sup>st</sup> Presentation</b> - Ghana Beneficial Ownership Disclosure process so far -Analysis of the Company Amendment Act-Gap Analysis	Dr. Steve Manteaw, ISODEC/PWYP
9:45 - 10:45am	<b>2<sup>nd</sup> Presentation</b> -Update on International processes on disclosures of beneficial ownership - The journey so far Practical steps & experiences from implementing Beneficial Ownership - Opportunities, Benefits, Risks and Challenges	Mr. Andrew Death, BEIS, United Kingdom
10:45 - 10:55am	Discussions - Questions and Answers	Facilitator
10:55 - 11:15am	<b>GROUP PHOTOGRAPH COCOA BREAK</b>	
11:15 - 12:45pm	Discussions - Questions and Answers	

12:45 – 1:15 pm	Break out session (Group Work)	
Groups	<p>Group 1 – What are the key BO implementation issues, their financial and logistical implications, as well as roles and responsibilities of relevant stakeholders?</p> <p>Group 2 – In what ways can the RGD/A-G’s office be supported to develop the regulations for the companies’</p>	<p>Facilitator–Mr. Emmanuel Kuyole, NRG1</p> <p>Facilitator –Mr. Korieh Duodu STAAC Ghana</p>
	<p>Amendment Act?</p> <p>Group 3 – Identify the critical steps to be taken to fully implement BO provisions in the amended companies’ Act, provide timelines and cost estimates of each activity.</p>	<p>Facilitator – Mr. Andrew Death BEIS, United Kingdom</p>
1:15 – 1:45pm	<b>Lunch</b>	
1:45 – 2:05 pm	Group Presentation	Group Representatives
2:05 – 2:25pm	Discussion on the draft Terms of Reference	Facilitator – Mr. Korieh Duodu, STAAC
2:25 – 2:30	<p>Formation of BO Implementation Working Group drawn from OGP, GHEITI, FIC, donor partners, and other relevant stakeholders. The Working Group would</p>	<p>Dr. Steve Manteaw ISODEC/PWYP</p>

	be convened by the Registrar General' s Dept. -The role of the Civil Society and other stakeholders	
2:30 - 2:35pm	Closing remarks/Next steps	Mr. Frimpong Kwateng-Amaning -Director, RSD, MoF

## APPENDIX II – LIST OF PARTICIPANTS

NAME	INSTITUTION
HON. ABENA OSEI-ASARE	DEPUTY MINISTER - MINISTRY OF FINANCE
GEORGE ADDY-MORTON	PETROLEUM COMMISSION
DICKSON AGBOBA	OFFICE OF THE ADMINISTRATOR OF STOOL LANDS
SAMUEL SACKY	GHANA REVENUE AUTHORITY
JEMIMA OWARE	REGISTRAR GENERAL' S DEPT.
GAD AKWENSIVIE (DR.)	OFFICE OF THE ADMINISTRATOR OF STOOL LANDS
PHILOMENA JOHNSON	PWYP-GH.
B. C. D. OCANSEY	GHANA REVENUE AUTHORITY
STEVE MANTEAW (DR.)	ISODEC/PUBLISH WHAT YOU PAY-GHANA
SHEILA NAAH-BOAMAH	S. L. T. F.
ANNOH KISSI	MOF
BEN ARYEE	MINISTRY OF LANDS & NATURAL RESOURCES
CHRIS HOLDE	RGD
SETH ASANTE	BELLA
JOHNATHAN AMABLE	BELLA
SAMUEL BEKOE	GOGIG
M. B. ABDUL-RAZAK	GHEITI/MINISTRY OF FINANCE
KWESI ASANTE	GHEITI/MINISTRY OF FINANCE
VICTORIA BENSON	GHEITI/MINISTRY OF FINANCE
DENNIS AKUNZULE	GHEITI/MINISTRY OF FINANCE
YASMIN BABA	SAM OKUDZETO AND ASSOCIATES
THERESA AFRIYIE	SAM OKUDZETO AND ASSOCIATES
NIC LEE	DFID/BHC
ANDREW DEA' TH	BEIS
KORIEH DOUDU	STAAC GHANA
CELESTE MACAUEY	AUSTRIAN HIGH COMMISSION
TERESA BARNES	AUSTRALIAN HIGH COMMISSION
BENJAMIN BOAKYE	ACEP
P. A. K. DANYO	PSRS (OGP)
GIFTY DELALI DOKASI	PSRS (OGP)
THOMAS KANKAM	PRIVATE ENTERPRISES FOUNDATION
ISABEL BOALEI	A. B. & DAVID
ISAAC NYAMEKE	GAFNET
LOUISIA SIAW	FUGAR & COMPANY
MARK EVANS	GOGIG
ABENA NTRAKWA-MENSAH	NTRAKRAW & CO.

MICHAEL BOADI	GHANA INTEGRITY INITIATIVE
AMBIKA SACHDEVA	STACC
EBUN OSINBOWALE	STACC
P. J. NAANA DONTOH	COMMITTEE OF EXPERTS
NAA NUNO-AMARTEFIO	TRANSPORT LOGISTICS LIMITED
MATTHEW GENASCI	NATURAL RESOURCE GOVERNANCE INSTITUTE
PROSPER K. DOSU	MINISTRY OF FINANCE
COROLINE TETTEYFIO	MINISTRY OF FINANCE
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