

TITLE: __MULTIPRONGED ACTION PLAN TO IMPLEMENT BENEFICIAL OWNERSHIP (BO) REQUIREMENTS IN LIBERIA

SUBMITTED BY: LIBERIA'S NATIONAL BENEFICIAL OWNERSHIP STEERING COMMITTEE

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I. List of Abbreviations

BO	Beneficial Ownership
CDD	Customer's Due Diligence
CSOs	Civil Society Organizations
CBL	Central Bank of Liberia
DNFBPs	Designated Non-Financial Businesses and Professions
EITI	Extractive Industries Transparency Initiative
EU	European Union
FATF	Financial Action Task Force
FIA	Financial Intelligence Agency
FMEs	Foreign Maritime Entities
GEMAP	Government Economic Management Assistance Program
GIABA	Inter-Governmental Action Group Against Money Laundering
GOL	Government of Liberia
LBR	Liberia Business Registry
LEITI	Liberia Extractive Industries Transparency Initiative
LISCR	Liberia International Shipping and Corporate Registry
LMA	Liberia Maritime Authority
LPRA	Liberia Petroleum Regulatory Authority
LRA	Liberia Revenue Authority
MME	Ministry of Mines and Energy
MOFA	Ministry of Foreign Affairs
MSG	Multi-Stakeholders Group
NSC	National Steering Committee
NRC	Non-Resident Corporations
OECD	Organization for Economic Cooperation and Development
OEP	Opening Extractives Program
OO	Open Ownership
PEPs	Politically Exposed Persons

II. General Background

In May 2007, Liberia announced its first commitment to the Extractive Industries Transparency Initiative (EITI). It was part of fulfilling the 2003-2006 transitional government's Governance and Economic Management Assistance Program (GEMAP) to improve the transparency of revenues and expenditures, particularly in the extractive sector. After its acceptance as an EITI Candidate in September 2007, the Liberia Extractive Industries Transparency Initiative (LEITI) worked effectively within the EITI arrangements of a tripartite framework, comprising civil society organizations (CSOs), government, and industry operators, to ensure the maximum utilization of extractive resources for sustainable development. The successes are realized through the increased publication of information on the extractive sector, which has generated meaningful public debates and enhanced accountability.

Since 2013, the EITI has encouraged implementing countries to publish comprehensive Beneficial Ownership Information. The 2019 Standard recommends that implementing countries maintain a publicly available register of the corporate entity's beneficial owners. Further, it requires that implementing countries request and companies publicly disclose beneficial ownership information by January 1, 2020. The disclosure of beneficial ownership (BO) information is expected to strengthen and advance transparency regarding the identities of real owners of corporate entities that operate and invest in extractive assets in all implementing countries. The idea was first tested with twelve EITI-implementing countries, including Liberia, which volunteered to pilot the new concept in 2014.

LEITI has taken a proactive step and demonstrated its unrelenting effort to establish a BO register. Consultations of stakeholders began in 2015 when the Liberia Business Registry (LBR) was identified as the implementing agency. The initial consultations centered on establishing a register. It also provided extensive education to various stakeholders, particularly in the mining, oil and gas, forestry, and agricultural sectors. The development of the register began with a much-anticipated success; however, the Pilot report demonstrated a lack of understanding from stakeholders and the absence of a legal framework to make BO data provision mandatory rather than voluntary. For instance, while 89 companies participated in the pilot, only 49 companies responded to the consultant's requests.

In demonstrating its commitment to implementing the Business and Other Requirements (BO) under the Extractive Industries Transparency Initiative (EITI), the LEITI Multi-Stakeholder Group (MSG) developed a BO roadmap in 2017, in compliance with the 2016 EITI Standard. The roadmap laid out clear recommendations for implementing BO in the extractive sector.

International commitments made under the EITI, Inter-Governmental Action Group against Money Laundering in West Africa (GIABA), the Financial Action Task Force (FATF), the European Union (EU), and the Organization for Economic Cooperation and Development (OECD) have sustained the political will to implement BO in Liberia. The implementation of BO disclosure in Liberia would satisfy obligations under the EITI and the FATF recommendations, as well as EU directives and other global requirements. The MSG is the governing body of the LEITI. Its membership includes representatives from the Government of Liberia, Civil Society Organizations, and Extractive Companies. Development Partners also serve as observers on the MSG. The Body was established in 2007 as it is a fundamental requirement for countries seeking to join the Extractive Industries Transparency Initiative. Members of the MSG serve a three-year tenure and are appointed by the President through appropriate consultations.

III. Accelerating Beneficial Ownership Transparency in Liberia

Liberia joined the Opening Extractives Program (OEP) in September 2021, further committing itself to the Open Ownership Beneficial Ownership Principles and the EITI requirements regarding Beneficial Ownership. The Opening Extractives program (OEP), a joint initiative between the EITI and Open Ownership (OO), aims to enhance the availability and utilization of beneficial ownership data in the extractive sector, ultimately seeking to strengthen accountability, curb corruption, and improve domestic resource mobilization. During the program's launch, the Government of Liberia (GOL) established a National Steering Committee (NSC) to expedite its implementation and ensure success. Institutions that form part of the NSC are as follows: the Liberia Extractive Industry Transparency Initiative (LEITI), the Liberia Revenue Authority (LRA), the Liberia Business Registry (LBR), the Ministry of Mines and Energy (MME), the Liberia Petroleum Regulatory Authority (LPRA), the Central Bank of Liberia (CBL), and the Financial Intelligence Agency of Liberia (FIA). The mandates of the National Steering Committee are as follows:

1. Coordinate the implementation of the Opening Extractive Program with development partners.
2. Provide Strategic guidance for the implementation of the program
3. Make key and collective decisions around the implementation of the program
4. Develop work plans to guide the program's implementation
5. Source resources to support the program through the development of concept notes and proposals
6. Collectively manage the risks of non-performance and key activities under the program
7. Ensure that the BO plans align with National priorities
8. Monitor and report to the heads of various institutions on the program's progress, performance, and challenges.

9. Ensure the free participation of all stakeholders in the implementation of the program.
10. Establish the scope and strategy of the program in line with national priorities.

IV. Laws and Regulations Governing Beneficial Ownership Transparency in Liberia

The following laws and regulations govern the implementation of Beneficial Ownership Transparency in Liberia:

- The 1986 Constitution of the Republic of Liberia
- Freedom of Information Act 2010
- Title 5, Associations Law (as amended) April 2020
- Regulations published by the Ministry of Foreign Affairs in furtherance of the Associations
- Law of Liberia
- Petroleum (Exploration and Production) Act 2014
- Disclosure of Ultimate Beneficial Ownership Regulation 2020 (0003/LPRA/20)
- AML/CFT Regulations for Financial Institutions in Liberia
- Regulation on Enhanced Due Diligence in the Provision of Financial Services for Politically Exposed Persons (PEPs)
- Beneficial Ownership Roadmap 2016 by LEITI MSG
- The National Beneficial Ownership Regulation for Domestic Entities

V. Publication of the BO National Regulations for Domestic Entities and Preliminary Launch of the Registry

In August 2023, Liberia's Ministry of Foreign Affairs (MFA) published Liberia's new beneficial ownership regulations that require domestic companies to disclose information about their beneficial or ultimate owners in a centralized register, including names, addresses, and ownership stakes.

On 29 September 2023, Liberia preliminarily launched its Beneficial Ownership Register. During the launch, the National Steering Committee indicated that testing would continue throughout, with companies and the Liberia Business Registry contributing to ensure the platform is easy to use and that the compliance rate by companies is maximized. A significant feature of a Beneficial Ownership (BO) register is its capability to identify and make publicly accessible the individuals who ultimately own or control a company or legal entity, aiding in the fight against corruption, money laundering, and tax evasion.

The full register will be available on or before December 31, 2025, when companies can begin making their declarations of beneficial ownership. However, while the National Steering Committee and Partners are working to finalize the register for launch in December 2025, a work plan has been developed to finalize other key components. The work plan seeks to finalize and publish the following:

- Virtual technical sessions weekly or bi-weekly between OE, LBR, and the Software developer to prepare for an in-person visit
- In-person visit to work with software developer, LBR, and LRA to advance registry development.
- In-person user research to get feedback from the data collector (LBR), data provider (private sector), & data users (CSO, NSC), & Incorporation of feedback
- Update and finalize guidance resources
- Design and produce publishable versions of guidance resources
- Develop short guidance videos to be shown at LBR offices to help applicants understand the BO information requirements

While the country anticipates the launch of the registry in December of 2025, the Liberia Business Registry continues to collect Beneficial Ownership Information through an Excel sheet for all sectors of the economy.

WORKPLAN FOR THE DOMESTIC CORPORATE SECTOR

Action Item	Responsible Agency	Date of execution
In-person user research to get feedback from the data collector (LBR), data provider (private sector), & data users (CSO, NSC), & Incorporation of feedback	Beneficial Ownership National Steering Committee (NCS)	May 2025
Develop short guidance videos to be displayed at LBR offices, helping applicants understand the BO information requirements.	Beneficial Ownership National Steering Committee (NCS)	(April 2025)
Design and produce publishable versions of guidance resources.	Beneficial Ownership National Steering Committee (NCS)	April 2025
Update and finalize guidance resources	Beneficial Ownership National Steering Committee (NCS)	April 2025

VI. Beneficial Ownership State of Play for Non-Resident Corporations, Foreign Maritime Entities, Foreign Limited Liability Companies, and Other Non-Resident Entities in Liberia

In Liberia, the Liberian International Ship and Corporate Registry (LISCR) and the Ministry of Foreign Affairs oversee non-resident corporations, foreign maritime entities, and other non-resident entities. LISCR acts as the exclusive registered agent for these entities. Below is the current state of affairs regarding Non-Resident Corporations (NRCs), foreign maritime entities, foreign limited liability companies, the Ministry of Foreign Affairs, and LISCR Trust Company.

1. Liberian Non-Resident Corporations: These corporations are designed for setting up commercial enterprises, suitable for personal or business single-asset ownership, holding companies, and even public offerings.

Key Features:

- A distinct legal entity, separate from individual owners.
- Limited by shares, limiting shareholder liability to the amount of their investment.
- The Articles of Incorporation, filed with the Registrar of Corporations (Ministry of Foreign Affairs), are the foundation of the corporation's existence.

Registered Agent:

The LISCR Trust Company is the exclusive registered agent for all Liberian non-resident corporate entities, providing a registered office address, receiving service of process, and handling filings.

2. Foreign Maritime Entities (FMEs): Non-Liberian entities, such as corporations, companies, and trusts, can register as Foreign Merchant Entities (FMEs) to own and operate vessels registered in the Liberian Ship Registry.

Process:

The non-Liberian entity remains the vessel owner, but the FME registers the vessel on the Liberian Ship Registry.

The application for FME registration, supporting documents, and payment must be submitted at least three working days before the vessel registration.

Name:

There is no requirement for the FME name to match the name of the non-Liberian entity.

3. Foreign Limited Liability Companies (LLCs): Liberia permits the formation of non-resident limited liability companies (LLCs), similar to corporations.

Key Features:

LLCs can be 100% foreign-owned and managed.

There's no requirement for Liberian participation in management or restrictions on shareholder nationality or residency.

Registered Agent:

Liberian law requires every LLC to appoint the LISC Trust Company as its registered agent.

4. Other Non-Resident Entities: The Associations Law of Liberia, modeled after U.S. corporate law, permits the formation of various non-resident entities, including private foundations and limited partnerships. Liberia is a reputable and compliant jurisdiction recognized for its leadership in international shipping and business. The Liberian Corporate Registry is one of the oldest registries with a long-standing global presence in the corporate service industry.

However, the National Steering Committee plans to begin the formulation of a regulation to regulate the collection of BO information in this sector. Consultations with key stakeholders are scheduled to begin in June 2025, and a regulation is expected to be developed and published in the first quarter of 2027.

WORKPLAN FOR THE OFFSHORE CORPORATE SECTOR

Action Item	Responsible Agency	Date for execution
Stakeholders' consultation for the development of a Beneficial Ownership Regulation for Non-Resident Corporations, Foreign Maritime Entities, Foreign Limited Liability Companies, and Other Non-Resident Entities	Beneficial Ownership National Steering Committee, Ministry of Foreign Affairs, and the Liberia Maritime Authority	June- December 2025
Development of a Scoping/ Assessment Report detailing the state of pay of Beneficial Ownership in Non-Resident Corporations, Foreign Maritime Entities, Foreign Limited Liability Companies, and Other Non-Resident Entities	Beneficial Ownership National Steering Committee, Ministry of Foreign Affairs, and the Liberia Maritime Authority	January- June 2026
Development of a Beneficial Ownership Regulation for Non-Resident Corporations, Foreign Maritime Entities, Foreign Limited	Beneficial Ownership National Steering Committee, Ministry of	June- December 2026

Liability Companies, and Other Non-Resident Entities	Foreign Affairs, and the Liberia Maritime Authority	
Publication of the Regulation for Non-Resident Corporations, Foreign Maritime Entities, Foreign Limited Liability Companies, and Other Non-Resident Entities	Beneficial Ownership National Steering Committee, Ministry of Foreign Affairs, and the Liberia Maritime Authority	February 2027

VII. Beneficial Ownership Declaration by Extractive Companies in Liberia under the EITI Standard

The 2019 EITI Standard recommends that implementing countries maintain a publicly available register of the beneficial owners of the corporate entity (ies) that apply for or hold a participating interest in an exploration or production oil, gas, or mining license or contract, including the identity (ies) of their beneficial owner(s), the level of ownership and details about how ownership or control is exercised.

In 2021, Liberia signed up for the Opening Extractive Programme (OEP), a programme implemented by the International EITI Secretariat and Open Ownership. OEP is intended to assist Liberia in implementing a BO regime that discloses high-quality and accurate information and enhances access to and use of BO information. OEP has conducted an initial scoping report that examines the current state of BO reforms in Liberia. It aims to identify specific gaps in BO implementation and make context-specific recommendations on how Liberia can advance beneficial ownership reforms.

The following updates have been made for the BO implementation in Liberia under the OEP program:

- a) Completion of a BO scoping study for Liberia.
- b) Completion of a BO Decision Document that outlines the key aspects of BO implementation, including thresholds, the definition of Politically Exposed Persons (PEPs), and the information to be collected from each beneficial owner, among other details.
- c) Completion of a stakeholder consultation session on BO regulations.
- d) Completion of BO draft regulations and stakeholder consultations, as well as BO draft forms and guidance notes.

- e) The adoption of the new Beneficial Ownership Regulations in August 2023 requires companies to disclose information about their beneficial or ultimate owners in a new central register, including names, addresses, and ownership stakes.
- f) Preliminary launch of the new Digital Beneficial Ownership Register in September 2023.

Companies selected in the LEITI's 15th reconciliation scope were required to make declarations regarding their legal and beneficial ownership in the reporting templates. In LEITI's 15th EITI Report, the following information was requested from extractive companies:

- a) Name of beneficial owner and nationality: full name(s) of the company's beneficial owner(s) and information on their identity (ies) including: - Name of any politically exposed person where any owner is also a 'politically involved person,
- b) Contact details of the beneficial owner, including a business address.
- c) Means of control: a description of how the beneficial owner and any politically engaged persons exercise control over the company.
- d) Signed statement of accuracy: A senior company official was required to sign a statement confirming that the provided information is accurate. Annexes 4 and 5 provide information on the declarations made by companies. [LEITI's 15th Report](#).

Accordingly, LEITI's MSG has agreed to continue publishing the beneficial ownership information of extractive companies. LEITI is currently developing a data portal that would assist in the visualization of BO information. The portal would help to make BO data more accessible and comprehensive. The data portal is expected to be launched in May 2025. The LEITI Secretariat has also developed a two-year work plan in keeping with the 2023 EITI Standard. [LEITI 2024-2025 Workplan](#)

WORKPLAN FOR THE EXTRACTIVE INDUSTRY

Action Item	Responsible Agency	Date of execution
Stakeholder consultations to enhance the BO data compliance rate among extractive companies	LEITI and other institutions make up the National Steering Committee	August 2025
Developing and incorporating the BO template into the LEITI data portal	LEITI and other institutions make up the National Steering Committee	June 2025
Capacity building around BO data management and verification	LEITI and other institutions make up the National Steering Committee	May 2025

VIII. Regulated Financial Institutions: Financial Sector AML/CFT

The Central Bank of Liberia (CBL) has published a report assessing the current state of Beneficial Ownership (BO) arrangements and compliance levels among Banking Institutions in Liberia, as per the Liberia Beneficial Ownership Disclosure Regulation for Domestic Entities.

Financial Institutions in Liberia demonstrate a strong commitment to complying with the Customer Due Diligence (CDD) requirements stipulated in Section 2.1 of the Liberia Beneficial Ownership Disclosure Regulation for Domestic Entities. The compliance levels among the nine licensed banks in Liberia are notably high. All nine (9) licensed banks conduct CDD on any individual who has a direct or indirect interest in the form of 1% (for Domestic PEP) and at least 5% (for Foreign PEPs or Stakeholders) shareholding or voting rights in a reporting entity; has the right to exercise direct or indirect control or influence over a reporting entity and lastly any individual who benefits from an amount that is equal to at least 15% of the reporting entity's annual profits or assets. This process involves:

Obtaining Documentation

Financial Institutions obtain CDD documents that unveil the identity of the natural person(s) behind the legal arrangements. The said documents include Articles of Incorporation, Business Registration, Proof of Existence, and the names of relevant persons holding senior management positions in the legal person or arrangement, along with their occupations, as required by Section 2.5 of the National Beneficial Owner Disclosure Regulation.

Enforcement

Section 2.3.1 of The Liberia Beneficial Ownership Disclosure Regulation requires financial institutions to obtain and maintain accurate, adequate, and up-to-date records of beneficial owners (BOs). The Central bank ensures that this is achieved through onsite and offsite inspection. The Liberia Beneficial Ownership Disclosure Regulation also addresses the risk of non-compliance and imposes appropriate sanctions for false declarations. This oversight is crucial for maintaining the integrity of the financial system and mitigating both inherent and emerging risks of money laundering and terrorist financing (ML/TF).

Key Reforms and Initiatives

No.	Key Reforms/Initiatives	Priority/Timeframe
1	Liberia now has a National Beneficial Ownership Disclosure Regulation, in addition to the existing Central Bank of Liberia's (CBL) BO Guidelines, to ensure the adequacy of policies in countering gaps that hinder beneficial ownership compliance. This policy incorporates, among other things, provisions for verifying the identities of Customers and Business Owners (BOs), as well as deadlines for reporting new, existing, or updated BO information to the Central Register of Beneficial Owners at LBR. The National Beneficial Ownership Disclosure Regulation supersedes CBL's BO Guidelines.	High/Ongoing
2.	The Liberia Beneficial Ownership Disclosure Regulation requires financial institutions to maintain adequate, accurate, and up-to-date information on beneficial owners (Section 2.3.1). This policy obligation is regularly reviewed through regulatory inspections. The Liberia Business Registry (LBR) is also developing a system that allows the public to report discrepancies between information held in the Central Register of Beneficial Owners and other databases.	High/Ongoing
3.	Four out of Nine banks have developed a BO Register to capture all beneficial owners.	High/Ongoing
4.	Financial institutions are increasingly adopting technological solutions to streamline the process of obtaining, verifying, and maintaining beneficial ownership information. Software like Dow Jones and World Compliance is being utilized for efficiency.	High/Ongoing

Challenges and Areas for Improvement

Complex Ownership Structures: The prevalence of complex ownership structures can impede the identification of actual beneficial owners.

Access to Information: Financial institutions face difficulties in accessing and verifying reliable information regarding beneficial ownership, primarily due to the lack of a comprehensive database that encompasses both local and foreign entities.

Ongoing Monitoring: The Central Bank of Liberia has found that financial institutions have not effectively updated customer profiles to reflect current risk levels. To address this gap, the Bank is conducting targeted Customer Due Diligence (CDD) reviews to prioritize ongoing monitoring.

Overall, financial institutions in Liberia are making significant strides in complying with the requirements for beneficial ownership. However, continued efforts are necessary to address existing challenges and enhance the effectiveness of compliance measures.

WORKPLAN FOR FINANCIAL INSTITUTIONS

Action Item	Responsible Agency	Date of execution
Technical capacity building for financial institutions to unlock complex ownership structures.	CBL	November 2025
Developing an integrated database for local and foreign entities to create ease of access in verifying BO information	CBL, LBR	March 2026
Capacity building for financial institutions in building and maintaining an effective database for customer due diligence. This will include issuing guidance and conducting training or outreach to help entities identify BO.	CBL	November 2025

IX. Regulated Designated Non-Financial Businesses and Professions (DNFBPs)

A Business Object (BO) structure is currently in place for Designated Non-Financial Businesses and Professions (DNFBPs). Currently available is the general condition for the registration of resident companies or businesses, which does not require a proper layout to fully capture the DNFBPs for proper supervision, monitoring, and compliance purposes.

Currently, the FIA is conducting a full-scope AML/CFT Compliance Inspection and Review of the Policies and Procedures of DNFBPs. Several inspections have already been conducted for

casinos, gaming institutions, and real estate, with others still pending. Key findings from these inspections will be used to help craft regulations that properly regulate this sector. The gap discovered during these inspections regarding BO for DNFBPs will be addressed by issuing directives, circulars, and regulations to remedy the situation.

A comprehensive ML/TF risk assessment conducted in the real estate sector in 2024 identified vulnerabilities related to Business Operations (BO). Recommendations from the risk assessment to ensure the effective collection of BOI during the buying, selling, mortgaging, and leasing of fundamental properties, as outlined in the guidance, circulars, directives, and/or regulations. This will ensure the effectiveness of monitoring and supervision in the sector, thereby preventing or detecting criminal activities within it.

The FIA revised Action Plan for 2024-2028 envisions developing sector regulations to include thresholds and all other AML/CFT preventive procedures, as well as amending the PEPs regulation to include DNFBPs, specifically CDD 22.2-22.5, by 2026. Based on this action plan, regulations for the real estate and NPO sectors are being drafted. The FIA will develop a comprehensive plan to regulate activities and obtain timely Beneficial Ownership information from designated non-financial businesses and professions (DNFBPs) following the publication of the beneficial ownership regulations for foreign entities. The process to conduct a comprehensive TF risk assessment in the NPO sector is ongoing.

WORKPLAN FOR DNFBPS

Activity	Responsible Agency	Date of Execution
Amendment of the PEPs regulations to include DNFBPs	Financial Intelligence Agency	March 2026
Finalization of the regulations for the real estate sector and NPO	Financial Intelligence Agency	March 2026
Conduct a comprehensive TF risk assessment in the NPO sector	Financial Intelligence Agency	December 2026
Issuing directives and circulars to address remaining gaps	Financial Intelligence Agency	December 2025