



GLOBAL FINANCIAL INTEGRITY

**"BELIZE BENEFICIAL
OWNERSHIP REGISTRY:
A COMPREHENSIVE
ANALYSIS OF
CURRENT PRACTICES"**

September, 2024

"Belize Beneficial Ownership Registry:
A Comprehensive Analysis of
Current Practices"

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This report reflects all these collaborative efforts, and we hope it serves as a constructive contribution to ongoing discussions about beneficial ownership transparency in Belize and beyond. The significance of this study lies not only in its potential to contribute to the enhancement of Belize's financial transparency and regulatory compliance but also in its broader contribution to the global discourse on beneficial ownership transparency.

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01. ABBREVIATIONS

- **ACAMS:** Association of Certified Anti-Money Laundering Specialists
- **AML:** Anti-Money Laundering
- **API:** Application Programming Interface
- **BCCI:** Belize Chamber of Commerce and Industries
- **BO:** Beneficial Ownership
- **BOR:** Beneficial Ownership Registry
- **DNFBPs:** Designated Non-Financial Businesses and Professions
- **EU:** European Union
- **FATF:** Financial Action Task Force
- **FIU:** Financial Intelligence Unit
- **FSC:** Financial Services Commission
- **GFI:** Global Financial Integrity
- **OBRS:** Online Business Registry System
- **OECD:** Organisation for Economic Cooperation and Development
- **SMEs:** Small and Medium-Sized Enterprises



02. INTRODUCTION

In the contemporary financial landscape, the issue of transparency in the ownership and control of corporate entities has taken center stage in the global fight against financial crimes such as corruption, money laundering, tax evasion, and terrorist financing. The establishment of Beneficial Ownership (BO) registries has been advocated by international bodies like the Financial Action Task Force (FATF) and the Organisation for Economic Cooperation and Development (OECD) as a pivotal measure to enhance transparency and assist in the identification of the natural persons who ultimately own or control legal entities.¹ In this context, the Belize Beneficial Ownership Registry (BOR) represents a critical component of Belize's commitment to international standards for financial transparency and the prevention of financial crimes.

Belize, a country that has been navigating international financial regulation² and striving to align its practices with global standards, introduced its BOR as part of an effort to improve its legal and regulatory framework to comply with international standards and improve its capacity to prevent financial crimes.

This paper aims to comprehensively analyze the current practices of Belize's BOR, evaluating its strengths and weaknesses in the broader context of global financial transparency efforts. By scrutinizing the legislative framework that underpins the registry, the methodology of its operation, and the perspectives of various stakeholders, this study seeks to identify the key challenges and opportunities

facing Belize's BOR. Furthermore, through a comparative analysis with BO registries in other jurisdictions, this research will draw on international best practices to formulate strategic recommendations aimed at enhancing the effectiveness and efficiency of Belize's registry.

This paper aims to offer valuable insights for policymakers, regulatory authorities, and stakeholders involved in or affected by the operation of beneficial ownership registries by providing a detailed examination of Belize's approach and identifying actionable strategies for improvement.

¹ FATF (2023), Guidance on Beneficial Ownership for Legal Persons, FATF, Paris, <http://www.fatf-gafi.org/publicat/FATFRecommendations/guidance-beneficial-ownership-legalpersons.html>
² Regulations and Recommendations by the Financial Action Task Force (FATF) and the Organisation for Economic Co-operation and Development (OECD)

03.

METHODOLOGY

This study employed a mixed-methods approach to comprehensively analyze the current practices, strengths, weaknesses, and strategic recommendations for enhancing Belize's BOR. The methodology was designed to gather in-depth insights from various sources to ensure a holistic understanding of the registry's operational framework, its alignment with international standards, and the perspectives of local stakeholders. The data collection was conducted through two primary avenues: stakeholder meetings and document review.

1. Stakeholder Meetings

A series of structured stakeholder meetings were conducted to gather qualitative data directly from those related to Belize's BOR. These stakeholders included government officials, representatives from financial institutions, legal experts, and members of civil society organizations. The meetings were designed to understand the operational challenges, perceived strengths and weaknesses, and recommendations for the registry's enhancement. The discussions were guided by a semi-structured questionnaire, allowing for open-ended responses to capture a broad range of insights. The data collected from these meetings were subjected to thematic analysis to identify common themes, concerns, and suggestions for improving the registry.

2. Document Review

The study also involved an extensive review of legal and regulatory documents to understand the legislative context underpinning Belize's BOR. Key documents reviewed included the Belize Companies Act and the Belize Money Laundering and Terrorism (Prevention) Act.

In addition to local legislation, the study examined international documents outlining the gold standards for BO legislation and registries. These documents included guidelines and recommendations from FATF and the OECD as well as some other papers, policy briefs, and reports that addressed BO challenges worldwide. The review aimed to benchmark Belize's registry against international best practices and identify gaps and areas for enhancement.

3. Data Analysis

The qualitative data gathered from stakeholder meetings were analyzed using thematic analysis to extract significant themes, challenges, and recommendations. The document review provided a comparative analysis framework, allowing for the assessment of Belize's compliance with international standards and the identification of legislative and regulatory gaps.

This mixed-methods approach, combining stakeholder insights with a detailed review of legislative frameworks and international best practices, provided a comprehensive understanding of the current state of Belize's BOR.



04. LEGISLATIVE CONTEXT OF BELIZE'S BOR

The legislative framework establishing and governing Belize's BOR is covered under two separate legislations.



Foundation & Legal Framework

The foundational legal provisions for Belize's BOR are enshrined in two primary legislative documents: the Belize Companies Act and the Money Laundering and Terrorism (Prevention) Act. These acts collectively lay down the regulatory groundwork for establishing, operating, and maintaining beneficial ownership, ensuring that entities incorporated³ or operating within Belize disclose their beneficial owners transparently and accountable.

ACT

DETAILS

The Belize Companies Act, 2022⁴

This act outlines the requirements for company registration, operation, and compliance. Pertinent to the BO Registry, the act outlines the obligations of companies to disclose their BO information, detailing the process for such disclosure and the maintenance of records. It establishes the legal basis for the registry's function as a tool for transparency, aiding in the identification of the natural persons who ultimately own, control, or influence corporate entities.

The Belize Companies Act, Section 93

(1) A company shall file with the Registrar, in the time and manner prescribed by Regulations, a copy of:

- (a) its register of members;
 - **Names** of each member (shareholder)
 - **Addresses** of members
 - **Details of shares held by each member**
- (b) its register of directors; and
 - **Names** of each director
 - **Addresses** of directors
 - **Dates of appointment and cessation**





as a director

(c) its register of beneficial owners.

- **Names** of each beneficial owner
- **Addresses** of beneficial owners
- **Nature of the interest in the company**
(e.g., percentage of shares held or control exercised)

The Money Laundering and Terrorism (Prevention) Act, Revision 2020

This act lays out a comprehensive framework to combat money laundering and terrorism financing in Belize. It strengthens the role of the Belize BOR in identifying and reporting suspicious financial activities and outlines clear due diligence and reporting obligations for financial institutions and other regulated entities. The Act brings Belize in line with several FATF recommendations, such as Recommendation 10 on Customer Due Diligence and Recommendation 22 on the regulation of Designated Non-Financial Businesses and Professions (DNFBPs). Emphasizing the collection and use of beneficial ownership information helps ensure that entities can effectively assess risks, prevent misuse of legal entities, and trace illicit financial flows.

**Money
Laundering
and Terrorism
(Prevention)
(Amendment)
Act, 2023
Section 3b**

Define BO as: **(a)** the natural person who ultimately owns or controls a customer, the natural person on behalf of whom a transaction is conducted, or the natural person who exercises ultimate control over a legal person or legal arrangement;

(b) in the case of a body corporate, any individual who: (i) In respect of a body, other than a company whose securities are listed on an appointed stock exchange, ultimately owns or controls (whether through direct or indirect ownership or control, including through bearer shareholdings) more than 25% of the shares or voting rights in the body; or (ii) otherwise exercises control over the management of the body;

(c) in the case of a partnership, any individual who: (i) ultimately is entitled to or controls, whether the entitlement or control is direct or indirect, more than a 25% share of the capital or profits of the partnership or more than 25% of the voting rights in the partnership; (ii) otherwise exercises control over the management of the partnership;





(d) in the case of a trust: (iv) the settlor of the trust, provided that for the purposes of subparagraph (i) where an individual is the beneficial owner of a body corporate which is entitled to a specified interest in the trust property or which has control over the trust, the individual is to be regarded as entitled to the interest or having control over the trust;

(v) the protector (if any);

³ See [https://www.centralbank.org.bz/docs/default-source/2.5-money-laundering-terroris\(m\)prevention\)-act/money-laundering-and-terroris\(m\)-prevention\)-act-revised-edition-2020.pdf?sfvrsn=2d787b95_3](https://www.centralbank.org.bz/docs/default-source/2.5-money-laundering-terroris(m)prevention)-act/money-laundering-and-terroris(m)-prevention)-act-revised-edition-2020.pdf?sfvrsn=2d787b95_3)

⁴ See "https://www.agm.gov.bz/uploads/laws/639771ad84fb6_Act_No_11_of_2022_Belize_Companies_Act_2022.pdf" and "<https://www.belizefsc.org.bz/belize-companies-amendment-act-2023-2/>"

Historical Context of Beneficial Ownership in Belize

Before the amendment of the Companies Act in 2023, Belize had a distinct framework for business registration, comprising two separate registries: one for local companies and another for foreign entities. [1] Before the central registry, companies had to maintain a list (“register”) of those individuals who own or control 10% or more of the entity. This register must be kept at a company’s registered office and/or with their registered agent. Before July 2023, companies were not required to report BO information to the government, and there was no central BO registry in Belize. The government requires financial entities, securities dealers, life insurance companies, brokers or independent agents, and money services businesses to obtain BO information from their clients as they are referred to as registered agents.

05. THE BELIZE’S BO REGISTRY

The BO registry in Belize has been subject to notable changes intended to improve financial transparency and align with international standards. These changes have been facilitated by amendments to the Belize Company Registry Act and the inclusion of provisions from the Belize Money Laundering and Terrorism Act, establishing a comprehensive legislative framework. This analysis examines the present configuration of the BO registry in Belize, focusing on its organizational structure, operational procedures, and the involvement of different stakeholders in the system.

1. Consolidation and Custodianship

The 2022 amendment to the Belize Company Registry Act integrated previously separate registries for local and international businesses into a single, centralized registry. This integration aimed at simplifying the process of registering and verifying BO. The Financial Services Commission (FSC) has been designated as the custodian of this centralized registry, tasked with overseeing its operations and ensuring compliance with regulatory standards.

2. Interoperability and Entities

While the FSC oversees the registry, the responsibility for maintaining and verifying Beneficial Ownership Information falls to registered agents. This requirement is intended to keep the registry current and reflective of the true ownership structures of companies within Belize. Registered agents are tasked with ensuring the accuracy of the information they submit to the FSC, a measure that highlights the emphasis placed on the registry's precision.

3. Access and Transparency

Access to the registry's data is limited to specific regulatory and government entities, including the FSC, the Financial Intelligence Unit (FIU), and the Belize Tax Department, to safeguard sensitive financial details while permitting necessary oversight and compliance verification. The general public can access limited information via a "short extract" from the Belize Companies & Corporate Affairs Registry website, which provides transparency. Detailed BO information, or "long extract," is confidential and only available under certain conditions, such as through court orders or for government-related business, reflecting an effort to balance confidentiality with the need for transparency in particular instances.

⁵ See <https://gfintegrity.org/wp-content/uploads/2023/06/BO-Fact-Sheet-FINAL2.pdf>

4. Registration and Compliance

The launch of the Online Business Registry System (OBRS) represents a key development in standardizing the submission of Beneficial Ownership information. This system requires all businesses to declare their Ultimate Beneficial Owners (UBO), with strict penalties for non-compliance. The registration process differs for foreign-owned/large entities and small businesses, aiming to facilitate compliance according to business size and type. The FSC's active role, including conducting site visits for verification, enhances the registry's overall reliability.

06. COMPARATIVE ANALYSIS

In the global fight against financial crimes such as money laundering, tax evasion, and corruption, the transparency of BO information has become a critical focus. Various international organizations, including the Financial Action Task Force (FATF), Global Financial Integrity (GFI), the European Union (EU), Open Government Partnership (OPG) and Open Ownership, have established best practices and guidelines to ensure that BO registries are effective in promoting financial transparency and accountability.

This comparative analysis evaluates Belize's current practices in managing its BO registry, focusing on four key areas: Consolidation and Custodianship, Interoperability and Entities, Access and Transparency, and Registration and Compliance. By comparing Belize's approach with international standards and incorporating feedback from local stakeholders, this analysis identifies strengths and areas for improvement, providing recommendations to enhance the effectiveness of Belize's BO registry in line with global best practices.

1. Consolidation and Custodianship

Belize has taken a significant step by consolidating its previously separate registries for local and international businesses into a single, centralized BO registry. This centralization aims to simplify the process of registering and verifying beneficial ownership information, with the FSC acting as the custodian responsible for overseeing the registry's operations and ensuring compliance with regulatory standards.

Organizations like GFI⁶ and the EU⁷ advocate for centralized registries to improve transparency and reduce the potential for financial crimes. They emphasize that such registries should be easily accessible and maintained by a responsible custodian. The custodian should have the resources and authority to enforce compliance and maintain the accuracy of the information. Open Government Partnership⁸ and FATF⁹ also support centralized registries but highlight the need for regular audits and public accessibility to certain information to balance transparency with privacy concerns.

The centralization of the BO registry has generally been welcomed as a move towards greater efficiency and transparency. However, some stakeholders have raised concerns about the FSC's capacity to effectively manage the registry, given its current resources. Additionally, there is a desire among stakeholders for greater transparency in how the registry is managed and who can access the information.



2. Interoperability and Entities

Registered agents play a crucial role in maintaining and verifying BO information. These agents are responsible for ensuring that the information submitted to the centralized BO registry is accurate and up-to-date. The system relies heavily on the diligence of these registered agents to reflect the true ownership structures of companies operating in Belize. This approach aims to streamline the process and place the onus of compliance on the entities closest to the information.

Global organizations, including GFI,¹⁰ the World Bank,¹¹ and the EU,¹² stress the importance of ensuring that BO registries are interoperable with other government databases, such as tax and corporate records, to verify the accuracy of the information provided. However, they also highlight the critical role of intermediaries like registered agents in maintaining data integrity. Open Ownership advocates for the use of standardized protocols and technologies¹³ that enable seamless data exchange between systems, while also ensuring that registered agents have clear guidelines and responsibilities for data submission. FATF¹⁴ emphasizes that the effectiveness of registered agents is crucial for the overall reliability of BO information, and they should be subject to oversight and accountability to prevent errors or omissions.

⁶ BO Legal Review COL - English Version," Global Financial Integrity, January 2022, <https://34n8bd.p3cdn1.secureserver.net/wp-content/uploads/2022/02/BO-legal-review-COL-english-version.pdf?time=1724675575>.

⁷ S.I. No. 194/2021 - European Union (Anti-Money Laundering: Beneficial Ownership of Trusts) Regulations 2021, available at: <https://www.irishstatutebook.ie/eli/2021/si/194/made/en/print>

⁸ Company Beneficial Ownership Transparency," Open Government Partnership, January 2023 https://www.opengovpartnership.org/wp-content/uploads/2023/01/OGP_BL_PA_CompanyBeneficial_January2023.pdf.

⁹ Guidance on Transparency and Beneficial Ownership," Financial Action Task Force (FATF), October 2014, <https://www.fatf-gafi.org/content/dam/fatf-gafi/guidance/Guidance-transparency-beneficial-ownership.pdf>.

¹⁰ Corporate Transparency: A guide for beneficial ownership laws in Uganda, Global Financial Integrity, April 2022, <https://gfiintegrity.org/report/corporate-transparency-a-guide-for-beneficial-ownership-laws-in-uganda/>

¹¹ Enhancing the Effectiveness of Anti-Money Laundering and Combating the Financing of Terrorism," World Bank, March 2024 <https://documents1.worldbank.org/curated/en/099042424121018634/pdf/P179427158716b0611a32c193533943dbc0.pdf>.

¹² See 7

A few stakeholders have expressed mixed feelings about the current reliance on registered agents for maintaining and verifying BO information. While this system allows for more direct and potentially efficient management of BO data, there are concerns about the varying levels of diligence and expertise among registered agents. Some stakeholders, particularly from government agencies, have pointed out that the effectiveness of this approach depends largely on the registered agents' ability to comply with regulations and their commitment to maintaining accurate records. The business community has also noted that inconsistencies in how different agents handle their responsibilities can lead to challenges in ensuring uniform compliance across the board.

3. Access and Transparency

As mentioned, Belize's BO registry is centralized under the FSC, with access to detailed BO information restricted to specific regulatory bodies and available to the public only in limited form. This approach aims to balance transparency with data protection, allowing the public to access a "short extract" of BO information while keeping more detailed records confidential.

Transparency is a cornerstone of global efforts to combat financial crimes. GFI¹⁵ advocates for public access to BO information, arguing that it enhances accountability and deters illicit activities. Open Ownership¹⁶ supports free and open access to BO information, emphasizing that it should be provided in an easily understandable format. FATF¹⁷ also recommends that BO information be available to competent authorities and, where appropriate, to the public, while ensuring that personal privacy is protected.



In Belize, the limited public access to BO information has been a source of concern. The business community has expressed that this could hinder due diligence processes and reduce transparency in business operations. NGOs and civil society groups have called for greater public access to foster accountability and combat corruption. Conversely, some government officials and lawmakers stress the importance of protecting personal data and preventing misuse of BO information.

4. Registration and Compliance

The introduction of the OBRS in Belize is a significant development aimed at standardizing the submission of BO information. However, ensuring compliance, particularly among small and medium-sized enterprises (SMEs) and foreign-owned entities, remains a challenge.

GFI¹⁸ and World Bank,¹⁹ emphasize the importance of mandatory BO registration for all relevant entities, with strict compliance measures to ensure accuracy and timeliness. Regular audits and penalties for non-compliance are seen as essential tools for maintaining the integrity of BO registries. Open Ownership advocates for user-friendly registration systems and regular updates to reflect changes in ownership. FATF stresses the need for ongoing verification and enforcement to ensure that BO information remains accurate and current.

The registration and compliance process has been challenging, particularly for SMEs. Some businesses struggle to understand and meet BO reporting obligations, and government agencies have expressed concerns about the effectiveness of current compliance mechanisms.

¹³ The New Open Ownership Register: Faster, More Efficient, and Produces Better Data." LinkedIn, accessed August 2023. <https://www.linkedin.com/pulse/new-open-ownership-register-faster-more-efficient-produces/>.

¹⁴ See 8

¹⁵ Illicit Financial Flows Risks Related to Beneficial Ownership in the Mining Sector in Kenya, Global Financial Integrity, July 2024, <https://gfintegrity.org/report/illicit-financial-flows-risks-related-to-beneficial-ownership-in-the-mining-sector-in-kenya/>

¹⁶ Open Ownership, <https://www.openownership.org/en/>

¹⁷ Beneficial Ownership, FATF, <https://www.fatf-gafi.org/en/topics/beneficial-ownership.html#:~:text=Guidance%20on%20Beneficial%20Ownership%20of,the%20true%20owners%20of%20companies.>

There is a general consensus that more robust enforcement and support mechanisms are needed to improve compliance.

Belize has made significant progress in enhancing its BO registry, demonstrating a clear commitment to aligning with global standards and promoting financial transparency. The consolidation of the registry and the central role of registered agents in maintaining and verifying information are commendable steps. However, the reliance on registered agents introduces variability in the accuracy and consistency of the data. To address this, Belize could benefit from enhanced training for agents, the implementation of standardized protocols, and better technological integration to ensure that the information remains reliable and up-to-date.

While Belize's emphasis on data protection is important, expanding public access to BO information could further enhance transparency and accountability. Balancing privacy concerns with the need for openness is crucial in building trust among stakeholders. By adopting best practices from organizations like FATF, GFI, the World Bank, the EU, and Open Ownership, Belize can continue to improve its BO registry, making it a more effective tool in the fight against financial crimes.

5. System Enhancements and Future Directions

With the July 2023 amendment to the Belize Companies Registry Act, the BO registry is now centralized however is still undergoing further development. The FSC's initial audits of licensed registered agents and the creation of a more straightforward registration process for small businesses indicate a continuous effort to improve the system. The progression to phase 2, focusing on system enhancements, signals ongoing enhancements aimed at increasing the registry's efficiency and functionality.

¹⁸ Beneficial Ownership Fact Sheet." Global Financial Integrity, June 2023. <https://gfintegrity.org/wp-content/uploads/2023/06/BO-Fact-Sheet-FINAL2.pdf>.

¹⁹ Emile Van Der Does de Willebois. "Beneficial Ownership: Increasing Transparency in a Simple Way for Entrepreneurs." World Bank Blogs, February 22, 2022. <https://blogs.worldbank.org/en/developmenttalk/beneficial-ownership-increasing-transparency-simple-way-entrepreneurs>.

Strengths of Belize's BO Registry

- 1. Centralized Registry System:** The consolidation of separate registries for local and international businesses into a single, centralized registry significantly enhances the efficiency of the registration process. This unification simplifies the management and accessibility of beneficial ownership information, facilitating easier oversight by regulatory bodies.
- 2. Custodianship of the FSC:** The Financial Services Commission's (FSC) role as the custodian of the BO registry ensures a structured and regulated approach to maintaining and updating BO information. The FSC's oversight guarantees that the registry operates within the legal framework, enhancing its credibility and reliability.
- 3. Mandatory Verification by Registered Agents:** Requiring registered agents to maintain and verify beneficial ownership information ensures a higher level of accuracy and integrity in the data collected. This measure helps in minimizing errors and discrepancies in the ownership information of registered entities.



Strengths of Belize's BO Registry

- 4. Restricted Access to Sensitive Information:** The registry's access control, where detailed BO information is available only through legal channels or to specific government bodies, protects sensitive data from misuse. This approach balances the need for transparency with the imperative of data security and privacy.
- 5. Online Business Registry System (OBRS):** The implementation of the OBRS as a compulsory platform for all business registrations in Belize facilitates a streamlined and standardized process for declaring Ultimate Beneficial Owners (UBO). This digital approach enhances the efficiency of registrations and compliance monitoring.
- 6. Proactive Verification Measures and Sanctions:** The FSC's initiative to conduct site visits for verifying UBO and other relevant information through registered agents exemplifies a proactive approach to ensuring the accuracy and completeness of the BO registry. FSC also upholds sanctions to those business who are not complying. Sanctions can include public memos of the business's inability to offer service due to not meeting the requirements.

Weaknesses of Belize's BO Registry

- 1. Limited Public Access:** While restricted access protects sensitive information, the limited availability of detailed BO information to the public can impede transparency. The current system may not fully satisfy the international calls for greater openness in ownership structures, potentially affecting trust and accountability.
- 2. Dependence on Registered Agents:** While the requirement for registered agents to verify information adds a layer of accuracy, it also introduces a dependency on these agents' diligence and integrity. Any lapses in their verification processes could lead to gaps in the registry's completeness and reliability.
- 3. Challenges in Enforcement:** Ensuring compliance with the BO declaration requirements, especially among small and medium-sized enterprises (SMEs) that may lack resources or awareness, remains a challenge. The effectiveness of enforcement mechanisms is critical for the registry's success.

Weaknesses of Belize's BO Registry

- 4. Potential for Data Accuracy Issues:** Despite the verification requirements, the risk of inaccuracies in BO information persists, particularly due to the dynamic nature of ownership structures. Regular updates and checks are essential to maintain the registry's accuracy over time.
- 5. Adaptability to International Standards:** As global standards for financial transparency evolve, the registry must continually adapt to meet these changing requirements. Keeping pace with international best practices requires ongoing legislative and operational updates, which can be resource-intensive.
- 6. Fragmentation Across Legislation:** One notable challenge within the regulatory framework is the dispersion of BO-related laws across two different pieces of legislation: the Belize Company Registry Act and the Belize Money Laundering and Terrorism Act. This division can potentially lead to complexities in enforcement, interpretation, and compliance. The fragmented legislative approach might complicate the understanding and implementation of BO requirements for stakeholders, requiring navigation through multiple legal texts to grasp the full scope of obligations and procedures.

07. STRATEGIC RECOMMENDATIONS

Based on the current practices of Belize's Beneficial Ownership (BO) Registry and insights drawn from a comparative analysis with international standards and practices, several strategic recommendations have been formulated to enhance the effectiveness, transparency, and reliability of Belize's BO Registry. These recommendations are designed to address the identified gaps and leverage best practices to ensure Belize's compliance with international standards and to fortify its defenses against financial crimes.

Legislative Amendments

- 1. Clarify Accountability and Responsibilities:** Cabinet to amend legislation to explicitly define the roles and responsibilities of all stakeholders involved in the BO Registry, including the authority responsible for ensuring the accuracy and completeness of the registry. This should include clear accountability mechanisms for verifying beneficial ownership information.
- 2. Strengthen Enforcement and Penalties:** FSC and the Attorney General to revise current laws to introduce stricter penalties for non-compliance and submission of inaccurate or incomplete BO information. This could include higher fines, criminal charges for intentional misrepresentation, and enhanced enforcement actions.
- 3. Expand Access Requirements:** Cabinet and FSC to amend laws to allow broader but controlled access to the BO Registry for relevant government agencies without compromising data protection principles. This could facilitate smoother regulatory checks and licensing processes.

Technological Upgrades

- 1. Implement Automated Cross-Checks:** FSC to invest in technology to enable automated cross-checking of BO information with other national databases (e.g., tax, electoral, and corporate registries) to ensure accuracy and to identify discrepancies proactively.
- 2. Enhance Digital Infrastructure:** In phase 2 or 3, FSC should upgrade the Online Business Registry System (OBRS) to improve user experience, security, and data integrity. Consider introducing features like API access for high-volume users and digital verification methods for stakeholders.
- 3. Expand Public Access Portal:** FSC to expand the public access portal and expand the information found within the “short-extract” that provides limited BO information to enhance transparency while safeguarding privacy. Include features for users to report discrepancies anonymously.
- 4. Integrate Beneficial Ownership Registry with Company Information:** Integrate the BO Registry with company information to connect BO data with shareholder details. This will provide a more comprehensive view of ownership structures and enhance transparency. Additionally, consider steps to make this information publicly accessible to allow greater scrutiny and prevent illicit activities

Increased International Cooperation

- 1. Harmonize Standards with International Best Practices:** FSC should aim to align Belize's BO Registry practices with international standards, especially those recommended by FATF, to facilitate cross-border cooperation and compliance.

2. **Engage in International Information Sharing:** FSC should establish agreements with other countries to share BO information for entities with cross-border operations, enhancing the global fight against money laundering and terrorist financing.
3. **Participate in Global Forums:** Actively participate in international forums and working groups on beneficial ownership transparency to stay updated on best practices and to contribute to the development of global standards.

Capacity Building for Stakeholders

1. **Training Programs for Registered Agents:** FSC in collaboration with Global Financial Integrity to develop and mandate comprehensive training programs for registered agents focusing on their legal obligations, the importance of accurate BO information, and the consequences of non-compliance.
2. **Awareness Campaigns for Entity Owners:** FSC in collaboration with Global Financial Integrity, the private and civil society to launch awareness campaigns targeting entity owners about their responsibilities related to beneficial ownership disclosure and the critical role of transparency in combating financial crimes.
3. **Support Mechanisms for Small Businesses:** FSC and Belize Chamber of Commerce and Industries (BCCI) to introduce support mechanisms, including helpdesks and online resources, to assist small businesses in understanding and fulfilling their BO reporting obligations.



08. CONCLUSION

The analysis of Belize's BOR reveals a system in transition, one that has taken significant steps towards enhancing financial transparency and aligning with international standards to combat money laundering and terrorism financing. The registry's current practices, while reflective of a commitment to these goals, highlight areas of strength such as the centralized framework and legal mandates for registered agents, alongside areas requiring improvement such as transparency levels, access limitations, and verification processes.

The comparative analysis with international best practices, and guided global organizations, underscores the importance of evolving Belize's BO Registry through legislative amendments, technological upgrades, increased international cooperation, and comprehensive capacity building for stakeholders. These strategic recommendations aim to address the registry's identified weaknesses and leverage its strengths to enhance its effectiveness, reliability, and compliance with global standards.

As Belize continues on its path toward financial integrity and transparency, the implementation of these enhancements will be crucial. Strengthening the BO Registry will not only fortify Belize's defenses against financial crimes but also foster a more trustworthy business environment, contributing to the country's reputation as a compliant and secure jurisdiction for international business and investment. This analysis serves as a foundation for ongoing dialogue and action toward achieving a BO Registry that is robust, transparent, and efficient, thereby playing a pivotal role in the global effort to eradicate financial crime.

In the collective effort to enhance financial transparency and combat illicit financial flows, Belize can benefit from collaboration with several global and regional financial entities, including Global Financial Integrity and Open Ownership. These partnership can provide Belize with access to a range of expertise, from policy analysis and advocacy to technical support and capacity-building. These organizations facilitate international dialogue, share best practices, and offer valuable guidance on refining beneficial ownership registries. Working with these entities allows alignment efforts with international standards of Beneficial Ownership. As Belize continues to develop its BO framework, ongoing collaboration with GFI and other partners will be crucial in promoting corporate integrity, ensuring transparency, and supporting the global fight against financial crime.



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