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4th December, 2019

John Penrose, MP

Prime Minister's Anti-Corruption Champion and
Minister of State for Northern Ireland

IRELAND

Dear *Sir*

Next steps for Beneficial Ownership Transparency Disclosure Principles

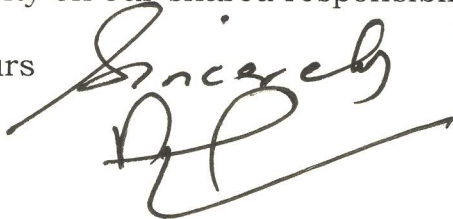
Reference is made to your letter dated 10th July 2019 inviting Kenya to join the Beneficial Ownership Leadership Group. Your recognition of Kenya's continued effort and commitment to an open, transparent and accountable state is greatly appreciated. The delay in responding to your letter which we regret, was occasioned by the need for consultations within government on the scope of responsibility arising from commitment to membership of the vanguard group.

This letter serves to communicate Kenya's pleasure to be part of the Vanguard countries that will set up the Beneficial Ownership Leadership Group. As is evident in our various legislation and regulations, Kenya has already taken the following critical steps towards advancing Beneficial Ownership.

- Publishing company beneficial ownership data that is freely downloadable, searchable, and reusable by the public, without a fee proprietary software, or the need for registration.
- Implementing progressively ambitious best practice in Beneficial Ownership Transparency, across technical, legislative, regulatory, and administrative parameters.
- Contributing to the building of best practice, including by recognizing the evolving illicit finance threat and considering implementing Beneficial Ownership Transparency beyond companies to a wider group of assets classes.
- Working in partnership with civil society and enabling their roles as watchdogs and users of the data.
- Engaging other partners, including Governments and International Institutions, to advance the objective of making Beneficial Ownership Transparency a global norm.

We look forward to continued engagement that will endeavor to create further clarity on our shared responsibility towards open governance.

Yours

A handwritten signature in black ink, appearing to read 'Ken N. Osinde', written over a horizontal line.

Amb. Ken N. Osinde, CBS
Chief of Staff

Copy to: **Hon. Justice Paul Kihara Kariuki, EGH**
Attorney-General
Office of the Attorney General
NAIROBI