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1.0 Initial Guide	2024-12-17	Initial Guide	Khairil Yusof < khairil.yusof@sinarproject.org > Withee Poositasai < witheep@gmail.com > Nattapat Neokul < nattapat.neokul@gmail.com >
1.1 Add Indonesia and update Thailand definition	2026-03-19	Indonesia joined the partnership. Update Thailand definition table following official regulation.	Suppaut Bosuwan < suppaut@hand.co.th > Alvin Nicola < anicola@ti.or.id > Agus Sarwono < asarwono@ti.or.id >

PEPs Open Data Guide

A guide for publishing and using reusable standard open data on political exposed persons

Introduction

At the first ASEAN CSO Integrity Workshop was held in Kuala Lumpur in October 2024, civil society organizations in Southeast Asia working on anti-corruption came together to discuss collaborations for solutions. The Open Data and Access to Information Focus Group identified several key issues around asset declaration, legislative access, large scale infrastructure projects and politically exposed persons (PEPs). At the first follow up meeting, and the establishment of the Southeast Asia Anti-Corruption Network (SEA-ACN), it was decided by the Open Data focus group consisting of [Hand Social Enterprise](#) (Thailand), [Sinar Project](#) (Malaysia) and [WeVis](#) (Thailand) to collaborate around the development of a regional standard and publication of PEPs and Beneficial Ownership Data, starting with datasets from Thailand and Malaysia.

WeVis and the Sinar Project have already been working on legislative open data for several years. Existing sets of open data therefore exist, along with practical applications. Sinar Project also has successfully demonstrated that a set of standardized open data enables collaboration¹.

¹ Canares M, Yusof K, et al (2017), *Collaborating for open data. Building an open database on politically exposed persons in Malaysia: A case study*. World Wide Web Foundation. <http://webfoundation.org/docs/2017/08/RP-Collaboration-For-Open-Data-082017.pdf>

This guide provides a practical framework in mapping and publishing [FATF Guidance: Politically Exposed Persons \(Recommendations 12 and 22\)](#) as open data following [Popolo open data standard](#), national regulatory definitions and editorial guidelines for media. It also provides guidance on usage on PEPs data standards for anti-corruption reporting for civil society and media.

What is PEPS

FATF Definitions

- **Foreign PEPs:** individuals who are or have been entrusted with prominent public functions by a foreign country; for example, heads of state or of government, senior politicians, senior government, judicial or military officials, senior executives of state owned corporations, important political party officials.
- **Domestic PEPs:** individuals who are or have been entrusted domestically with prominent public functions; for example, heads of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state owned corporations, important political party officials.
- **International organisation PEPs:** persons who are or have been entrusted with a prominent function by an international organisation, refers to members of senior management or individuals who have been entrusted with equivalent functions, i.e. directors, deputy directors and members of the board or equivalent functions.
- **Family members** are individuals who are related to a PEP either directly (consanguinity) or through marriage or similar (civil) forms of partnership.
- **Close associates** are individuals who are closely connected to a PEP, either socially or professionally.

PEPs Open Data

There are limited open data sets for politically exposed persons for Southeast Asia. Globally available data sets are usually limited to definitions by positions and do not include extended networks of family members and close associates. A more comprehensive set of open data for PEPs that is reusable across the region will be useful for multiple actors and for cross-border collaborations. Locally sourced data compliant to national laws and regulatory definitions will also ensure some level of protection from legal persecution when reporting on anti-corruption issues.

Use Cases

Business

- For businesses, reliable and extensive local PEPs data is helpful for risk assessment and analysis for investments and partnerships.

Civil Society

- Civil society organisations working on anti-corruption are better equipped to discover issues where corruption happens by rapidly identifying persons in power that ultimately gain from problematic uses of public funds.
- Reliable PEPs data based on regulatory definitions, helps protect them from legal threats when raising questions about involvements of persons holding positions of power or related to them.

Media

- Similar to civil society, able to rapidly discover involvement of key persons in power in reliable manner in stories, as well as connect them.
- PEPs definitions can also be used as an additional tool for mapping potential human sources for an investigative story

Financial Institutions

- Improved information for risk assessments and detection for money laundering activities.
- Better information helps reduce risks for investments and can lead to more competitive lending rates and higher profits.

Lack of Official PEPs Data

Malaysia

- Does not have a central database. “Reporting institutions are encouraged to develop internal references or databases in identifying family members or close associates of PEPs. Reporting institutions may also refer to public or commercial databases and supplement this with a customer’s self-declaration.” - [Bank Negara Malaysia](#)
- The identification of the close associates should be on a best effort basis, based on information obtained and available to the reporting institutions and subject to the risk assessment of the reporting institution. - [Bank Negara Malaysia](#)

Thailand

- AML SOLUTION is a private platform that offers PEP (Politically Exposed Persons) data verification services for a fee. You can access it at <https://www.amlsolution.co/aml>
- There is no database specifying individual names, as Anti-Money Laundering Office (AMLO) does not provide a list of persons; instead, AMLO defines the relevant positions, and the reporting entities are responsible for collecting and updating information on any changes accordingly. See Anti-Money Laundering Office (AMLO)’s [Guideline on Political Exposed Persons](#)

In recent years, Thailand has faced multiple cases that present heightened risks of money laundering, underscoring structural vulnerabilities in both the financial system and certain business sectors. In response, the Anti-Money Laundering Office of Thailand (AMLO) has strengthened coordination with relevant authorities to enhance national anti–money laundering efforts.

Regulatory measures have gone beyond requiring banks and financial institutions to strengthen Know Your Customer (KYC) and customer due diligence practices. AML obligations have also been extended to several high-risk business sectors, including gold shops, jewelry and precious stone dealers, and motor vehicle sellers, where high-value transactions and asset convertibility increase exposure to money laundering risks.

Despite these efforts, Thailand continues to face significant challenges in the systematic identification and data collection of Politically Exposed Persons (PEPs), as well as their family members and close associates. The absence of a centralized and publicly accessible PEPs registry means that reporting entities must rely on fragmented sources, commercial databases, or self-declared information, resulting in inconsistencies and operational gaps.

These challenges are particularly pronounced for small and medium-sized enterprises (SMEs), which often lack the technical capacity, financial resources, and access to reliable data needed to implement comprehensive PEP screening and enhanced due diligence measures. As a result, compliance burdens can be disproportionate, while risks of under-identification and uneven enforcement remain.

Indonesia

Despite being assessed as “*largely compliant*” in the [2025 FATF Mutual Evaluation Follow-Up Report](#), Indonesia continues to face a critical structural weakness in its anti-money laundering and integrity systems, which is the absence of a single, authoritative, and comprehensive source of Politically Exposed Persons (PEP) data. This weakness persists even though clear regulatory definitions exist across [OJK \(Indonesia Financial Services Authority\)](#), [PPATK \(Indonesia’s Financial Intelligence Unit\)](#), [Bank Indonesia](#) (Central Bank of Indonesia), and the [Ministry of Finance](#). In practice, the country does not yet possess a unified national PEP registry that consolidates all relevant categories of PEPs as envisaged by FATF.

1. Indonesia’s PEP information is fragmented across multiple government entities, with each agency holding only partial datasets. [PPATK’s national PEP Application](#) represents an important step forward, but its coverage remains inherently limited. The system focuses primarily on domestic PEPs, and even then, the available data is incomplete and updated irregularly. Because the application relies heavily on voluntary or bureaucratic data-sharing from ministries and state institutions, the quality and timeliness of the data vary widely. More importantly, the system does not provide comprehensive information on foreign PEPs, family members across all relevant jurisdictions, or close associates
2. Indonesia does not publish or maintain a transparent national registry of individuals who hold or have held prominent public functions. This stands in contrast to several other jurisdictions that openly publish PEP lists or maintain centralised registries accessible to reporting institutions. Without such transparency, banks, fintech firms, insurance companies, securities companies, cooperatives, property agents, and other reporting entities must rely on commercial databases or fragmented internal efforts to identify PEPs—despite being legally obligated to detect them and apply enhanced due diligence under the AML law.
3. Although Indonesia possesses several important datasets relevant to PEP identification—such as [LHKPN](#) (asset declarations) and the [Beneficial Ownership](#) (BO) registry—these systems are not integrated. They operate in silos, lacking interoperability, shared identifiers, or cross-database linkage mechanisms. This fragmentation severely undermines the ability to trace whether a PEP is concealing ownership through relatives, nominees, or shell companies. The situation is made worse by the weak compliance level of the BO registry, with only [51% of companies](#) submitting beneficial ownership information (1.831.411 of 3.556.916 companies).

PEPs Data Mapping Frameworks

The following are initial frameworks to map FATF definitions to national regulatory definitions and where definitions are still not clearly defined to also map it to media editorial guidelines, and finally as data.

Malaysia

Malaysia's central bank and financial regulatory body, Bank Negara Malaysia provides guidance on customer due diligence (CDD) on PEPs through the policy documents such as [Anti-Money Laundering, Countering Financing of Terrorism and Targeted Financial Sanctions for Financial Institutions \(AML/CFT and TFS for FIs\)](#). Additionally close business associates are also defined in the Companies Act 2016.

FATF Category	National Regulatory Definition	Media Sub Category	Media Editorial Definition	Data Category	Notes
Foreign PEPs	<p>foreign PEPs – individuals who are or who have been entrusted with prominent public functions by a foreign country.</p> <p>For example, Heads of State or Government, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations and important political party officials; (BNM)</p>			<p>Popolo Membership Post Category</p>	State-owned corporations not clearly defined.
Domestic PEPS	<p>domestic PEPs – individuals who are or have been entrusted domestically with prominent public functions. For example, Heads of State or Government, senior politicians, senior government (includes federal, state and local government),</p>			<p>Popolo Membership Post Category</p>	State-owned corporations not clearly defined.

	judicial or military officials, senior executives of state-owned corporations and important political party officials; (BNM)				
International Organisation PEPs	<p>persons who are or have been entrusted with a prominent function by an international organisation which refers to members of senior management. For example, directors, deputy directors and members of the Board or equivalent functions.</p> <p>The definition of PEPs is not intended to cover middle ranking or more junior individuals in the foregoing categories. (BNM)</p>			Popolo Membership Post Category	
Family Members	<p>Refers to individuals who are related to a PEP either directly (consanguinity) or through marriage. A family member in this context, includes:</p> <p>(a) parent; (b) sibling; (c) spouse; (d) child; or (e) spouse's parent, for both biological or non-biological relationships. (BNM)</p>			<p>Popolo (extension) Relationship</p> <p>Types: Parent Sibling Spouse Child Member</p>	
Close Associates	<p>Refers to any individual closely connected to a politically exposed person (PEP), either socially or professionally.</p> <p>A close associate in this context includes:</p> <p>(a) extended family members,</p>	<p>Romantic Partner Superior Close Associate (used as friends/social) Employer Superior</p>	<p>Business Partners Has joint investments, is listed in company records (Registrar of Companies), has a verbal or written agreement to jointly-administer, operate or invest in a business entity.</p> <p>Close Associate Mutually know each other and interact</p>	<p>Popolo (extension) Relationship</p> <p>Types: Business Partner Extended Family Member</p>	<p>Beneficial Ownership Interests and Control statements can help further identify additional close associates through disclosure of beneficial ownership and state owned companies and subsidiaries.</p>

	<p>such as relatives (biological and non-biological relationship);</p> <p>(b) financially dependent individuals (e.g. persons salaried by the PEP such as drivers, bodyguards, secretaries);</p> <p>(c) business partners or associates of the PEP; (BNM) and (Companies Act)</p> <p>(d) prominent members of the same organisation as the PEP;</p> <p>(e) individuals working closely with the PEP (e.g. work colleagues); or</p> <p>(f) close friends.</p>		<p>with one another in a social sense.</p> <p>Romantic Partner Editorial definition: In a romantic or sexual relationship, without marriage.</p> <p>Employer Pays someone for his/her services, usually as an owner of a firm</p> <p>Superior In relation to a subordinate. I.e. Manages the performance or duties of a subordinate, usually in a workplace environment. May also apply to political parties.</p> <p>Subordinate In relation to a superior. I.e Someone who is answerable to and whose performance is managed by a superior, usually in a workplace environment. May also apply to political parties.</p>	<p>Superior Subordinate Employer Employee Romantic Partner</p> <p>Popolo Membership</p> <p>BODS Ownership and Control Statement</p>	
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Thailand

Definition: an individual assigned or formerly holding a significant position, domestically or internationally, such as a head of state or government, minister, high-ranking government official, judiciary member, constitutional organization member, prosecutor, or military officer; an executive of a state-owned enterprise or other state-owned agency; or a person with a significant role in a political party, including family members or close associates. It also includes individuals assigned to or previously holding key positions in international organizations, such as board members, deputy board members, or members of executive committees, or those holding equivalent positions, as defined by the Secretary-General.

Reference: Ministerial Regulation on Customer Due Diligence, B.E. 2563 (2020)

FATF Category	National Regulatory Definition	Media Sub Category	Media Editorial Definition	Data Category	Notes
Foreign PEPs	<p>Foreign Politically Exposed Persons (Foreign PEPs) include:</p> <ol style="list-style-type: none"> 1. Heads of State 2. Governments 3. Ministers 4. Senior government officials 5. Courts 6. Independent agencies 7. Public prosecutors 8. Military personnel 9. Individuals holding senior positions in business entities owned by the government or other state authorities 10. Individuals with significant roles in political parties 			<p>Popolo Membership Post Category</p>	

	All of the above shall be regarded as Politically Exposed Persons (PEPs) if their positions are equivalent to those of Domestic PEPs.				
Domestic PEPS	<p>1. A person holding a high-ranking position with significant authority in the legislative, executive, or judiciary branches.</p> <p>2. A person in a high-ranking position with key control and management authority in central government agencies, local government agencies, state enterprises, or other state-owned organizations.</p> <p>3. A person holding a senior command position in the military or police force.</p> <p>4. A person holding a senior or board member position in a constitutional organization.</p> <p>In Thailand, a politically exposed person also includes individuals meeting the above criteria who have vacated their positions within the past year or who continue to hold influence related to the position, even if they left office more than one year ago.</p>			Popolo Membership Post Category	
International Organisation PEPs	Individuals holding senior management positions in international organizations shall be regarded as Politically Exposed Persons (PEPs).			Popolo Membership Post Category	
Family Members	Father, mother, children,			Popolo	

	<p>adopted children, or adoptees of a politically exposed person.</p> <p>Siblings who share the same father and mother, or those who share either parent with a politically exposed person.</p> <p>Spouse or domestic partner (living together as husband and wife without official marriage registration) of a politically exposed person.</p>			<p>(extension) Relationship</p> <p>Types: Parent Sibling Spouse Child Member</p>	
Close Associates	<p>Close associates include:</p> <p>(a) Individuals entrusted with the possession or management of assets or other benefits.</p> <p>(b) Individuals with a close relationship due to the establishment or conduct of a business relationship.</p>	<p>Romantic Partner Superior Close Associate (used as friends/social) Employer Superior</p>	<p>Business Partners Has joint investments, is listed in company records (Registrar of Companies), has a verbal or written agreement to jointly-administer, operate or invest in a business entity.</p> <p>Close Associate Mutually know each other and interact with one another in a social sense.</p> <p>Romantic Partner Editorial definition: In a romantic or sexual relationship, without marriage.</p> <p>Employer Pays someone for his/her services, usually as an owner of a firm</p> <p>Superior In relation to a subordinate. I.e. Manages the performance or duties of a subordinate, usually in a workplace environment. May also apply to political parties.</p> <p>Subordinate In relation to a superior. I.e Someone who is answerable to and whose performance is managed by a superior, usually in a workplace environment. May also apply to political parties.</p>	<p>Popolo (extension) Relationship</p> <p>Types: Business Partner Extended Family Member Superior Subordinate Employer Employee Romantic Partner</p> <p>Popolo Membership</p> <p>BODS Ownership and Control Statement</p>	

Indonesia

Definition :

Politically Exposed Person (PEPs) in Indonesia refers to any natural person—Indonesian or foreign—who currently holds, or has previously held, a prominent public function, and those whose position or relationships create a heightened risk of corruption, abuse of power, or money-laundering. This operational definition is drawn from Indonesian laws and regulations, notably Bank Indonesia Regulation ([PBI 12/20/2010](#)), OJK regulations and guidance ([SEOJK 11/2021](#); [POJK No. 8/2023](#)), [PPATK](#) regulations, and Ministry of Finance rules ([PMK 30/2010](#)).

1. PEPs

1. Foreign PEPs

Persons who are entrusted with prominent public functions by a foreign country. Examples include heads of state or government, senior politicians, senior government officials, senior military or law-enforcement officers, senior executives of state-owned enterprises (SOEs), and senior party officials. (Sources: SEOJK 11/2021; POJK 8/2023).

2. Domestic PEPs

Persons who hold or have held prominent public functions within Indonesia. Typical examples enumerated in national regulation include: the President and Vice-President; ministers and deputy ministers; members of the national and regional legislatures (DPR/DPD/DPRD); senior judges (Supreme Court, Constitutional Court); heads and senior officials of oversight bodies (KPK, BPK, OJK Board, Bank Indonesia Board); governors, regents/mayors and their deputies; senior civil servants (echelon I/II and equivalent); prosecutors and investigators; senior military and police officers; directors and commissioners of SOEs/BUMDs; leaders of state universities; senior officials in sectors such as oil & gas, mining; and political party leaders. (Sources: PBI 12/20/2010; PPATK regulations; POJK 8/2023; PMK 30/2010).

3. PEPs of International Organisations

Persons who are entrusted with prominent functions by international organisations—for example directors, deputy directors, board members or senior managers at institutions such as the IMF, World Bank, UN, OECD, ADB, IDB—who are treated as PEPs for AML/CFT purposes. (Source: POJK 8/2023).

2. Family members (PEPs relatives)

Regulations explicitly include family members as part of the PEP risk universe. Family members typically covered are those up to **second degree**, vertically and horizontally. Commonly listed relationships include:

- parents (biological, step, adoptive)
- siblings (biological, step, adoptive)
- children (biological, step, adoptive)
- grandparents (biological, step, adoptive)
- grandchildren (biological, step, adoptive)
- spouse (husband/wife)
- parents-in-law (mertua / besan)
- spouses of children/grandchildren, in-laws, and other equivalent second-degree relations as specified in POJK 8/2023 and related guidance.

3. Close associates (related parties)

“Close associates” or related parties are persons or entities publicly known to have a close personal or business relationship with a PEP. Examples explicitly cited in the regulations include:

- personal assistants
- private secretaries
- drivers
- long-standing business partners or confidants
- companies owned, managed or controlled by the PEP
- nominees or proxies used to hold assets on behalf of the PEP.

Limitations and implementation issues

- **Duration after leaving office:** there is no single harmonised rule across agencies for how long a former officeholder remains a PEPs. PPATK guidance has treated certain former domestic PEPs as higher-risk for up to five years post-tenure, whereas other authorities (including OJK in some contexts) have used a two-year period, reflecting an inconsistency that complicates operational application.

- **Beneficial ownership challenges:** detecting ultimate beneficial ownership when PEPs use nominees, layered corporate structures, or proxies remains a major practical challenge. POJK 8/2023 requires reporting institutions to treat beneficial owners who are PEPs as high risk and to apply EDD, but corporate BO reporting by companies has been incomplete (regulatory reporting compliance was low, cited at ~51% as of November 2025), which hampers detection.
- **Data and system limitations:** PPATK has developed an official PEPs application to assist identification and monitoring, and this application is available to reporting parties, law enforcement and supervisory agencies. However, the application's coverage and integration with other government datasets (LHKPN asset disclosures, and BO registry) are limited. Consequently, many reporting entities — especially smaller banks, cooperatives, and DNFBPs — rely on commercial screening tools or manual checks, and implementation across non-bank sectors is uneven.
- **DNFBPs and other sectors:** certain designated non-financial businesses and professions (notaries, lawyers, accountants, real-estate agents, dealers in high-value goods, auction houses) are included as reporting parties in law and guidance, but FATF and national assessments have identified gaps in DNFBP compliance, for example, inconsistencies in recordkeeping, risk analysis, and transaction reconstruction obligations.

The 2025 Mutual Evaluation Report (MER) of the Financial Action Task Force (FATF), *Anti-Money Laundering and Counter-Terrorist Financing Measures – Indonesia, 2nd Enhanced Follow-Up Report*, indicates that Indonesia is assessed as largely compliant with Recommendation 12 and Recommendation 22, both of which relate to the treatment of Politically Exposed Persons (PEPs). While Indonesia's formal definition of *domestic PEPs* is considered sufficiently broad, the implementation remains uneven, particularly across state-owned enterprises (BUMN/BUMD). Moreover, the regulatory framework does not impose Enhanced Due Diligence (EDD) obligations on designated non-financial businesses and professions (DNFBPs) such as lawyers, notaries, and public accountants—despite these professions being frequently used as intermediaries by PEPs in money-laundering schemes.

- **Recommendation 12 (Largely Compliant)**
FATF notes that entities supervised by Bank Indonesia, as well as service and postal providers, are not required to obtain senior management approval before establishing business relationships with foreign PEPs. In addition, savings and loan cooperatives are only required to apply PEP-related measures to *foreign* PEPs and not to domestic PEPs, creating a significant regulatory gap.
- **Recommendation 22 – DNFBPs: Customer Due Diligence (Largely Compliant)**
For DNFBPs, FATF highlights several deficiencies. Regulations for notaries do not mandate documenting the results of risk analysis for low- and medium-risk customers. For accountants, the rules do not require record-keeping related to transaction completion, customer risk rating analysis, or reconstruction of transaction records. Furthermore, senior management approval is not required when entering into a business relationship with a PEPs.

FATF Category	National Regulatory Definition	Media Sub Category	Media Editorial Definition	Data Category
Foreign PEPs	<p>Defined by OJK (POJK 8/2023; SEOJK 11/2021) as individuals entrusted with a <i>prominent public function</i> by a foreign state. This includes foreign heads of state or government, senior politicians, senior government officials, senior military or law-enforcement officials, senior executives of foreign state-owned enterprises, and senior officials of foreign political parties. Bank Indonesia and the Ministry of Finance also recognise foreign PEPs as high-risk persons requiring EDD.</p>	<p>Foreign leaders / Foreign officials / Foreign political elites</p>		
Domestic PEPS	<p>As defined in BI Regulation PBI 12/20/2010, OJK POJK 8/2023, SEOJK 11/2021, PPATK PER-02/2015 & PER-11/2020, and PMK 30/2010: individuals entrusted with domestic public authority or prominent public functions, including state officials (president, vice-president, ministers, DPR/DPD/DPRD members, Supreme Court/Constitutional Court judges, prosecutors, senior law enforcement), senior bureaucrats (echelon I–II), strategic officials, SOE/BUMD executives, licensing officials, regional heads, political party officials, senior military/police, LHKPN-obligated officials, and any individuals exercising strategic public roles.</p>	<p>National officials / Regional officials / Senior bureaucrats / Political elites / Military & police elites / SOE executives</p>		

International Organisation PEPs	Defined by OJK (POJK 8/2023; SEOJK 11/2021) as individuals entrusted with <i>prominent functions</i> within international organisations. This includes directors, deputy directors, senior managers, and board members at institutions such as the IMF, World Bank, UN, OECD, ADB, IDB, and similar bodies.	International officials / Multilateral executives		
Family Members	Defined by OJK (POJK 8/2023), SEOJK 11/2021, and PPATK PER-11/2020: family members up to the second degree, vertically and horizontally. Includes: parents, siblings, children, grandparents, grandchildren, parents-in-law, spouses, in-laws, spouses of children/grandchildren, siblings-in-law, and other publicly recognised close family connections.	Political dynasty / Relatives of power		
Close Associates	Defined by OJK (POJK 8/2023), SEOJK 11/2021, and PPATK PER-11/2020: persons closely connected to PEPs, including companies owned/managed/controlled by PEPs, individuals publicly known to have close personal or business ties with the PEP (drivers, personal assistants, private secretaries, aides, consultants, advisors), long-term business partners, nominee shareholders, and entities indirectly controlled by PEPs.	Trusted associates / Cronies / Business partners / Nominees / Inner circle		

Data Standard for PEPS

A data standard is a “Set of designed data structures for a specific purpose”. In this study, we want to propose one for PEPS because it will provide the following benefits:

1. **Reusable knowledge and tools.** Organizations can use the same tools and knowledge to understand PEPS datasets from different regions.
2. **Ability to join datasets across sources.** We can connect PEPS across regions to analyze cross-border connections.
3. **Easy to get started for any organization.** Anyone can follow this guideline without rethinking the data structure again.

Our proposed standard is based on Popolo: International open government data specifications (www.popoloproject.com) which were adopted by many public sector and civic tech eg. My Society (UK), g0v (Taiwan), and Sinar Project (Malaysia). The standard itself is not fixed with any specific data storage and format, but we use Google Sheets for demonstration because it is easy to collaborate and easy to understand especially for non-technician people.

Data Categories

Divided into each category, the PEPS dataset should contain the following 6 tables:

Person

Describe the person who qualified as PEPS as defined in the previous section. This table should have the following columns:

Column Name	Data Type	Description
id	Text	Unique identifier
name	Text	A person's preferred full name
other_name	List of text	An alternate name, such as a pseudonym
email	Text	A preferred email address
gender	Text	A gender
birth_date	Date	A date of birth
death_date	Date	A date of death
image	Text	A URL of a head shot
summary	Text	A one-line account of a person's life
biography	Text	An extended account of a person's life
national_identity	Text	A national identity
contact_details	List of text	A means of contacting the person
links	List of text	A URL to a document about the person

Organization

Describe any kind of related organization: government body, private organization, etc. This table should have the following columns:

Column Name	Data Type	Description
id	Text	Unique identifier
name	Text	A primary name, e.g. a legally recognized name
other_names	Text	An alternate name, e.g. a trading or colloquial name
parent_id	Text	The id of the organization that contains this organization
classification	Text	An organizational category, e.g. charity, committee, etc.
founding_date	Date	A date of founding
dissolution_date	Date	A date of dissolution, termination, expiry, etc.
image	Text	A URL of an image
contact_details	List of text	A means of contacting the organization
links	List of Text	A URL to a document about the organization

Post

Describe the position of each organization. This table should have the following columns:

Column Name	Data Type	Description
id	Text	Unique identifier

label	Text	A label describing the post
other_labels	Text	An alternate label, such as an abbreviation
role	Text	The function that the holder of the post fulfills
organization_id	Text	The organization in which the post is held
start_date	Date	A date of creation
end_date	Date	A date of elimination
contact_details	List of text	A means of contacting the holder of the post
links	List of Text	A URL to a document about the post

Membership

Connect the person to the position in a membership relationship. This table should have the following columns:

Column Name	Data Type	Description
id	Text	Unique identifier
label	Text	A label describing the membership
role	Text	The role that the member fulfills in the organization
person_id	Text	The ID of the person that is a member of the organization
organization_id	Text	The ID of the organization in which the person is a member
post_id	Text	The ID of the post held by the member in the organization

start_date	Date	The date on which the membership began
end_date	Date	The date on which the membership ended
contact_details	List of text	A means of contacting the member of the organization
links	List of Text	A URL to a document about the membership

Relationship

Describe the relation between two people that would make a person become PEPs as describe tin the previous section. This table should have the following columns:

Column Name	Data Type	Description
id	Text	Unique identifier
type	Text	A type of the relationship
subject_id	Text	The subject person's id
object_id	Text	The object person's id
start_date	Date	The date on which the relationship began
end_date	Date	The date on which the relationship ended

Example data structure with sample data: [+ PEPs Data Samples](#)

Internationalization

To be able to use across datasets with the same standard at the international level, English name, and translation is important. However, we propose to **use the local official language by default**, then if the English name and translation for each column will be appended `_en` at the end of column name eg. `name` and `name_en`

Why use the local language by default?

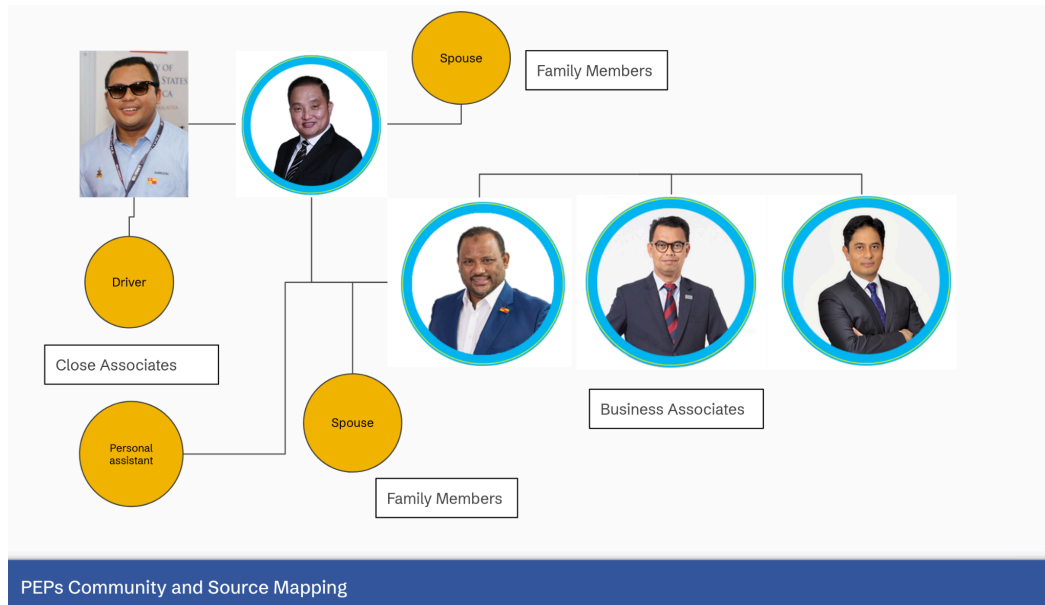
1. Local people should be the main target group who will have the highest chance of using the PEPs dataset. Using English would decrease local people's accessibility to the dataset.
2. If a country doesn't use English as its official language, like Thailand, almost every official document is in Thai only. This means adding an English translation or finding an official English name is a huge task that needs a lot of effort to make it available. So, the dataset can be released in the official language first, then the English name and translation can be followed.

Using PEPs Data Standards and Definitions for Media and Civil Society

PEPs data standards and definitions can also be applied by investigative journalists and civil society organizations investigating anti-corruption. It provides a standard and regulatory compliant way for identifying, investigating and reporting on involvement of PEPs in anti-corruption cases. It serves as an additional tool for source and community mapping for investigations for human and OSINT sources.

These initial training slides have been used in several joint capacity building workshops between Centre for Center to Combat Corruption & Cronyism (C4 Center) and Sinar Project for civil society organisations in Malaysia, and introductory investigative journalism workshop in East-Timor with Journalists Against Corruption (JAC) partners Sinar Project, Narasi TV, Philippines Centre for Investigative Journalism (PCIJ) and Association Journalist Timor Leste (AJTL).

[Initial training slides](#)



Research Activities and Outputs

Here are the activities which contribute to this PEPs research:

Activities	Partners	Regional/Country	Outputs / Dissemination
Southeast Asian Anti-Corruption Network (SEA-ACN) Networking Seminar, 7th June 2024, Bangkok, Thailand	UNODC, WeViz, Center to Combat Corruption and Cronyism (C4), PCIJ, Sinar Project, HAND, ACT, CAC Thailand, NACC Thailand	Philippines, Indonesia, Thailand, Timor-Leste, Cambodia, Malaysia	Open Data & Editorial Standards for Anti-Corruption
Investigating Corruption: Focus on Online Scams, 15th July 2024, Bangkok, Thailand	UNODC, PCIJ, C4, Sinar Project,	Philippines, Indonesia, Thailand, Timor-Leste, Cambodia, Malaysia	Data and Media
Regional Peer Exchange: Advancing anti-corruption in Southeast Asia through beneficial ownership transparency, August 2024, Jakarta, Indonesia	UNODC, STAR, Open Ownership	Philippines, Indonesia, Thailand, Timor-Leste, Cambodia, Malaysia, Brunei	Rapidly Building An Extensible Corruption Tool And Publishing Platform Using Open Data Standards (PEPS & BO)
Capacity Development Workshop on Open-Government Advocacy (4 workshops) Oct-December 2024, Malaysia	International Republican Institute, Sinar Project, C4 Center	Malaysia	<ul style="list-style-type: none"> 📄 Anti-Corruption Legislative Inform... 📄 PEPS - Activity
Timor-Leste Accountability and Integrity Mechanism (AIM)/Introduction to Investigative Reporting, 28th November 2024, Dili, Timor-Leste	USAID, Narasi.tv, Sinar Project, PCIJ, Association Journalist Timor Leste (AJTL)	Timor-Leste	<ul style="list-style-type: none"> 📄 PEPS - Activity Malaysian PEPS Table Reference
SEA-ACN Online Roundtable on Open Data: Harmonizing PEPs, 8th November 2024, Online Definitions in ASEAN (Malaysia and Thailand)	UNODC, KRAC, ACT, HAND, Sinar Project, Wevis, ACT	Philippines, Indonesia, Thailand, Timor-Leste, Cambodia, Malaysia	Presentation <ul style="list-style-type: none"> 📄 PEPs Data Samples Weviz to Politikus Import Script

Recommendations and Next Steps

- An initial set of verified PEPs datasets for Malaysia and Thailand will need to be published online. Discussions and development of the publication process including legal liability and quality controls will be needed.
 - [OpenSanctions](#) already publishes international open data on PEPs and should be included in the development of the publication process.
 - Resources will be needed to support research and verification for the initial set of publicly available datasets.
 - Development of a regional PEPs website for searching PEPs online and download of datasets.
- To extend and improve existing frameworks and spreadsheets to include more countries such as the Philippines, Indonesia, Cambodia and Timor-Leste with local partners in respective countries.
- To support cross-border investigative stories using PEPs open data and methodologies, should be undertaken as a joint activity with Journalists Against Corruption (JAC).
- To research and apply similar techniques with Beneficial Ownership Data Standards with Open Ownership. State owned enterprises and subsidiaries are a key issue in this region. The identification of beneficial ownership and control of state owned enterprises will help extend PEPs data and provide transparency in involvement of PEPs in businesses.