

A large-scale photograph of a mining operation. In the foreground, a complex conveyor belt system is shown, with a prominent vertical conveyor leading upwards. The ground is a mix of reddish-brown earth and grey gravel. In the background, a massive, multi-tiered rock face of a quarry or mine is visible, showing various geological strata in shades of blue, green, and brown. The sky is not clearly visible, suggesting an overcast or hazy day.

# SIERRA LEONE EXTRACTIVE INDUSTRIES TRANSPARENCY INITIATIVE (SLEITI)

EITI report  
2019

This report has been prepared at the request of the Multi-Stakeholder Group (MSG) in charge of the implementation of the Extractive Industries Transparency Initiative in Sierra Leone (SLEITI). The opinions expressed in the report are those of the Independent Administrator and do not reflect the official opinion of the SLEITI MSG. This report has been prepared exclusively for use by EITI Sierra Leone and must not be used by other parties, nor for any purposes other than those for which it is intended.

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<b>LIST OF ABBREVIATIONS</b>	
AGE	Africa Global Enterprise
AML	African Mineral Limited
AML/CFT Act	Anti-Money Laundering and Countering Financing of Terrorism Act
ASGM	Artisanal and Small-scale Gold Mining
BGS	British Geological Survey
BO	Beneficial Ownership
CAC	Corporate Affairs Commission
CGT	Capital Gains Tax
CIT	Corporate Income Tax
DACDF	Diamond Area Community Development Fund
DCP	Diamond Cutting and Polishing
DPMT	Directorate of Precious Minerals Trading
DT	Diamond Trading
EIA	Environmental Impact Assessment
EIR	Extractive Industry Revenue
EIRA	Extractive Industries Revenue Act
EPA	Environmental Protection Agency
EPR	Environment Protection Regulations
FATF	Financial Action Task Force
FIFA	First-in First-Assessed
FOB	Free on Board
GA	Government Agencies
GDP	Gross Domestic Product
GFS	Government Finance Statistics
GoSL	Government of Sierra Leone
GPFS	General Purpose Financial Statements
GST	Goods and Services Tax
HSE	Health Safety and Environmental
IA	Independent Administrator
LMC	London Mining Company
MAB	Minerals Advisory Board
MCAS	Mining Cadastre Administration System
MCIMU	Mining Cadastre Management Unit
MCO	Mining Cadastre Office
MDAs	Ministries Department Agencies
MLGRD	Ministry of Local Government and Rural Development
MMA	Mines and Minerals Act
MMMR	Ministry of Mines & Mineral Resources
MMOR	Mines and Minerals Operational Regulations
MoF	Ministry of Finance
MoU	Memorandum of Understanding
MPs	Members of Parliament
MSG	Multi-Stakeholder Group
NMA	National Minerals Agency
NRA	National Revenue Authority
PD	Petroleum Directorate
PEPs	Politically Exposed Person(s)
RCF	Rapid Credit Facility
SGMT	Sierra Gems and Metals trust
SIEROMCO	Sierra Ore and Metal Company
SISG	Shandong Iron and Steel Group
SL	Sierra Leone
SLEITI	Extractive Industries Transparency Initiative in Sierra Leone
SLST	Sierra Leone Selection Trust
SMHL	Sierra Mineral Holdings Limited
SRL	Sierra Rutile Limited
ToR	Terms of Reference
TRG	Titanium Resources Group

**LIST OF ABBREVIATIONS**

USD United States Dollars

## INTRODUCTION

### Extractive Industries Transparency Initiative (EITI)

The Extractive Industries Transparency Initiative (EITI) is a global Standard to promote open and accountable management of natural resources. It seeks to strengthen government and company systems, inform public debates, and enhance trust. In each implementing country, it is supported by a coalition of governments, companies operating in the extractive sector and civil society organisations working together.

EITI was first announced at the World Summit on Sustainable Development in Johannesburg in 2002 (the Earth Summit 2002) and was officially launched in London in 2003. EITI is currently being implemented in 56 countries in Africa, Asia, Europe and America. The EITI Standard sets out of the requirements which countries need to meet to be recognised, first as EITI Candidates and subsequently as EITI Compliant countries.

From 1 January 2020 onwards, EITI reports must only adopt the 2019 EITI Standard. This is the sixth version of the Standard since the EITI Principles were declared in 2003. The 2019 EITI Standard encourages countries to make use of existing reporting systems for EITI data collection and make the results transparent at source. The 2019 Standard introduced new aspects on environmental, social, and gender impacts. It also broke ground on the disclosure of the identity of the real owners - the 'beneficial owners' - of the companies that have obtained rights to extract oil, gas and minerals starting from 2020.

### EITI in Sierra Leone<sup>1</sup>

The Government of Sierra Leone first announced its intention to join the EITI programme in June 2006 to promote transparency and accountability in the management of its mineral resources. The country formed its first multi-stakeholder group (MSG), the Sierra Leone EITI Steering Committee (SLEITI), in June 2007. Sierra Leone became an EITI Candidate in February 2008 and it became a Compliant country in 2014.

Section 105 of the Petroleum (Exploration & Production) Act 2011 stipulates that the payments made to the State shall be disclosed according to the terms and procedures of the Sierra Leone Extractive Industries Transparency Initiative.

**The SLEITI Multi-stakeholder Steering Group (MSG)** was set up by a Memorandum of Understanding (MoU) dated 25 March 2021 which now supersedes the MoU dated 20 July 2011. The MoU is a tripartite agreement entered into by the Government of Sierra Leone, civil society organisations jointly or severally, and mining companies operating in Sierra Leone in the oil, gas and mineral sectors and is collectively known as the MSG.

The SLEITI MSG is responsible for developing policies and programmes that align with the EITI Standard and reflect national priorities, oversee the EITI reporting process, approve work plans and effectively undertake outreach activities on necessary information that emanates from the EITI Process.

The SLEITI MSG provides oversight of the SLEITI process and comprises full members and their alternates from several government ministries, departments and agencies, mining companies, and civil society organisations. The MSG has reviewed its own internal governance for better oversight of the SLEITI implementation.

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<sup>1</sup> For more information on EITI in Sierra Leone, see the website: <http://www.sleiti.gov.sl/>

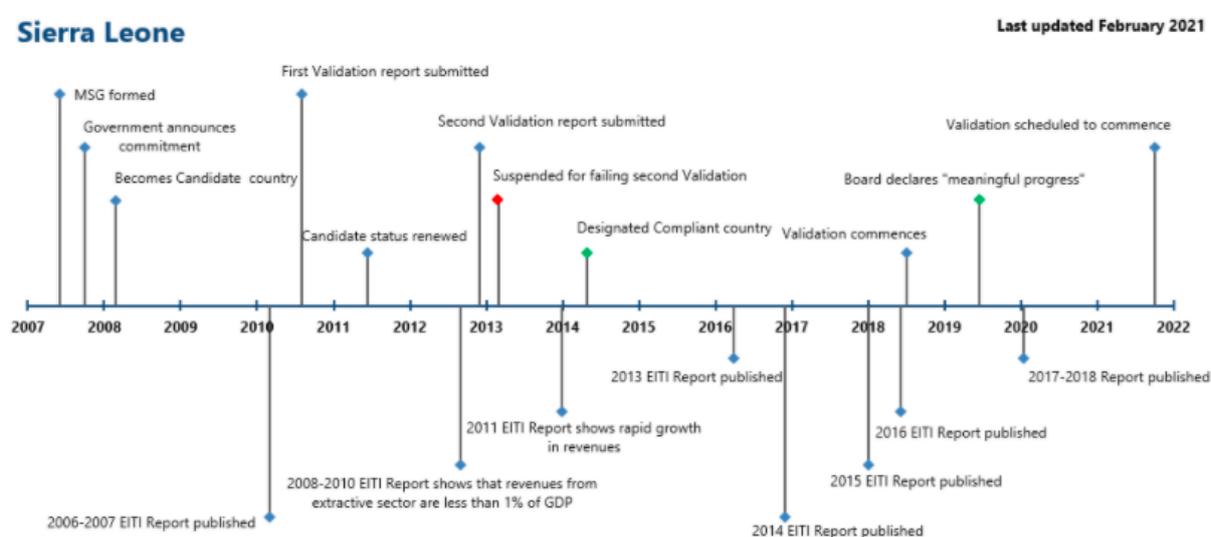
The **SLEITI Secretariat** is responsible for the implementation of planned and approved activities designed by the MSG's work plan and EITI Standard. Headed by a National Coordinator, the Secretariat includes key professional staff drawn from several professional backgrounds required for the day-to-day operations of the Secretariat.

The SLEITI process covers two sectors in Sierra Leone: mining and oil & gas. To date, nine EITI Independent Administrator reports have been published covering the years from 1 January 2006 to 31 December 2018.

This report is the tenth Sierra Leone EITI report which covers the period from 1 January to 31 December 2019.

The timeline for the SLEITI process can be presented as follows:

**Figure 1: SLEITI process timeline**



### EITI Validation

On 17 June 2019, Sierra Leone was found to have made meaningful progress in implementing the 2016 EITI Standard. Sierra Leone's second validation was meant to commence on 1 October 2021 in accordance with the revised validation schedule approved by the Board in December 2020.<sup>1</sup> However, given that the 2019 EITI report had yet to be finalised, the validation exercise was postponed.

### Scope of work

BDO UK LLP has been appointed as Independent Administrator for the preparation of the SLEITI 2019 report. We have performed our work in accordance with ISRS 4400 (Engagements to Perform Agreed Upon Procedures Regarding Financial Information). The procedures performed were those set out in the terms of reference as set out in the Contract for Consultants Services.

The compilation and reporting procedures carried out were not designed to constitute an audit or review in accordance with International Standards on Auditing or International Standards on Review Engagements and as a result we do not express any assurance on the transactions beyond the explicit

<sup>1</sup> : <https://eiti.org/board-decision/2020-92>

statements set out in this report. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

The report consists of six sections as follows:

- 1) Executive Summary;
- 2) Approach and Methodology;
- 3) Scope of the SLEITI report;
- 4) Contextual Information on the Extractive Industries;
- 5) Analysis of EITI data; and
- 6) Recommendations.

The data reported has been disaggregated by individual project, company, government agency and revenue stream. The amounts in this report are stated in United States Dollars (USD), unless otherwise stated. The exchange rate used to convert Leone to USD is 1 USD = 9,716.71 Leone. The exchange rate on 31 December 2019 is as indicated in the General Purpose Financial Statements (GPFS) of the Consolidated Fund for the financial year ended 31 December 2019.<sup>1</sup>

Our report includes information received up to **15 December 2021**. Any information received after this date has not, therefore, been taken into consideration.

Our work included a general understanding of the extractive sectors in Sierra Leone. We also held meetings with several entities involved in the EITI process to collect relevant information and documentation necessary to achieve the objectives of our work.

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<sup>1</sup> <https://mof.gov.sl/wp-content/uploads/2020/06/public-accounts-2019.pdf>

# 1. EXECUTIVE SUMMARY

## 1.1. Objective of the report

The purpose of this 10<sup>th</sup> SLEITI report is to compile and present the data provided by the extractive companies (hereafter referred to as “Companies”) with the data provided by relevant Government Agencies.

The overall objective of this exercise is to assist the Government of Sierra Leone (GoSL) in identifying the positive contribution that mineral resources make to the economic and social development of the country and to realise their potential through improved resource governance that encompasses and fully implements the principles and criteria of the EITI.

## 1.2. EITI flexible reporting in response to the Covid-19 pandemic

Recognising the ongoing challenges associated with the COVID-19 pandemic, the EITI Board has agreed the extension of measures to provide flexibility in EITI implementation and reporting. These measures allow implementing countries to retain the momentum of the EITI process while adapting to local circumstances and urgent information needs.

### Flexible EITI reporting

MSGs may prepare EITI reports based on information disclosed by government agencies and/or companies, subject to MSG endorsement, and provided that the flexible reporting requirements are met.

MSGs are encouraged to use this flexibility to communicate timely data that is relevant to the situation in their country. For example, they can consider including current or forward-looking information on production, exports and revenues, or disclosing licenses or contracts recently awarded which might affect future extractive revenues.

With flexible EITI reporting, implementing countries may deviate from the standard procedure for EITI reporting, including reconciliation for EITI Reports scheduled for publication by 31 December 2021. In doing so, the country must disclose the following information in their reporting:

- information on current and forward-looking extractive sector developments and industry outlook, in the light of COVID-19, commodity price shocks and the potential for longer-term reductions in demand for commodities;
- unilateral disclosures by government and/or companies in accordance with EITI Requirements 2, 3, 4, 5 and 6, with the exception of provisions relating to data quality and assurance (Requirement 4.9b);
- disclosures of the latest production, export and revenue data for 2018 and to the extent possible for 2019. Countries are also encouraged to provide this information by the first semester of 2020, wherever possible;
- a complete overview of the disclosed data; and
- an assessment by the MSG of the comprehensiveness and reliability of the disclosed data, identifying any gaps or weaknesses in disclosures in accordance with the 2019 EITI Standard.

The SLEITI MSG has decided to prepare the 2019 SLEITI report by adopting **the flexible EITI reporting**.

## 1.3. Key conclusions

The 2019 SLEITI report summarises information about the revenues generated from the extractive industries in Sierra Leone as part of the EITI process. In this context, extractive companies and government agencies report payments, revenues and contextual information respectively.

### 1.3.1 EITI scope

The 2019 SLEITI report covers revenues received by government agencies and sub-national entities from mining companies and diamond and gold exporters and other material payments and benefits to government agencies as detailed in Section 5 of the report.

This report also includes background and contextual information about the extractive industries in accordance with the 2019 EITI Standard. This information includes a brief description of the legal framework and fiscal regime, an overview of the extractive sector, the contribution of the extractive sector to the economy, production data, export data, revenue allocations, the sustainability of revenues, license registers and license allocations.

### 1.3.2 Revenues generated from the extractive sector

According to the data collected from government agencies and extractive companies, the total revenues generated from the extractive industries in Sierra Leone in 2019 amounted to **USD 67,837,325** (including social and environmental expenditure).

#### Breakdown by type of revenue

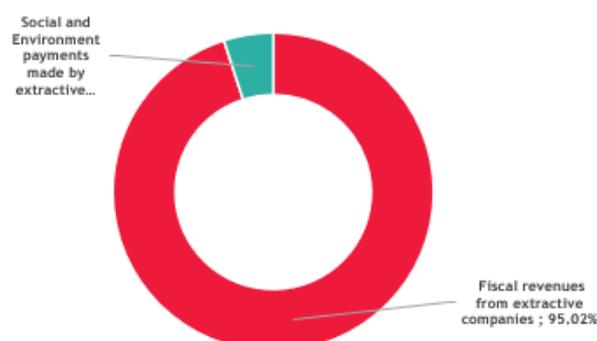
The analysis of the extractive revenues by type indicates that fiscal revenues represented **95%** of the total revenues collected in 2019 while social and environmental payments made by extractive companies accounted for approximately 5%.

The table below presents the contribution of type of revenue:

TABLE 1 : Contribution to extractive industries revenues by type of revenue

FY 2019		
Type of revenues	Extractive revenues (US\$)	%
Fiscal revenues from extractive companies	64,461,575	95.02%
Social and environmental payments made by extractive companies	3,375,750	4.98%
<b>Total</b>	<b>67,837,325</b>	<b>100.00%</b>

Figure 2: Contribution to extractive industries revenues by type of revenue



### Analysis of tax revenues

Analysis of tax revenues from the extractive sector indicates that the payments made to the Consolidated Fund represented 98% of the total revenues collected in 2019 while sub-national payments made by extractive companies accounted for approximately 2%. The table below presents the total payments to the Consolidated Fund and the total payment to sub-national entities:

FY 2019		
Type of revenues	Extractive revenues (US\$)	%
Consolidated Fund	63,206,829	98.05%
Subnational payments	1,254,746	1.95%
<b>Total</b>	<b>64,461,575</b>	<b>100.00%</b>

### 1.3.3 Variance of tax revenues in the extractive sector

Tax revenues collected from the extractive industries increased by approximately 7% during the FY 2019 from US\$ 60.46 million in the FY 2018 to US\$ 64.46 million in the FY 2019 as shown in the following table:

	FY 2019 US\$ million	FY 2018 (*) US\$ million	Variance US\$ million	%
Total extractive revenues	64.46	60.46	4.00	7%

(\*) SLEITI report 2017 & 2018

### 1.3.4 Analysis of production data

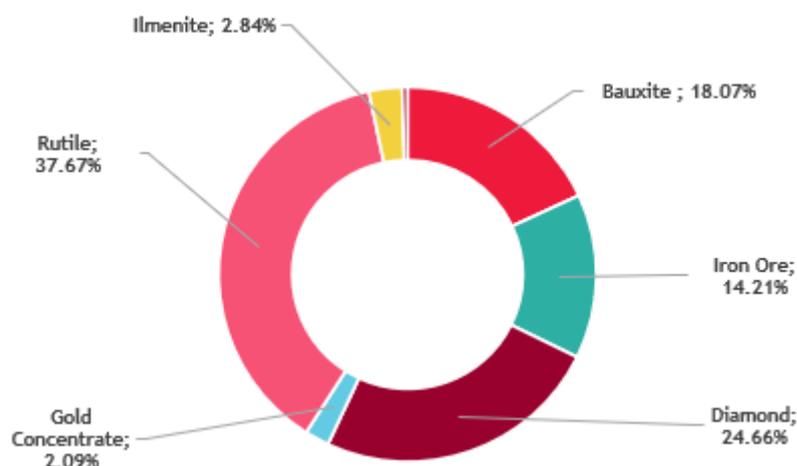
Total production value for FY 2019 amounted to US\$ 399 million. We present in the table below the production volumes and values by commodity:

TABLE 2: Mining production volumes and value by commodity in 2019

Commodity	Unit	Volume	Value USD	% value
Rutile	DMT	132,805	150,420,567	37.67%
Diamond	Carats	604,205	98,472,657	24.66%
Bauxite	DMT	2,017,606	72,147,235	18.07%
Iron ore	DMT	722,305	56,732,074	14.21%
Ilmenite	DMT	61,326	11,336,701	2.84%
Gold oncentrate	DMT	2,649	8,360,204	2.09%
Zircon	DMT	2,466	1,823,699	0.46%
<b>Total</b>			<b>399,293,138</b>	<b>100.00%</b>

Source: NMA

Figure 3: Production value by commodity



We present in Section 5.1 of the report the production volumes and values by commodity and disaggregated by region, by mining company, by project and the methods for calculating production volumes and values.

### 1.3.5 Analysis of export data

Total export value for FY 2019 amounted to US\$ 418 million. We present in the table below the export volumes and values by commodity:

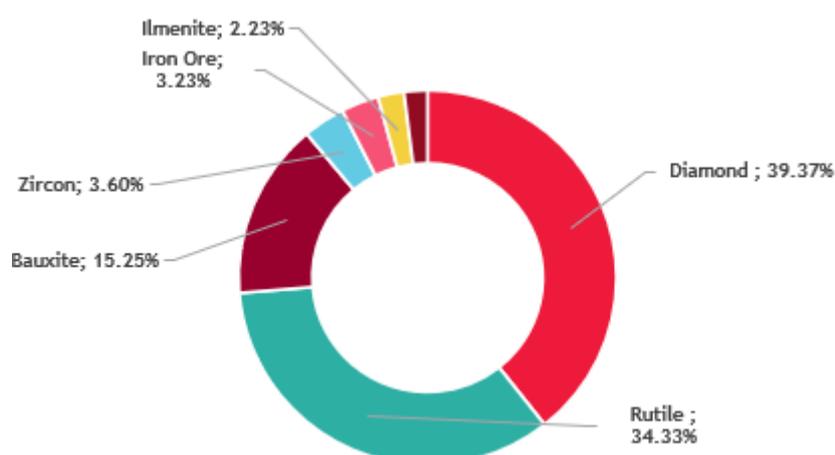
TABLE 3: Mining exports volumes and value by commodity in 2019

Commodity	Volume	Unit	Total value (USD)	% Value
Diamond	803,583	Carats	164,532,927	39.37%
Rutile	126,498	DMT	143,476,121	34.33%
Bauxite	1,785,436	DMT	63,737,568	15.25%
Zircon	36,897	DMT	15,059,740	3.60%
Iron ore	174,665	DMT	13,492,697	3.23%
Ilmenite	53,853	DMT	9,304,133	2.23%
Gold concentrate	242,600	Grams	8,360,204	2.00%
<b>Total</b>			<b>417,963,389</b>	<b>100.00%</b>

Source: NMA

We present in Section 5.2 of the report the export volumes and values by commodity, disaggregated by region, by mining company, by project and the methods for calculating production volumes and values.

Figure 4: Export value by commodity



### 1.3.6 Impact of COVID-19 pandemic on production, exports and government revenues from extractive industries

#### Production volumes

We have made a comparison between FY 2019 and FY 2020 production volumes in order to review the impact of the COVID-19 pandemic on extractive industries production in Sierra Leone. The table below indicates the variation by commodity:

*Source: NMA*

Commodity	Unit	2020	2019	Variation	% variation
Rutile	DMT	116,564	132,805	(16,241)	(12.23%)
Diamond	Carats	602,993	604,205	(1,212)	(0.20%)
Bauxite	DMT	1,441,982	2,017,606	(575,624)	(28.53%)
Iron ore	DMT	N/A	722,305	N/A	N/A
Ilmenite	DMT	45,822	61,326	(15,504)	(25.28%)
Gold concentrate	DMT	783	2,649	(1,866)	(70.44%)
Zircon	DMT	3,500	2,466	1,034	41.93%

N/A: not available

#### Exports volumes

We have made a comparison between FY 2019 and FY 2020 exports volumes in order to review the impact of COVID-19 pandemic on extractive industries exports in Sierra Leone. The table below indicates the variation by commodity:

*Source: NMA*

Commodity	Unit	2020	2019	Variation	% variation
Diamond	Carats	558,331	803,583	(245,252)	(30.52%)
Rutile	DMT	107,829	126,498	(18,669)	(14.76%)
Bauxite	DMT	1,308,951	1,785,436	(476,485)	(26.69%)
Zircon	DMT	34,141	36,897	(2,756)	(7.47%)
Iron Ore	DMT	N/A	174,665	N/A	N/A
Ilmenite	DMT	58,468	53,853	4,615	8.57%
Gold Concentrate	Grams	75,098	242,600	(167,502)	(69.04%)

N/A: not available

### Government revenues from extractive industries

We have made a comparison between 2019 and 2020 government revenues from extractive industries in order to review the impact of COVID-19 pandemic on government revenues from extractive industries in Sierra Leone. The calculation indicates that the revenues decreased by 10.11% as shown in the table below:

Source: NRA

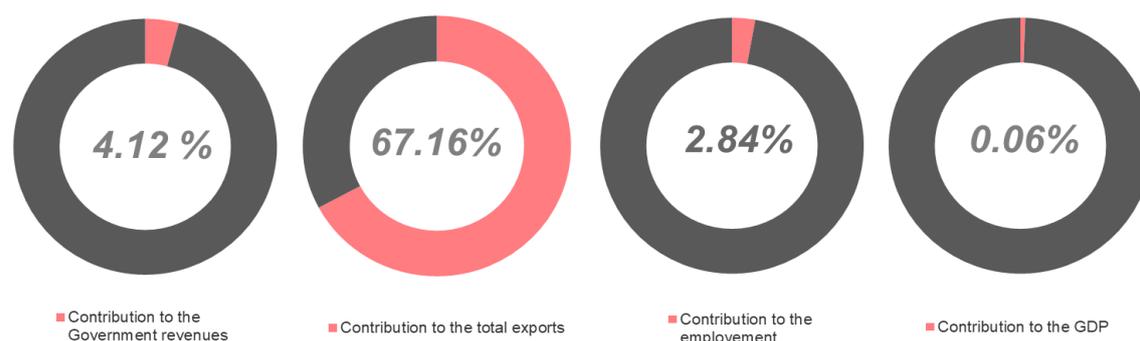
	2020	2019	Variation	%
Government revenues from extractive industries (*)	56,404,685	62,747,609	(6,342,924)	(10.11%)

(\*) excluding revenues collected by EPA and surface rental.

### 1.3.7 Contribution of the extractive industries to the economy in 2019

According to the data collected from government agencies and other sources, the contribution of the extractive sector to total government receipts was 4% in the FY 2019. The contribution of the extractive sector to the country's total exports was 67%. The extractive sector employed approximately 3% of the country's total work force, which represented 0.06% of the total GDP.

Figure 5: Contribution of the extractive industries to the economy in 2019



Details of these contributions are presented in Section 5.6 of this report.

### 1.3.8 Completeness, data quality and assurance

#### Comprehensiveness

##### Government agencies

The SLEITI MSG agreed that eleven government agencies would be required to disclose the revenues received from extractive companies, contextual data related the exploration, production, exports, state participation, infrastructure provisions and barter agreements, environmental and social expenditure, and employment as required by the 2019 EITI Standard. The government agencies selected in the scope are presented in the table below:

N°	Government agency
1	National Revenue Authority (NRA)
2	National Minerals Agency (NMA)
3	Ministry of Finance (MoF)
4	Ministry of Mines & Mineral Resources (MMMR)
5	Petroleum Directorate (PD)
6	Environmental Protection Agency (EPA)
7	Ministry of Local Government and Rural Development (MLGRD)
8	Directorate of Precious Minerals Trading (PMT)
9	District Councils / City Councils
10	Chiefdom Administrations
11	Members of Parliament (MPs)

All in-scope government agencies have submitted their Reporting Templates.

## Extractive companies

The SLEITI MSG agreed that mining companies who paid more than US\$ 500,000 during the FY 2019 would report the following information:

- surface rental payments to Landowners and Paramount chiefs;
- legal ownership;
- beneficial ownership (BO);
- exploration;
- production;
- exports;
- state participation;
- infrastructure provisions and barter agreements;
- environmental and social expenditure; and
- employment statistics.

Based on the above, 14 mining companies were selected in the scope. The mining companies selected in the scope are presented in the table below:

N°	Mining company
1	SIERRA RUTILE LIMITED
2	KOIDU LIMITED
3	SIERRA MINERALS HOLDINGS NO.1 LIMITED
4	S.L MINING LTD
5	KINGHO INVESTMENT LIMITED
6	TONKOLILI IRON ORE (SL) LIMITED
7	MEYA MINING LTD
8	DAYU MINING COMPANY LIMITED
9	H. M. DIAMONDS
10	AFRICAN RAILWAY & PORT SERVICES
11	SIERRAMIN BAUXITE (SL) LIMITED
12	TONGUMA LIMITED
13	SIERRA DIAMONDS LIMITED
14	WONGOR INVESTMENT AND MINING CORPORATION LTD

All extractive companies selected in the scope submitted their Reporting Templates as shown in the following table except for SIERRAMIN BAUXITE (SL) LIMITED as its mining license had been cancelled in September 2021 for a non-compliance issue:

N°	Mining company	RT Excel sheet submitted?
1	SIERRA RUTILE LIMITED	Yes
2	KOIDU LIMITED	Yes
3	SIERRA MINERALS HOLDINGS NO.1 LIMITED	Yes
4	S.L MINING LTD (*)	Yes
5	KINGHO INVESTMENT LIMITED	Yes
6	TONKOLILI IRON ORE (SL) LIMITED	Yes
7	MEYA MINING LTD	Yes
8	DAYU MINING COMPANY LIMITED	Yes
9	H. M. DIAMONDS	Yes
10	AFRICAN RAILWAY & PORT SERVICES	Yes
11	SIERRAMIN BAUXITE (SL) LIMITED	No
12	TONGUMA LIMITED	Yes
13	SIERRA DIAMONDS LIMITED	Yes
14	WONGOR INVESTMENT AND MINING CORPORATION LTD	Yes

(\*) Mining license was cancelled in July 2019

## Independent Administrator assessment on the comprehensiveness

Based on above, we concluded that both financial and non-financial data included in the 2019 SLEITI report is comprehensive.

## Data quality and assurance

### Government agencies

In order to comply with EITI Requirement 4.9 on Data quality and assurance, SLEITI MSG agreed on the following approach:

The government agencies reporting templates must be:

- signed by an authorised senior officer; and
- certified by the Auditor General of Sierra Leone.

All government agencies submitted a signed and certified Reporting Template.

### Assessment of the data quality of government agencies

The SLEITI MSG agreed that the assessment of the data quality of government agencies depends on the percentage of contribution of the government agencies who failed to submit signed and certified reporting templates to the total government revenues from the extractive sector as indicated in the table below:

Reporting entities	Data	Less than 5%	Between 5% and less than 20%	20% and above
Government agencies	Financial and contextual data	High data quality	Medium data quality	Low data quality

As all government agencies submitted signed and certified Reporting Templates, we concurred with the assessment of “high quality data” reported by government agencies based on the SLEITI MSG criteria.

### Extractive companies

In order to comply with EITI Requirement 4.9 on Data quality and assurance, SLEITI MSG agreed on the following approach:

The extractive companies reporting templates must be:

- signed by an authorised senior manager; and
- certified by an external auditor: The reporting templates must be certified by a registered external auditor who should confirm that the figures and information reported in the Reporting Templates are in accordance with instructions issued by SLEITI, comprehensive and agree with the company’s accounts for the FY 2019.

We present in Annex 11 of this report data completeness and assurance compliance by mining company.

### Assessment of the data quality of extractive companies

SLEITI MSG agreed that the assessment of the data quality of extractive companies depends on the percentage of contribution of the companies who failed to submit signed and certified reporting templates to the total government revenues from extractive sector as indicated in the table below:

Reporting entities	Data	Less than 5%	Between 5% and less than 20%	20% and above
Extractive companies	Contextual data	High data quality	Medium data quality	Low data quality

We present in the table below the extractive companies who failed to submit their signed and certified Reporting Templates and those who complied with the data quality and assurance procedure:

MINING COMPANIES	Submission of certified and signed reporting Templates	Signed beneficial ownership declaration
S.L MINING LTD (*)	X	X
SIERRAMIN BAUXITE (SL) LIMITED	X	X

(\*) Mining license was cancelled in July 2019

The contribution of the two companies who failed to submit a signed and certified reporting templates (S.L MINING LTD and SIERRAMIN BAUXITE (SL) LIMITED) represented 2.40% of total government revenues from extractive sector.

As the contribution of the two mining companies to the total government revenues from extractive sector is less than 5%, we concurred with the assessment of “high quality data” reported by extractive companies based on the SLEITI MSG criteria.

#### Independent Administrator data quality and assurance assessment

In order to assess the overall data quality and assurance of the SLEITI report 2019, SLEITI MSG agreed that the assessment should be a combination of the assessment of data quality of the government agencies and data quality of the extractive companies as indicated in the table below:

Reporting entities		Extractive companies		
		High data quality	Medium data Quality	Low data quality
Government Agencies	High data quality	High data quality	High data Quality	Medium data quality
	Medium data quality	Medium data quality	Medium data Quality	Low data quality
	Low data quality	Medium data quality	Low data Quality	Low data quality

As we concurred with the assessment of “high quality data” reported by government agencies and of “high quality data” reported by extractive companies, we concurred with the assessment of “high quality of overall data” included in the 2019 SLEITI report based on the SLEIT MSG criteria.

## 1.4. Findings and recommendations

We have made recommendations to improve the EITI implementation in Sierra Leone as well as the overall governance of the extractive sector and revenue management.

These recommendations are summarised in the following table:

N°	Title	Sector	Entity	Recommendation
1	Contract transparency	Mining and oil & gas sectors	SLEITI MSG	<p>The SLEITI MSG should document its discussion on what constitutes government policy on contract disclosures by identifying ongoing reforms or new measures under discussion that could strengthen or threaten the availability of contract information.</p> <p>The SLEITI MSG should then address any obstacles and challenges in adopting full contract transparency as required by the EITI Standard (Requirement 2.4).</p> <p>Finally, the SLEITI MSG should develop a roadmap for strengthening the disclosures of extractive contracts, which include actions, responsible parties, timelines, resource and technical assistance needs.</p>
2	Implementation of register of licenses in the oil & gas sector	Oil & gas sector	Petroleum Directorate	<p>In order to comply with Requirement 2.3 (b) of the 2019 EITI Standard, the Government of Sierra Leone should implement a publicly available register for oil &amp; gas licenses including the following information:</p> <ul style="list-style-type: none"> <li>- license holder(s);</li> <li>- coordinates of the licensed area;</li> <li>- dates of application, dates of award and duration of the licenses; and</li> <li>- In the case of production licenses, the commodity being produced.</li> </ul>
3	Contribution of the extractive sector to the economy	Mining and oil & gas sectors	Ministry of Finance, Central Bank of Sierra Leone and Ministry of Labour	<p>In order to comply with requirement 6.3 of EITI Standard 2019, we recommend to the government agencies to disclose contribution of the extractive sector to the economy on annual basis. It is required that this information includes:</p> <ul style="list-style-type: none"> <li>- the size of the extractive industries in absolute terms and as a percentage of gross domestic product as well as an estimate of informal sector activity, including, but not necessarily limited to, artisanal and small scale mining;</li> <li>- total government revenues generated by the extractive industries (including taxes, royalties, bonuses, fees, and other payments) in absolute terms and as a percentage of total government revenues;</li> <li>- exports from the extractive industries in absolute terms and as a percentage of total exports; and</li> <li>- employment in the extractive industries in absolute terms and as a percentage of the total employment. The information should be disaggregated by gender and,</li> </ul>

N°	Title	Sector	Entity	Recommendation
				when available, further disaggregated by company and occupational level.
4	Non-compliance with EITI Reporting Templates deadlines	Mining and oil & gas sectors	Reporting entities	We recommend that the reporting entities comply with the deadlines set by the SLEITI MSG. Emphasis should be also laid on the importance of the collaboration of reporting entities towards the IA following the submission of Reporting Templates.
5	Lack of financial support to SLEITI Secretariat	Mining and oil & gas sectors	SLEITI MSG	We recommend to the SLEITI MSG to seek financial support to the SLEITI Secretariat from government or international funding institution in order to: <ul style="list-style-type: none"> <li>- promote EITI values in Sierra Leone;</li> <li>- perform awareness workshops to improve the involvement of SLEITI Stakeholders in the EITI reporting process; and</li> <li>- capacity building of government agencies' and extractive companies' EITI focal points.</li> </ul>

These recommendations are further detailed in Section 6.1 of the report.

#### Follow up of previous Independent Administrator recommendations

Section 6.2 of this report shows the progress SLEITI made towards the implementation of the previous IA recommendations.

#### Follow up of last validation recommendations

Section 6.3 of the report shows the progress SLEITI has made towards the implementation of the latest corrective actions.

Mark Henderson

Partner

BDO LLP

23 December 2021

55 Baker Street

London W1U 7EU

## 2. APPROACH AND METHODOLOGY

The EITI reporting process consisted of the following steps:

- perform a study to determine the scope of the EITI Report and to update the Reporting Templates;
- collection of payment data from government agencies and extractive companies, which provide the basis for the data collection; and
- contact with government agencies and extractive companies for additional information and explanations.

### 2.1. Scoping study

In accordance with our terms of reference, we carried out a scoping study and reported to SLEITI on matters which should be considered in determining the scope of the 2019 Report, including:

- materiality thresholds for receipts and payments;
- taxes and revenues to be included;
- companies and government agencies to be included in the report;
- reporting templates to be used; and
- assurances to be provided by reporting entities to ensure the credibility of the data made available to us.

We conducted interviews with key stakeholders between 16 February and 24 April 2021.

During these meetings, we were able to obtain an understanding of the regulatory and fiscal frameworks of the extractive sector, the revenue collection process and key events that may have occurred in 2019.

The scope of the EITI Report is one of the key steps that the MSG needs to consider before preparing an EITI Report.

To be effective and compliant, the EITI Report must be timely, reliable, comprehensive and comprehensible. Scoping decisions are critical in ensuring that EITI Reports meet these requirements. The scoping study involves:

- collating all necessary information related to the management of the extractive sectors in line with MSG's objectives and workplan, and the EITI's requirements (EITI Requirements 2, 3, 4, 5 and 6);
- proposing options for strengthening disclosure of information to ensure accessibility, reliability and complementarity with existing government and company systems (EITI Requirement 7.2.c and the EITI Open data policy);
- identifying the total government revenues from the extractive sectors to document a recommended definition of materiality and coverage (EITI Requirements 4, 4.1.d and 4.1.a);
- suggesting the payments and revenue streams to be reported, including appropriate materiality thresholds and the levels of disaggregation where applicable (EITI Requirements 4.1.a, 4.1.b and 4.7);
- listing the companies, state-owned enterprises and government agencies expected to participate in the report according to a suggested materiality threshold (EITI Requirement 4.1.a.);
- identifying additional benefit streams from the extractive sectors that should be disclosed (EITI Requirements 4.2, 4.3, 4.4, 4.5 and 4.6);

- identify revenue streams that are not recorded in the national budget and explain the allocation of such off-budget revenues as well as track implementation of the International Monetary Fund's Government Finance Statistics (GFS) classifications for extractive revenues;
- consider revenue allocations and expenditure that should be disclosed under EITI Requirements 5 and 6, and, to the extent possible, assess the possibility for unilateral or where possible reconciliation of social expenditure as per EITI Requirements 6.1 a) and b) and other contributions;
- assessing the reliability of available data, including reviewing current auditing practices and the assurances to be provided by the reporting entities (EITI Requirement 4.9);
- identifying any barriers to disclosure of the information requested and propose solutions for addressing them; and
- investigate any other issues as mandated by the MSG.

To conduct the preliminary analysis, we performed the following:

- obtained a good understanding of the extractive resources and sectors of the country;
- reviewed the fiscal regime and other relevant revenue streams applicable to the extractive sector, including in-kind payments, social payments, infrastructure provisions and other bartering agreements;
- considered the current auditing practices for companies and government agencies;
- reviewed existing data from the relevant period to determine significant revenue streams;
- defined a materiality threshold for revenue streams to be covered in the EITI Report;
- identified extractive companies which make material payments within the scope of the agreed material revenue streams;
- identified government agencies, including those at sub-national level, which collect material revenues within the scope of the agreed material revenue streams;
- examined the MSG's workplan in order to gain a clear understanding of the objectives and scope of Sierra Leone's EITI implementation;
- reviewed any annual progress reports that have been produced as well as any actions undertaken by the MSG to assess progress made and address recommendations from any previous EITI reporting exercises and validations;
- undertook a review of all past EITI and Validation reports to gain an understanding of the current scope and state of the EITI reporting process in Sierra Leone and assessed areas where further improvement is needed; and
- assessed the timeliness, comprehensiveness and reliability of the information received and made recommendations on how publicly available data can be improved or complemented to address the EITI requirements and the MSG's objectives.

## 2.2. Data collection

We developed instructions, including reporting templates and reporting guidelines, requesting extractive companies and government agencies to report all required data. The reporting package, including Reporting Template and the instructions for its completion, was sent electronically to the stakeholders, who were given three weeks to fill in the Reporting Template.

Extractive companies and government agencies were required to report directly to the Independent Administrator (IA), to whom they were also requested to direct any queries about the Reporting Template.

The process of data collection was carried out between 24 June and 24 September 2021. In carrying out the data collection, we performed the following procedures:

- figures reported by extractive companies and government agencies were reviewed item-by-item. As a result, all errors identified have been listed item by item in relation to each government agency and extractive company;
- the government agencies and extractive companies were asked to provide supporting documents and/or confirmation for any adjustments to the information provided on the original data collection templates. In cases where we had to obtain additional information, we tried to contact the reporting entities and reviewed additional supporting documentation evidencing the payments or information declared.

## 2.3. Reliability and certification of data reported

In order to comply with EITI Requirement 4.9, which aims to ensure the credibility of the data submitted, the SLEITI MSG agreed to adopt the following approach:

### Extractive companies

The Reporting Templates should be:

- signed by an authorised senior manager; and
- certified by a registered external auditor: This external auditor who should confirm that the figures and information reported in the reporting templates are in accordance with instructions issued by SLEITI, comprehensive and agree with the company's accounts for the FY 2019.

Extractive companies were also required to submit their audited financial statements for the FY 2019 in order to compare information reported in their reporting templates against those of the audited financial statements.

### Government agencies

The Reporting Templates should be:

- signed by an authorised senior officer; and
- certified by the Auditor General of Sierra Leone, who must submit a report to confirm that the figures and information reported in the government agencies' Reporting Templates are in accordance with instructions issued by SLEITI, are comprehensive and agree with the Government accounts for the FY 2019.

## 2.4. Accounting records

The data collection has been carried out on a cash basis. Accordingly, any payment made prior to 1 January 2019 has been excluded. The same applies to any payments made after 31 December 2019.

For payments made in another currency, reporting entities were required to report in the currency of payment. Payments made in Leone have been converted to USD at the rate of 1 USD = 9,716.71 Leone. The exchange rate used is that indicated in the General Purpose Financial Statements (GPFS) of the Consolidated Fund for the financial year ended 31 December 2019.<sup>1</sup> **Government agencies**

In respect of government agencies, care has been taken to ensure that amounts shown on the "Payment/Receipt Report" include all receipts collected in 2019 irrespective of whether the receipt was allocated in the government agencies' records against amounts due in a previous or subsequent financial year.

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<sup>1</sup> <https://mof.gov.sl/wp-content/uploads/2020/06/public-accounts-2019.pdf>

## 3. SCOPE OF THE SLEITI REPORT 2019

The Terms of Reference state that the purpose of the inception report is to confirm the scope of the EITI reporting process and the data collection procedures for publishing the 10<sup>th</sup> SLEITI Report.

The SLEITI 2019 inception report is available on SLEITI's website through this link: <https://sleiti.gov.sl/index.php/reports-and-documents/sleiti-reports/sleiti-2019-scoping-report-final>

### 3.1. Fiscal year (EITI Requirement 4.8)

The SLEITI MSG agreed that the 10<sup>th</sup> SLEITI Report covers the fiscal year from 1 January to 31 December 2019, including data related to the FY 2020 in accordance with the 2019 EITI Standard and the Flexible Reporting Framework as adopted by the International EITI Board.

### 3.2. Level of disaggregation (EITI Requirement 4.7)

The SLEITI MSG agreed that the EITI data would be disaggregated by mining company, by government agency, by revenue stream and by project.

#### Disaggregation by project

Over the discussion, the SLEITI MSG agreed that EITI data be disaggregated by mining agreement and petroleum license as they form the basis for payment of liabilities with a government.

The SLEITI MSG has specified that specific revenue streams to the extractive sector (mining and oil & gas) should be levied and/or imposed on the basis of mining agreements and petroleum license and therefore should be disaggregated as such. The list of specific revenue streams are listed in the table below:

Revenue stream	Government agencies
Mineral resources royalty	NRA
Mining license	NRA
Corporate Tax	NRA
Diamond & gold export duties	NMA
License fee	EPA
Exploration license	NRA
Monitoring fee	NMA

### 3.3. Government agencies

The SLEITI MSG agreed that 11 government agencies would be required to disclose the revenues received from extractive companies, contextual data related the exploration, production, exports, state participation, infrastructure provisions and barter agreements, environmental and social expenditure, and employment as required by the 2019 EITI Standard.

The government agencies selected in the scope are presented in the table below:

Table 4: Government agencies selected in the scope of the 2019 SLEITI report

N°	Government agency
1	National Revenue Authority (NRA)
2	National Minerals Agency (NMA)
3	Ministry of Finance (MoF)
4	Ministry of Mines & Mineral Resources (MMMR)
5	Petroleum Directorate (PD)

N° Government agency	
6	Environmental Protection Agency (EPA)
7	Ministry of Local Government and Rural Development (MLGRD)
8	Directorate of Precious Minerals Trading (PMT)
9	District Councils / City Councils
10	Chiefdom Administrations
11	Members of Parliament (MPs)

The SLEITI MSG agreed that the 11 government agencies were required to submit an individual Reporting Template for each mining company which contributed 0.10% or more to the total government revenues generated from the extractive sector. The 36 mining companies (above materiality) are presented in the table below:

N°	Company	N°	Company
1	SIERRA RUTILE LIMITED	19	KANU EQUIPMENT
2	KOIDU LIMITED	20	METALS AND MINERALS TRADING (SL) LTD
3	SIERRA MINERALS HOLDINGS NO.1 LIMITED	21	DIG-SIERRA LEONE LIMITED
4	S.L MINING LTD	22	BCMI SIERRA LEONE LIMITED
5	KINGHO INVESTMENT LIMITED	23	JINGXIANG MINING CO LTD
6	TONKOLILI IRON ORE (SL) LIMITED	24	XIN TAI MINING CO LTD
7	MEYA MINING LTD	25	SEAWRIGHT MINING COMPANY
8	DAYU MINING COMPANY LIMITED	26	AFRO ASIA MINING CORPORATION
9	H. M. DIAMONDS	27	TONGOMA UNDERGROUND MIN. PROJECT
10	AFRICAN RAILWAY & PORT SERVICES	28	CHENG SHOU MINING COMPANY
11	SIERRAMIN BAUXITE (SL) LIMITED	29	KASILA MINING & ENGINEERING `
12	TONGUMA LIMITED	30	CHENG LI MINING COMPANY SL
13	SIERRA DIAMONDS LIMITED	31	GOLDEN BRIDGE INVESTMENT LTD
14	WONGOR INVESTMENT AND MINING CORPORATION LTD	32	MONJED MAROUF JAWAD
15	FOREVER FAITH MINING	33	PLUTO MINING COMPANY (SL) LIMITED
16	BME	34	FLUICONNECTO SL LIMITED
17	KASSIM M BASMA	35	WISSAM MROUE
18	CROCODILE MINING (SL) LIMITED	36	XIN YIN COMPANY LIMITED

For remaining mining companies and gold and diamond companies those below materiality, from company number 37 to company n°353, (i.e. which contributed less than 0.10% to the total government revenues generated from the extractive sector), the government agencies were required to submit one Reporting Template including all revenues received from those mining companies and gold and diamond companies below materiality.

Finally, each government agency should submit 37 Reporting Templates as follows:

- 36 Reporting Templates for each mining company; and
- 1 Reporting Template including all revenues received from mining companies and gold and diamond companies below materiality (from company number 37 to company n° 353).

Please refer to the scoping report.

## 3.4. Extractive companies

### 3.4.1 Mining sector

The SLEITI MSG agreed to require mining companies which paid more than US\$ 500,000 during the FY 2019 to report the following information:

- surface rental payments to Landowners and Paramount chiefs;
- legal ownership;
- beneficial ownership (BO);
- exploration;
- production;
- exports;
- state participation;
- infrastructure provisions and barter agreements;
- environmental and social expenditure; and
- employment statistics.

Based on the above, 14 mining companies were selected in the scope to report contextual data:

**Table 5: Mining companies selected in the scope of the 2019 SLEITI report**

N°	Company
1	SIERRA RUTILE LIMITED
2	KOIDU LIMITED
3	SIERRA MINERALS HOLDINGS NO.1 LIMITED
4	S.L MINING LTD
5	KINGHO INVESTMENT LIMITED
6	TONKOLILI IRON ORE (SL) LIMITED
7	MEYA MINING LTD
8	DAYU MINING COMPANY LIMITED
9	H. M. DIAMONDS
10	AFRICAN RAILWAY & PORT SERVICES
11	SIERRAMIN BAUXITE (SL) LIMITED
12	TONGUMA LIMITED
13	SIERRA DIAMONDS LIMITED
14	WONGOR INVESTMENT AND MINING CORPORATION LTD

### 3.4.2 Oil and gas sector

The SLEITI MSG did not select any oil & gas company in the scope for the 2019 SLEITI report.

## 3.5. Revenue streams

The SLEITI MSG agreed to include in the scope of the 2019 EITI report all revenue streams of US\$ 300,000 and above, paid to government agencies in the mining sector. This led to 96.65% coverage of these revenues. Please refer to the SLEITI scoping report 2019.

Based on above, 11 revenue streams (above materiality) were selected. The list of the revenue streams is presented in the table below:

Table 6: Revenue streams selected in the scope of the 2019 SLEITI report

N°	Revenue stream
1	PAYE
2	Mineral resources royalty
3	Mining license
4	W/H 5% contract
5	Corporate tax
6	Import and export duties
7	Diamond & gold export duty
8	License fee
9	Exploration license
10	Diamond & gold exporters license
11	Monitoring fee

### 3.6. Other information to be disclosed in accordance with EITI Standard 2019

The SLEITI MSG agreed that the following information should be included in the scope of the 2019 SLEITI report as required by the 2019 EITI Standard:

- Legal framework and fiscal regime (EITI requirement 2.1);
- Contract and license allocations (requirement 2.2);
- Register of licenses (EITI requirement 2.3);
- Government’s policy on disclosure of contracts and licenses (EITI requirement 2.4);
- Beneficial ownership (EITI requirement 2.5);
- State participation in the extractive industries (EITI requirement 2.6);
- An overview of the extractive industries, including any significant exploration activities (EITI requirement 3.1);
- Production data (EITI requirement 3.2);
- Export data (EITI requirement 3.3);
- Infrastructure provisions and Barter arrangements (EITI requirement 4.3)
- Transportation revenues (requirement 4.4);
- Environmental expenditure by extractive companies (EITI requirement 6.1);
- Subnational payments (EITI requirement 4.6);
- Sub-national transfers (EITI requirement 5.2);
- Social expenditure by extractive companies (EITI requirement 6.1);
- Sale of the state’s share of production or other revenues collected in kind (EITI requirement 4.2);
- Quasi-fiscal expenditure (EITI requirement 6.2);
- Distribution of revenues from the extractive industries (EITI requirement 5.1); and
- Contribution of the extractive industries to the economy (EITI requirement 6.3).

### 3.7. Additional information to be disclosed according to the EITI flexible reporting requirements

The SLEITI MSG agreed that the following information should be included in the scope of the 2019 SLEITI report as required by the 2019 EITI Standard, the EITI flexible reporting requirements and the Terms of Reference:

**Table 7: Additional information to be disclosed in the 2019 SLEITI report**

EITI requirement	Additional information to be disclosed in the FY 2019 SLEITI report
Requirement 2.1: Legal framework and fiscal regime	<ul style="list-style-type: none"> <li>- Legal or regulatory changes, including moratoriums, in response to Covid-19.</li> <li>- Adjustments to the fiscal regime, incentives or relief requested by or given to companies (e.g., force majeure, modified consultation).</li> </ul>
Requirement 2.2: Contract and license allocations.	<ul style="list-style-type: none"> <li>- Any new license/contract awarded or transferred in 2018, 2019 and early 2020.</li> <li>- Delays or postponements of license or contracts awards.</li> <li>- Alternative approaches to licensing considering social distancing requirements.</li> </ul>
Requirement 2.3: Register of licenses	Suspended licenses or operations in view of Covid-19.
Requirement 2.4: Contracts	Changes in licensing and contract negotiations or amendments to contracts, revisions on work schedules if they are annexed to the contract.
Requirement 2.6: State participation	<ul style="list-style-type: none"> <li>- Changes in state participation and policies for state-owned enterprises.</li> <li>- Ad-hoc SOE payments and transfers related to the Covid-19 crisis.</li> <li>- Amendments to the rules and practices related to SOE's operating and capital expenditures, procurement, subcontracting and corporate governance in light of the Covid-19 crisis.</li> <li>- Additional SOE quasi-fiscal expenditures agreed in response to the impact of the Covid-19 crisis.</li> </ul>
Requirement 3.1: Exploration	<ul style="list-style-type: none"> <li>- A narrative overview of sector developments and industry outlook considering Covid-19 and the commodity price downturn.</li> <li>- Effects of Covid-19 and the decline in prices on exploration or development plans.</li> </ul>
Requirement 3.2 and 3.3: Production and Exports	<ul style="list-style-type: none"> <li>- Effects of Covid-19 on projected and actual production and export, disaggregated by commodity, company and project.</li> <li>- Production volumes and values disaggregated by company and project for 2018 and to the extent possible for 2019 and early 2020.</li> </ul>
Requirement 4.1 and 4.7: Comprehensive disclosure of taxes and revenues and Level of disaggregation	<ul style="list-style-type: none"> <li>- Effects of Covid-19 on projected and actual revenues and taxes from the extractive industries for 2018 and to the extent possible for 2019 and early 2020.</li> <li>- Analysis of potentially foregone revenues where fiscal relief has been provided or is being considered to the industry.</li> </ul>
Requirement 4.2. State's share of production or other revenues collected in-kind	Effects of Covid-19 and the declining commodity prices on expected revenues from the sale of the state's share of production and other revenues collected in-kind. This could include analysis of the potentially foregone revenues from commodity sales because of the declining prices.
Requirement 4.3: Infrastructure provisions and barter arrangements	<ul style="list-style-type: none"> <li>- New or renegotiated infrastructure agreements related to Covid-19 relief operations.</li> <li>- New or renegotiated resource-backed loans.</li> </ul>
Requirement 4.4: Transportation revenues	<ul style="list-style-type: none"> <li>- Changes to extractive commodities transportation arrangements considering the Covid-19 crisis.</li> <li>- Outlook for transportation arrangements, revenues and any relevant extractive industries supply chain disruptions in light of Covid-19 related movement restrictions.</li> </ul>
Requirement 4.6: Sub-national payments	Projected and actual subnational direct payments and possible implications for local government budgets.
Requirement 5.1: Distribution of the extractive industries revenues	Budget re-alignments for extractive industry revenues earmarked for Covid-19 relief.
Requirement 5.2: Sub-national transfers	<ul style="list-style-type: none"> <li>- Projected and actual subnational transfers and possible implications for local government budgets and local communities.</li> <li>- The management of subnational transfers by local governments and any changes in response to the Covid-19 crisis.</li> <li>- Revisions to revenue and budget projections (including breakeven commodity price assumptions).</li> </ul>
Requirement 5.3: Revenue management and expenditures	<ul style="list-style-type: none"> <li>- Rescue funding, stimulus packages, or subsidies related to the sector or its state-owned enterprises).</li> <li>- Shifts in sector-specific borrowing.</li> <li>- Exceptional uses of sovereign wealth funds.</li> </ul>
Requirement 6.1: Social and environmental expenditures	- Reforms in legal and contractual social expenditure requirements considering the Covid-19 crisis.

EITI requirement	Additional information to be disclosed in the FY 2019 SLEITI report
Requirement 6.3: The contribution of the extractive industries to the economy	<ul style="list-style-type: none"> <li>- Social expenditures allocated by companies to support Covid-19 measures in areas of operation.</li> <li>- Changes to companies' social expenditure plans and possible impacts on local governments and local communities.</li> <li>- Impact of Covid-19 and declining commodity prices on exports and employment (including resulting from movement restrictions and cross-border quarantines).</li> <li>- Impact of the commodity price downturn on the extractive sector and general economic outlook.</li> <li>- Geographic information on the impact of the Covid-19 crisis on the location of extractive activities.</li> </ul>
Requirement 6.4: Environmental impact of extractive activities	Shifts in regulatory rules or enforcement related to environmental protection, climate mitigation, Free, Prior and Informed Consent and other consultations

## 4. CONTEXTUAL INFORMATION ON THE EXTRACTIVE SECTORS

### 4.1. Mining sector

#### 4.1.1 General context of the mining sector

Sierra Leone is rich in natural resources and is well known for its vast endowment in minerals which include diamonds, rutile, bauxite, gold, iron ore, limonite, platinum, chromite, coltan, tantalite, columbite and zircon. In the 1990s, the 11-year civil war funded with revenues from the minerals sector engulfed the country, resulting in the destruction of infrastructures and a severe contraction in the economy. The sector was also greatly affected by the dual shock of the drop in iron ore prices and the Ebola epidemic in 2014.

The Government of Sierra Leone set up the National Minerals Agency under the Ministry of Mines and Mineral Resources in 2012 with a mandate to implement clear policies and regulations, enhance transparency and accountability and ensure mineral resources support economic and social development. Sierra Leone became a member of the Kimberley Process in 2003 to protect the legitimate trade in rough diamonds, and in 2007 enacted the Diamond Cutting and Polishing Act to issue licenses entitling the holder to buy, deal in, export, import as well as cut, polish, crush and set diamonds for the purposes of trade.<sup>1</sup>

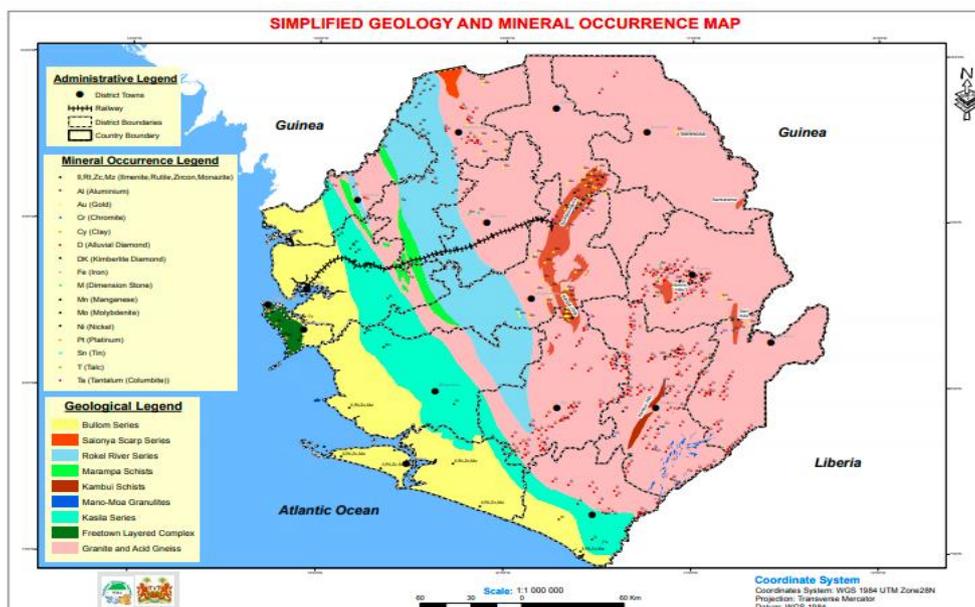
The country has substantial mineral reserves and production capabilities, which have the potential to underpin much higher GDP growth rates notwithstanding the current slump in the minerals sector due largely to the downturn in global prices and higher cost structures in the country.

Apart from iron ore, the country has proven deposits of bauxite, chromite, diamonds, gold, platinum and rutile with several foreign operators already involved in most of these sub-sectors. All operators are being challenged by current adverse world supply and demand conditions, and it is highly likely that these conditions will persist for the foreseeable future.<sup>2</sup>

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<sup>1</sup> <https://www.trade.gov/country-commercial-guides/sierra-leone-mining-and-mineral-resources>

<sup>2</sup> <http://documents1.worldbank.org/curated/zh/272761511578835426/pdf/SIERRA-LEONE-PAD-11032017.pdf>

Figure 6: Geology and mineral occurrence map of Sierra Leone<sup>1</sup>

## Diamonds

The Sierra Leone Selection Trust (SLST) began mining diamonds in Kono in 1930 and by 1951 cumulative production annual production averaged 750,000. In 1970, the government acquired a 51% interest and after 1975, exports declined to less than 0.3 Mct/yr and official exports dwindled to less than 10,000 ct during the civil war years (1991 to 2002). The reserves are estimated at 6.3 million carats at Koiduand and 3.2 million carats at Tongo both to a depth of 600m. Fig 3 The Geological Map of Sierra Leone and its associated stratigraphy (Based on Dixey, F, 1925) Abu Bakarr Jalloh et al. / Procedia Earth and Planetary Science 6 (2013) 131 - 138 135 Mining leases were granted to Rex mining Company and Branch Energy to exploit the kimberlite deposits. Branch Energy has transferred its lease to Koidu Holdings S.A. which is currently producing 120,000 carats per year and they have plans to increase production because they have identified reserves to permit ongoing mining for at least another 15 years. They have finished exploring the Tongo dykes and they are now developing it into another producing mine. The search for other kimberlitic source rocks continues because not all alluvial diamond occurrences in the country could be linked with the known sources through alluvial dispersion.<sup>2</sup>

## Gold

Gold was first discovered in the northern part of the country in 1926 and the prospecting activities by the country's Geological Survey concluded the existence of gold in many other localities within the granite-greenstone terrain. Following the discovery of gold, several mining companies were involved in alluvial gold production. There was continuous but low mining from 1930 but mining activities stopped in 1956 due to the advent of the Alluvial Mining Scheme. However, mining resumed later, with production increasing in response to favourable market conditions reaching a peak annual production of 30,000 ounces in 1984. Exploration activities resumed in 2003, after the civil conflict and over 20 prospecting licenses were issued by the government. In 2008, Cluff Gold Limited submitted proposals for a mining lease in Baomahun. Recent results from Baomahun have already

<sup>1</sup> National Minerals Agency (NMA)

<sup>2</sup> The Geology, Mineral Resources of Sierra Leone and how the Resources can be Used to Develop the Nation (core.ac.uk)

identified a mineral resource of over 1.1 million ounces of gold and a scoping study confirmed that an open pit mine could produce between 140,000 to 200,000 ounces annually. Another company, Mano River Resources has three gold exploration concessions, which coincides with the richest areas for artisanal gold in the country. All three deposits are considered to have potential gold deposits that are significantly larger than the deposits at Baomahun and Komahun which are the largest currently.<sup>1</sup>

### Iron ore

Iron ore was discovered in the Marampa area in 1926. In 1933, Sierra Leone Development Company (DELCO) started producing iron from Marampa until 1975, when it went into liquidation. In 2005, the London Mining Company (LMC) took over the Marampa concession and has developed it to a mining project. The tailings left by DELCO was reported at 45 million tons from 40 million at an average grade of 27.7% Fe and the primary ore was reported at 1 billion from 92 million at an average grade of 37.7% Fe. LMC started producing tailings and weathered ore to a consistent high quality in November 2011, and has produced as of May 2012, 300,000 dry metric tons of ore and shipped about 230,000 to Europe and China. This result has put the company in position to achieve their 2012 production target of 1.5Mt. The other deposits investigated were the Tonkolili and Bagla Hill deposits. The Tonkolili iron deposit occurs in the Archaean Sula Mountain-Kangari Hills greenstone belt, close to Ferengbeya in the northern part of the country. The iron occurs as residual or secondary ore caps resting on Precambrian banded iron formation. The caps are because of tropical weathering and leaching of underlying quartz-magnetite rocks and the iron rich amphibolites. Estimates for the caps and primary ore are at least 720 million tons at an average grade of 56.3% Fe. African Mineral Limited (AML) have done an extensive drilling for resource modeling and has come up with an estimated reserve of 5 billion tons at an average grade 56.3% Fe and in late 2011 started exporting the cap to china. Annual export figures are not available yet at the Ministry. The Bagla Hill iron ore deposit occurs in the south eastern part of the country and it is a metamorphosed banded magnetite silicate rock made up of alternating layers of magnetite and quartzite. Preliminary evaluation done by Bethlehem Steel Company gave an ore reserve estimate of 384 million tons of primary ore (magnetite) at average grade of 18.1% Fe and about 90 million tons of haematite ore at 34.3% iron. Other minor occurrences are the Krim-Kpaka deposit in the south with 9 million tons at 40% iron and the Kukuna deposit in the north-west which is been currently developed by Cape Lambert Iron Ore Company with 15 million tons at 39% iron.<sup>2</sup>

### Bauxite

Bauxite occurrence in Sierra Leone was first recorded in 1920 and 1921 at Falaba and Waia respectively, located in the northern part of the country. Other bauxite occurrences included those between Moyamba and Mano which are weathered dolerite sills of the Rockel River Group, the Krim-Kpaka deposits in Pujehun District in the South; the Kamakwie and Makumre bauxite deposits in the North. The most important bauxite deposit finds were made by the Geological Survey in the Mokanji and Gbonge hills in 1960 and by SierraOre and Metal Company (SIEROMCO) in Port Loko in 1972. The Mokanji and Gbonge deposits in Moyamba district were mined by SIEROMCO from 1963 to 1995. The company was able to attain a maximum annual production of about 1.5 million tons. Feasibility studies carried out by SIEROMCO on the Port Loko deposit indicated a mineable deposit with reserves of over 100 million tons out of which 77.3 million tons have been proved. The lease to explore, develop and possibly mine this deposit has been allocated to Gondwana Investments S.A. The former bauxite mine owned by SIEROMCO has now been taken over by a new company; Sierra Minerals Holding

<sup>1</sup> The Geology, Mineral Resources of Sierra Leone and how the Resources can be Used to Develop the Nation (core.ac.uk)

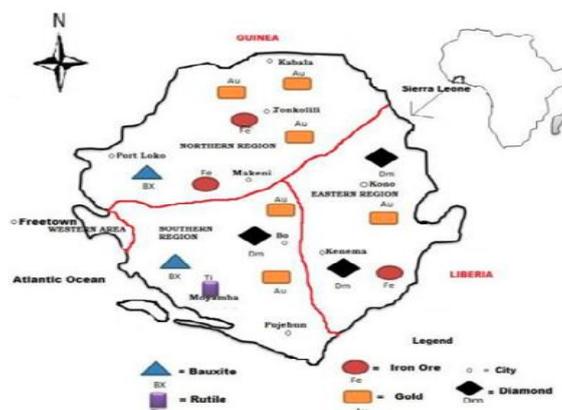
<sup>2</sup> The Geology, Mineral Resources of Sierra Leone and how the Resources can be Used to Develop the Nation (core.ac.uk)

and they commenced mining operations in March 2006 and have reported monthly production and export of up to June 2007. In 2006, they produced 1,071,059 mt. and in half a year in 2007, they produced 623,343 mt.

## Rutile

Rutile was discovered in Sierra Leone in 1954 in the gravels of the Lanti River south of the Gbangbama region in the southern province. Four groups of deposits are known to be distributed around the country: the Gbangbama, Sembahun, Rotifunk and the Kambia deposit. Sierra Leone has the largest natural rutile reserve in the world. The Gbangbama deposit consists of six major deposits: Mogbemo, Bamba-Pelebu, Pujubu, Lanti, Gbeni and Gangama. The first three deposits of the Gbangbama group have been almost completely exhausted. The Lanti deposit is currently being mined. At the end of 1994 the Gbangbama group had an estimated 150 million tons of rutile at grade of 1.5 to 2% and large reserves of ilmenite and zircon. The Sembahun deposit is also made up of six deposits: Kibi, Dodo, Benduma, Komende, Mokamatipa and Matehun. Here exploration results in 1990, revealed the presence of over 180 million tons of rutile with grades ranging from 1.2 to 1.6% rutile. The indicated resource estimate for the Rotifunk deposit in 1990 was 235 million tons at 0.62% rutile. The deposit consists of 6-7m thick horizon of sandy clay within the Bullom Group of sediments. Sierra Rutile Limited (SRL), a subsidiary of Titanium Resources Group (TRG) is now the sole operating company in the country and was the largest producer of natural rutile, accounting for about one quarter of global output before its rutile mine was shut down in 1995. The company began to rehabilitate in 2005 and after a ten-year gap due to the rebel war, began production and exporting in 2006. Rutile production in 2006 and 2007 were as follows: in 2006, 73,803 million tons were produced and in a half year in 2007, 42,005 tons were produced.<sup>1</sup>

Figure 7: Map of Sierra Leone and its mineral distribution



### 4.1.2 Exploration activities during 2019

#### Overview of the mining industries, including any significant exploration activities during 2019

In 2018, GoSL launched a countrywide airborne geophysical survey to provide a wealth of geophysical data and information that will illuminate geological thinking for decades to come. This survey forms a vital component of the NMA's strategy to encourage investment in the minerals sector was completed in December 2019.

<sup>1</sup> The Geology, Mineral Resources of Sierra Leone and how the Resources can be Used to Develop the Nation (core.ac.uk)

The availability of these geophysical data sets help investors, both local and international, to take less risky and hasty decisions on investment in the country.

In 2019, the British Geological Survey (BGS) and NMA geologists completed an orientation survey for the proposed countrywide geochemical mapping. NMA geologists, under the guidance of BGS geologists, designed and implemented the Orientation survey campaign in May 2019. The geochemical orientation survey was conducted to:

- primarily form the basis of the development of the Terms of Reference (ToR) for the countrywide geochemical survey contract procurement;
- study the rocks that are typical of Sierra Leone's geology to determine the most applicable analytical method(s); and
- assess personnel and logistical requirements for the proposed countrywide geochemical mapping campaign.

During the geochemical mapping orientation survey, 57 stream sediments, 63 pan (heavy mineral concentrate) and 34 bulk samples collected from 58 sampling sites across the various lithological units. Sediments and bulk samples were sun-dried at the NMA Laboratory, and all pan concentrates were oven-dried. Sample preparation was undertaken by the BGS and NMA Geologists and Technicians at the NMA Laboratory in June 2019. All samples were dispatched to ALS Laboratories in South Africa in November 2019 for multi-elemental analysis<sup>1</sup>.

### Main ongoing mining projects in Sierra Leone

We present in the table below the main ongoing mining projects in Sierra Leone in 2019:

**TABLE 8: Main ongoing mining projects in Sierra Leone in 2019**

Project	Commodity	Location	Company	Description
Lanti and Gangama Rutile mine Project	Rutile	Bonthe and Moyamba Districts	Sierra Rutile Limited	Sierra Rutile, a subsidiary of Iluka Resources, is a multi-mine operation located in the Bonthe and Moyamba districts. Sierra Rutile has the world's largest natural rutile deposit and encompasses two operations at Lanti and Gangama; a mineral separation plant; and a dedicated port facility. Sierra Rutile's main product stream is natural rutile and the operation also produces smaller quantities of ilmenite and zircon (in concentrate). Sierra Rutile has an established operating history of more than 50 years and further mine life of at least 20 years, depending on future development options. The Lanti Dry expansion and the Gangama expansion increased the capacity of each mine from 500-600 tonnes per hour of ore to 1,000-1,200 tonnes per hour. <sup>2</sup>
Koidu Kimberlite Project	Diamond	KONO District	KOIDU LIMITED	The Koidu Kimberlite Project is situated in the Kono District of Sierra Leone, approximately 330 km east of the capital city, Freetown. The mining lease area is 4km <sup>2</sup> and comprises two kimberlite pipes, four dyke zones and a number of blows off the dykes. In 2003, Koidu Holdings set up operations on the property and began dewatering and removing silt from the existing 30m excavation of the No.1 Pipe. While the original planning for the pipes included conventional open pit operations, mitigating factors such as the proximity of the town, the presence of houses close to the perimeter of the pit, the size of the kimberlite pipe and the planned open pit depth, combined with relevant stripping ratios and uncertainties on the grades concerning an underground operation, lent themselves to the vertical pit concept. <sup>3</sup>
Guinea Bauxite	Bauxite	Moyamba, Bo and	Sierra Minerals	Sierra Mineral Holdings 1 Limited (hereinafter referred to as SMHL) a subsidiary of the Vimetco N.V, a private entity with

<sup>1</sup> National Minerals Agency

<sup>2</sup> <https://iluka.com/operations-resource-development/operations/sierra-leone>

<sup>3</sup> <https://www.srk.com/en/publications/koidu-vertical-pit-sierra-leone>

Project	Commodity	Location	Company	Description
Deposits project		Bothe Districts	Holdings No.1 Limited	major operating subsidiaries, Alro SA (88% owned) listed on the Bucharest Stock Exchange and Henan Zhongfu Industry (53.9% owned) listed on the Shanghai Stock Exchange. SMHL is one of the arms of Vimetco Holdings - one of the largest Aluminium producers in the world and has been supplying its parent i.e., Alum its raw materials for a production activity that brings out quality production of Aluminium to supply the global market. Sierra Mineral Holdings 1 Limited holds this mining lease of 321.7 km <sup>2</sup> that lies along the same belt with the world known Guinea bauxite deposit. <sup>1</sup> In 2019, the production was about 2 million tons of commercial bauxite and the resource base as in 2019 remains at 60 million tons approximately.
Marampa iron ore mine project	Iron Ore	Port Loko District	SL Mining Limited	Iron ore is also mined in the Marampa area. The Marampa iron ore deposits have been traced as far as Kukuna near the Guinea border and to the south at Toma and Makalawa. Located in the Port Loko District, in the country's north, SL Mining is engaged in the exploration, development and production of a high-grade iron ore concentrate with >65% Fe content. The company estimates that Marampa, permitted since 2017, holds about 1 billion tonnes of iron ore with a potential lifespan of 30 years. <sup>2</sup> In 2018 Marampa Mine, in Port Loko District, was transitioning from care and maintenance to be developed into a producing mine by SL Mining Limited. In February 2019, SL Mining resumed iron ore production at the Marampa Mine following its year-long care & maintenance operation for the most part of 2018. However, the country's two main operations, Tonkolili Mine (100% owned by China's Shandong Iron and Steel Group, (SISG) and Marampa Mine (100% owned by SL Mining Ltd), faced numerous regulatory and operational issues, and Sierra Leone's exports dropped to less than quarter of a million tonne in 2019. SISG and SL Mining mineral rights were cancelled in June 2019 and October 2019 respectively, for failure to comply with their statutory obligations.
Masumbiri Gold project	Gold	KOKOLILI District	DAYU MINING COMPANY LIMITED	Dayu Mining, which operates the country's largest gold mine, has started mining gold concentrate in Masumbiri, Simiria chiefdom. <sup>3</sup>

### 4.1.3 Legal framework

#### Current legal framework

The main legislation and regulations governing mining activities in Sierra Leone are:

- The Mineral and Mines Act (MMA, 2009 Act): which provides details on how mining is to be conducted in Sierra Leone. It advocates the setting up of a modern cadastral system for issuing, registering and surveying mining operations. The Act provides that all rights of ownership and control of minerals in Sierra Leone including its continental shelf are vested in the State notwithstanding any other ownership rights.
- The National Minerals Agency Act, 2012;
- The Extractive Industry Revenue Act 2018;
- The Mines and Minerals Operational Regulations of July 2013;
- The Diamond Cutting and Polishing Act;
- The Diamond Trading Act;

<sup>1</sup> <https://vimetcobauxite.com/>

<sup>2</sup> SL Mining to halt operations at Marampa iron ore mine in Sierra Leone - MINING.COM

<sup>3</sup> <http://www.mercuryconvention.org/Portals/11/documents/NAP/Sierra-Leone-ASGM-NAP-2020.pdf>

- The Environment Protection (Mines and Minerals) Regulations of July 2013;
- The Income Tax Act, 2000 as amended by the Finance Acts;
- The Customs Act 2011;
- The Sierra Leone Local Content Agency Act, 2016 [No. 3 of 2016];
- The Public Financial Management Act; and
- The Local Content Act.

### Legal reforms in mining sector

The 2009 Mines and Minerals Act (MMDA) is the primary legislation governing minerals development in Sierra Leone. As is industry practice, mining-related legislation (incl. environmental, fiscal and others) is also applied.

In 2018, Cabinet adopted three mineral sector policies, namely, (i) the Sierra Leone Minerals Policy, (ii) the Artisanal Mining Policy and (iii) the Geo-data Management Policy. Together, these policies create the framework within which the review of the Mines and Minerals Act 2009 would occur.

In 2019, the Ministry of Mines and Mineral Resources (MMMR) with support from the World Bank sought to adopt clear mining legislation that reflects government policy and industry practice, and sets out legally enforceable guidance. Commencing June 2019 through early-2020, as part of the EITAP II Bank assistance, the World Bank provided technical and financial support to the formulation of a draft Mines and Minerals Development Bill, 2021.

### The Mines and Minerals Development Bill 2021

Following several consultations with other associated Ministries, Departments and Agencies as well as bilateral, multilateral, and broad nationwide stakeholder consultations including mining companies, civil society groups and local communities, a draft Mines and Minerals Development Bill 2021 was formulated by the Law Officers Department in the Office of the Attorney General and Minister of Justice in June 2021. Key reform changes in the draft Bill included:

- i. Clarifying institutional roles and responsibilities taking into consideration the establishment of the National Minerals Agency (NMA) by an Act of Parliament, the National Minerals Agency Act 2012. The institutional changes are geared towards clarifying policy formulation and oversight functions of the Ministry and regulatory functions performed by the NMA.
- ii. Streamlining the role of the Minerals Advisory Board (MAB) as it relates to the award, suspension, transfer, or cancelation of mineral rights. Primarily, the MAB's role is to conduct due diligence on applications for mineral rights, other than Artisanal Mining licence, submitted to it by the NMA and to make recommendations to the Minister accordingly. The MAB also makes recommendation to the Minister on matters related to the suspension, transfer, and cancelation of mineral rights other than artisanal mining licence.
- iii. Beneficial ownership disclosure for companies operating in the mining sector. It is required that the identities of shareholders with 5% or more shares in any company operating in the mining sector in Sierra Leone must be disclosed.
- iv. Transparency assurance provision was introduced.
- v. Gender and social protection provisions were introduced.
- vi. Government of Sierra Leone to acquire 10% free carried interest in new companies registered to operate in the mining sector.
- vii. Sub-national transfers to finance development projects in mining communities was introduced or enhanced.

### Engagement with the World Bank

The World Bank mining and legal team were asked to provide reviews of the draft Bill. A series of review notes were submitted along with proposed amendments and a comparison of core policy issues

included in the Minerals Policy of Sierra Leone. Considerations of good industry practice have also been given.

In September 2021, the Ministry of Mines and Mineral Resources, the World Bank mining and legal teams and senior government officials of Ministries, Department and Agencies relevant to mineral sector governance and management reviewed the draft Bill. Useful changes incorporated in the draft Bill that rectified issues specific to the Sierra Leone mining market have been retained. These include the revision of license categories and promotion of mining as an integrated segment of the economy.

### Status

The Ministry of Mines and Mineral Resources have submitted a revised final draft of the Mines and Minerals Development Bill, 2021 to the Law Officers Department, Office of the Attorney General for drafting of the final Bill. Further reviews by the World Bank and MMR are being carried out on aspects of the Bill that will be subsequently submitted to the Law Officers Department.

It is expected that licensing authority, institutional roles and responsibilities and community issues, fiscal issues, may see further changes. However Beneficial Ownership Disclosure and Transparency provisions are not expected to be changed any further.

#### 4.1.4 Institutional framework

The Ministry of Mines and Mineral Resources (MMMR) and the National Minerals Agency (NMA) are the main government agencies responsible for the promotion and control of exploration and mining activities in Sierra Leone. They are also responsible for the implementation and monitoring of government policies and the development of legislative and regulatory provisions applicable to the mining sector. The key responsibilities of each government agency in the managing of the mining sector are summarised in the table below:

TABLE 9 : Institutional Framework

Entity	Functions
Ministry of Mines and Mineral Resources (MMMR)	MMMR has the responsibility for policy making in the extractive sector. The Ministry oversees the issuance of all mineral rights and the administration and supervision of all activities under these rights and administers regulations on mining and marketing of precious minerals through the Precious Mineral Trading.
National Minerals Agency (NMA)	NMA was set up in 2012 by the National Minerals Agency Act 2012. It is responsible for the day-to-day implementation of the Mines and Minerals Act (2009) and other mining acts and related regulations. This includes responsibility for mineral rights management, collecting and disseminating geological information and regulating the trading of precious minerals. NMA is responsible for the administration and regulation of the minerals sector. It provides fairer and more predictable implementation of laws and regulations, which will encourage investment in the minerals sector. NMA also works closely with other Government Agencies with responsibilities in the sector (such as the National Revenue Authority and the Environmental Protection Agency) to support them in implementing those policy areas for which they are responsible and impact upon the minerals sector.
Mining Cadastre Office (MCO)	MCO is responsible for the management of the Mining Cadastre Administration System (MCAS) including: <ul style="list-style-type: none"> <li>the processing of mineral rights applications; the issuance and administration of licenses and permits;</li> <li>the maintenance of cadastral records, registers and maps; and</li> <li>the receipt and safe-keeping of reports in a non-discretionary and transparent manner in accordance with the laws of Sierra Leone.</li> </ul> All applications, requests, communications regarding a mining license and documents required to maintain and manage a license must be addressed to the MCO, directly. This Unit sits within the Directorate of Mines at the National Minerals Agency's Headquarters, New England Ville, Freetown. <sup>1</sup>

<sup>1</sup> <https://www.nma.gov.sl/mining-cadastre-office/>

Entity	Functions
Environmental Protection Agency (EPA)	<p>EPA was set up through the Environmental Protection Agency Act (2008) as amended in 2010. Its objective is to create and enforce strict regulatory framework for environmental regulation in Sierra Leone. Its mandate is to coordinate, monitor and evaluate the implementation of national environmental policies, programmes and projects, including issuing Environmental Impact Assessment (EIA) licenses.</p> <p>It also effectively protects and manages the environment by monitoring and regulation of companies with EIA licenses. Additionally, EPA investigates illegal operations that have an impact on the environment and advises the Minister of Environment on all environmental matters.</p>
National Revenue Authority (NRA)	<p>NRA was set up by the National Revenue Act 2002 (Act No-11) in September 2002. The National Revenue Authority in Sierra Leone is responsible for assessing and collecting domestic taxes, customs duties and other revenues specified by law, as well as administering and enforcing laws related to these revenues. (<a href="http://nra.gov.sl">nra.gov.sl</a>).</p>
Ministry of Local Government & Rural Development (MLGRD)	<p>MLGRD is responsible for local government, which comprises six urban councils (Freetown, Bo, Kenema, Makeni, Koidu and Bonthe) and 16 district councils under the Local Government Act 2004. In the third sphere of government there are chiefdom councils. Local authorities and chiefdom councils have revenue-raising powers, and they impose levy property taxes and license fees for mining activities in host communities.</p>
Chiefdoms and District Councils	<p>The paramount chiefs and ruling families in the chiefdoms have been recognised and empowered by Sierra Leone's British Colonial Administration. All Chiefdoms have been constituted into district councils. These sub-national Government Agencies receive surface rentals from mining companies.</p>
Members of Parliament	<p>Parliament oversees the activities of the extractive Sector in Sierra Leone. Members of Parliament who receive 10% surface rent from mining companies or more must disclose payments received from mining companies to Independent Administrator during data collection phase.</p>
Minerals Advisory Board (MAB)	<p>MAB advises the Minister in the discharge of his statutory responsibilities under the Mines and Minerals Act. In fact, the act restricts the wide range of discretionary powers the minister had under the previous legislation which the average investor was hardly ever comfortable with. The Board is made up of fourteen (14) members including the Director of Mines as Secretary and the Director of Geological Survey as member. The local Chamber of Mines is well represented on the Board with others from the industry and together, presents an informed voice of the industry in its deliberation. The Secretary to the Board is a senior member of the Ministry of Mineral Resources.</p> <p>Composition of the MAB:</p> <ul style="list-style-type: none"> <li>• Chairman;</li> <li>• Director of Mines (Secretary of the Minerals Advisory Board);</li> <li>• Director of Geological Survey;</li> <li>• Commissioner-General of National Revenue Authority;</li> <li>• Representative of Attorney-General and Minister of Justice;</li> <li>• Representative of the Ministry responsible for local government;</li> <li>• Representatives of the Ministry of Environment;</li> <li>• the Permanent Secretary of the Ministry of Mineral Resources; and</li> <li>• two persons with considerable qualifications and experience in the mining industry.<sup>1</sup></li> </ul>

<sup>1</sup> <https://www.slminerals.org/structure-of-the-ministry/>

### 4.1.5 Tax regime

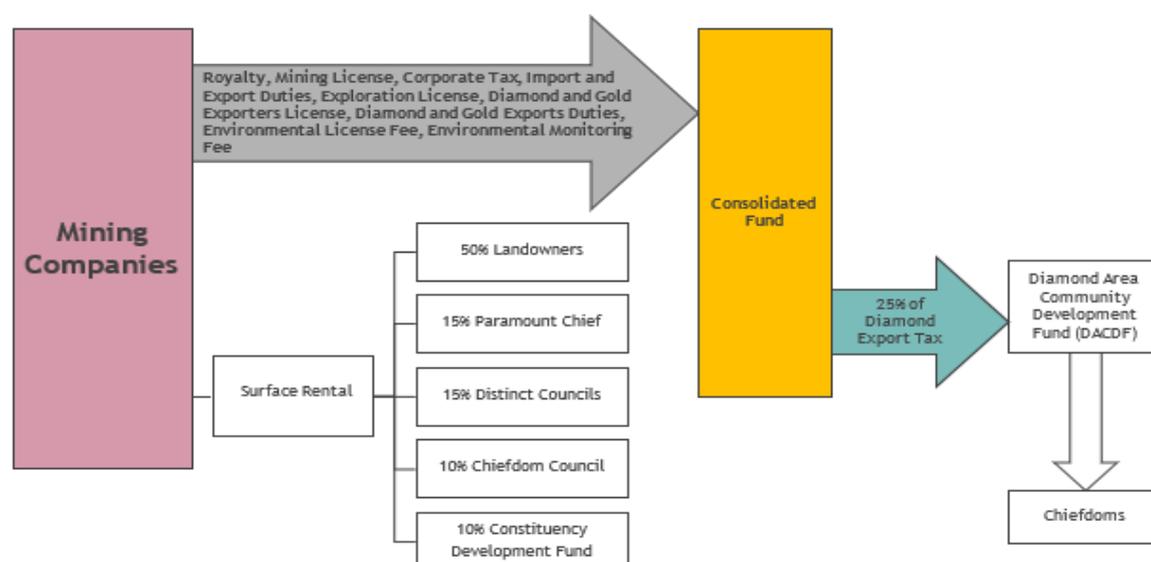
The tax regime in the mining sector is governed by:

- the Income Tax Act, 2000 as amended by subsequent Finance Acts;
- the Mineral and Mines Act (MMA, 2009 Act); and
- the Extractive Industries Revenue Act (EIRA), 2018.

The main revenue streams paid by mining companies are: Corporate income taxes, royalties, surface rentals and mining license fees:

Tax	Description
Royalty	<p>The Extractive Industries Revenue Act (EIRA) 2018 sets out the rates of royalty as follows: For minerals other than by artisanal mining licenses:</p> <ul style="list-style-type: none"> <li>• 6.5% for precious stones other than special stones;</li> <li>• 8% for special stones;</li> <li>• 5% for precious metals; and</li> <li>• 3% in other cases, including bulk minerals.</li> </ul> <p>3% for minerals obtained pursuant to an artisanal mining license. Samples of minerals obtained for purposes of assay, analysis or other examination or testing shall be exempt from royalties, but royalties shall apply if a sample is sold.</p>
Corporate income tax (CIT)	<p>The CIT rate is 30% on profits. According to the EIRA, the effective income tax rate for mineral operations is 30% of profits.</p>
Mining license fees	<p>In accordance with section 152 of the EIRA 2018, the annual charge in respect of mineral rights shall be payable to the government by the holder of any mineral right as may be prescribed. The annual charge payable pursuant shall be payable on the grant of a mineral right and thereafter annually on the anniversary of the grant until the termination of the mineral right.</p>
Surface rental	<p>According to paragraph 34.A of the Mines and Minerals Act (2009) land lease or other rights to use land obtained by the holder of a large-scale mining license, shall be subject to surface rent which shall be distributed as follows:</p> <ul style="list-style-type: none"> <li>▪ (a) Landowners 50%</li> <li>▪ (b) District Council 15%</li> <li>▪ (c) Paramount Chiefs 15%</li> <li>▪ (d) Chiefdom Administration 10%</li> <li>▪ (e) Constituency Development Fund 10%</li> </ul>
Goods and services tax (GST)	<p>The GST Act 2009 stipulates that a tax on the domestic consumption of imported and locally produced goods and/or services, is payable as a percentage of their value at the time they are imported, sold, exchanged, or delivered. From 01 September 2009, GST is applicable at the rate of fifteen percent (15%) on most goods and services (including imports) supplied in Sierra Leone for local use or benefit.</p>
Withholding of tax by employers	<p>According to the Income Tax Act 2000 as amended by subsequent Finance Acts: An employer shall withhold tax from employment income as instructed by the Commissioner— (a) in the case of an employee who is resident or temporarily resident in Sierra Leone, at the rates prescribed in Part I of the First Schedule; or (b) in the case of an employee who is not resident in Sierra Leone at the rate prescribed in Part II of the Second Schedule.</p>
Capital gains tax (CGT)	<p>CGT is a tax on gains—the profit realised on the sale of a non-inventory assets that was purchased at a cost that was lower than the amount realised on the sale. 30% of the capital gain acquired from the disposal of a chargeable asset is taxable.</p>
Environmental license fee	<p>License obtained after conducting Environmental impact studies and approval by the EPA Board. It is a pre-requisite for obtaining mining license. Its payment is based on the Environmental Protection Act 2008 as amended in 2010.</p>
Environmental monitoring fee	<p>Amount levied to enable the EPA to ensure compliance and enforcement.</p>

The mining revenue collections framework can be represented diagrammatically as follows:



### Tax regime reforms

In 2018, GoSL put in place the fiscal framework for the extractive industries, with an Extractive Industries Revenue (Act) Bill (EIRA) to consolidate existing provisions for tax and non-tax rules for the extractive industries (including petroleum) under one legislative instrument. The newly enacted 2018 Extractive Industry Revenue Act (EIRA) is expected to support revenue mobilization efforts through harmonization and consolidation of the extractive sector fiscal regime.

#### 4.1.6 Types of licenses

All individuals or operators wishing to participate in the minerals sector of Sierra Leone are required to be licensed before they can engage in the mining activities. We present in the table below, the types of mining licenses in Sierra Leone, their duration and rights conferred by each type of mining license:

Type	Duration	Rights conferred
Reconnaissance License	The Reconnaissance license is granted for one year and renewed for another year	A reconnaissance license is the first stage in the mining enterprise entitles the holder to search for all minerals by geological, geophysical and geochemical means. In general, reconnaissance licenses do not allow drilling, excavation, or other physical activities on the land, except where such activity is specifically mentioned by the license. A reconnaissance area shall not exceed 10,000(ten thousand) square kilometres.
Exploration License	The exploration license is granted initially for 4 years with a first extension for 3 years and a further extension for 2 years, i.e., a total of 9 years	Exploration licenses which cover the second stage of mining operations entitle the holder to search for the stipulated minerals and to determine their extent and economic value. The size of the concession granted for the first 4 years is a maximum of 250 km <sup>2</sup> . This size is halved from the 4 <sup>th</sup> year onwards i.e., 125 km <sup>2</sup> . If one holds more than 125 km <sup>2</sup> then the license fees is increased.
Small Scale Mining License	A small-scale mining license shall be valid for a period not exceeding three years and may be renewed for further periods not exceeding three years at a time.	A small-scale mining license area shall not be less than one hectare and not more than one hundred hectares. The holder of a small-scale-mining license shall have the exclusive right to carry on exploration and mining operations in the licensed area.
Large Scale Mining License	The period for which a large-scale mining license is granted shall be stated in the license and shall not exceed twenty-five years or the	The holder of a large-scale mining license shall have the exclusive right to carry on exploration and mining operations in the large-scale mining license area.

Type	Duration	Rights conferred
	estimated life of the ore body proposed to be mined, whichever is shorter.	
Artisanal mining License	An artisanal mining license shall be valid for a period of one year and may be renewed for up to three further periods not exceeding one year at a time.	An artisanal mining license area shall not be more than one half hectare. The holder of an artisanal license shall have the exclusive right to carry on exploration and mining operations in the licensed area.

Source: Mineral and Mines Act (MMA, 2009 Act)

### Other types of licenses

All individuals or operators wishing to participate in the minerals sector of Sierra Leone are required to be licensed before they can engage in the business of mining, buying and selling of minerals. Licenses that are required for those not actively involved in mining but are in the business of buying and selling minerals include:

Type
Diamond Exporter Agent
Diamond Exporter License
Gold Exporter License

### Active mining licenses on 31 December 2019

According to the NMA mining register, there were 1,487 active mining licenses on 31 December 2019. We present in the table below the number of active mining licenses by type of license:

Type of License	Number
Reconnaissance License	-
Exploration License	33
Small Scale Mining License	12
Large Scale Mining License	12
Artisanal mining license	1,430
<b>Total</b>	<b>1,487</b>

### Other active types of licenses

According to NMA, there were 69 other types of licenses were active on 31 December 2019. We present in the table below the number of other types of licenses and by type:

Type of License	Number
Diamond Exporter Agent	27
Diamond Exporter License	20
Gold Exporter License	22
<b>Total</b>	<b>69</b>

### 4.1.7 Register of mining licenses

According to section 39 of the 2009 MMA, the Director of Mines shall establish and maintain a Mining Cadastre Office which shall be accessible to the Public.

According to section 40 of the 2009 MMA, the Mining Cadastre Office shall open and maintain for the purposes of this Act registers and a cadastral survey map, to be known collectively as the mining cadastre, comprising:

- the register of mineral rights;
- the register of mineral rights applications; and
- the cadastral survey map of mineral rights and mineral rights applications.

Section 40 (2) stipulates that the mining cadastre may include a computerised system involving a spatially related database for registering and administering mineral rights and mineral rights applications.

Section 40 (2) stipulates that the register of mineral rights shall for every license granting a mineral right contain a record in sufficient detail to show:

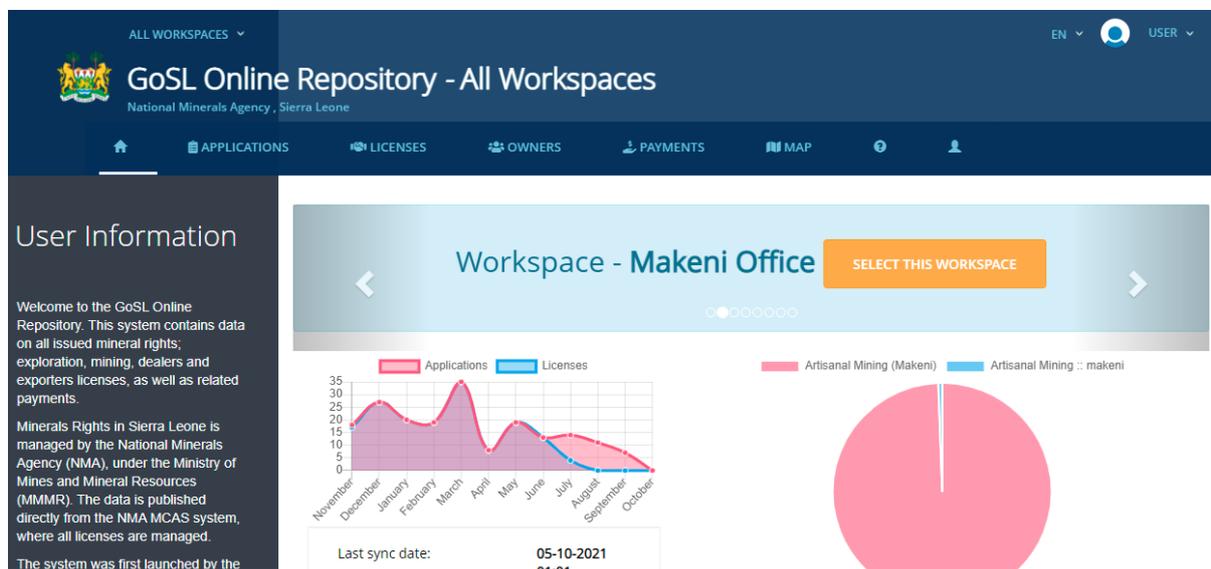
- the name of the holder of the mineral right, and if the holder is a company the names of the principal owners and or shareholders;
- the type of mineral right;
- the area subject to the mineral right;
- the duration of the mineral right; and
- the date the license was registered.

Sierra Leone has an online (an updated) cadastre system, the Mining Cadastre Administration System (MCAS)<sup>1</sup> which provides information on the following with the view to ensuring transparency in the management of minerals rights. This Online Repository of mining licenses contains data on all issued mineral rights, exploration, mining, as well as dealers and export licenses, related payments (type of license, license holder, license code, status active/non active, coordinates, start date, expiry date, application date, the commodity being produced, etc.).

Open to the public, the system is further linked to the tax authorities’ systems. This system allows them to publish revenues from the sector online and therefore makes a significant contribution to transparency efforts in license management.

The data is published directly from the MME Mining Cadastre Administration System (MCAS), where all licenses are managed by the Mining Cadastre Management Unit (MCIMU).

The MACAS is accessible through this link: <https://sierraleone.revenuedev.org/dashboard>



<sup>1</sup> <https://sierraleone.revenuedev.org/dashboard>

We present in Annex 1 of the report, the list of active mining licenses on 31 December 2019. The list contains the following information:

- type of license;
- license holder;
- application date;
- award date;
- expiry date;
- duration of the license;
- the commodity being produced; and
- area.

Coordinates are provided in the online Mining Cadastre Administration System (MCAS)<sup>1</sup>.

SL mining license (ML 01/2017) was cancelled on 4<sup>th</sup> October 2019. As result, the mining license is not included in the list of active mining licenses on 31 December 2019.

Kingho mining company license (ML 01/2020) was awarded on 07 January 2020. As result, the mining license is not included in the list of active mining licenses on 31 December 2019.

### **Mining Cadastre Office (MCO)**

The Mining Cadastre Office (MCO) is responsible for the management of the Mining Cadastre Administration System (MCAS) including:

- the processing of mineral rights applications;
- the issuance and administration of licenses and permits;
- the maintenance of cadastral records, registers and maps; and
- the receipt and safe-keeping of reports, all in an objective, non-discretionary and transparent manner in accordance with the laws of Sierra Leone.

All applications, requests, communications regarding a mining license and documents required to maintain and manage a license must be addressed to the MCO, directly.

This unit sits within the Directorate of Mines at the National Minerals Agency's Headquarters, New England Ville, Freetown.<sup>2</sup> The Cadastre is guided by the principle of transparency in handling applications for mining and mineral-related rights on a first-in first-assessed (FIFA) basis.

### **4.1.8 Mining agreements**

The mining agreements are legally binding agreements between mining companies and the Government of Sierra Leone.

The mining agreements set out the main following rules:

- exploration and production work programmes;
- environmental protection and management;
- fiscal and tax obligations;
- financial reporting;
- terms guaranteeing the right of the other party to be free from currency of other exchange controls with respect to the proceeds of export sales, to repatriate earnings, and to exchange currency in Sierra Leone at fair market rates of exchange; and
- terms providing for international binding arbitration of disputes arising, terms affirming such party's right to import goods and equipment for use in its operations and to export minerals.

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<sup>1</sup> <https://sierraleone.revenuedev.org/dashboard>

<sup>2</sup> <https://www.nma.gov.sl/mining-cadastre-office/>

## List of mining agreements

NMA has provided the list of active mining agreements on 31 December 2019. According to the list ten mining agreements were active on 31 December 2019. We present in the table below the list of active mining agreements on 31 December 2019:

N°	Mining Company	Year	Commodity	Contract type
1	Sierra Rutile Limited, Concession, 2002	2002	Rutile	Mining agreement
2	Sierra Rutile Limited, SRL Acquisition No. 3 Limited, Concession, Amendment, 2004	2004	Rutile	Mining agreement
3	African Minerals Limited, Tonkolili, Concession, 2010	2010	Iron Ore	Mining agreement
4	Koidu Holdings SA, Concession, 2010	2010	Diamonds	Mining agreement
5	London Mining Company Limited, Concession, 2012	2012	Iron Ore	Mining agreement
6	Tonguma Limited, Tonguma, Concession, 2012	2012	Diamonds Gold	Mining agreement
7	Sierra Minerals Holdings 1, 2012	2012	Bauxite	Mining agreement
8	Koidu Holdings SA, Concession, 2010	2012	Diamond	Mining agreement
9	SL Mining Limited, Concession, 2014	2017	Iron Ore	Mining agreement
10	SierraMin Bauxite Limited, Concession, 2017 2017 Bauxite Concession Agreement	2017	Bauxite	Mining agreement

## Public disclosure mining contracts

The 2019 Standard stipulates that implementing countries are required to disclose any contracts and licenses that are granted, entered into force or amended from 1 January 2021.

The Government of Sierra Leone does not have a contract disclosure policy. However, the SLEITI Bill has provisions and objectives which are intended to promote contract disclosure. The SLEITI bill has not been passed into legislation at the time of finalising this report.

The Right to Access Information Act 2013, has its preamble stating that “Being an Act to provide for the disclosure of information held by public authorities or by persons providing services for them and to provide for other related matters”.

However, the ten mining agreements are publicly available on NMA website and Resource Contracts website:

N°	Mining Company	Year	Commodity	Contract type	Publicly available	Link
1	Sierra Rutile Limited, Concession, 2002	2002	Rutile	Mining agreement	Yes	<a href="http://www.nma.gov.sl/resourcecontracts/">http://www.nma.gov.sl/resourcecontracts/</a>
2	Sierra Rutile Limited, SRL Acquisition No. 3 Limited, Concession, Amendment, 2004	2004	Rutile	Mining agreement	Yes	<a href="http://www.nma.gov.sl/resourcecontracts/">http://www.nma.gov.sl/resourcecontracts/</a>
3	African Minerals Limited, Tonkolili, Concession, 2010	2010	Iron Ore	Mining agreement	Yes	<a href="http://www.nma.gov.sl/resourcecontracts/">http://www.nma.gov.sl/resourcecontracts/</a>
4	Koidu Holdings SA, Concession, 2010	2010	Diamond	Mining agreement	Yes	<a href="http://www.nma.gov.sl/resourcecontracts/">http://www.nma.gov.sl/resourcecontracts/</a>
5	London Mining Company Limited, Concession, 2012	2012	Iron Ore	Mining agreement	Yes	<a href="http://www.nma.gov.sl/resourcecontracts/">http://www.nma.gov.sl/resourcecontracts/</a>
6	Tonguma Limited, Tonguma, Concession, 2012	2012	Diamond Gold	Mining agreement	Yes	<a href="http://www.nma.gov.sl/resourcecontracts/">http://www.nma.gov.sl/resourcecontracts/</a>
7	Sierra Minerals Holdings 1, 2012	2012	Bauxite	Mining agreement	Yes	<a href="http://www.nma.gov.sl/resourcecontracts/">http://www.nma.gov.sl/resourcecontracts/</a>
8	Koidu Holdings SA, Concession, 2010	2012	Diamond	Mining agreement	Yes	<a href="http://www.nma.gov.sl/resourcecontracts/">http://www.nma.gov.sl/resourcecontracts/</a>
9	SL Mining Limited, Concession, 2014	2017	Iron Ore	Mining agreement	Yes	<a href="https://resourcecontracts.org/countries/sl">https://resourcecontracts.org/countries/sl</a>
10	SierraMin Bauxite Limited, Concession,	2017	Bauxite	Mining agreement	Yes	<a href="https://resourcecontracts.org/countries/sl">https://resourcecontracts.org/countries/sl</a>

N°	Mining Company	Year	Commodity	Contract type	Publicly available	Link
	2017 Bauxite Concession Agreement					

Other documents such Environmental Impact Assessments and model contracts are publicly available on the NMA website<sup>1</sup> :

1. African Minerals Limited Environmental Impact Assessment, 2010;
2. Model Contract, Concession, 2012
3. Sierra Minerals Holdings 1, 28N Gria Zone, Environmental Impact Assessment, 2012
4. Tonguma Limited, Tonguma, Environmental Impact Assessment, 2014
5. London Mining Company Limited, Environmental Impact Assessment, 2012
6. Koidu Holdings SA, Environmental and Social Impact Assessment 2011

#### 4.1.9 Licenses allocation

There is a strict requirement that no individual or company shall prospect for minerals or carry out mining operations or mineral processing operations without a mining right or a mineral processing license being granted under the Mineral and Mines Act (MMA, 2009 Act). We present in the table below, the allocation process of each type of mining licenses:

Type	Granted by	Granting process
Reconnaissance License	A Reconnaissance license is granted by the Minister of Mines upon advice of the Minerals Advisory Board.	An application for granting a reconnaissance license shall be submitted to the Mining Cadastre Office in the prescribed form and content.
Exploration License	An Exploration license is granted by the Minister of Mines upon advice of the Minerals Advisory Board.	An application for granting an exploration license shall be submitted to the Mining Cadastre Office in the prescribed form and content.
Small Scale Mining License	A Small-Scale Mining License is granted by the Minister of Mines upon advice of the Minerals Advisory Board.	An application for the grant of a small-scale mining license shall be submitted to the Mining Cadastre Office in the prescribed form.
Large Scale Mining License	A Large-Scale Mining License is granted by the Minister of Mines upon advice of the Minerals Advisory Board.	An application for granting a large-scale mining license shall be submitted to the Mining Cadastre Office in the prescribed form.
Artisanal mining License	An Artisanal mining License is granted by the Director of Mines.	An application for granting an artisanal mining license shall be made to the Director of Mines in such form as may be prescribed.

#### Licensing method

The Mineral and Mines Act (MMA, 2009 Act) stipulates that mining licenses are awarded on a first-in first-assessed (FIFA) basis.

#### Licensing process

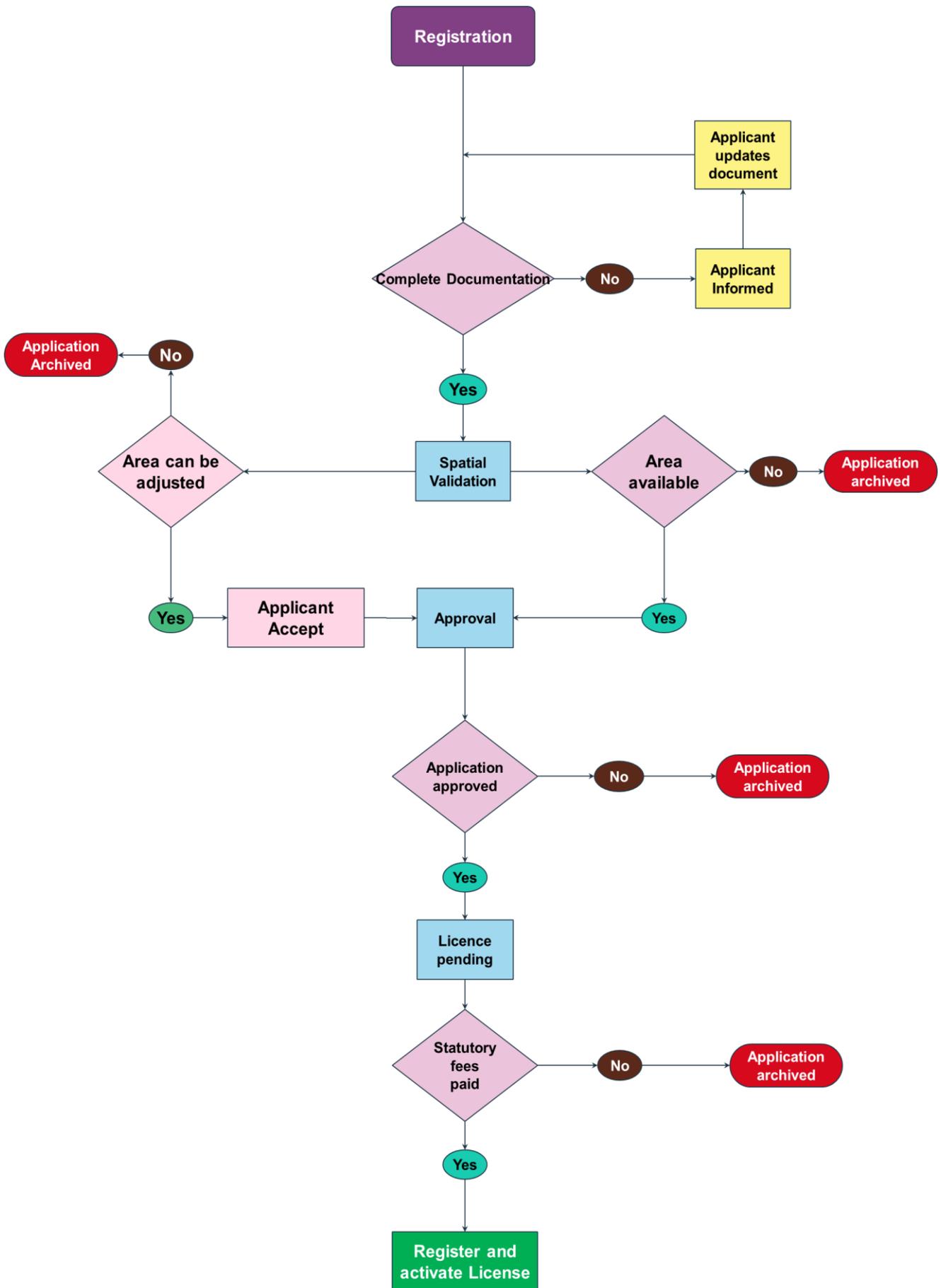
The licensing process can be summarised in ten (10) steps as follows:

- Step 1:** Submission of license application;
- Step 2:** Registration of license application;
- Step 3:** Validation of application by Mining Cadastre Office if complete documentation;
- Step 4:** Technical and financial assessment by NMA;
- Step 5:** Submission by Mining Cadastre Office to Minerals Advisory Board for recommendation (or advise);
- Step 6:** Recommendation received from Minerals Advisory Board;
- Step 7:** Application approved (If recommended by Minerals Advisory Board);

<sup>1</sup> [http://www.nma.gov.sl/resourcecontracts/search?q=&order=asc&sortby=contract\\_name](http://www.nma.gov.sl/resourcecontracts/search?q=&order=asc&sortby=contract_name)

- Step 8:** License pending until fees payment;
- Step 9:** License granted by the Minister of Mines; and
- Step 10:** Register and activate license.

The licensing process can be also described in the following flowchart:



### Mining licenses awarded during FY 2019

According to the register of licenses, 1,433 mining licenses were awarded in 2019. We present these in the table below by type of license:

Type of license	Number
Reconnaissance License	0
Exploration License	0
Small Scale Mining License	10
Large Scale Mining License	2
Artisanal Mining License	1,421
<b>Total</b>	<b>1,433</b>

### Technical and financial criteria

According to the Section 70 (f) of the Mineral and Mines Act (MMA, 2009 Act), the application for an Exploration license shall be accompanied by a statement giving particulars of the technical and financial resources available by the applicant, and a certified copy of its audited accounts for the year immediately preceding the application.

Section 93 (3) of the Mineral and Mines Act (MMA, 2009 Act) stipulates that “Where an application for granting a small-scale mining license is made by an individual who is not the holder of an exploration license to which the proposed mining area relates, the application shall, in addition to the matters referred to under subsection (2), give or be accompanied by a statement giving particulars of the financial and technical resources available to the applicant”.

Section 105 (3) of the Mineral and Mines Act (MMA, 2009 Act) stipulates that “Where an application for granting a large-scale mining license is made by an individual who is not the holder of an exploration license to which the proposed mining area relate, there shall be provided in addition to the matters referred to in subsection (1), a statement giving particulars of the financial and technical resources available to the applicant for the proposed mining operations”.

Section 105 (2) of the Mineral and Mines Act (MMA, 2009 Act) refers to the application for granting large-scale mining licenses as follows: “The applicant has adequate financial resources, technical competence and experience to carry on effective mining operations”.

### Transfer of mineral rights

Type	Transfer process	Technical and financial criteria of the Transferee
Transfer of Reconnaissance License	A reconnaissance license is not transferable.	Not applicable
Transfer of Exploration License	An application for transfer of an exploration license shall be made to the Mining Cadastre Office in the prescribed form and shall state details of the transfer as may be prescribed together with such other information as the Minister on the advice of the Minerals Advisory Board.	The transferee shall have the technical and financial resources available, as for the application for the exploration license.
Transfer of large-scale mining license	An application for transfer of a large-scale mining license shall be made to the Mining Cadastre Office in the prescribed form and shall state details of the transfer as may be prescribed.	The transferee shall have the technical and financial resources available as for the application for the large-scale mining license.
Transfer of Artisanal mining License	An artisanal mining license is not transferable.	Not applicable

Source: Mineral and Mines Act (MMA, 2009 Act)

According to NMA, no transfers of mining licenses were made in 2019.

## Review of awarding process during FY 2019

SLEITI MSG agreed on the selection of a sample from the list of mining licenses awarded in 2019 to verify if there were any material deviations from the applicable legal and regulatory framework governing license transfers and awards in accordance with requirement 2.2 of the 2019 EITI Standard. The sample was selected based on two licenses of each type of license. The sample is presented in the following table:

License Type	License Holder	Size unit	Size	Application Date	Start Date	Expiry Date	Commodity
Large Scale	WONGOR INVESTMENT AND MINING CORPORATION LTD	Sq. Kms	100.00	04/10/2018	23/05/2019	22/05/2089	Associated Minerals, Gold
Large Scale	Meya Mining	Sq. Kms	130.38	20/05/2019	26/07/2019	25/07/2089	Associated Minerals, Diamonds, Gold
Small Scale	Afro-Asia Mining Corporation Limited	Hectares	99.98	21/05/2018	13/08/2019	12/08/2031	Ilmenite, Rutile, Zircon
Small Scale	XIN TAI MINING COMPANY LIMITED	Hectares	99.99	08/01/2019	09/10/2019	08/10/2031	Gold

In order to verify whether there were any material deviations from the applicable legal and regulatory frameworks governing the award of mining licenses, we requested the following documents from the MME:

N°	Document
1	Application to MCO
2	Proposed programme of mining operations
3	Technological report
4	Consent to use the land for mining purposes given to the applicant by Chiefdom mining Allocation Committee
5	Environmental impact
6	Proof of adequate financial resources, technical competence and experience to carry on effective mining operations
7	Advise of Minerals Advisory Board
8	Grant Notification of the Minister
9	Prescribed non-refundable fee

The results of our review of the documents are presented in the table below:

N°	Document	Wongor Investment and Mining Corporation Ltd	Meya Mining	Afro-Asia Mining Corporation Ltd	Xin Tai Mining Company Ltd
1	Application to MCO	Yes	Yes	Yes	Yes
2	Proposed programme of mining operations	Yes	Yes	Yes	Yes
3	Technological report	Yes	Yes	Yes	Yes
4	consent to use the land for mining purposes given to the applicant by Chiefdom mining Allocation Committee	Yes	Yes	Yes	Yes
5	Environmental impact	Yes	Yes	Yes	Yes
6	Proof of adequate financial resources, technical competence and experience to carry on effective mining operations	Yes	Yes	Yes	Yes
7	Advise of Minerals Advisory Board	Yes	Yes	Yes	Yes

N°	Document	Wongor Investment and Mining Corporation Ltd	Meya Mining	Afro-Asia Mining Corporation Ltd	Xin Tai Mining Company Ltd
8	Grant Notification of the Minister	Yes	Yes	Yes	Yes
9	Prescribed non-refundable fee	Yes	Yes	Yes	Yes

After reviewing the documents related to the award of the licenses selected in the sample, we did not find any material deviations from the applicable legal and regulatory framework governing license transfers and awards mining licenses applicable in Sierra Leone (**The Mineral and Mines Act (MMA, 2009 Act)**).

### Technical and financial criteria used in practice

After reviewing the documents related to the award of the licenses selected in the sample, we noted the following technical and financial criteria used in practice by NMA when assessing Technical and Financial capacities:

Criteria	
Technical criteria	<ul style="list-style-type: none"> <li>Proposed Work plan</li> <li>Proposed mining equipment</li> <li>Experience of affiliated companies</li> <li>CV of proposed Experts</li> </ul>
Financial criteria	<ul style="list-style-type: none"> <li>Commitment of affiliated companies to support project investment.</li> <li>Bank Statements.</li> <li>Credibility Letter from the bank for supporting project.</li> </ul>

### Scoring scheme/weighting framework

We noted that there was no scoring scheme/weighting framework applied, as there is in the oil and gas sector. This is because the license allocation in the mining sector is based on a Firsted Come First Served (FCFS) basis.

#### 4.1.10 State participation in the mining sector

The Mines and Minerals Act (MMA) of 2009 makes no provision for Government to acquire shares in any of the Large-Scale Mining Companies. Section 162 (1) of the MMA 2009 makes it optional for the government to acquire shareholding interests in any large-scale mining operations.

Section 162 of the Mines and Minerals Act (2009) stipulates that “The Government of Sierra Leone shall have the option to acquire on such terms as shall be agreed upon between the holder of a large-scale mining license and the Government, shareholding interest in any large-scale mining operations. Any agreement concluded shall be done with the advice of the Minerals Advisory Board and with the concurrence of the Minister of Finance.”

To ensure maximum benefits for the government and people of Sierra Leone, provision has been made in the New Draft Mines and Minerals Bill for the Government to acquire a 10-15% shareholding in any of the Large-Scale Mining companies, free of charge. Additionally, the Government may acquire further shares up to 35% on terms that will be negotiated and agreed by parties. This legislation will not be applied retroactively.

#### State participation (interests) in the mining contracts

SLEITI MSG agreed that there was no State participation (interests) in the mining contracts in Sierra Leone in FY 2019.

### State legal ownership in mining companies

SLEITI MSG agreed that there was no State legal ownership in mining companies in Sierra Leone in 2019.

### State-owned enterprises in the mining sector

SLEITI MSG agreed that there were no state-owned enterprises operating in the mining sector in Sierra Leone in 2019.

#### 4.1.11 In-kind payments

SLEITI MSG agreed that there were no in-kind revenues from the mining sector in Sierra Leone in 2019.

#### 4.1.12 Infrastructure provisions and barter arrangements

According to information collected from government agencies and mining companies, there are no ongoing infrastructure provisions and barter arrangements in Sierra Leone.

Over discussion, SLEITI MSG agreed that there were no infrastructure provisions and barter arrangements in the mining sector in Sierra Leone in 2019. The requirement is not applicable in FY 2019.

#### 4.1.13 Transportation revenues

SLEITI MSG agreed that there were no transportation revenues received by GoSL from the mining sector in 2019.

#### 4.1.14 Artisanal Mining

The artisanal sector comprises individual miners who operate independently of one another. No cooperatives have been set up in the sector to date.

Artisanal mining takes place in several parts of Sierra Leone. Artisanal mining traditionally contributes to the country's economy through royalties and taxes paid by licensed dealers and exporters of gold and diamonds.

However, other artisanal miners hold mining artisanal licenses. Some of the most lucrative mines are located in remote and inaccessible areas in the forest regions, and the government is challenged in effectively monitoring mining activities.

A recent study (May 2020) on the artisanal mining sector in Sierra Leone has been published on the SLEITI website. The baseline study of artisanal mining in Sierra Leone aims at increasing the availability of quantitative and qualitative data on the current status and categorisation of artisanal mining in Sierra Leone. This study estimates that artisanal miners represent up to 1% of the national population (18% are women), while around 900,000 people, or nearly 15% of the population, rely directly or indirectly on artisanal mining for a living.

The study estimated that at the time of research there were 700 active mine sites, of which 485 were diamond sites, 200 gold sites and 15 coltan. On these sites, an estimated 70,000 miners were working, of which 55% primarily mined diamonds, 40% primarily gold and 5% primarily coltan

This study is available on the SLEITI website through this link: <http://sleiti.gov.sl/index.php/documents>

The government of Sierra Leone also published a report on the National Action Plan for Reducing Mercury Use in the Artisanal and Small-scale Gold Mining (ASGM) Sectors in April 2020. The report is available through the following link:

<http://www.mercuryconvention.org/Portals/11/documents/NAP/Sierra-Leone-ASGM-NAP2020.pdf>

SLEITI MSG agreed to include revenues collected from artisanal mining by including revenues collected from licensed dealers and exporters of gold and diamonds:

- Diamond and gold export duties;
- Diamond and gold exporters licence.

We present in Annex 2 the list of diamond exporter licenses and in Annex 3 gold exporter licenses.

We present in Annex 17, diamond exports volume and value by parcel, by exporter, by country destination and amount of 3% diamond export tax for each parcel.

#### 4.1.15 Subnational payments

There is direct payment from mining companies to subnational government agencies in accordance with EITI Requirement 4.6. Section 34 (A) of the **Mineral and Mines Act (MMA, 2009 Act)** which stipulates that surface rent is a sub-national payment made by companies or holders of mining licenses and which must be shared amongst five categories of recipients as follows:

- 50%-Landowners;
- 15%-Paramount chief;
- 15%-District councils;
- 10%-Chiefdom council; and
- 10%-Constituency development fund.

SLEITI MSG agreed to include the Ministry of Local Government and Rural Development, the district councils, the chiefdom councils and the Constituency development fund in SLEITI 2019 scope in order to report revenues received directly from the mining companies. The SLEITI MSG also agreed that mining companies should provide information of payments made to paramount chiefs and landowners unilaterally.

MPs, districts councils and chiefdom councils have submitted reporting templates indicating surface rental revenues from mining companies.

Mining companies have also reported surface rental payments to landowners and paramount chiefs.

Total surface rental payments reported by subnational entities and mining companies amounted US\$ 1,254,746 in 2019. We indicate in the table below the revenues received by each subnational entity in 2019:

Subnational entity	Amount USD
LANDOWNERS	577 590
DISTRICT COUNCILS	230 417
CHIEFDOM COUNCILS	192 314
PARAMOUNT CHIEFS	170 522
MPS	83 903
<b>Total</b>	<b>1 254 746</b>

We present in Annex 7 surface rental revenues received by each district council, by each chiefdom council, by MPs, by landowner, by paramount chief and by mining company.

#### 4.1.16 Sub-national transfers

##### Diamond Area Community Development Fund (DACDF)

SLEITI MSG agreed that the DACDF is a sub-national transfer in Sierra Leone. DACDF was formally approved by Sierra Leone's Ministry of Mineral Resources in December 2001, as part of a broader

reform programme for the diamond sector initiated after the end of the civil war. DACDF is funded by a 25% of the government's 3% diamond export tax (amounting to 0.75% of the total export value)<sup>1</sup>. Two key reasons for setting up DACDF are:

- to give back some of the money it (government) gets from the sale of diamonds to chiefdoms in diamond mining areas to carry out development projects in their towns and villages; and
- to encourage the chiefs and other local leaders in mining chiefdoms assist in stopping all forms of illegal mining activities.

The SLEITI MSG agreed that government agencies should report transfers made to Diamond Area Community Development Fund (DACDF) in 2019 and disbursements made to chiefdoms in 2019.

#### ▪ Transfers made to DACDF during FY 2019

According to reporting templates submitted by NMA, US\$ 467,637 transferred to DACDF during FY 2019. Monthly transfers (Actual) are presented in the table below:

MONTH	25% of diamond export tax transfers to DACDF In US\$
JANUARY	40,217
FEBRUARY	45,020
MARCH	23,012
APRIL	35,044
MAY	83,763
JUNE	8,302
JULY	32,798
AUGUST	25,930
SEPTEMBER	20,559
OCTOBER	30,140
NOVEMBER	13,141
DECEMBER	109,710
<b>TOTAL</b>	<b>467,637</b>

Calculation of discrepancies between the transfer amount calculated in accordance with the relevant revenue sharing formula (25% of total diamond export duty FY 2019) and the total actual amounts transferred to DACFD in 2019:

	Amount US\$
Total diamond export duty FY 2019	1,874,286
Transfers amount calculated in accordance with the relevant revenue sharing formula (25% of Total Diamond Export duty)	468,572
Actual transfers to DACFD	467,637
<b>Discrepancy</b>	<b>(935)</b>

We found that only US\$ 935 is the difference between the transfer amount calculated in accordance with the relevant revenue sharing formula (25% of total diamond export duty FY 2019) and the total actual amounts transferred to DACFD in FY 2019:

- Disbursements made from DACDF to chiefdoms during FY 2019

<sup>1</sup> [https://elr.info/sites/default/files/261-273\\_maconachie.pdf](https://elr.info/sites/default/files/261-273_maconachie.pdf)

According to the reporting templates submitted by the MMR, US\$ 328,029 is the total of disbursements made from DACDF to chiefdoms during FY 2019 (eq. Le 3,187,359,530). We present in Annex 12 breakdown by chiefdom.

According to the bank statement, DACDF's balance on 31 December 2019 amounted Le 8,792,724,476 (eq. US\$ 904,908).

#### 4.1.17 Environmental impact of extractive activities

The Environment Protection Agency Act, 2008 as amended in 2010 (No. 11 of 2008) establishes the Environment Protection Agency, defines its functions and powers, provides for its organisation and administration and sets out the rules for various matters regarding the environment in Sierra Leone such as environmental impact assessments and the control of ozone-depleting substances.

The Mines and Minerals Act of 2009 requires mining companies to acquire Environmental Impact Assessment (EIA) licences before they can be granted mining licences.

The Mines and Minerals Act of 2009 requires every mineral right holder to protect the environment and carry out operations in a way that will minimise and manage negative environmental impact. In doing this, the EPA should ensure that environmental impact assessments are conducted to ascertain the impact that mining operations will cause. Through interviews with personnel of the EPA, it was however revealed that the EPA does not have any role in the monitoring of artisanal miners because the Mines and Minerals Act of 2009 is silent on EPA's role regarding artisanal miners.

#### 4.1.18 Social and environmental expenditure

##### Mandatory social expenditure

Following the review of several mining agreements, we note that these agreements include mandatory social expenditure to be made by mining companies regarding medical services, education and training. Additionally, the mining law includes the following social mandatory contributions:

**Community Development Fund:** Section 139 stipulates that the holder of a small-scale or large-scale mining licenses are required to implement a **Community development agreement** with the primary host community.

The holder of a small-scale or large-scale mining licenses shall assist in the development of mining communities affected by their operations to promote sustainable development, enhance the general welfare and the quality of life of the inhabitants, and shall recognise and respect rights, customs, traditions and religion of local communities (MMA,2009). These are to be achieved through community development agreements.

Holders of small or large-scale mining licenses shall expend in every year that the community development agreement is in force, no less than one percent of the gross revenue amount earned by the mining operations in the previous year to implement the agreement, and such amount and breakdown of expenditure shall be reported to the Minister annually as may be prescribed (Section 139(4); MMA, 2009). Community Development Committees comprising the representatives from the company and the community are responsible for managing the Community Development Fund.

SLEITI MSG agreed that social expenditure (mandatory and voluntary) made by mining companies made during 2019 would be included in the 2019 SLEITI report based on unilateral disclosure from mining companies.

According to data reported by mining companies selected in the scope, the total amount of mandatory and voluntary social expenditure is US\$ 2,696,410 (including Community Development Fund) as presented in the table below:

Social payments	Amount US\$
Mandatory social payments	2,476,732
Voluntary social payments	219,678
<b>Total</b>	<b>2,696,410</b>

We present in Sub-Section 5.5 breakdown of mandatory social expenditure by mining company. We present in Annex 13 the details of mandatory social expenditure by beneficiary, function, region, description and legal basis.

### Environmental expenditure

Following a review of mining agreements, we note that these agreements include expenditure payments to be made by the mining companies regarding the environment.

The SLEITI MSG agreed that environmental expenditure made by the mining companies during 2019 would be included in the 2019 SLEITI report based on unilateral disclosure from mining companies.

According to data reported by mining companies selected in the scope, the total amount of Environmental expenditure is US\$ **679,340**.

We present in Sub-Section 5.5 breakdown of Environmental expenditure by mining company.

We present in Annex 15 the details of Environmental expenditure.

## 4.1.19 Local content

### Local content of mining law

The main local content-related to the provisions under current legislation are found in Part XVI, Part XVI and Sections 163 & 164 of the Mines and Mineral Act 2009, which set out these provisions common to all mining licenses related to community development, health and safety. Preference must be given for the purchase of Sierra Leone products and employment and training of Sierra Leone citizens, as stipulated in Parts 5 and 8 of the Local Content Agency Act 2016.

### Local content of the MDAs

The mining agreements establish clear rules regarding local content requirements, essentially employment, training and local procurement requirements and technology transfer. These are negotiated on a case-by-case basis, with each mining firm and targets and objectives are set according the jointly agreed criteria and conditions.

## 4.2. Oil & gas sector

### 4.2.1 Context of the oil & gas sector in Sierra Leone

Oil and gas exploration activities started in the early 1980s with two dry wells drilled by Mobil and Amoco. Due to technological challenges and price volatility, interest waned out until the onset of the current millennium when GOSL partnered with TGS Geophysical Company to undertake a preliminary survey, and subsequently market the hydrocarbon potential, and held two bidding rounds in 2003 and 2005.

A new impetus was added when in 2011 a new legislation was passed-in 2011 (PEPA). Although not perfect, it represents a significant improvement over its predecessor PEPA 2001, which was very scanty in scope, reflecting the level of knowledge available then. The Third Bid Round was held in 2012 with 69 applications received for 9 open blocks. Until 2013/14, government had granted 11 Blocks to 9 international oil corporations.

Four discoveries have so far been made although, none of these have resulted in commercial discovery. Owing to a combination of factors including the global decline in commodity prices, and the Ebola breakout, most of these companies withdrew from the exploration landscape. By 2014 and 2015 following the twin shocks of Ebola and sliding oil prices, about six companies operating in Sierra Leone either voluntarily withdrew from the basin or were terminated on grounds of no compliance with their contractual obligations.

To get the right players, the licenses of non-performing / non-compliant operators were revoked, the exploration space redefined and a Fourth Licensing Round initially launched in 2018 and eventually closed in February 2020. Six pre-qualified applications were received, of which two were granted provisional licenses and an agreement was signed with one of the bidders last December, pending parliamentary ratification.

Further, the Petroleum Directorate has been working toward shifting the frontiers of exploration inland where drilling and exploration wells can cost five to ten times less, compared to drilling in offshore environments with water depths of between 1,000 and 2,500 meters. As a result, a preliminary airborne survey has been undertaken resulting in the corresponding acquisition of aeromagnetic data over the interior plains of the country. The existing legislation is currently being amended to incorporate provisions for onshore exploration activities.

This exploration frontier expansion move is a logical response to increasing interests in onshore exploration activities, as reflected in the frequency of enquiries from international oil and gas exploration outfits. It is based on the view that attaining commercial discovery status is also a function not only of the size of the reservoir, but also the environment and in particular the water depth, which has a strong correlation with exploration costs.

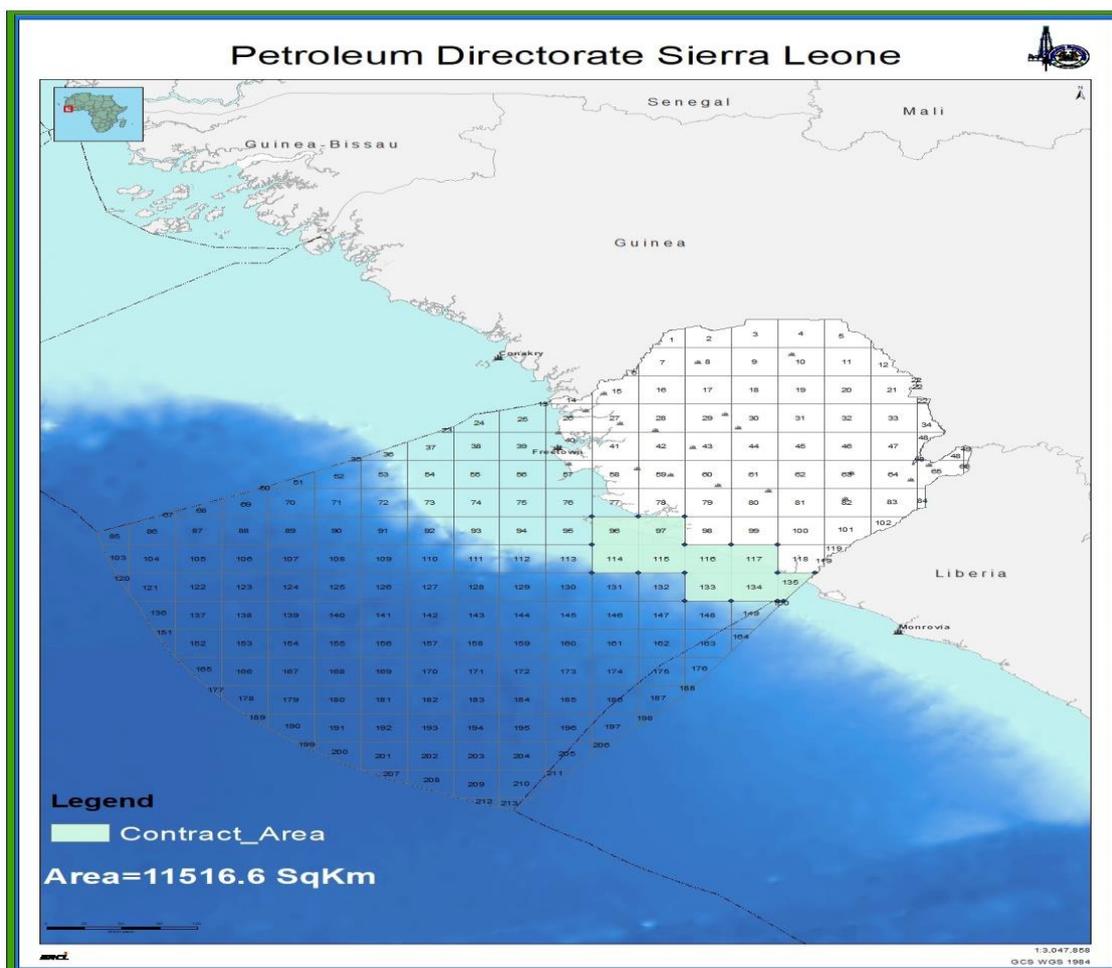
With the gradual recovery of the global price of oil, coupled with progress so far in managing the COVID-19 pandemic, the prospect for oil and gas exploration seems promising. It is hoped that the transformative potential of this sector will translate into concrete outcomes in the immediate-medium term.<sup>1</sup>

The oil and gas sector in Sierra Leone was in exploration phase during 2019.

The map below shows the current onshore and offshore blocks in Sierra Leone.

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<sup>1</sup> Petroleum Directorate

Figure 8: Map of onshore and offshore blocks in Sierra Leone<sup>1</sup>

## 4.2.2 Legal framework

### Legal framework

Oil and gas exploration and production activities in Sierra Leone are governed by the main following legislation:

- the Petroleum (Exploration and Production) Act 2011;
- the Petroleum (Exploration and Production) (Amendment) Act 2014;
- the Extractive Industries Revenue Act (EIRA) 2018;
- the Income Tax Act 2000 as amended by subsequent Finance Acts;
- the Companies Act 2009;
- the Environment Protection Act; and
- the Local Contents Act.

### Legal framework reforms

It has been observed recently that the main statute covering petroleum exploration contains omissions or provisions that need to be amended to reflect best practice and recent developments. One key proposal for reform is providing for onshore exploration activities which is absent in the

<sup>1</sup> Petroleum Directorate

current Petroleum Exploration and Production Act 2011. Recently, lots of interests have been expressed by Oil companies for undertaking exploration activities onshore. It is the view of the PD that if the four successive discoveries that were made between 2009 and 2013 were onshore discoveries, it is highly likely that the Nation may have graduated to a producing Nation given that commercial discovery is not only a function of the size of the reservoir, but also of cost of development which has been estimated to be between three and five-fold less costly in onshore environments.

The process for the promulgation of an amendment covering provisions for onshore exploration featuring sub provisions on the following has already been commenced: Opening up of New Areas for Petroleum Activities, Natural Resource other than Petroleum Resources, Restrictions on Petroleum Rights and Rights of others, Rights to surface and sub-surface activities, compensation for disturbance of rights among others.

Furthermore, Section 40 (2) of The Petroleum Exploration and Production Act 2011 as amended in 2014, provides for the publication of the summary of every Petroleum License agreement between the State and the licensee. Copies of such E & P Licenses are normally deposited at the Office of the Administrator and Registrar General for interested members of the public to inspect.

However, since the Law also provides for the State's participation in the EITI process (See Section 105 of the Act) and given that the 2016 Standard and its successor require that the full text be publicized, the Directorate is also working toward reviewing same with a view to conforming it to the EITI Standard.

Along the same line of thought, the new Act provides for the disclosure of beneficial owners of at least 5% of interests in Applicant companies, there is no definition of who a beneficial owner is, thereby rendering the term vulnerable to multiple and perhaps conflicting interpretations. This area has also been highlighted for a legislative review.

#### 4.2.3 Institutional framework

The oil and gas sector in Sierra Leone is administered by the Petroleum Directorate. The key responsibilities of the Petroleum Directorate in the managing of the oil and gas sector can be summarised as follows:

TABLE 10 : Institutional framework of oil & gas sector

Entity	Role
Petroleum Directorate	<p>The Petroleum Directorate was set up in 2011 pursuant to section 4 of the Petroleum Exploration and Production Act 2011.</p> <p>The Directorate's responsibilities include:</p> <ul style="list-style-type: none"> <li>▪ coordinating the award of licenses;</li> <li>▪ negotiating the terms of licenses;</li> <li>▪ monitoring, regulating and facilitating upstream activities on behalf of the state; and</li> <li>▪ developing regulations from the beginning of exploration to decommissioning.</li> </ul> <p>In managing the petroleum resources on behalf of the state, the Directorate reports directly to the President.</p>

#### 4.2.4 Tax regime

##### Oil and gas tax regime

The tax regime for the oil and gas sector is set by:

- the Income Tax Act, 2000 as amended by subsequent Finance Laws;
- the Petroleum (Exploration and Production) Act 2011; and
- the Extractive Industries Revenue Act (EIRA), 2018.

The main revenue streams payable by oil and gas companies are royalties, income taxes and petroleum resource rent tax.

Tax	Description
Royalty	The holder of a petroleum right shall pay royalties for petroleum obtained pursuant to the right. The royalty rates: <ul style="list-style-type: none"> <li>for crude oil - 10%; and</li> <li>for natural gas - 5%.</li> </ul> Royalties may be paid in kind in accordance with section 107 of the Petroleum (Exploration and Production) Act, 2011, provided that no more than 15% of royalties are payable under a petroleum right for a year of assessment may be paid in kind unless the Minister of Finance agrees otherwise.
Income tax	The income tax for petroleum operations for a year of assessment shall be calculated by applying the rate set out in paragraph 4 of the Second Schedule to a person's chargeable income from petroleum operations for the year and if the person has other chargeable income, that income shall be charged at the appropriate rate under the Income Tax Act, 2000. The income tax rate for petroleum operations shall be 30%.
Petroleum resource rent tax	Paragraph 30 of the EIRA stipulates that the holder of a petroleum license who has accumulated net receipts or a year of assessment from production activities of a separate petroleum operation shall pay petroleum resource rent tax. The amount of petroleum resource rent tax shall be calculated by applying the rate specified in paragraph 6 of the Second Schedule of the EIRA to the accumulated net receipts for the year.

### Tax regime reforms

The Sierra Leonean Parliament passed the Extractive Industries Revenues Act (EIRA) 2018 to streamline taxes and levies on extractive industries, including new regulations on fiscal aspects of agreements with extractive companies. The Act provides for various taxes and charges on extractive companies, the regulation of fiscal aspects of extractive industry agreements and for other related matters. The newly enacted 2018 Extractive Industry Revenue Act (EIRA) is expected to support revenue mobilisation efforts through harmonisation and consolidation of the extractive sector fiscal regime.

#### 4.2.5 Types of licenses

According to the Petroleum (Exploration and Production) Act 2011, there are two types of oil and gas licenses: Reconnaissance permits and Petroleum licenses.

Type	Duration	Rights conferred
Reconnaissance permit	Specified in the reconnaissance permit	A reconnaissance permit shall confer on the holder a non-exclusive right to undertake reconnaissance operations in the permit area.
Petroleum license	A petroleum license shall be valid for a maximum period of thirty years from the effective date, unless sooner cancelled or terminated as provided in the Petroleum (Exploration and Production) Act 2011.	A petroleum license shall confer on the licensee an exclusive right to undertake exploration and production within a license area.

Source: *The 2011 Petroleum (Exploration and Production) Act*

According to the Petroleum Directorate (PD) there were no active oil and gas licenses in 2019.

#### 4.2.6 Licenses allocation

The oil and gas licenses allocation process is regulated by the Petroleum (Exploration and Production) Act 2011. We present in the table below, the allocation process of each type of Oil & Gas license:

Type	Granted by	Granting process
Reconnaissance permit	The Minister may, on the advice of the Directorate grant a reconnaissance permit to the applicant or applicants.	A company or group of companies may, upon payment of the prescribed non-refundable application fee, apply to the Minister for a reconnaissance permit.
Petroleum license	Granted by the Minister	Subject to the Petroleum (Exploration and Production) Act 2011, the Minister may prescribe a petroleum license shall be acquired through: <ul style="list-style-type: none"> <li>a call for tenders; or</li> <li>direct negotiations.</li> </ul>

Source: *The 2011 Petroleum (Exploration and Production) Act*

## Licensing method

The 2011 Petroleum (Exploration and Production) Act stipulates that petroleum licenses are awarded following call for tenders or direct negotiations.

## Licensing process

Licensing process (workflow) in oil & gas sector can be summarized as follows:

Step	Description
1	Expression of interest by Applicant Company
2	Submission of Application for pre-qualification.
3	Preliminary assessment and prequalification of applicant
4	Applicant to Visit Data Room in Freetown or London and identify area of interest
5	Submission of Application
6	Constitution of multi sectoral Evaluation Committee comprising representatives of Office of President, Petroleum Directorate, Ministry of Finance, Office of Attorney General and Minister of Justice, Environmental Protection Agency, Local Content Agency
7	Design and approval of Evaluation instrument
8	Further due diligence by sub-Committee
9	Evaluation and ranking of applicants if there is competition for Blocks
10	Grant of provisional Licence subject to outcome of Negotiation
11	Announcement of evaluation outcome
12	Multi sectoral Negotiation Committee constituted, comprising representatives of Office of President, Petroleum Directorate, Ministry of Finance, Office of Attorney General and Minister of Justice
13	Face-face or virtual negotiation held
14	Signing of Agreement and
15	Parliamentary ratification

## Technical and financial criteria

Section 16 (2) of the Petroleum (Exploration and Production) Act 2011 stipulates that: *“Where the Minister is satisfied on the advice of the Directorate, the applicant for a petroleum right or to be an operator thereunder has been evaluated and accepted to possess such technical, financial, operational, industrial or other expertise to qualify as a permit holder, licensee or an operator, he may issue to the applicant a notice of qualification”.*

Section 21 (f) of the Petroleum (Exploration and Production) Act 2011 stipulates that: *“In addition to any other particulars as may be prescribed an application for a reconnaissance permit it shall contain... a description of the financial, technical and industrial resources available to the applicant...”*

Section 36 (f) of the Petroleum (Exploration and Production) Act 2011 prescribes that: *“Subject to sections 30 and 31 and upon payment of the prescribed fee, a company or group of companies may apply to the Minister for a petroleum license and the application shall contain...a description of the technical and industrial resources available to the applicant...”*

## Sierra Leone fourth offshore licensing Round 2018

The fourth Offshore Petroleum Licensing Round was launched in January 2018 for a six-month period, extended initially to September of the same year, and later suspended and re-launched in May 2019, and eventually terminated in February 2020. It is worthy to note that the Licensing system in the context of the Fourth Petroleum Licensing Round was based on a block framework, and was designed such that applicants were given the freedom to delineate their areas of interest by assembling multiple contiguous blocks of 1,360 km<sup>2</sup> each, a phenomenon being increasingly referred to as block nomination.

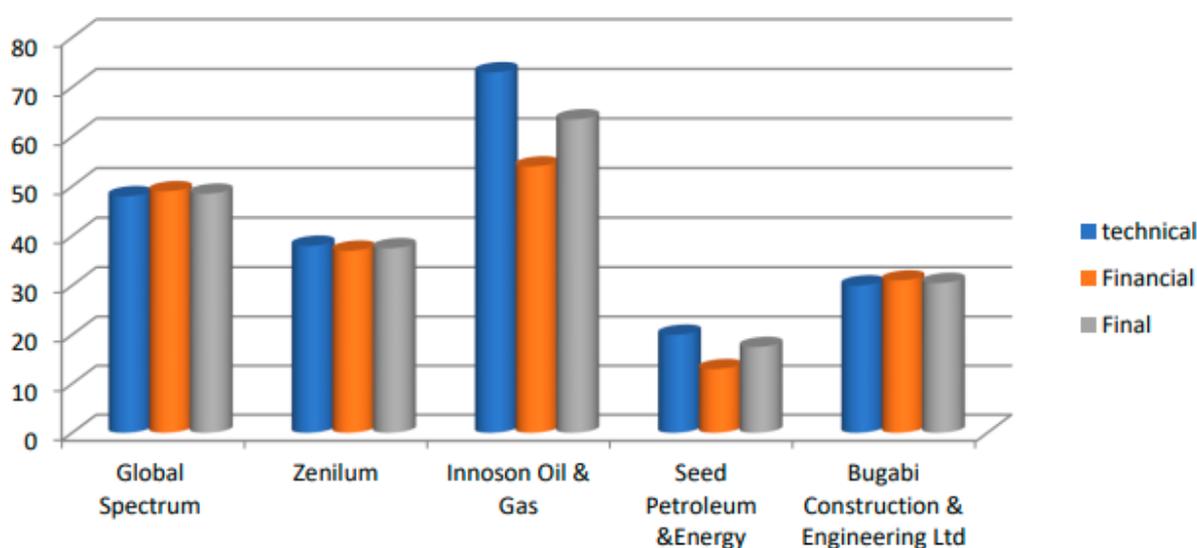
## Results of the fourth round

Following the termination of the Fourth Petroleum Licensing Round in February 2020, a total of six Applications were received as follows:

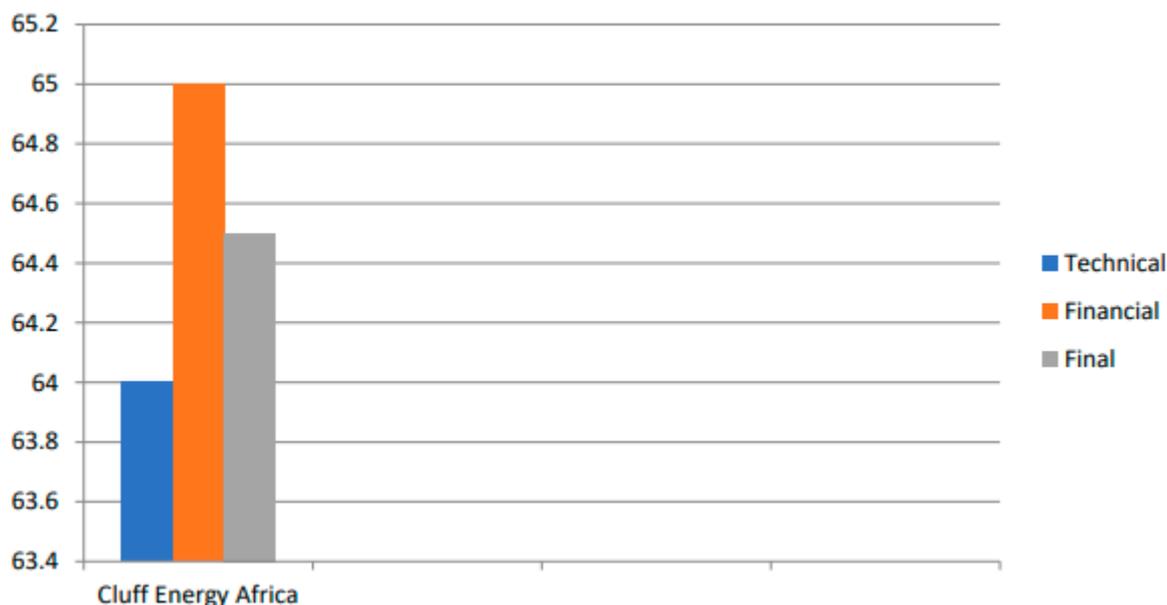
N°	Name of company	Area of interest (Graticular Blocks)	Total surface Area (km <sup>2</sup> )
1	Cluff Energy Africa	23, 24, 25, 36, 37, 38, 39, 54, 55, 56, 57, 74, 75, 94 & 95.	17,290.50
2	Global Spectrum Energy Services Plc.	132, 133, 134, 146, 147, 148, & 149.	9,258.44
3	Bugabi Group	116,117, 132, 133, 134, 147, 148, 149.	Not available
4	Zenilum Company Ltd	132, 133, 134, 147, 148, & 149.	7,898.40
5	Seed Petroleum & Energy	131,132, 133, 134,148, & 149.	13,558
6	Innoson Oil and Gas Ltd	96, 97, 114, 115, 116, 117, 133,134, & 135.	11,516.80

The charts below provide a summary of the outcome of the evaluation of the various applications:

Applicants' relative scores relating to area wholly or partly covering range of graticular blocks 96, 97, 114, 115, 116, 117, 132, 133, 134, 146, 147, 148, & 149.



Final (aggregate) score - (Area Covering Graticular Blocks 23, 24, 25, 36, 37, 38, 39, 54, 55, 56, 57, 74, 75, 94 & 95).



Of the six pre-qualified companies that applied and were evaluated, two of these emerged successful and thereby granted provisional licenses to Cluff Energy Africa and Innoson Oil and Gas. Following intensive negotiations, only Innoson Oil and Gas was awarded a license agreement, which was recently signed and which is expected to be ratified by Parliament soon. With Cluff Energy Africa, negotiations have paused a number of times and are yet to be resumed.

The licence awarded to Innoson Oil and Gas is an Exploration Licence, for a period of seven years. No Signature Bonus payment requirement was incorporated. However, other bonus payments include Technology Bonus, payable on the anniversary date of the Licence, production bonus, when production starts, Annual Licence Fees of US \$30 / km<sup>2</sup> and annual contribution to Training Research and Development Fund in the sum of US\$ 10,000 per Graticular Block.

#### Financial & technical criteria used in practice for applicants' evaluation

**Evaluation Template Benchmarking:** The objective of the evaluation process is to determine the Suitability of applicants for award of offshore oil and gas concessions in Sierra Leone. Consequently, the evaluation template is normally tailored toward identifying the applicant's proposed exploration strategy that is most likely to accomplish the fullest assessment and understanding of the petroleum potential within the area applied for.

During the previous Licensing Round specifically, a benchmarking exercise was undertaken to collectively agree on expectation/standards and weight assignment against the pre-determined bidding factors which had included:

- Applicants' (technical) assessment of the petroleum potential of the area.
- A primary work program consisting of field work activities such as the type, quantity and duration of seismic acquisition.
- A secondary work program containing field work activities such as the timing and drilling of wells, recognizing the essential role of wells in the discovery of petroleum. d) Applicant's Health, Safety and Environmental (HSE) policy and practices.
- Evidence of the Applicant's technical, financial, and managerial capacity to undertake the proposed work programme.
- Commercial proposal including bonuses and commitment to community development and local capability empowerment initiatives.

The above factors were clustered into three generic categories-Technical, Financial and Commercial. Since Sierra Leone implements a Work Programme-based petroleum exploration, the **technical** variable was assigned **134 points**, **Financial 90 points**, **Commercial 30 points** and **miscellaneous 10 points**, which add up to **264 marks**.

The above considerations were ranked within a pre-determined scoring system.

The Team conducted the evaluation process by initially flipping through the bid documentation to find out whether all material information had been provided. Otherwise, efforts were made to secure same through a local representative or contact.

### Bid evaluation criteria

#### Technical capability

Applicants' technical proposals were assessed based on the following standard of expectation (Please see attached copy of the Evaluation Instrument for details).

- Technical understanding of the Block/Basin - maximum of 20 points
- Applicant's exploration expertise - maximum of 30 points
- Applicant's operational Experience - maximum of 20 points
- Work programme (including timing as a function of months/years from award) - maximum of 54 marks.
- Applicant's HSE policy and management - maximum of 10 marks.

#### Financial capability

- A given applicant's financial capability was assessed based on the following among others:
- Company value/net worth; maximum of 20 marks
- Audited financial statement or financial guarantee of company and parent company; Maximum of 10 marks
- Applicant's financing plan to support the proposed work programme; maximum of 10 marks

#### Commercial proposal (including applicant's management structure and experience).

This was assessed based on additional commercial terms offered by the applicant apart from their standard fiscal obligations. The following were evaluated:

- Proposed commitment to extension and other forms of bonus payments 10 points
- Size and timing of social program offered - maximum of 10 points
- Commitment to fulfilment of local content and local capability empowerment- 10 points
- Applicant's management structure and experience - maximum of 10 marks.

**Rating modality:** Each committee member independently assessed the various proposals submitted using the assessment framework or standard provided in the evaluation template. Individual marks were allocated for each applicant taking into account the weights assigned. Individual marks were then aggregated and the mean scores derived as the final score for each applicant.

**Evaluation outcome:** At the completion of the individual assessments, a composite score sheet was designed to capture the aggregate scores as a step toward ranking of applicants. Since the technical and financial capabilities are the most critical elements in the determination of bid responsiveness, the commercial and miscellaneous elements were compressed into the financial variable to allow for a simplified reporting.

Because of the rigorous screening involved particularly in due diligence and procedural compliance, the team settled on 50 per cent as the eligibility threshold. Applicants were rated based on the extent to which their various proposals met the prescribed standard of expectations. Further, some

applicants scored extremely high marks on all the bidding factors whilst some performed highly on a few of them. The final scores reflected these variable performances.

We present in Annex 16 the template used for application evaluation.

### **Marketing campaign 2019**

By 2019, the Petroleum Directorate was engaged in aggressive marketing campaign activities with a view to encouraging dependable oil and gas exploration corporations to invest in the Sierra Leone exploration landscape.

### **Awarded oil & gas licenses during FY 2019**

According to the Petroleum Directorate, there were no oil and gas licenses awarded during the FY 2019.

### **Transfer of oil & gas licenses**

According to section 114 (1) of The Petroleum (Exploration and Production) Act 2011, a licensee shall not directly transfer of or indirectly assign its participating interest in a petroleum right, license, whether in whole or in part, to a third party or an affiliate without the prior written approval by the Minister.

According to the Petroleum Directorate, there was no transfer of oil & gas licenses in 2019.

### **Oil and gas licenses register**

Section 117 of the Petroleum (Exploration and Production) Act 2011 prescribes that, the Minister shall cause to be kept and maintained at the Ministry, a register of permits and licenses granted under the Petroleum (Exploration and Production) Act 2011. A person may upon the payment of the prescribed fee, inspect the register or take copies of an entry in the register.

Section 20 (3) of the Petroleum (Exploration and Production) Act 2011 stipulates that, each application for reconnaissance licenses shall, upon receipt by the Minister, be filed in the register of petroleum rights applications which will be updated regularly.

According to section 36 (2) of The Petroleum (Exploration and Production) Act 2011, each application for a petroleum license shall, upon receipt by the Minister, be filed at the register of petroleum rights applications.

#### **4.2.7 Register of oil & gas licenses**

We concluded that Sierra Leone don't maintain a publicly available register or cadastre in the oil & gas sector as required by EITI requirement 2.3 (b).

#### **4.2.8 Oil and gas agreements**

Section 40 (2) of the Petroleum (Exploration and Production) Act 2011 stipulates that, each petroleum license, and any accompanying agreement between the State and the licensee providing details on the license conditions attached to the license, shall be published in its entirety in the Gazette and in such other manner as may be prescribed.

##### **List of oil & gas agreements**

According to the Petroleum Directorate, there were no active oil & gas agreements in 2019.

##### **Public disclosure of oil and gas agreements**

According to article 40 A of Petroleum Law amendment 2014: "Petroleum licence granted under section 39 shall be delivered by the Director-General to the Registrar-General for registration in a book kept for that purpose".

This amended article 40 A of Petroleum Law amendment 2014 aims that a copies of petroleum Licenses are normally deposited to the Registrar-General for interested members of the public to inspect.

The PD discloses model of oil and gas contracts on its website through this link: <https://pd.gov.sl/assets/regulations/15%20Model%20Petroleum%20Agreement.pdf>.

#### **4.2.9 State participation in the oil & gas sector**

##### **State-owned enterprises in the oil and gas sector**

SLEITI MSG agreed that there no state-owned enterprises in the oil and gas sector in Sierra Leone.

##### **State participation in petroleum agreements**

Sections 84, 85 and 86 of the Petroleum (Exploration and Production) Act (2011) state:

- the State may participate as a licensee with a specific participating interest in a petroleum license under the auspices of the National Company;
- the National Company shall have all the rights and obligations of a licensee under the Petroleum (Exploration and Production) Act (2011) and the joint operating agreements to which it is a party;
- the revenue resulting from the management of the participating interests shall belong to the State;
- the National Company shall retain an amount not exceeding twenty five percent of total revenues received in any financial year to meet its operational, administrative and investment requirements for that year, subject to submission of an annual cost plan to the Minister and to Parliament;
- retention of the total amount of revenues received in excess of the percentage stipulated in sub-section (4) shall be subject to the prior written approval by the Minister of finance;
- the National Company shall keep and maintain separate accounts in respect of revenues and expenses relating to the participating interests of the State in each petroleum license;
- where the State elects to participate in a petroleum license, it shall have an initial carried interest of at least ten percent (10%) and may acquire an additional paying interest up to a declared maximum within a specified period from the date a discovery is declared to be commercial discovery; and
- a petroleum license shall provide that a licensee wishing to assign, or transfer its interest whether in part or in whole shall give the right of first refusal to the State to acquire the interest at the same price as agreed with a potential purchaser.

SLEITI MSG agreed that there was no State participation in oil and gas licenses or agreements in 2019.

#### **4.2.10 Sub-national payments in the oil & gas sector**

SLEITI MSG concluded that there was no provision in the law or regulations imposing direct tax payments from oil & gas companies to subnational government entities.

Therefore, SLEITI MSG agreed sub-national payments are not applicable in the oil and gas sector in Sierra Leone as defined by Requirement 4.6 of the 2019 EITI Standard.

#### **4.2.11 Subnational transfer in the oil & gas sector**

SLEITI MSG agreed that sub-national transfers are not applicable in oil and gas sector in Sierra Leone as defined by Requirement 5.2 of the 2019 EITI Standard.

#### 4.2.12 Infrastructure provisions and barter arrangements

SLEITI MSG agreed that there were no active infrastructure provisions and barter arrangements in the oil & gas sector in Sierra Leone in 2019 as defined by Requirement 4.3 of the 2019 EITI Standard.

#### 4.2.13 Transportation revenues

SLEITI MSG agreed that there were no transportation revenues from the oil & gas sector in Sierra Leone in 2019 as defined by Requirement 4.4 of the 2019 EITI Standard.

#### 4.2.14 Social and environmental expenditure

Section of 57 (1) (i) of the Petroleum (Exploration and Production) Act (2011) states that: *“a social and environmental impact assessment for the development area has to be approved in accordance with the Environmental Protection Act 2008”*.

Section of 91 (4) of the Petroleum (Exploration and Production) Act (2011) stipulates that: *“In preparing the environmental impact assessment under subsection (3), a holder of a petroleum right shall hold consultations with representatives of local communities or citizens at risk of suffering social, environmental or economic disruption as a result of petroleum operations”*.

There were no social and environmental expenditures made by oil & gas companies in 2019.

## 4.3. Beneficial ownership

### 4.3.1 Existing beneficial ownership disclosure obligations in the extractive sector in Sierra Leone

#### Mining sector

Section 42 (3) of the Mineral and Mines Act (MMA, 2009 Act) stipulates that: The register of mineral rights shall, for every license granting a mineral right, contain a record in sufficient detail of:

- the name of the holder of the mineral right, and if the holder is a company the names of the principal owners and or shareholders.

Section 106 (2) also states that an application for the grant of a large-scale mining license shall contain:

- the registered name and place of incorporation of the company, its certificate of incorporation and a certified copy of its memorandum and articles of association, the names and nationalities of its directors and the name of every shareholder who is the beneficial owner of five percent or more of the issued share capital.

#### Oil and gas

Section 21 of the Petroleum (Exploration and Production) Act 2011 dictates that an application for a reconnaissance permit shall contain:

- the name of each person who is the beneficial owner of 5 percent or more of the shares issued by the company or companies. Section 37 of Petroleum (Exploration and Production) Act 2011 dictates the same regarding applications for a petroleum license.

Section 37 (a) of the Petroleum Exploration and Production License provides that applications for Petroleum Licenses must contain among other things, the name of every person who is a beneficial owner of 5 percent or more of the shares issued by the company.

#### All sectors

Outside the extractive sector, the Companies Act 2009, which set up the Corporate Affairs Commission (CAC), and the 2014 Amendments to that Act, give powers to the CAC to request and receive beneficial ownership information from companies. However, this is limited only to public companies, and private companies are exempt.

### 4.3.2 Beneficial Ownership (BO) road map

According to requirement 2.5 (a) of EITI Standard 2019: It is recommended 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 exerted. Where possible, beneficial ownership information should be incorporated in existing filings by companies to corporate regulators, stock exchanges or agencies regulating extractive industry licensing. Where this information is already publicly available, the EITI Report should include guidance on how to access this information.

Implementing countries are required to document the government's policy and multi-stakeholder group's discussion on disclosure of beneficial ownership. This should include details of the relevant legal provisions, actual disclosure practices and any reforms that are planned or underway related to beneficial ownership disclosure.

Sierra Leone published its Beneficial Ownership (BO) Roadmap of the extractive sectors in 2016. This roadmap is designed to guide Sierra Leone's efforts to fully implement the Beneficial Ownership disclosure requirements under the 2019 EITI Standard (Requirement 2.5).

The BO roadmap is available on this link: <https://eiti.org/document/sierra-leone-beneficial-ownership-roadmap>

In November 2016, the Beneficial Ownership (BO) working group adopted the working definition of beneficial ownership for Sierra Leone which is based on the International Financial Action Task Force' (FATF) recommendations and which set the threshold on what is to be disclosed:

**Approved definition:** *“Beneficial owner refers to the natural person(s) who ultimately owns or controls a company and/or the natural person on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement”.*

*Reference to “ultimately owned or controlled” and “ultimate effective control” refer to situations in which ownership/control is exercised through a chain of ownership or by means of control other than direct control”.*

**Approved threshold:** *“Amount above which disclosure will be mandatory for companies in the extractive sector”.*

**Politically Exposed Person(s) - PEPs:** The comprehensive PEP definition below as mentioned in the Anti-Money Laundering Act 2012 has been adopted by the BO working Group in November 2016 for replication in other key documents: *“Persons holding prominent public positions domestically or in a foreign country such as heads of state or government, senior politicians at national level, senior government, judicial, military or party officials at national level, or senior executives of state-owned enterprises of national importance, or individuals or undertakings identified as having close family ties or personal or business connections to such persons.”*

#### **4.3.3 Progress made on the implementation of BO Transparency by developing Beneficial Ownership Registry for the extractive sector in line with EITI Requirement 2.5 (a)**

In order to comply with Requirement 2.5 (a), SLEITI recruited a Consultant in January 2021 to support their work with CAC, NMA, FIU, BSL, NRA, PD, MoF, MMR and other stakeholders on the implementation of Beneficial Ownership Transparency by developing Beneficial Ownership Registry for the mining and oil and gas sectors with a long-term plan for extending the registry to all areas of business:

The consultant was expected to undertake the following tasks:

- mapping of existing CAC/NMA/PD processes;
- stakeholder Mapping and Engagement;
- review the findings and recommendations of the 2017 report;
- review and update of template for the collection of Beneficial Ownership (BO) information;
- inter-agency coordination, data collection, and sharing;
- support SLEITI and CAC/NMA in technical capacity building and transfer of expert knowledge in the field;
- undertake an initial paper-based BO disclosure based on reviewed BO declaration forms for the upcoming validation; and
- report and Roadmap for phase two.

The final report submitted by the consultant. It is published on SLEITI website on this following link: <http://sleiti.gov.sl/index.php/documents>

The main recommendations of the consultancy report are the following:

N°	Area	Recommendation
1	Legislative process	The Mines and Minerals Bill should be revised to reflect a more comprehensive definition of BO which covers indirect interests as well as controls exercised by BO without holding interests. The amendment of the Bill should also allow clear differentiation between BO definition and legal shareholder definition. The Bill would also need to refer to the AML/CFT Act (2012) which provided a definition of BO in order to avoid any risk of contradiction in the legislation of the country. The legislation should explicitly mandate CAC for maintaining the BO register through the amendment of the Companies Act (2009) as well as in the Mines and Minerals Bill. Clear processes to ensure reliability of the information on beneficial ownership should be included in the legislation through the reform of the Companies Act (2009).
2	Beneficial Ownership IT systems	BO IT systems CAC system is required to be upgraded to:- use of the Https protocol and TLS certificate;- use of an OCR system for real-time document validation;- use of two-factor identification system and e-signature to enhance system security; - create a separate BO module in order to restrict access to personal data which would not be made publicly available; and - allow data synchronisation between ITAS and CAC system.
3	Beneficial ownership declaration form	In order to apply governance best practices and to comply with the EITI Standard requirements, the declaration form which would be used to collect BO data should consider:- a set of required and optional information to be requested; and- a set of collected BO data to be publicly available and personal data to be collected for the Government internal use.

#### 4.3.4 Beneficial ownership reporting under SLEITI 2019 report

As of 1 January 2020, it is required that implementing countries request, and companies publicly disclose, beneficial ownership information. This applies to corporate entity(ies) that apply for or hold a participating interest in an exploration or production oil, gas or mining license or contract and should include the identity(ies) of their beneficial owner(s), the level of ownership and details about how ownership or control is exerted. Any significant gaps or weaknesses in reporting on beneficial ownership information must be disclosed, including naming any entities that failed to submit all or parts of the beneficial ownership information.

The multi-stakeholder group should assess any existing mechanisms for assuring the reliability of beneficial ownership information and agree an approach for corporate entities within the scope of 2.5(c) to assure the accuracy of the beneficial ownership information they provide. This could include requiring companies to attest the beneficial ownership declaration form through sign-off by a member of the senior management team or senior legal counsel or submit supporting documentation.

In order to comply with Requirement 2.5 (C) for collecting information about the Beneficial Owners of the extractive companies operating in Sierra Leone for the 2019 SLEITI report, the SLEITI MSG agreed to maintain the definition of Beneficial Owner and Politically Exposed Persons as adopted by the Beneficial Ownership (BO) working group.

**Agreed definition:** *“Beneficial owner refers to the natural person(s) who ultimately owns or controls a company and/or the natural person on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement”. Reference to “ultimately owns or controls” and “ultimate effective control” refer to situations in which ownership/control is exercised through a chain of ownership or by means of control other than direct control”.*

**Agreed threshold:** *“directly or indirectly (e.g., through a chain of entities) 5% or more of the shares or voting rights of an entity”*

**Agreed definition of Politically Exposed Person(s) - PEPs:** “Persons holding prominent public positions domestically or in a foreign country such as heads of state or government, senior politicians at national level, senior government, judicial, military or party officials at national level, or senior executives of state-owned enterprises of national importance, or individuals or undertakings identified as having close family ties or personal or business connections to such persons.”

In order to collect information about the Beneficial Owners of the extractive companies operating in Sierra Leone for the FY 2019, the SLEITI MSG agreed five percent (5%) or more as disclosure threshold as set by the Mineral and Mines Act (MMA, 2009 Act) and by the Petroleum (Exploration and Production) Act 2011.

SLEITI MSG agreed that the information on beneficial ownership should be included through the reporting process of extractive companies included in the reporting scope (14 mining companies).

In order to collect BO information, SLEITI MSG agreed using BO declaration form recommended by the International Secretariat: [Beneficial ownership declaration form high quality data collection](#)

In order to comply with requirement 2.5 (e), SLEITI MSG agreed that beneficial ownership declaration form must be sign-off by a member of the senior management team or senior legal counsel.

### Results of beneficial ownership reporting under SLEITI 2019 report

Among the 11 companies who submitted their reporting templates five companies have failed to submit information on their beneficial owners. We present in the table below the list of companies those failed to submit BO information and those complied with BO information reporting:

N°	Mining reporting company	BO information (Yes/No)
1	Sierra Rutile Limited	No
2	KOIDU LIMITED	Yes
3	Sierra Mineral Holdings I Limited	Yes
4	SL MINING LIMITED	Yes
5	Kingho Mining Company Limited	No
6	MEYA MINING LIMITED	No
7	DAYU MINING COMPANY LIMITED	No
8	H. M. DIAMONDS	Yes
9	TONGUMA LIMITED	Yes
10	Sierra Diamonds Limited	No
11	WONGOR INVESTMENT AND MINING CORPORATION LIMITED	Yes

We present in Annex 9, the beneficial ownership information reported by mining companies selected to report BO information.

We present in Annex 10, the legal ownership information reported by mining companies selected to report Legal Ownership information.

## 4.4. Collection and distribution of the extractive revenues

### 4.4.1 Budget process

#### Budget preparation

Section 107 of the Constitution of Sierra Leone mandates the Minister for Finance to prepare and lay before Parliament in each financial year estimates of the revenues and expenditure of Sierra Leone for the following financial year.

The Ministry of Finance and Economic Development (MOF) initiates the Budget Preparation Strategy Phase which deals principally with policy. The elements that comprise this phase include:

- the National Strategy;
- the Ministries Department Agencies (MDAs)/Sector Planning;
- the Macro-fiscal analysis and forecasting;
- the Public Investment Planning;
- the External Assistance planning; and
- the Budget Policy Hearings.

The Budget Policy Hearings afford MDAs the opportunity to defend the alignment of their budgets to the strategic plan of the government. The outcome of these processes is documented in a Budget Framework Paper which provides advice to the government on the strategy to be adopted in the medium-term budget.

A Budget Call Circular is prepared by MOF in the first week of July each year after Cabinet's approval of Budget Framework Paper to allow MDAs to prepare detailed budget proposals for the budget year. MOF analyses the budget proposals from MDAs and later engages them in public budget discussions. MOF consolidates the MDA budgets into a government budget for reference to the Cabinet for approval. The Cabinet approves the budget proposal, which is then presented to Parliament by the Sector Minister for legislative approval. After several parliamentary debates the Appropriation Bill is then passed into an Act to give the budget legal backing.

### **Budget implementation**

At implementation, MDAs are required to complete Medium Term Expenditure Framework/Public Expenditure Tracking Survey Forms I and II for the release/expending of their quarterly allocations as well as quarterly procurement and cash flow plans to MOF. Vote controllers within the various MDAs capture expenditure for the Accountant-General.

#### **4.4.2 Revenue collection**

The National Revenue Authority is the principal Government Agency responsible for revenue collection from the extractive sector. The revenues collected are transferred to the Sierra Leone National Treasury. The revenues from the extractive sector are not reported separately in the national budget. They are recorded primarily as departmental receipts as part of the overall tax revenue estimates for each tax category of the budget books prepared for each year.

#### **Revenue collection in the mining sector**

Revenues collected from the mining sector are from large and small-scale mining operations. These are non-tax and tax revenues.

The non- tax revenues include exploration and mining licenses as well as mineral royalties. Mining entities engaged in exploration and mining activities pay exploration and mining licenses respectively. Mineral royalties are paid by entities engaged in the production of minerals. Companies producing minerals also pay corporate income tax on profits declared annually. Exploration/ Mining licenses, royalties and corporate income tax are collected by NRA.

In addition to the above, large scale mining lease holders also pay surface rentals to district councils, Paramount Chiefs/ Chieftdom Administration, Constituency Development Fund and individuals with surface rights within their areas of operation. Surface rent is paid in accordance with part 5, section 34 of the Mining and Minerals Act 2009. Surface rents are negotiated between the companies and the communities.

#### **4.4.3 Budget audit**

Section 119 of the constitution of Sierra Leone mandates the Auditor General to audit the Public Accounts of Sierra Leone and all public offices, including courts, the accounts of the Central and

Local Government Administration, universities and public institutions of like nature, statutory corporations, companies or other bodies and organisations, set up by an Act of Parliament or statutory instrument or otherwise set up partly or wholly out of public funds shall be audited and reported by or on behalf of the Auditor General<sup>1</sup>.

Vote controllers prepare financial statements for the year within one month after the end of the financial year to the Accountant-General to consolidate and prepare the government's budget.

Sierra Leone's Annual Financial Report includes information on revenues and other funds received and spent by the Government during the financial year. The Annual Financial Report can be found at: <https://www.auditservice.gov.sl/annual-reports/>

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<sup>1</sup> <http://www.sierra-leone.org/Laws/constitution1991.pdf>

## 4.5. Information on current and forward-looking extractive sector developments and industry outlook, in light of COVID-19 pandemic

### 4.5.1 Impact of COVID-19 on domestic revenue mobilization in Sierra Leone: a study of the Macro-Fiscal Policy Division of the Ministry of Finance of Sierra Leone

The first confirmed positive case of COVID-19 in Sierra Leone was only reported on the 31<sup>st</sup> March 2020, but the impact of the pandemic, globally, was already manifesting its effect on the economy and by extension, revenue administration. As a result of COVID, the 2020 domestic revenue target of Sierra Leone has been downsized by Le1.1 trillion (or 17.1%) (National Revenue Authority, Revenue, and Tax Policy Department, Sierra Leone). The impact of the pandemic on domestic revenue collection was clearly felt in Quarter Two (Q2) i.e. April- June. Therefore, when Q2 2020 collection is compared to the same period in 2019, domestic revenue declined by at least 11% (or Le147 bn) even in nominal terms (Revenue and Tax Policy Department, Sierra Leone).

#### The setbacks of COVID-19 on effective domestic revenue mobilization

The pandemic has presented concerns that domestic revenue mobilization of any nation will be adversely affected due to several combined effect mechanisms:

Global domestic economic activities in some countries were nearly brought to a halt, which has resulted to lower profits of many corporations, declining consumption, and ultimately unemployment. This will adversely affect the revenues generated from Corporation Taxes, Goods and Services Taxes (GST), and Income Taxes (Kapoor and Buiters, 2020).

- With numerous prolonged lockdown and cancellations of major flights throughout Sierra Leone since mid-March 2020 as well as the general fear associated with the virus, tourist flows into the country have since declined to almost zero, thus affecting GST collection and Foreign Travel Tax. “The World Trade Organisation (WTO) has projected that; global merchandise trade could decline by up to 32%” (OECD, 2020: p.5) compare to 2019 as a result of the crises and tourist arrival could fall by 60-80% globally (UNWTO, 2020).
- In addition, Sierra Leone is a resource-rich country like some other Sub-Saharan African countries that generate a high share of tax from the mining sector. The effect on mining sector revenues has been notable. Whilst mining royalties, and licenses marginally increased by 2% for the first half of 2020 compared to the same period in 2019, yet when the COVID-19 period of Q2 2020 is hived out, the effect is that revenues declined by almost half (49%) in Q2 2020 compared to the same period in 2019. (National Revenue Authority, Sierra Leone).
- As pointed out by (Steel and Phillips, 2020), there is the heavy reliance of low-income countries over other income groups on revenues from natural resources and their dependence have increased over the years (UNCTAD, 2020). These revenue streams will witness a significant drop in revenue as a result of a drop in global prices (OECD, forthcoming) chiefly attributed to the global CoVID-19 pandemic.

#### Proactive steps/ measures taken by the government to reduce the tax burden on taxpayers in the wake of the pandemic

Furthermore, tax relief measures such as deadline extension, tax concessions, deferment of taxes and duties, tax refunds, etc. have been instituted by governments and tax authorities in order to reduce some tax burden on the taxpayer so that they could be able to continue with doing their business operations (OECD/FTA, 2020). All this instituted measure is at the expense of lowering national funds.

Revenue from cross-border trading such as customs and excise duties, royalties on fisheries, timber levy, and mining royalties, as demand for Sierra Leone's exports (marine, minerals, and timber) slow down due to global weakening of demand for such commodities. With Sierra Leone's export largely destined for China and Europe, which are the main countries hardly hit by the virus, it is expected that the demand for them will weaken, thus waning prices and revenues.

All the above mechanisms put together could affect domestic revenue mobilization in a very negative way in developing economies such as Sierra Leone. Suggestion such as World Bank (2020) calculations depicts that as a result of COVID-19 government revenues could fall by up to 16% which will lead to a deterioration of fiscal deficit by around 2.7 to 3.5 percent of GDP.

Not only do government revenues, but other revenues such as private domestic revenues could be affected as well due to the rise in economic uncertainties and liquidity problems, thus affecting consumption, and economies savings.

The fear of the second wave of COVID-19 is creating more uncertainties among financial institutions and businesses particularly when the development of a vaccine is still at the embryonic stage and hence no guarantee that the workforce would soon return to commence productivity.

#### **The current fiscal stance of government to support the Sustainable Development Goals (SDGs)**

Sierra Leone like most countries in Sub-Saharan Africa is struggling to support the Sustainable Development Goals (SDGs) prior to COVID 19 due to the fact that the domestic revenue they were generating was considered insufficient to finance projects that are geared towards the actualization of the SDGs. Thus, the unanticipated COVID-19 pandemic has exacerbated the situation and the likelihood of the actualization of the said SDGs is farfetched in the years to come. Gaspar et al. (2019) noted that "low- income countries will have to spend on average of 15.4% points of GDP" (OECD, 2020: p.3) and emerging economies 19.5% points to match their SDG gaps. However, it has already been established that prior to COVID-19 both domestic and external sources of finance put together were not sufficient to meet the Sustainable Development Goals of most lower- income countries (UN SG, 2019). Also, it is estimated that the pandemic will exceed the Global Finance Crises of 2008 by 60%, (OECD 2020)

Most African countries already have high debt; they struggle to finance priority sectors such as health, social, infrastructural, and educational sectors which Sierra Leone is not an exception to these. In fact, the Government of Sierra Leone has stopped issuing a sovereign guarantee to finance projects due to the high level of debt relative to the GDP.

#### **4.5.2 Impact of COVID-19 on the mining sector**

In Sierra Leone, the environmental regulations instituted by the government to contain the spread of the COVID-19 range from partial to full lock-down including suspension of international flights to Sierra Leone. Vimetco, a large-scale bauxite mining company informed the Sierra Leone Extractive Industries Transparency Initiative (SLEITI) that the "COVID-19 pandemic is having some serious impact on the company operations" to the extent that "third party buyers -especially spot market buyers - are cancelling short-term orders of bauxite". This is a decision that may impact negatively on cash flow.

The Precious Minerals Department (PMT) of the National Minerals Agency recorded hardly any revenue on export duty on gold and diamond since April. Until the government of Sierra Leone ease the restrictions on all incoming flights, the PMT may potentially raise little or nothing as revenue for 2nd and 3rd quarters of 2020. These are revenues that may have contributed to government earnings, as well as providing necessary data for SLEITI reporting on the potential of the extractive sectors contribution to the economy.

### Important response adjustment

There are several options available to the government of Sierra Leone and operational large-scale companies to leverage the economic impact of COVID-19 on the extractive sector. Vimetco is considering "scaling down mining operations and purchases to bear necessity" and undertaking some structural adjustment that will send some workers on "COVID-19 sit-at-home scheme with partial salary". Though other companies may have adopted other measures, experts suggested that companies could request government to exempt company operations from lock-down and where possible waive mineral royalties as last resort. With drop in sales revenue, it is certain that tax deferment could be a necessary option on the plates of large-scale companies in Sierra Leone. While tax relaxation may sound realistic, experts have warned that governments must not provide waivers to offshore registered companies as their intent is akin to defrauding state authorities of taxable income. Should tax relation measures were to be considered by the government, mines workers' interest and issues of community livelihood must serve the basis of negotiation.

### Other information on impact of the COVID-19 pandemic collected during data collection phase

During data collection phase, we required from government agencies and mining companies to report information on current and forward-looking extractive sector developments and industry outlook, in the light of COVID-19 pandemic as required by EITI flexible reporting approach. We present in the table below a description of COVID-19 impact on mining sector in Sierra Leone as reported by reporting entities:

Additional information to be disclosed in the FY 2019 SLEITI report	Description
- Legal or regulatory changes, including moratoriums, in response to Covid-19.	There was no major changes in legal and regulatory framework in response of COVID-19 which has significant impact on the operation of the company.
- Adjustments to the fiscal regime, incentives or relief requested by or given to companies (e.g. force majeure, modified consultation).	None
- Any new license/contract awarded or transferred in 2018, 2019 and early 2020.	
- Delays or postponements of license or contracts awards.	No delay or postponement.
- Alternative approaches to licensing considering social distancing requirements.	No alternative approach but social distancing during Mineral Advisory Board meetings were strictly adhered to.
Suspended licenses or operations in view of Covid-19.	No mining licence or operation was suspended in view of Covid-19.
Changes in licensing and contract negotiations or amendments to contracts, revisions on work schedules if they are annexed to the contract.	None
- Changes in state participation and policies for state-owned enterprises.	Not applicable
- Ad-hoc SOE payments and transfers related to the Covid-19 crisis.	Not applicable
- Amendments to the rules and practices related to SOE's operating and capital expenditures, procurement, subcontracting and corporate governance in light of the Covid-19 crisis.	Not applicable
- Additional SOE quasi-fiscal expenditures agreed in response to the impact of the Covid-19 crisis.	Not applicable

Additional information to be disclosed in the FY 2019 SLEITI report	Description
- A narrative overview of sector developments and industry outlook considering Covid-19 and the commodity price downturn.	The government implemented many measures to curtail the spread of the virus and these measures restricted movement of goods and labour and consequently the temporary closure of the mine and subsequent reduction in working days and hours.
- Effects of Covid-19 and the decline in prices on exploration or development plans.	Effects of Covid-19 will lead to delay in completion of exploration/development activities and subsequent delay in commencement of mining operations.
- Effects of Covid-19 on projected and actual production and export, disaggregated by commodity, company and project.	Lockdown and restriction of movement affected the mining activities of the companies. Delay in getting vessels to load materials as a result of covid restrictions and quarantine requirement imposed worldwide. Production was adversely affected as a result in adjustment in working condition through the segregation of employees into workable groups. That is blue and white.
- Production volumes and values disaggregated by company and project for 2018 and to the extent possible for 2019 and early 2020.	The main negative impacts of Covid-19 on the production stage of mines include the reduction of production. This is mainly due to the reduction in the demand for raw materials resulting from the condition of economies on a global scale and the pandemic limitations on the workforce, the problem with transport, and market sales problems (disturbance of the product supply). Production limitations may also result from disruptions in the supply of materials necessary for mining operations.
- Effects of Covid-19 on projected and actual revenues and taxes from the extractive industries for 2018 and to the extent possible for 2019 and early 2020.	
- Analysis of potentially foregone revenues where fiscal relief has been provided or is being considered to the industry.	Not applicable
Effects of Covid-19 and the declining commodity prices on expected revenues from the sale of the state's share of production and other revenues collected in-kind. This could include analysis of the potentially foregone revenues from commodity sales because of the declining prices.	Not applicable
- New or renegotiated infrastructure agreements related to Covid-19 relief operations.	Not applicable
- New or renegotiated resource-backed loans.	Not applicable
- Changes to extractive commodities transportation arrangements considering the Covid-19 crisis.	Not applicable
- Outlook for transportation arrangements, revenues and any relevant extractive industries supply chain disruptions in light of Covid-19 related movement restrictions.	Not applicable
Projected and actual subnational direct payments and possible implications for local government budgets.	Reduction in revenues of companies could lead to less support to the local governments. Less ore mined due to reduction in working days and hours led to shortage of ore available for production and commodities available for sale.
Budget re-alignments for extractive industry revenues earmarked for Covid-19 relief.	

Additional information to be disclosed in the FY 2019 SLEITI report	Description
<ul style="list-style-type: none"> <li>- Projected and actual subnational transfers and possible implications for local government budgets and local communities.</li> <li>- The management of subnational transfers by local governments and any changes in response to the Covid-19 crisis.</li> </ul>	<p>Reduction in revenues of companies could lead to less support to the local governments and communities.</p>
<ul style="list-style-type: none"> <li>- Revisions to revenue and budget projections (including breakeven commodity price assumptions).</li> </ul>	<p>The original target set for total domestic revenue in 2020 was Le6.470 trillion. However, following the declaration of COVID-19 Pandemic in March 2020, the original revenue target was revised downward to Le5.363 trillion for 2020. It was later increase to Le5.399 trillion consistent with the IMF's approved Rapid Credit Facility (RCF). The review of the RCF in September-October, the 2020 Revenue target was slightly revised downward to Le5.366 trillion, which has become the final reference target upon which 2020 revenue performance is assessed.</p> <p>For the Fiscal Year 2020, actual domestic revenue collection amounted to Le5.501 trillion, which was in excess of the IMF-revised target of Le5.366 trillion by Le134.0 billion.</p>
<ul style="list-style-type: none"> <li>- Rescue funding, stimulus packages, or subsidies related to the sector or its state-owned enterprises).</li> </ul>	None
<ul style="list-style-type: none"> <li>- Shifts in sector-specific borrowing.</li> </ul>	None
<ul style="list-style-type: none"> <li>- Exceptional uses of sovereign wealth funds.</li> </ul>	None
<ul style="list-style-type: none"> <li>- Reforms in legal and contractual social expenditure requirements considering the Covid-19 crisis.</li> <li>- Social expenditures allocated by companies to support Covid-19 measures in areas of operation.</li> <li>- Changes to companies' social expenditure plans and possible impacts on local governments and local communities.</li> </ul>	<p>Exemptions were provided to certain sector which does not affect the mining sector.</p> <p>Voluntary social expenditures by companies moved up in order to support local health authorities to curtail the spread of the virus in areas of operation.</p>
<ul style="list-style-type: none"> <li>- Impact of Covid-19 and declining commodity prices on exports and employment (including resulting from movement restrictions and cross-border quarantines).</li> <li>- Impact of the commodity price downturn on the extractive sector and general economic outlook.</li> </ul>	<p>Declining commodity prices could lead to less than expected royalties payment to the government and lockdown locally and internationally means unavailability of required skilled labour and increased cost relating to expatriates' travel.</p>
<ul style="list-style-type: none"> <li>- Geographic information on the impact of the Covid-19 crisis on the location of extractive activities.</li> </ul>	<p>According to KOIDU Limited, iamond industry has moved from a relatively stable to a highly uncertain environment over the last couple of years, and especially with Covid-19 restrictions profoundly affecting the whole value chain.</p> <p>Rough-diamond prices fell close to 13% (Koidu Ltd) year to date as the Covid-19 crisis continues. Analysts predict that markets will start to recover gradually from the 30-40 per cent fall in global revenue from rough diamond sales this year, in the last quarter 2020 into the first half of 2021 as jewellers and polishers resume operations.</p> <p>Should subsequent waves of coronavirus occur and result in further lockdowns this or in the next year, cautious optimism still remains that global rough diamond revenue will still grow by about 20-25 per cent in 2021</p>
<ul style="list-style-type: none"> <li>- Shifts in regulatory rules or enforcement related to environmental protection, climate mitigation, Free, Prior and Informed Consent and other consultations</li> </ul>	None

### 4.5.3 Impact of COVID-19 on the oil & gas sector

#### Marketing campaigns

Towards the end of 2019, which coincided with the outbreak of COVID-19 and its categorization as a global pandemic, the Petroleum Directorate had invested substantial effort in promotional activities against the backdrop of the Fourth Petroleum Licensing Round which was due to be concluded in February 2020. In as much as some small independent companies had submitted applications for Oil and Gas Concessions, a key strategy of the PD then was to target super majors and reaching out to them at their respective comfort zones, through what came to be regarded as Intensive Industry Engagement, which involved aggressive marketing campaigns to the extent that talks were at advanced stage with Exxon, LUKOIL and Eni. These had assured PD of their participation, and Eni had even proposed a working visit to Freetown. However, the proposed timing of the visit coincided with the outbreak taking a serious toll in Europe generally and Eni's home country Italy, particularly. Implication was that the Participation proposal was understandably aborted. And that's the same with Lukoil and Exxon even though these did not state such as the official explanation.

On 29<sup>th</sup> April, the Government of Sierra Leone announced that the Open Offshore Petroleum acreages covering several graticular blocks have been provisionally awarded to Cluff Energy Africa and Innoson Oil & Gas Companies as an initial option following the Nation's Fourth Offshore Petroleum License Round. Under normal circumstances, the winning bidders are expected to accept the provisional offer and express interest to negotiate with the Government within one month. With the COVID-19 already scaring potential investors away and wreaking havoc on economies, the Government is hoping that the awardees will submit their responses in a timely manner.

## 5. ANALYSIS OF EITI DATA FY 2019

### 5.1. Production

We present in the table below production volumes and values by commodity and disaggregated by region, mining company and project:

TABLE 11: Production volumes and value by commodity, by company, by project and by region in 2019

Company	Commodity	Region (District)	Project	Unit	Volume	Unit	Value USD	Value %
Sierra Minerals Holdings No.1 Limited	Large scale Bauxite	Moyamba	ML 01/95	DMT	2,017,606	36	72,147,235	18.07%
SL Mining Limited	Large scale Iron Ore	Port Loko	ML 1/2017	DMT	722,305	79	56,732,074	14.21%
Koidu Limited	Large scale Diamond	KONO	ML 06/95	Carats	604,205	163	98,472,657	24.66%
Dayu Mining Compan Limited	Large scale Gold Concentrate	KOKOLILI	ML 2/2019	Grams	264,900	32	8,360,204	2.09%
Sierra Rutile Limited	Large scale Rutile	Moyamba	ML2134	DMT	132,805	1,133	150,420,567	37.67%
	Large scale Ilmenite	Moyamba	ML 2134	DMT	61,326	185	11,336,701	2.84%
	Large scale Zircon	Moyamba	ML 2134	DMT	2,466	740	1,823,699	0.46%
<b>Total</b>							<b>399,293,138</b>	<b>100.00%</b>

According to NMA, the calculation of production values is based on **production costs** (direct and indirect costs) as reported by mining companies. Production volumes are based on mining companies monthly reporting.

Figure 9: Production value by company

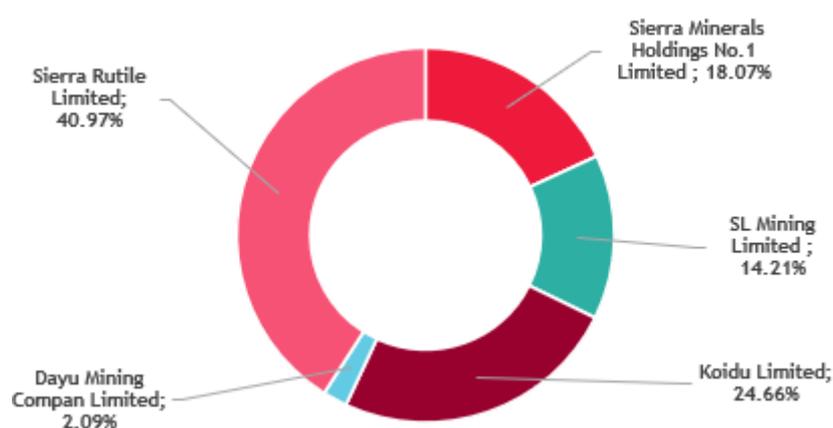


Figure 10: Production value by region

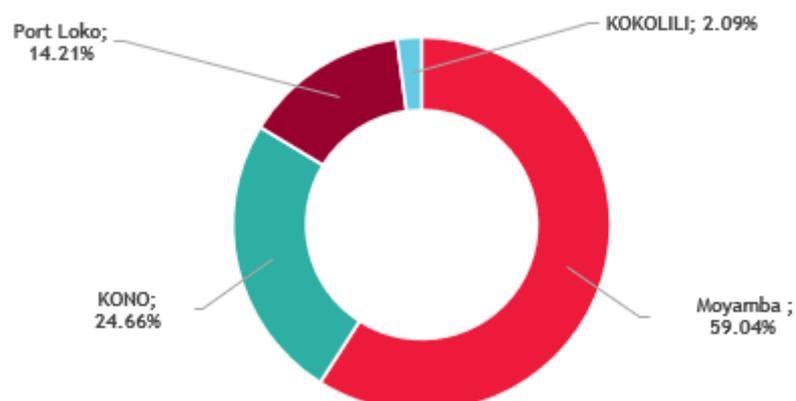
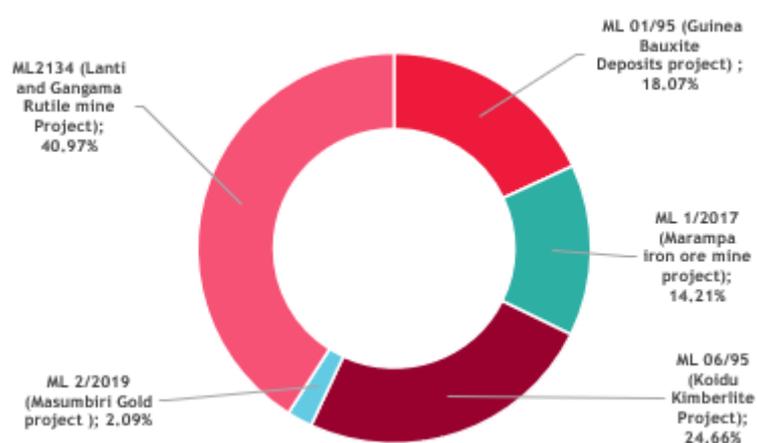


Figure 11: Production value by project



## 5.2. Exports

We present in the table below exports volumes and value by commodity:

TABLE 12: Production volumes and value by commodity in 2019

Commodity	Volume	Unit	Unit Price (USD)	Total value (USD)
Diamond	803,583	Carats	204.75	164,532,927
Rutile	126,498	DMT	1,132.64	143,476,121
Bauxite	1,785,436	DMT	35.76	63,737,568
Zircon	36,897	DMT	689.75	15,059,740
Iron ore	174,665	DMT	78.54	13,492,697
Ilmenite	53,853	DMT	184.86	9,304,133
Gold concentrate	242,600	grams	34.65	8,360,204
<b>Total</b>				<b>417,963,389</b>

According to NMA, the calculation of export values has been based on **free on board (FOB) value**, as declared by mining companies to customs services.

We present in the table below export volumes and values by commodity disaggregated by region, mining company and project:

TABLE 13: Exports volumes and value by commodity, by company, by project and by region in 2019

Company	License	Commodity	Region (District)	MDA/ Concession / License	Volume	Unit	Total value (USD)	% value
Sierra Minerals Holdings No.1 Limited	Mining lease	Bauxite	Moyamba	ML 01/95	1,785,436	DMT	63,737,568	15.25%
SL Mining Limited	Large scale	Iron Ore	Port Loko	ML 1/2017	174,665	DMT	13,492,697	3.23%
Koidu Limited	Mining lease	Diamond	KONO	ML 06/95	636,375	Carats	103,201,301	24.69%
Dayu Mining Company Limited	Large scale	Gold Concentrate	KOKOLILI	ML 2/2019	242,600	grams	8,360,204	2.00%
Sierra Rutile Limited	Mining lease	Rutile	Moyamba	ML2134	126,498	DMT	143,476,121	34.33%
		Ilmenite	Moyamba	ML 2134	53,853	DMT	9,304,133	2.23%
		Zircon	Moyamba	ML 2134	36,897	DMT	15,059,740	3.60%
MEYA MINING LTD	Large scale	Diamond	KONO	ML 2/2019	6,387	Carats	1,677,358	0.40%
Tonguma Limited	Large scale	Diamond	KENEMA	ML 02/2012	542	Carats	41,541	0.01%
SEAWRIGHT MINING COMPANY	Exploration	Diamond	KENEMA	EL 45/2011	357	Carats	246,485	0.06%
H. M. DIAMONDS	Diamond Exporter	Diamond	Other regions	Other projects	102,766	Carats	31,943,821	7.64%
KASSIM M BASMA	Diamond Exporter	Diamond	Other regions	Other projects	47,644	Carats	10,874,614	2.60%
CROCODILE MINING (SL) LIMITED	Diamond Exporter	Diamond	Other regions	Other projects	134	Carats	9,525,330	2.28%
Metals and Minerals Trading (SL) Ltd	Diamond Exporter	Diamond	Other regions	Other projects	699	Carats	1,124,896	0.27%
MONJED MAROUF JAWAD	Diamond Exporter	Diamond	Other regions	Other projects	3,528	Carats	2,471,869	0.59%
PLUTO MINING COMPANY (SL) LIMITED	Diamond Exporter	Diamond	Other regions	Other projects	992	Carats	2,501,380	0.60%
WISSAM MROUE	Diamond Exporter	Diamond	Other regions	Other projects	4,159	Carats	924,334	0.22%
<b>Total</b>							<b>417,963,389</b>	<b>100.00%</b>

We present in Annex 17, diamond exports volume and value by parcel, by exporter, by country destination and amount of 3% diamond export tax for each parcel

Figure 12: Export value by company

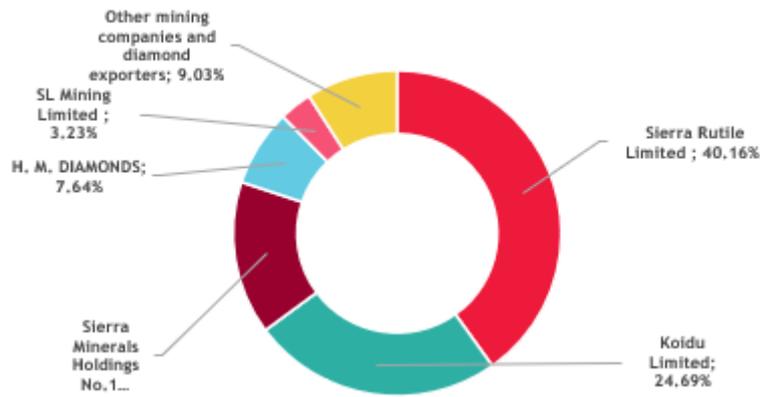


Figure 13: Export value by project

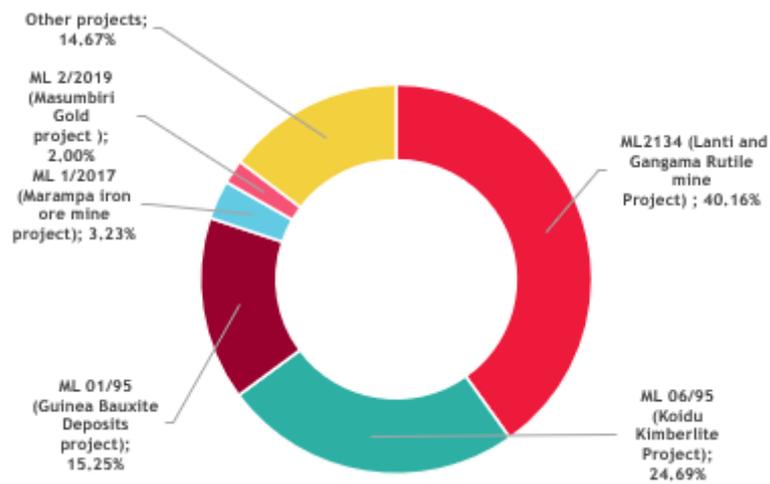
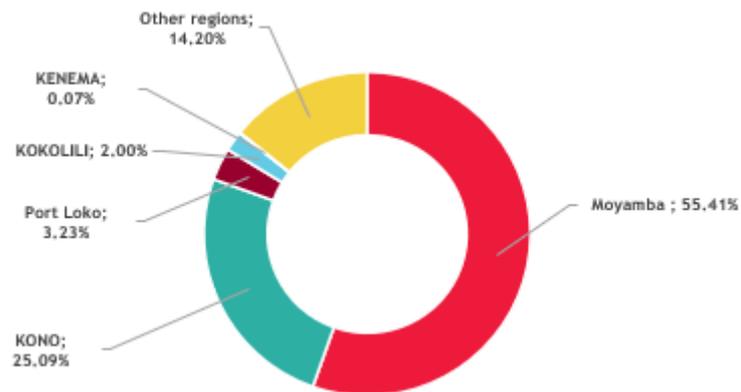


Figure 14: Export value by region



### 5.3. Analysis of government revenues from the extractive sector

The analysis of government revenues from extractive industries (fiscal revenues) by sector indicates that the mining sector contributed 100% of the total government revenues from the extractive industries in 2019.

#### By extractive company

The analysis of fiscal revenues from the extractive industries indicates that Sierra Rutile Limited contributed 41,73% of the fiscal revenues during the FY 2019 followed by KOIDU Limited which contributed 20.08%, Sierra Minerals Holdings No.1 Limited with 8.99% and Kingho Mining Company Limited with 5.82%.

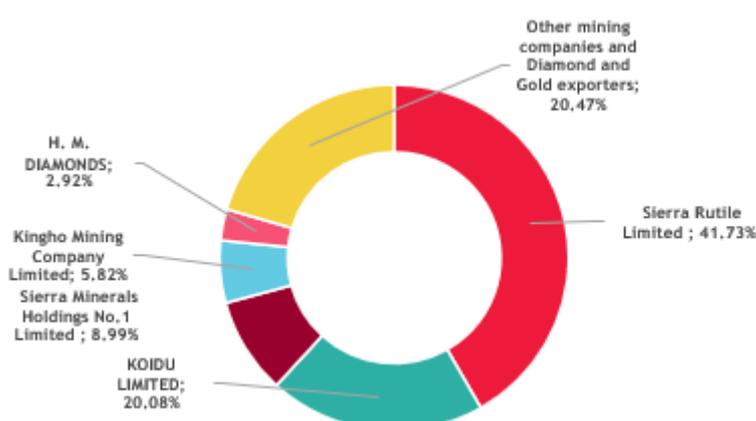
We set out an analysis of fiscal revenues from the extractive sector for the FY 2019 by mining company in the table below:

TABLE 14: Contribution to the extractive industries revenues by company

Company	Sector	Type of license	Commodity	Contribution to fiscal revenues (US\$)	%
Sierra Rutile Limited	Mining company	Mining lease	Rutile	26,896,661	41.73%
KOIDU LIMITED	Mining company	Mining lease	Diamond	12,940,942	20.08%
Sierra Minerals Holdings No.1 Limited	Mining company	Mining lease	Bauxite	5,795,655	8.99%
Kingho Mining Company Limited	Mining company	Large scale	Iron Ore	3,749,606	5.82%
H. M. DIAMONDS	Diamond exporter	Diamond exporter	Diamond	1,882,955	2.92%
Other mining companies and Diamond and Gold exporters	Other mining companies and Diamond and Gold exporters	Various type of licenses	Various type of commodities	13,195,757	20.47%
<b>Total</b>				<b>64,461,575</b>	<b>100.00%</b>

Government revenues from other mining companies and diamond and gold exporters and dealers are presented in Annex 4 and Annex 18.

Figure 15: Revenue contribution to the extractive sector by company



#### By government agency and sub-national entity

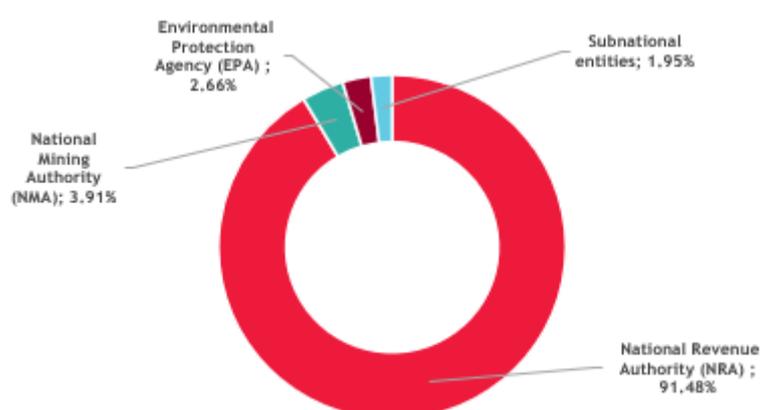
Analysis of extractive revenues by government agency indicates that **National Revenue Authority (NRA)** collected **91%** of the fiscal revenues from the extractive companies during the FY 2019 followed

by the **National Minerals Agency (NMA)** which accounted for approximately 4%, the **Environmental Protection Agency (EPA)** with 2.66% and sub-national entities with almost 2%. The table below presents the contribution by government agency:

TABLE 15: Contribution to the extractive industries revenues by government agency

FY 2019		
Government agencies	Collected revenues (US\$)	%
National Revenue Authority (NRA)	58,971,448	91.48%
National Minerals Agency (NMA)	2,521,415	3.91%
Environmental Protection Agency (EPA)	1,713,966	2.66%
Subnational entities	1,254,746	1.95%
<b>Total</b>	<b>64,461,575</b>	<b>100.00%</b>

Figure 16: Contribution to the extractive industries revenues by government agency and subnational payment



### By revenue stream

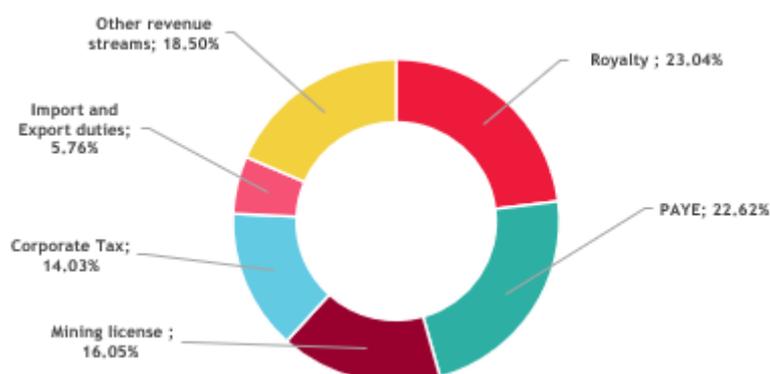
The analysis of fiscal revenues from extractive industries by revenue stream indicates that **royalty** contributed to **23.04%** during the FY 2019 followed by **PAYE** representing **22.62%**, **Mining license** with **16.05%**, **corporate tax** with **14.03%**, **import and export duties** with **5.76%** and other revenue streams with **18.50%**.

The table below presents the contribution by revenue stream:

TABLE 16: Contribution to the extractive industries revenues by revenue stream

Revenue stream	Contribution to fiscal revenues (US\$)	%
Royalty	14,851,394	23.04%
PAYE	14,582,175	22.62%
Mining license	10,348,511	16.05%
Corporate tax	9,041,624	14.03%
Import and export duties	3,709,904	5.76%
Other revenue streams	11,927,968	18.50%
<b>Total</b>	<b>64,461,575</b>	<b>100.00%</b>

Figure 17: Contribution to the extractive sector revenues by revenue stream



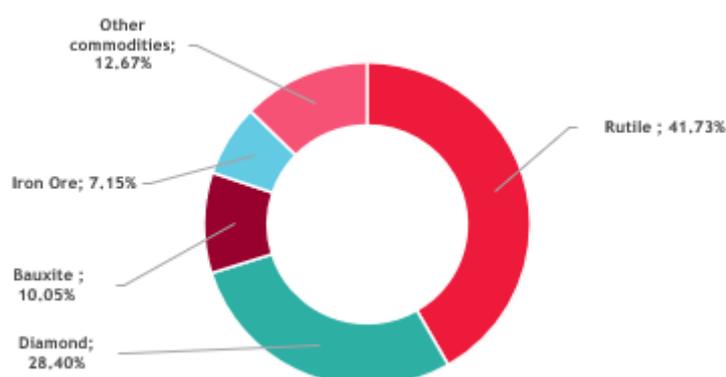
### By commodity

The analysis of fiscal revenues from the extractive sector by commodity indicates that **Rutile** accounted for approximately **42%** of the total fiscal revenues during the FY 2019 followed by **Diamond** representing **28%** and **Bauxite** with **10%**. The below table presents the contribution by commodity:

TABLE 17 : Contribution to the extractive industries revenues by commodity

Revenue stream	Contribution to fiscal revenues (US\$)	%
Rutile	26,896,661	41.73%
Diamond	18,303,878	28.40%
Bauxite	6,480,253	10.05%
Iron ore	4,611,396	7.15%
Other commodities	8,169,388	12.67%
<b>Total</b>	<b>64,461,575</b>	<b>100.00%</b>

Figure 18: Contribution to the extractive sector revenues by commodity



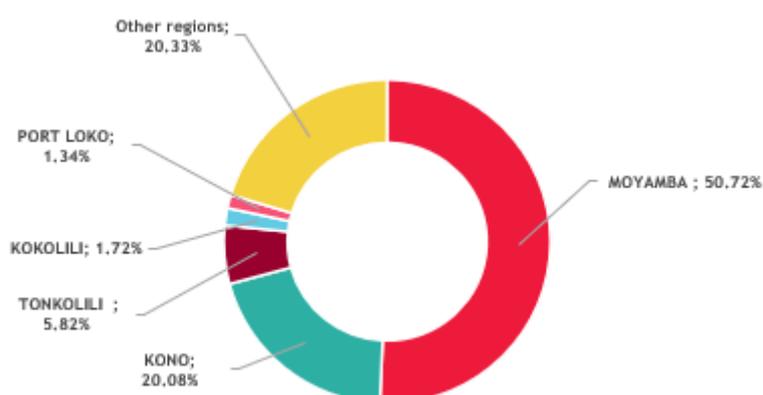
### By region

The analysis of fiscal revenues from the extractive sector by region indicates that the **MOYAMBA DISTRICT** contributed to half of the total fiscal revenues in 2019 followed by the **KONO District** by 20%. The table below presents the contribution by region:

TABLE 18: Contribution to the extractive industries revenues by region

FY 2019		
Region	Collected revenues (US\$)	%
MOYAMBA	32,692,316	50.72%
KONO	12,940,942	20.08%
TONKOLILI	3,749,606	5.82%
KOKOLILI	1,110,075	1.72%
PORT LOKO	861,790	1.34%
Other regions	13,106,846	20.33%
<b>Total</b>	<b>64,461,575</b>	<b>100.00%</b>

Figure 19: Contribution to the extractive sector revenues by region



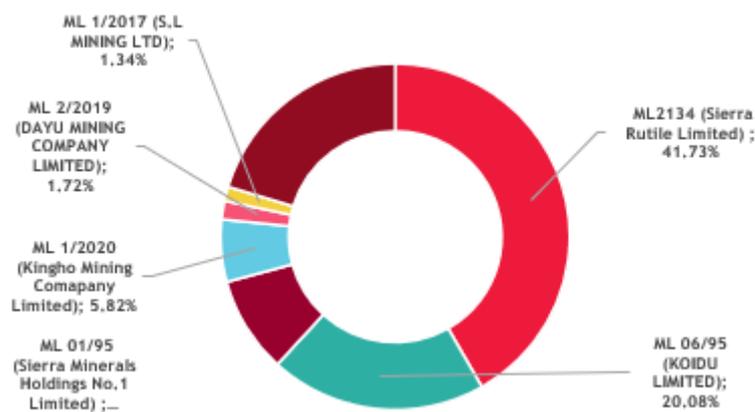
### By mining agreement

The analysis of fiscal revenues from extractive sector by project indicates that ML2134 accounted for 42% of the total fiscal revenues in 2019 followed by ML 06/95 representing 20%. The table below presents the contribution by project:

TABLE 19: Contribution to the extractive industries revenues by project

FY 2019		
Region	Collected revenues (US\$)	%
ML2134 (Sierra Rutile Limited)	26,896,661	41.73%
ML 06/95 (KOIDU LIMITED)	12,940,942	20.08%
ML 01/95 (Sierra Minerals Holdings No.1 Limited)	5,795,655	8.99%
ML 1/2020 (Kingho Mining Comapany Limited)	3,749,606	5.82%
ML 2/2019 (DAYU MINING COMPANY LIMITED)	1,110,075	1.72%
ML 1/2017 (S.L MINING LTD)	861,790	1.34%
Other mining projects	13,106,846	20.33%
<b>Total</b>	<b>64,461,575</b>	<b>100.00%</b>

Figure 20: Contribution to the extractive sector revenues by project



We present in Annex 4, Annex 5 and Annex 6, the breakdown of fiscal revenues generated from extractives industries detailed by mining company, by government agencies, by revenue stream and by project.

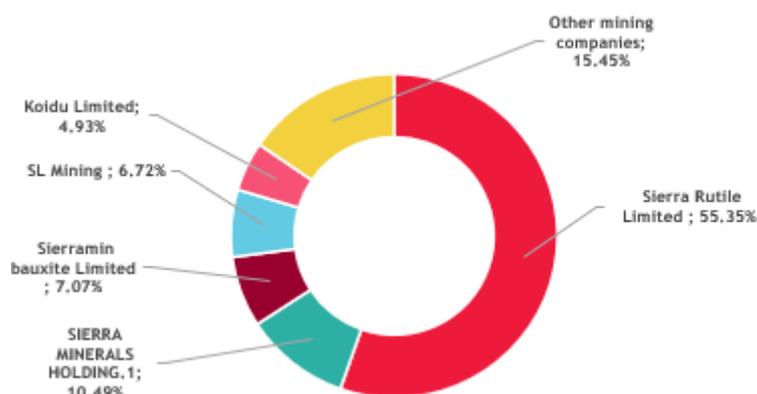
## 5.4. Analysis of sub-national payments

Sub-national entities (MPs, District Council, Chiefdom Council) and mining companies (for payments made to Landowners and Paramount chief) have reported US\$ 1,254,746 of Surface rental payments for FY 2019.

Surface rental payments by mining company are presented in the table below:

Mining company	Amount US\$	%
Sierra Rutile Limited	694,465	55.35%
SIERRA MINERALS HOLDING.1	131,582	10.49%
Sierramin bauxite Limited	88,718	7.07%
SL Mining	84,294	6.72%
Koidu Limited	61,821	4.93%
Meya mining	49,800	3.97%
Kingho Mining Comapany Limited	41,166	3.28%
SIERRA DIMOND	39,979	3.19%
WONGOR INVESTMENT AND MINING CORPORATION LIMITED	34,744	2.77%
Marampa Mining company	24,730	1.97%
DAYU MINING COMPANY LIMITED	3,448	0.27%
<b>Total</b>	<b>1,254,746</b>	<b>100.00%</b>

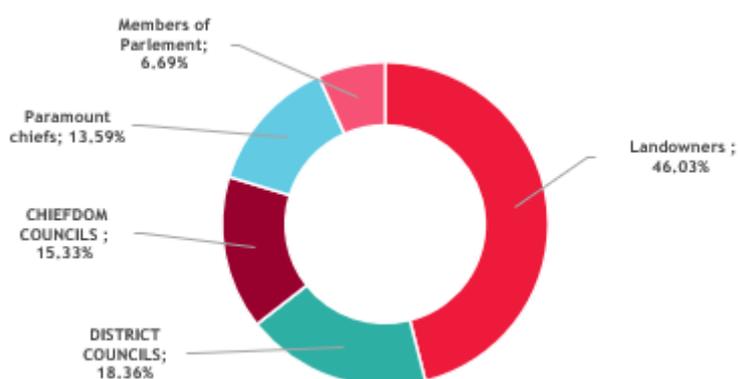
Figure 21: Contribution to the subnational payment by company



Surface Rental revenues by sub-national entity are presented in the table below:

Sub-national entity	Amount USD	%
LANDOWNERS	577,590	46.03%
DISTRICT COUNCILS	230,417	18.36%
CHIEFDOM COUNCILS	192,314	15.33%
PARAMOUNT CHIEFS	170,522	13.59%
MEMBERS OF PARLIAMENR	83,903	6.69%
<b>Total</b>	<b>1,254,746</b>	<b>100.00%</b>

Figure 22: Sub-national payments by recipient



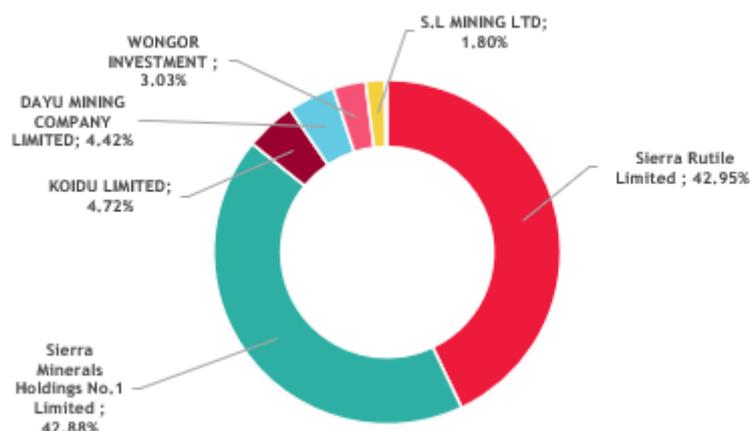
Details of surface rental revenues by mining company, by sub-national entity (by District councils, Chiefdom councils, members of parliament and landowners are presented in Annex 7 of this report.

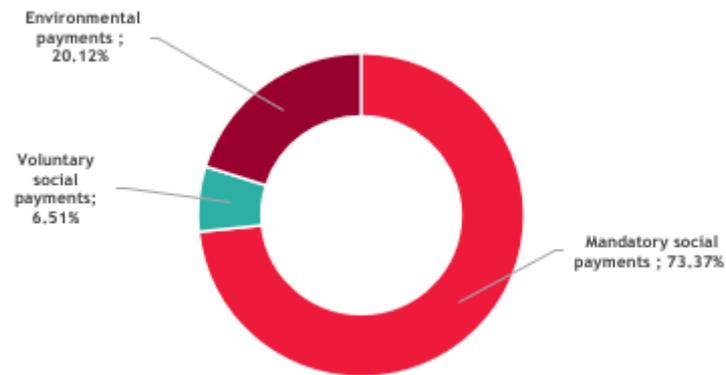
## 5.5. Analysis of social and environmental payments

The extractive companies selected to submit reporting templates have reported mandatory and voluntary social payments and environmental payments amounted US\$ 3,375,750 during FY 2019. The table below summarises these payments by company and by type of payment.

Company	Mandatory social payments		Voluntary social payments		Environmental payments		Total	%
	Cash payment	In Kind	Cash payment	In Kind	Cash payment	In Kind		
Sierra Rutile Limited	832,383		-	71,704	545,839		1,449,926	42.95%
Sierra Minerals Holdings No.1 Limited	1,447,604						1,447,604	42.88%
KOIDU LIMITED	47,724		111,702				159,426	4.72%
DAYU MINING COMPANY LIMITED	22,641	126,380	315				149,337	4.42%
WONGOR INVESTMENT AND MINING CORPORATION LTD			3,880		98,412		102,292	3.03%
S.L MINING LTD			25,521		35,089		60,610	1.80%
Sierra Diamonds Limited			6,555				6,555	0.19%
<b>Total</b>	<b>2,350,352</b>	<b>126,380</b>	<b>147,973</b>	<b>71,704</b>	<b>679,340</b>	<b>-</b>	<b>3,375,750</b>	<b>100.00%</b>

Figure 23: Social and environmental payments by company



**Figure 24: Social and environmental payments by type**

Details of social and environmental payments reported by each company are presented in Annex 13 Annex 14 and Annex 15 of this report.

## 5.6. Contribution of the extractive sectors to the economy

### 5.6.1 Contribution to government revenues

As shown in the table below, revenues from the extractive sector represent 4.12% of total government revenues (non-tax receipts).

Contribution to domestic revenue	Million US\$	% contribution to government revenues
<b>Total Sierra Leone domestic revenue 2019</b>	<b>557.504</b>	
<b>Mining departments (excluding revenues from corporate tax, GST and Customs and Excise)</b>	<b>22.992</b>	<b>4.12%</b>
Royalties on Rutile	7.212	1.29%
Royalties on Bauxite	1.112	0.20%
Royalties on Diamond and Gold	7.990	1.43%
Royalties on Iron Ore	0.355	0.06%
Licenses (including Petroleum revenues)	7.352	1.32%

Source: Ministry of Finance (Statement of economic and financial policies for the Financial Year 2021)

### 5.6.2 Contribution to gross domestic product (GDP)

As shown in the table below, the extractive sector represented approximately 0.6% of the total GDP in the FY 2019:

Contribution to GDP	% Contribution to GDP
Contribution domestic revenues to GDP	<b>14.90%</b>
Mining departments (excluding revenue from corporate tax, GST and Customs and Excise)	<b>0.60%</b>
Royalties on Rutile	0.2%
Royalties on Bauxite	0.0%
Royalties on Diamond and Gold	0.2%
Royalties on Iron Ore	0.0%
Licenses (including Petroleum revenues)	0.2%

Source: Ministry of Finance (Statement of economic and financial policies for the Financial Year 2021)

### 5.6.3 Contribution to total exports

As shown in the table below, the extractive sector exports represented approximately 67.16% of the country's total exports in 2019:

Contribution to Exports	Million US\$
<b>Total Sierra Leone exports 2019 (*)</b>	<b>554.073</b>
<b>Total mining exports 2019</b>	<b>372.128</b>
<b>% Contribution</b>	<b>67.16%</b>

Source: Central Bank of Sierra Leone

### 5.6.4 Contribution to employment

As shown in the table below, employment in the extractive sector represented approximately 2.84% of the total labour force during the FY 2019.

Contribution to employment	Male	Female	Total	
Industrial mining (*)	5,277	489	5,766	0.22%
Artisanal mining (**)	56,255	14,064	70,319	2.62%

Contribution to employment	Male	Female	Total	
Total mining employment	61,532	14,553	76,085	2.84%
Labour force, total - Sierra Leone (**)	2.30%	0.54%	2,681,078	

(\*) EITI data

(\*\*) baseline study of artisanal mining in Sierra Leone

(\*\*\*) World Bank data

We present in Annex 8 employment data reported by large-scale mining companies disaggregated by mining company and by gender.

## 6. RECOMMENDATIONS

### 6.1. Findings and recommendations raised during FY 2019

During our work, we came across several shortcomings and accordingly, we have made recommendations with a view to improve the EITI process in Sierra Leone as well as governance and revenue management in the extractive sector.

These recommendations are described as follows:

<b>Recommendation n° 1:</b>	<b>Title: Contract transparency</b>
<b>Type of finding:</b> Non-compliance with Requirement 2.4	
<b>Relevant entity:</b> SLEITI MSG	
<b>Description:</b>	
<p>Requirement 2.4 (b) of the EITI Standard 2019 stipulates that implementing countries are required to disclose any contracts and licenses that have been granted, entered into or amended from 1 January 2021. It is a requirement to document the government's policy on disclosure of contracts and licenses that govern the exploration and exploitation of oil, gas and minerals.</p> <p>Although all active mining agreements are publicly available on NMA's as well as Resource Contracts websites, we note that the SLEITI MSG did not:</p> <ul style="list-style-type: none"> <li>• document the government's policy on contract disclosure and licenses that govern the exploration and exploitation of oil, gas and minerals;</li> <li>• outline any barriers or gaps in timely, comprehensive and reliable disclosures face to implement contract transparency fully, as well as technical or financial support needs;</li> <li>• document all the obstacles and challenges of adopting full contract transparency as required by the EITI Standard;</li> <li>• identify whether there are any legal reforms underway or under discussion that could strengthen or threaten the availability of contract information; and</li> <li>• propose and develop a roadmap for strengthening the disclosures of extractive contracts which include actions, responsible parties, timelines, resource and technical assistance needs.</li> </ul>	
<b>Recommendation:</b>	
<p>The SLEITI MSG should document its discussion on what constitutes government policy on contract disclosures by identifying ongoing reforms or new measures under discussion that could strengthen or threaten the availability of contract information.</p> <p>The SLEITI MSG should then address any obstacles and challenges in adopting full contract transparency as required by the EITI Standard (Requirement 2.4).</p> <p>Finally, the SLEITI MSG should develop a roadmap for strengthening the disclosures of extractive contracts, which include actions, responsible parties, timelines, resource and technical assistance needs.</p>	

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**Recommendation n° 2:**
**Title:** Implementation of register of licenses in oil and gas sector
 

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**Type of finding:** Non-compliance with Requirement 2.3
 

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**Relevant entity:** Petroleum Directorate
 

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**Description:**

In accordance with Requirement 2.3 (b) of the 2019 EITI Standard, implementing countries are required to maintain a publicly available register or cadastre system(s) with timely and comprehensive information. We noted that Sierra Leone does not maintain a publicly available register for oil and gas licenses.

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**Recommendation:**

In order to comply with Requirement 2.3 (b) of the 2019 EITI Standard, the Government of Sierra Leone should implement a publicly available register for oil & gas licenses including the following information:

- license holder(s);
  - coordinates of the licensed area;
  - dates of application, dates of award and duration of the licenses; and
  - In the case of production licenses, the commodity being produced.
-

<b>Recommendation n° 3:</b>	<b>Title:</b> Contribution of the extractive sector to the economy
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**Type of finding:** Non-compliance with Requirement 6.3

**Relevant entities:** Ministry of Finance, Central Bank of Sierra Leone and Ministry of Labour

**Description:**

In accordance with EITI Requirement 6.3, implementing countries must disclose, when available, information about the contribution of the extractive sector to the economy for the fiscal year covered by EITI implementation, especially contribution to GDP, to Government revenues, to Exports and to employment.

We note that this information was not disclosed by relevant government agencies. For instance, the Ministry of Finance did not disclose the contribution of the extractive sector to GDP, or to government revenues. The Central Bank of Sierra Leone was unable to disclose the contribution of the EITI sector to exports, while the Ministry of Labour could not provide statistics on employment in the extractive sector.

**Recommendation:**

In order to comply with requirement 6.3 of EITI Standard 2019, We recommend the government agencies disclose contribution of the extractive sector to the economy on an annual basis. It is required that this information includes:

- The size of the extractive industries in absolute terms and as a percentage of gross domestic product as well as an estimate of informal sector activity, including but not necessarily limited to artisanal and small scale mining;
- Total government revenues generated by the extractive industries (including taxes, royalties, bonuses, fees, and other payments) in absolute terms and as a percentage of total government revenues;
- Exports from the extractive industries in absolute terms and as a percentage of total exports.
- Employment in the extractive industries in absolute terms and as a percentage of the total employment. The information should be disaggregated by gender and, when available, further disaggregated by company and occupational level.

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**Recommendation n° 4:****Title:** Non-compliance with EITI reporting templates deadlines

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**Type of finding:** Non-compliance with Requirement 4.1

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**Relevant entities:** Reporting entities

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**Description:**

We note that government agencies as well as extractive companies did not honour the deadline of [Please insert date] set by the SLEITI MSG for the submission of reporting templates . Additionally, there was a complete lack of response to our queries, despite several chasers sent to these stakeholders.

As result, the preparation of the 2019 SLEITI report took longer than anticipated and was significantly delayed.

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**Recommendation:**

We recommend for future exercises that the MSG engages with the reporting entities so they adhere to the deadlines set. These could be in the form of training workshops and emphasis should be laid upon the fact that late reporting could lead to SLEITI's suspension from the EITI Programme. Additionally, they should also be encouraged to reply promptly to the IA's queries so the report can be finalised on time.

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**Recommendation n° 5:****Title:** Lack of financial support to SLEITI Secretariat

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**Type of finding:** Non-compliance with Requirement 7

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**Relevant entity:** SLEIT MSG

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**Description:**

We note that the SLEITI Secretariat does not have sufficient financial support to carry out the following tasks:

- promotion of the EITI values across the country;
- awareness workshops to improve the participation of SLEITI Stakeholders in EITI reporting process; and
- capacity building of government agencies and extractive companies EITI focal points.

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**Recommendation:**

We recommend to the SLEITI MSG to seek a financial support to the SLEITI Secretariat from government or international funding institution in order to:

- promote EITI values in Sierra Leone ;
  - perform awareness workshops to improve the involvement of SLEITI Stakeholders in the EITI reporting process; and
  - capacity building of government agencies' and extractive companies' EITI focal points.
-

## 6.2. Follow up of previous recommendations

No.	Detail of the issue	Recommendation	Addressed (Yes/No)
1	MCAS or the online mining register/cadastre does not feature essential requirements such as license terminations and transfers. These are available offline.	We recommend that these details are uploaded into the MCAS system for easier accessibility	Yes
2	Surface rents vary with mining agreements as currently there are no uniform statutory rates or cost per area established for mining companies.	There should be uniform rates or threshold rates for certain categories of mining contracts and activities. This will ensure standardization and foster transparency.	No
3	During reconciliation surface rent templates are sent in by several chiefdoms and District Councils. Where there is much chiefdom within the operational area of the mine, it is difficult to distribute the payments made by the Companies.	Companies or NMA should provide details of payments made by mining companies to Communities (stating which chiefdoms and Parliament chiefs and the amounts paid) within their operational area to afford easy reconciliation.	Yes

### 6.3. Follow up of last validation recommendations

During our work, we reviewed whether the last validation recommendations had been implemented:

The progress made concerning the last validation recommendations are described in the table below:

Requirement	Recommendation	Implementation	IA comments	Indication in 2019 SLEITI report
<b>2.2 Licenses allocation</b>	Sierra Leone should publicly disclose the procedures for awarding and transferring all extractives licenses, including specific technical and financial criteria and any non-trivial deviations from the applicable legal and regulatory framework.	Yes	SLEITI MSG has selected a sample. IA has reviewed the sample to ensure that the license allocation was in accordance with Law and regulations. Technical and financial criteria used in practice are described in this report.  Conclusion: No-trivial deviations from the applicable legal and regulatory framework.	Sub-section 4.1.9 & 4.2.6
<b>2.6. State participation</b>	Sierra Leone should ensure that where the government and 11 SOE(s) have provided loans or loan guarantees to mining, oil and gas companies operating within the country, details on these loans and guarantees are clarified, as well as any details on transactions related to them. Sierra Leone is urged to revisit such issues annually, to ensure comprehensive reporting of the state's participation in the extractive sector	Yes	MSG agreed that there is no state participation in mining sector in Sierra Leone. - No SOE in mining sector in Sierra Leone; - No State legal ownership in mining companies; - No State participation in mining contracts.  Government agencies and extractive companies have confirmed that did not provide loans or loan guarantees to mining, oil and gas companies operating within the country	Sub-section 4.1.10 & 4.2.9
<b>3.2 Production</b>	Sierra Leone should ensure that all production volumes and values, including for the ASM subsector, is publicly accessible and reported on.	Yes	Large scale mining production was provided and included in the SLEITI 2019 report. Regarding the ASM production, NMA has provided Baseline Study on Artisanal Mining including an estimation of ASM mining	Sub-section 1.3 & 5.1

Requirement	Recommendation	Implementation	IA comments	Indication in 2019 SLEITI report
			production. The report is published on SLEITI website.	
<b>4.1 Comprehensiveness</b>	Sierra Leone should ensure that all significant payments and revenues made by extractive companies are considered in determining material revenue streams. Any omissions should be documented and justified. It should only exclude entities where payments are demonstrably not material, in accordance with Requirement 4.1.c. The MSG should also ensure that the government unilaterally reports all government revenues from the extractive sector, by individual revenue stream, regardless of its inclusion in the reconciliation exercise as per Requirement 4.1.d	Yes	In scoping phase, all material revenues mining sector (by revenue stream) were captured and included in the scope of SLEITI report 2019.	<b>Section 3: Scope of the report and Sub-Section 1.3.7</b>
<b>4.3 Infrastructure provisions and barter agreements</b>	Sierra Leone is required to consider whether any agreements, or set of agreements, involve the provisions of goods and services (including loans, grants and infrastructure works), in full or partial exchange for oil, gas or mining exploration or production rights. To do so, the MSG and the Independent Administrator needs to gain a full understanding of the terms of any relevant agreement and contracts between the state and other parties involved, the value of such agreements, and the materiality of such agreements relative to conventional agreements. Where such agreements are material, the MSG and Independent Administrator should ensure that EITI Reports provide a level of detail and transparency commensurate with disclosures and reconciliation of other payments and revenue streams.	Yes	SLEITI MSG has agreed that Infrastructure provisions and barter agreements requirement is not applicable in Sierra Leone.	<b>Sub-section 4.1.12 &amp; 4.2.12</b>

Requirement	Recommendation	Implementation	IA comments	Indication in 2019 SLEITI report
<b>4.6 Subnational payment</b>	Sierra Leone should undertake a comprehensive review of which direct taxes and levies extractive companies are subject to at subnational level. Sierra Leone should ensure that reporting mechanisms are established which allow for estimation of total subnational payments in Sierra Leone, to determining whether payments are material. The MSG should provide a comprehensive explanation of how such payments are determined, paid, and managed. Where material, the Sierra Leone should ensure that reconciled information on all companies' payments to subnational government entities and the collection of payments are publicly accessible.	Yes	SLEITI MSG has agreed that Surface rental is the only subnational payment in Sierra Leone in 2019.  The mining companies, Members of Parliament, District councils and Chiefdom Councils have reported Surface rental revenues under SLEITI 2019 report	Sub-section 4.1.15 & Sub-section 4.2.10 and Annex 7
<b>4.9. Data quality</b>	EITI requires an assessment of whether the payments and revenues are subject to credible, independent audit, applying international auditing standards. In accordance with Requirement 4.9.b.iii and the standard Terms of Reference for the Independent Administrator agreed by the EITI Board, the MSG and Independent Administrator should: a. Agree on reporting templates ahead of data collection b. Ensure that the Independent Administrator provides a clear and categorical assessment of comprehensiveness and reliability of the (financial) data presented. c. Ensure that the Independent Administrator provides an assessment of whether all companies and government entities within the agreed scope of the EITI reporting process provided the requested information. Any gaps or weaknesses in reporting to the Independent Administrator must be disclosed in the EITI Report, including naming any entities that	Yes	Auditor General have certified all Government agencies reporting templates. All mining companies selected in the scope have submitted their certified reporting templates except SL mining and Sierra Bauxite Limited.	Sub-section 1.3.7 of this report and Annex 11

Requirement	Recommendation	Implementation	IA comments	Indication in 2019 SLEITI report
	failed to comply with the agreed procedures, and an assessment of whether this is likely to have had material impact on the comprehensiveness and reliability of the report.			
<b>5.2 Subnational Transfers</b>	Sierra Leone should ensure that subnational transfers of extractive sector revenues are publicly disclosed, when such transfers are mandated by national law or other revenue sharing mechanism. In addition, Sierra Leone should publish the detailed transfer amounts calculated in accordance with the relevant revenue formulas to each subnational entity under both the Diamond Area Community Development Fund (DACDF) and surface rent payments that are distributed by central government agencies. Lastly, Sierra Leone should ensure actual transfers are disclosed in detail, reconciled and summarised, highlighting any deviation from statutory calculations.	Yes	SLEITI MSG has agreed that Diamond Area Community Development Fund (DACDF) is the only subnational transfers in Sierra Leone in 2019. We obtained from NMA Transfers made in 2019 to DACDF. We obtained from MMR disbursements made in 2019 to communities. We obtained DACDF balance on 31 December 2019.	Sub-section 4.1.16 / Annex 12 and Sub-Section 4.2.12
<b>6.1 mandatory social expenditures</b>	Sierra Leone should ensure mandatory social expenditures, such as expenditures under Community Development Agreements, are comprehensively disclosed each reporting year. For all material mandatory social expenditures, companies are required to disclose the nature and value of transactions, whether in cash or in kind, and ensure that disclosures be disaggregated by non-government beneficiary with information on the names and functions of third-party beneficiaries. Sierra Leone is encouraged to reconcile mandatory social expenditures and consider disclosing information on companies' voluntary social expenditures	Yes	Mining companies selected in the scope have reported Mandatory Social and expenditure under CDAs or mining agreement (in cash, in kind, beneficiaries, ect.)	Sub-section 4.1.18 and Annex 13

**ANNEXS**

## Annex 1: Register of small &amp; large-scale mining licenses

License Type	License Holder	Size unit	Size	Application Date	Start Date	Expiry Date	Commodity
Mining Lease	Sierra Minerals Holdings No.1 Limited	Sq. Kms	321.73	01/01/2001	17/01/2005	16/01/2075	Bauxite
Mining Lease	Sierra Rutile Limited	Sq. Kms	488.51	01/01/2001	09/09/2010	09/09/2080	Columbite, Graphite, Ilmenite, Monazite, Rutile, Titanium, Zircon
Mining Lease	KOIDU Limited	Sq. Kms	4	01/02/1995	22/07/1995	21/07/2070	Diamonds
Large Scale	Northern Mining Company Limited	Sq. Kms	82.02	16/12/2013	28/01/2014	28/01/2084	Associated Minerals, Iron Ore
Large Scale	Mass Energy Mining Company Limited	Sq. Kms	118.86	16/12/2013	28/01/2014	28/01/2084	Associated Minerals, Iron Ore
Large Scale	CKH Mining Company Limited	Sq. Kms	103.24	16/12/2013	28/01/2014	28/01/2084	Associated Minerals, Iron Ore
Large Scale	Tonguma Limited	Sq. Kms	124.82	02/07/2012	11/07/2012	11/07/2037	Diamonds
Large Scale	Sierra Diamonds Limited	Sq. Kms	9.9	26/11/2015	16/05/2018	16/05/2088	Diamonds
Large Scale	Sierramin Bauxite (SL) Limited	Sq. Kms	123.91	05/08/2016	07/09/2016	07/09/2086	Bauxite
Large Scale	DAYU MINING COMPANY LIMITED	Sq. Kms	9.46	21/12/2017	04/01/2018	04/01/2088	Gold
Large Scale	WONGOR INVESTMENT AND MINING CORPORATION LTD	Sq. Kms	100	04/10/2018	23/05/2019	22/05/2089	Associated Minerals, Gold
Large Scale	Meya Mining	Sq. Kms	130.38	20/05/2019	26/07/2019	25/07/2089	Associated Minerals, Diamonds, Gold
Small Scale	Dojo Resources (SL) Limited	Hectares	41	13/12/2017	19/01/2018	19/01/2030	Associated Minerals, Gold
Small Scale	Forever Faith Mining (SL) Limited	Hectares	100	21/02/2018	05/06/2018	05/06/2030	Titanium, Zircon
Small Scale	Afro-Asia Mining Corporation Limited	Hectares	99.981	21/05/2018	13/08/2019	12/08/2031	Ilmenite, Rutile, Zircon
Small Scale	XIN TAI MINING COMPANY LIMITED	Hectares	99.99	08/01/2019	09/10/2019	08/10/2031	Gold
Small Scale	Metals and Minerals Trading (SL) Limited	Hectares	93.97	08/01/2019	14/08/2019	13/08/2031	Columbite, Tantalite
Small Scale	Forever Faith Mining (SL) Limited	Hectares	99.26	01/04/2019	05/09/2019	04/09/2031	Ilmenite, Rutile, Zircon
Small Scale	Cheng Shuo Mining Company (SL) Limited	Hectares	91.3	12/04/2019	17/10/2019	16/10/2031	Gold
Small Scale	Hong Peng Resources (SL) Mining Investment Co. Limited	Hectares	2.73	10/05/2019	14/10/2019	13/10/2031	All Minerals
Small Scale	GOLDEN BRIDGE MINING INVESTMENT LIMITED	Hectares	99.84	02/07/2019	23/10/2019	22/10/2031	All Minerals
Small Scale	Xin Yin Company Limited	Hectares	27.23	09/07/2019	30/08/2019	29/08/2031	Gold
Small Scale	JINGXIANG Mining Company Limited	Hectares	99.72	24/09/2019	18/10/2019	17/10/2031	Gold

License Type	License Holder	Size unit	Size	Application Date	Start Date	Expiry Date	Commodity
Small Scale	KASINO MINING COMPANY LIMITED	Hectares	99.98	10/10/2019	28/11/2019	27/11/2031	Ilmenite, Rutile, Zircon
Exploration	Seawright Mining Company Limited	Sq. Kms	49.38	06/03/2009	24/04/2011	24/04/2022	Diamonds, Gold
Exploration	JYORK Industries Inc. Limited	Sq. Kms	40.75	01/08/2012	07/01/2013	07/01/2026	Associated Minerals, Diamonds, Gold
Exploration	Sierramin Bauxite (SL) Limited	Sq. Kms	123.29	02/12/2014	09/12/2014	09/12/2023	All Minerals, Associated Minerals
Exploration	Sierramin Bauxite (SL) Limited	Sq. Kms	124.45	02/12/2014	09/12/2014	09/12/2023	All Minerals, Associated Minerals
Exploration	Anant Resources (SL) Limited	Sq. Kms	163.08	19/02/2015	03/03/2015	03/03/2024	Associated Minerals, Diamonds, Gold
Exploration	Baumin Gold (SL) Limited	Sq. Kms	246.92	24/02/2015	23/06/2015	23/06/2024	Columbite, Gold, Tantalite
Exploration	Perfect International Company Limited	Sq. Kms	102.58	05/04/2016	10/05/2016	10/05/2025	Columbite, Diamonds, Gold, Tantalite
Exploration	Mourne Mining Limited	Sq. Kms	107.7	08/07/2016	09/08/2016	09/08/2025	Associated Minerals, Diamonds, Gold
Exploration	Serrarus Mining and Exploration Limited	Sq. Kms	70.842	26/07/2016	24/01/2017	24/01/2026	Gold
Exploration	ALGOM RESOURCES LIMITED	Sq. Kms	59.806	31/08/2016	09/01/2017	09/01/2026	All Minerals
Exploration	Goldarama (SL) Limited	Sq. Kms	22.09	14/02/2017	11/04/2017	11/04/2026	Gold
Exploration	SMC Marine Mining (SL) Limited	Sq. Kms	20.62	26/04/2017	23/10/2017	23/10/2026	Diamonds, Gold
Exploration	Xin Yin Company Limited	Sq. Kms	57.69	11/05/2017	07/07/2017	07/07/2026	All Minerals
Exploration	J.M. MINING KENEMA (SL) LIMITED	Sq. Kms	137.071	19/05/2017	27/07/2017	27/07/2026	Associated Minerals, Columbite, Gold, Tantalite
Exploration	Aberdeen Gold and Diamond Center Limited	Sq. Kms	64.43	19/05/2017	04/08/2017	04/08/2026	Associated Minerals, Bauxite, Gold
Exploration	Angel Mining Company Limited	Sq. Kms	118.12	12/06/2017	04/08/2017	04/08/2026	Diamonds
Exploration	Angel Mining Company Limited	Sq. Kms	167.6	12/06/2017	04/08/2017	04/08/2026	Diamonds
Exploration	West Africa Natural Resources (SL) Limited	Sq. Kms	204.37	06/07/2017	11/07/2017	11/07/2026	Associated Minerals, Bauxite
Exploration	West Africa Natural Resources (SL) Limited	Sq. Kms	162.22	06/07/2017	11/07/2017	11/07/2026	Associated Minerals, Bauxite

License Type	License Holder	Size unit	Size	Application Date	Start Date	Expiry Date	Commodity
Exploration	Bright Mining Technical Services and Logistics Company Limited	Sq. Kms	106.95	06/07/2017	18/09/2017	18/09/2026	All Minerals
Exploration	Bright Mining Technical Services and Logistics Company Limited	Sq. Kms	97.9	06/07/2017	20/09/2017	20/09/2026	All Minerals
Exploration	Bright Mining Technical Services and Logistics Company Limited	Sq. Kms	60.96	06/07/2017	18/09/2017	18/09/2026	All Minerals
Exploration	Afro-Asia Mining Corporation Limited	Sq. Kms	137.69	10/08/2017	18/09/2017	18/09/2026	Associated Minerals, Rutile
Exploration	African Gold Stream Mining (AGSM) (SL) Limited	Sq. Kms	30.58	13/11/2017	19/01/2018	19/01/2027	Gold
Exploration	Perfect International Company Limited	Sq. Kms	66.19	13/12/2017	28/12/2017	28/12/2026	All Minerals
Exploration	Solid Rock Mining and Exploration (SL) Limited	Sq. Kms	90.01	15/02/2018	02/03/2018	02/03/2027	All Minerals
Exploration	Solid Rock Mining and Exploration (SL) Limited	Sq. Kms	85.84	15/02/2018	02/03/2018	02/03/2027	All Minerals
Exploration	Metals and Minerals Trading (SL) Limited	Sq. Kms	71.3	15/02/2018	02/03/2018	02/03/2027	All Minerals
Exploration	Metals and Minerals Trading (SL) Limited	Sq. Kms	80.05	15/02/2018	02/03/2018	02/03/2027	All Minerals
Exploration	Kasila Mining and Engineering Services	Sq. Kms	69.8	23/03/2018	24/09/2018	24/09/2027	Ilmenite, Rutile, Zircon
Exploration	GOLD GENEROUS INDUSTRIAL COMPANY LIMITED	Sq. Kms	147.86	13/06/2018	31/07/2018	31/07/2027	All Minerals
Exploration	Metals and Minerals Trading (SL) Limited	Sq. Kms	169.734	12/07/2018	30/07/2018	30/07/2027	All Minerals
Exploration	GUANG YUAN (SL) LIMITED	Sq. Kms	82.72	13/07/2018	02/08/2018	02/08/2027	Associated Minerals, Diamonds, Gold

## Annex 2: Diamond exporter licenses

Application Code	License Code	Application Date	Start Date	Expiry Date	Owner Name	Type	Minerals
APL-T-2666	DEL 2/2019	29/01/2019	07/02/2019	07/02/2020	Metals and Minerals Trading (SL) Limited	Diamond Exporter (FULL YEAR)	Diamonds
APL-T-2673	DEL 3/2019	05/02/2019	25/02/2019	25/02/2020	Pluto Mining Company (SL) Limited	Diamond Exporter (FULL YEAR)	Diamonds
APL-T-2694	DEL 4/2019	18/03/2019	01/04/2019	01/04/2020	Sierra Gems and Metals trust (S.G.M.T)	Diamond Exporter (FULL YEAR)	Diamonds
APL-T-2695	DEL 5/2019	28/03/2019	05/04/2019	05/04/2020	ContinentalAfrica Minerals (SL) Limited	Diamond Exporter (FULL YEAR)	Diamonds
APL-T-2720	DEL 6/2019	26/03/2019	26/04/2019	26/04/2020	Mroue, Wissam	Diamond Exporter (FULL YEAR)	Diamonds
APL-T-2732	DEL 7/2019	08/05/2019	14/05/2019	14/05/2020	Klata SL Limited	Diamond Exporter (FULL YEAR)	Diamonds
APL-T-2739	DEL 8/2019	11/04/2019	16/05/2019	16/05/2020	Forward Mining and Investment Limited	Diamond Exporter (FULL YEAR)	Diamonds
APL-T-2740	DEL 9/2019	13/05/2019	23/05/2019	23/05/2020	Africa Global Enterprise (AGE)	Diamond Exporter (FULL YEAR)	Diamonds
APL-T-2766	DEL 10/2019	30/05/2019	03/07/2019	02/07/2020	Beryl Grace Limited	Diamond Exporter (FULL YEAR)	Diamonds
APL-T-2767	DEL 11/2019	31/05/2019	03/07/2019	02/07/2020	NB Global Investment INC	Diamond Exporter (FULL YEAR)	Diamonds
APL-T-2768	DEL 12/2019	28/05/2019	03/07/2019	02/07/2020	Kassim Basma Gems	Diamond Exporter (FULL YEAR)	Diamonds
APL-T-2769	DEL 13/2019	21/05/2019	03/07/2019	02/07/2020	Gemfair (SL) Limited	Diamond Exporter (FULL YEAR)	Diamonds
APL-T-2778	DEL 14/2019	31/05/2019	04/07/2019	03/07/2020	H. M. Diamonds	Diamond Exporter (FULL YEAR)	Diamonds
APL-T-2787	DEL 15/2019	02/07/2019	19/07/2019	18/07/2020	Rough & Polish Gem (SL) Limited	Diamond Exporter (FULL YEAR)	Diamonds
APL-T-2812	DEL 16/2019	30/07/2019	07/08/2019	06/08/2020	Leo Investment (SL) Limited	Diamond Exporter (FULL YEAR)	Diamonds
APL-T-2823	DEL 17/2019	19/08/2019	29/08/2019	28/08/2020	Scintilating Diamonds (SL) Limited	Diamond Exporter (FULL YEAR)	Diamonds
APL-T-2851	DEL 18/2019	21/08/2019	24/09/2019	23/09/2020	Koroma, Patrick	Diamond Exporter (FULL YEAR)	Diamonds
APL-T-2868	DEL 19/2019	11/09/2019	04/10/2019	03/10/2020	Rabbit Investment LLC	Diamond Exporter (FULL YEAR)	Diamonds
APL-T-2869	DEL 20/2019	05/09/2019	04/10/2019	03/10/2020	Diatrade (SL) Limited	Diamond Exporter (FULL YEAR)	Diamonds
APL-T-2913	DEL 21/2019	05/11/2019	15/11/2019	14/11/2020	Crocodile Mining (SL) Limited	Diamond Exporter (FULL YEAR)	Diamonds

## Annex 3: Gold exporter licenses

Application Code	License Code	Application Date	Start Date	Expiry Date	Owner Name	Type	Minerals
APL-T-2647	GEL 1/2019	20/12/2018	18/01/2019	18/01/2020	ORPALL (SL) LIMITED	Gold Exporter	Gold
APL-T-2656	GEL 2/2019	14/12/2018	21/01/2019	21/01/2020	Sellem Industries (SL) Limited	Gold Exporter	Gold
APL-T-2672	GEL 3/2019	05/02/2019	25/02/2019	25/02/2020	Persefona (SL) Limited	Gold Exporter	Gold
APL-T-2679	GEL 5/2019	13/02/2019	05/03/2019	05/03/2020	Tai Holdings Limited	Gold Exporter	Gold
APL-T-2680	GEL 4/2019	22/02/2019	05/03/2019	05/03/2020	Bandawor Mining Co. (SL) Limited	Gold Exporter	Gold
APL-T-2696	GEL 6/2019	28/02/2019	01/04/2019	01/04/2020	Maramco (SL) Limited	Gold Exporter	Gold
APL-T-2697	GEL 7/2019	10/04/2019	07/04/2019	07/04/2020	Advantage Partners (SL) Limited	Gold Exporter	Gold
APL-T-2712	GEL 8/2019	26/03/2019	11/04/2019	11/04/2020	Sabbour Minerals Trading Company Limited	Gold Exporter	Gold
APL-T-2738	GEL 9/2019	09/05/2019	24/05/2019	24/05/2020	Tangikora, Hagi	Gold Exporter	Gold
APL-T-2781	GEL 10/2019	27/05/2019	15/07/2019	14/07/2020	Krowork AU Limited	Gold Exporter	Gold
APL-T-2782	GEL 11/2019	27/06/2019	16/07/2019	15/07/2020	Bright Continent Minerals Limited	Gold Exporter	Gold
APL-T-2785	GEL 12/2019	21/06/2019	17/07/2019	16/07/2020	Lake INC Limited	Gold Exporter	Gold
APL-T-2786	GEL 13/2019	17/07/2019	25/07/2019	24/07/2020	Precise (SL) Limited	Gold Exporter	Gold
APL-T-2811	GEL 14/2019	25/07/2019	09/08/2019	08/08/2020	Continental mining Company Limited	Gold Exporter	Gold
APL-T-2824	GEL 15/2019	20/08/2019	02/09/2019	01/09/2020	Jasal Minerals (SL) Limited	Gold Exporter	Gold
APL-T-2841	GEL 16/2019	26/08/2019	06/09/2019	05/09/2020	Atlas Industries (SL) Limited	Gold Exporter	Gold
APL-T-2850	GEL 17/2019	29/08/2019	16/09/2019	15/09/2020	N B Global Investments Inc	Gold Exporter	Gold
APL-T-2867	GEL 18/2019	11/09/2019	04/10/2019	03/10/2020	Rabbit Investment LLC	Gold Exporter	Gold
APL-T-2912	GEL 19/2019	30/10/2019	19/11/2019	18/11/2020	Solidar Global company (SL) Limited	Gold Exporter	Gold
APL-T-2922	GEL 20/2019	18/11/2019	04/12/2019	03/12/2020	Shefaf Limited	Gold Exporter	Gold
APL-T-2923	GEL 21/2019	26/11/2019	05/12/2019	04/12/2020	Luxec (SL) Limited	Gold Exporter	Gold
APL-T-2928	GEL 22/2019	03/12/2019	18/12/2019	17/12/2020	Bumblebee (SL) Limited	Gold Exporter	Gold

#### Annex 4: Government revenues from extractive industries disaggregated by company, by government agency and by revenue stream

Company / Revenue stream	EPA	NMA	NRA	Subnational entities	Total USD
<b>Sierra Rutile Limited</b>	<b>234,384</b>		<b>25,967,811</b>	<b>694,465</b>	<b>26,896,661</b>
Corporate Tax			7,598,260		7,598,260
Environmental License Fee	195,320				195,320
Environmental Monitoring fee	39,064				39,064
Exploration license			106,179		106,179
Import and Export duties			2,960,282		2,960,282
Mining license			377,848		377,848
PAYE			6,083,663		6,083,663
Royalty			6,129,670		6,129,670
Surface Rent				694,465	694,465
W/H 5% Contract			2,711,909		2,711,909
<b>KOIDU LIMITED</b>	<b>102,792</b>		<b>12,776,329</b>	<b>61,821</b>	<b>12,940,942</b>
Environmental License Fee	85,660				85,660
Environmental Monitoring fee	17,132				17,132
Mining license			260,955		260,955
PAYE			5,657,036		5,657,036
Royalty			6,327,659		6,327,659
Surface Rent				61,821	61,821
W/H 5% Contract			530,678		530,678
<b>Sierra Minerals Holdings No.1 Limited</b>	<b>118,272</b>		<b>5,545,801</b>	<b>131,582</b>	<b>5,795,655</b>
Corporate Tax			1,443,363		1,443,363
Environmental License Fee	98,560				98,560
Environmental Monitoring fee	19,712				19,712
Mining license			500,000		500,000
PAYE			1,710,975		1,710,975
Royalty			1,891,464		1,891,464
Surface Rent				131,582	131,582
<b>Kingho Mining Comapany Limited</b>	<b>208,440</b>		<b>3,500,000</b>	<b>41,166</b>	<b>3,749,606</b>
Environmental License Fee	173,700				173,700
Environmental Monitoring fee	34,740				34,740
Mining license			3,500,000		3,500,000
Surface Rent				41,166	41,166
<b>H. M. DIAMONDS</b>		<b>958,315</b>	<b>924,640</b>		<b>1,882,955</b>

Company / Revenue stream	EPA	NMA	NRA	Subnational entities	Total USD
Diamond & Gold Export duties		958,315	889,640		1,847,955
Diamond & Gold Exporters licence			35,000		35,000
<b>CROCODILE MINING (SL) LIMITED</b>		<b>720,760</b>	<b>749,336</b>		<b>1,470,096</b>
Diamond & Gold Export duties		720,760			720,760
Import and Export duties			749,336		749,336
<b>Tonkolili Iron Ore (SL) Limited</b>			<b>1,456,740</b>		<b>1,456,740</b>
Mining license			1,131,940		1,131,940
PAYE			324,800		324,800
<b>MEYA MINING LTD</b>	<b>81,912</b>	<b>117,415</b>	<b>1,200,425</b>	<b>49,800</b>	<b>1,449,552</b>
Diamond & Gold Export duties		117,415			117,415
Environmental License Fee	68,260				68,260
Environmental Monitoring fee	13,652				13,652
Mining license			500,000		500,000
PAYE			346,218		346,218
Surface Rent				49,800	49,800
W/H 5% Contract			354,207		354,207
<b>DAYU MINING COMPANY LIMITED</b>	<b>146,940</b>		<b>959,688</b>		<b>1,106,628</b>
Environmental License Fee	122,450				122,450
Environmental Monitoring fee	24,490				24,490
Mining license			500,000		500,000
PAYE			53,065		53,065
Royalty			372,943		372,943
W/H 5% Contract			33,679		33,679
<b>S.L MINING LTD</b>	<b>202,608</b>		<b>574,888</b>	<b>84,294</b>	<b>861,790</b>
Environmental License Fee	168,840				168,840
Environmental Monitoring fee	33,768				33,768
Mining license			530,450		530,450
Royalty			44,438		44,438
Surface Rent				84,294	84,294
<b>Sierra Diamonds Limited</b>	<b>6,708</b>		<b>772,366</b>	<b>39,979</b>	<b>819,053</b>
Environmental License Fee	5,590				5,590
Environmental Monitoring fee	1,118				1,118
Mining license			500,000		500,000
PAYE			203,096		203,096
Surface Rent				39,979	39,979
W/H 5% Contract			69,271		69,271

Company / Revenue stream	EPA	NMA	NRA	Subnational entities	Total USD
<b>Sierramin Bauxite (SL) Limited</b>	<b>80,880</b>		<b>515,000</b>	<b>88,718</b>	<b>684,598</b>
Environmental License Fee	67,400				67,400
Environmental Monitoring fee	13,480				13,480
Mining license			515,000		515,000
Surface Rent				88,718	88,718
<b>Tonguma Limited</b>		<b>2,700</b>	<b>614,937</b>		<b>617,637</b>
Diamond & Gold Export duties		2,700			2,700
Mining license			614,937		614,937
<b>WONGOR INVESTMENT AND MINING CORPORATION LTD</b>			<b>500,000</b>	<b>34,744</b>	<b>534,744</b>
Mining license			500,000		500,000
Surface Rent				34,744	34,744
<b>African Railway &amp; Port Services</b>			<b>437,702</b>		<b>437,702</b>
Mining license			250,000		250,000
PAYE			187,702		187,702
<b>KASSIM M BASMA</b>		<b>326,238</b>	<b>29</b>		<b>326,267</b>
Diamond & Gold Export duties		326,238			326,238
PAYE			29		29
<b>FOREVER FAITH MINING</b>	<b>28,332</b>		<b>192,627</b>		<b>220,959</b>
Environmental License Fee	23,610				23,610
Environmental Monitoring fee	4,722				4,722
Exploration license			170,582		170,582
Royalty			22,045		22,045
<b>Metals and Minerals Trading (SL) Ltd</b>	<b>37,260</b>	<b>33,747</b>	<b>137,149</b>		<b>208,156</b>
Diamond & Gold Export duties		33,747			33,747
Diamond & Gold Exporters licence			35,000		35,000
Environmental License Fee	31,050				31,050
Environmental Monitoring fee	6,210				6,210
Exploration license			16,973		16,973
Mining license			85,176		85,176
<b>Cheng Li Mining Company sl</b>	<b>86,592</b>		<b>86,592</b>		<b>173,184</b>
Environmental License Fee	72,160				72,160
Environmental Monitoring fee	14,432				14,432
Mining license			86,592		86,592
<b>SEAWRIGHT MINING COMPANY</b>	<b>89,232</b>	<b>17,254</b>	<b>19,752</b>		<b>126,238</b>
Diamond & Gold Export duties		17,254			17,254
Environmental License Fee	74,360				74,360

Company / Revenue stream	EPA	NMA	NRA	Subnational entities	Total USD
Environmental Monitoring fee	14,872				14,872
Exploration license			19,752		19,752
<b>Jingxiang Mining Co Ltd</b>	<b>23,784</b>		<b>100,770</b>		<b>124,554</b>
Diamond & Gold Exporters licence			20,994		20,994
Environmental License Fee	19,820				19,820
Environmental Monitoring fee	3,964				3,964
Mining license			79,776		79,776
<b>Golden Bridge Investment Ltd</b>	<b>32,652</b>		<b>79,872</b>		<b>112,524</b>
Environmental License Fee	27,210				27,210
Environmental Monitoring fee	5,442				5,442
Mining license			79,872		79,872
<b>Xin Tai Mining Co Ltd</b>	<b>32,400</b>		<b>79,992</b>		<b>112,392</b>
Environmental License Fee	27,000				27,000
Environmental Monitoring fee	5,400				5,400
Exploration license			79,992		79,992
<b>PLUTO MINING COMPANY (SL) LIMITED</b>		<b>75,041</b>	<b>35,000</b>		<b>110,041</b>
Diamond & Gold Export duties		75,041			75,041
Diamond & Gold Exporters licence			35,000		35,000
<b>AFRO ASIA MINING CORPORATION</b>			<b>107,522</b>		<b>107,522</b>
Exploration license			27,538		27,538
Mining license			79,984		79,984
<b>Tongoma Underground Min. Project</b>	<b>102,792</b>				<b>102,792</b>
Environmental License Fee	85,660				85,660
Environmental Monitoring fee	17,132				17,132
<b>Cheng Shou Mining Company</b>	<b>28,836</b>		<b>73,040</b>		<b>101,876</b>
Environmental License Fee	24,030				24,030
Environmental Monitoring fee	4,806				4,806
Mining license			73,040		73,040
<b>MONJED MAROUF JAWAD</b>		<b>74,156</b>			<b>74,156</b>
Diamond & Gold Export duties		74,156			74,156
<b>Xin Yin Company Limited</b>	<b>39,384</b>		<b>27,553</b>		<b>66,937</b>
Environmental License Fee	32,820				32,820
Environmental Monitoring fee	6,564				6,564
Exploration license			5,769		5,769
Mining license			21,784		21,784
<b>WISSAM MROUE</b>		<b>27,730</b>	<b>35,000</b>		<b>62,730</b>

Company / Revenue stream	EPA	NMA	NRA	Subnational entities	Total USD
Diamond & Gold Export duties		27,730			27,730
Diamond & Gold Exporters licence			35,000		35,000
<b>Marampa Mining company</b>				<b>24,730</b>	<b>24,730</b>
Surface Rent				24,730	24,730
<b>Kasila Mining &amp; Engineering`</b>			<b>6,980</b>		<b>6,980</b>
Exploration license			6,980		6,980
<b>DAYU MINING COMPANY LIMITED</b>				<b>3,448</b>	<b>3,448</b>
Surface Rent				3,448	3,448
<b>Other Mining companies and Dimond and Gold exports</b>	<b>29,766</b>	<b>168,059</b>	<b>1,493,906</b>		<b>1,691,731</b>
Diamond & Gold Export duties		168,059			168,059
Diamond & Gold Exporters licence			816,500		816,500
Diamond Dealer License			162,582		162,582
Environmental Monitoring fee	29,766				29,766
Exploration license			269,077		269,077
Import and Export duties			286		286
Mining license			161,157		161,157
PAYE			15,592		15,592
Royalty			63,174		63,174
W/H 5% Contract			5,538		5,538
<b>Total</b>	<b>1,713,966</b>	<b>2,521,415</b>	<b>58,971,448</b>	<b>1,254,746</b>	<b>64,461,575</b>

## Annex 5: Government revenues from extractive industries disaggregated by revenue stream and by government agency

Revenue stream	EPA	NMA	NRA	Government agencies Subnational entities	Total USD
Royalty			14,851,394		14,851,394
PAYE			14,582,175		14,582,175
Mining license			10,348,511		10,348,511
Corporate Tax			9,041,624		9,041,624
Import and Export duties			3,709,904		3,709,904
W/H 5% Contract			3,705,283		3,705,283
Diamond & Gold Export duties		2,521,415	889,640		3,411,055
Environmental License Fee	1,403,500				1,403,500
Surface Rent				1,254,746	1,254,746
Diamond & Gold Exporters licence			977,494		977,494
Exploration license			702,842		702,842
Environmental Monitoring fee	310,466				310,466
Diamond Dealer License			162,582		162,582
<b>Total</b>	<b>1,713,966</b>	<b>2,521,415</b>	<b>58,971,448</b>	<b>1,254,746</b>	<b>64,461,575</b>

## Annex 6: Government revenues from extractive industries disaggregated by project and by government agency

Project	Government agencies			Total USD	
	EPA	NMA	NRA		
<b>ML2134</b>	<b>234,384</b>		<b>25,967,811</b>	<b>694,465</b>	<b>26,896,661</b>
Corporate Tax			7,598,260		7,598,260
Environmental License Fee	195,320				195,320
Environmental Monitoring fee	39,064				39,064
Exploration license			106,179		106,179
Import and Export duties			2,960,282		2,960,282
Mining license			377,848		377,848
PAYE			6,083,663		6,083,663
Royalty			6,129,670		6,129,670
Surface Rent				694,465	694,465
W/H 5% Contract			2,711,909		2,711,909
<b>ML 06/95</b>	<b>102,792</b>		<b>12,776,329</b>	<b>61,821</b>	<b>12,940,942</b>
Environmental License Fee	85,660				85,660
Environmental Monitoring fee	17,132				17,132
Mining license			260,955		260,955
PAYE			5,657,036		5,657,036
Royalty			6,327,659		6,327,659
Surface Rent				61,821	61,821
W/H 5% Contract			530,678		530,678
<b>ML 01/95</b>	<b>118,272</b>		<b>5,545,801</b>	<b>131,582</b>	<b>5,795,655</b>
Corporate Tax			1,443,363		1,443,363
Environmental License Fee	98,560				98,560
Environmental Monitoring fee	19,712				19,712
Mining license			500,000		500,000
PAYE			1,710,975		1,710,975
Royalty			1,891,464		1,891,464
Surface Rent				131,582	131,582
<b>ML 1/2020</b>	<b>208,440</b>		<b>3,500,000</b>	<b>41,166</b>	<b>3,749,606</b>
Environmental License Fee	173,700				173,700
Environmental Monitoring fee	34,740				34,740
Mining license			3,500,000		3,500,000
Surface Rent				41,166	41,166
<b>ML 2/2019</b>	<b>146,940</b>		<b>959,688</b>	<b>3,448</b>	<b>1,110,075</b>

Project	Government agencies				Total USD
	EPA	NMA	NRA	Subnational entities	
Environmental License Fee	122,450				122,450
Environmental Monitoring fee	24,490				24,490
Mining license			500,000		500,000
PAYE			53,065		53,065
Royalty			372,943		372,943
Surface Rent				3,448	3,448
W/H 5% Contract			33,679		33,679
<b>ML 1/2017</b>	<b>202,608</b>		<b>574,888</b>	<b>84,294</b>	<b>861,790</b>
Environmental License Fee	168,840				168,840
Environmental Monitoring fee	33,768				33,768
Mining license			530,450		530,450
Royalty			44,438		44,438
Surface Rent				84,294	84,294
<b>Other projects</b>	<b>700,530</b>	<b>2,521,415</b>	<b>9,646,930</b>	<b>237,971</b>	<b>13,106,846</b>
Diamond & Gold Export duties		2,521,415	889,640		3,411,055
Diamond & Gold Exporters licence			977,494		977,494
Diamond Dealer License			162,582		162,582
Environmental License Fee	558,970				558,970
Environmental Monitoring fee	141,560				141,560
Exploration license			596,663		596,663
Import and Export duties			749,622		749,622
Mining license			4,679,258		4,679,258
PAYE			1,077,436		1,077,436
Royalty			85,219		85,219
Surface Rent				237,971	237,971
W/H 5% Contract			429,016		429,016
<b>Total</b>	<b>1,713,966</b>	<b>2,521,415</b>	<b>58,971,448</b>	<b>1,254,746</b>	<b>64,461,575</b>

## Annex 7: Surface rental revenues disaggregated by recipient and by mining company

Recipient	Recipient category	Revenue Stream	Mining company	USD	Reporting entity
Nimikor Chiefdom	CHIEFDOM COUNCIL	Surface Rent	WONGOR INVESTMENT AND MINING CORPORATION LIMITED	18,021	CHIEFDOM COUNCIL
Landowners	Landowners	Surface Rent	WONGOR INVESTMENT AND MINING CORPORATION LIMITED	12,864	WONGOR INVESTMENT AND MINING CORPORATION LIMITED
Paramount chief	Paramount chief	Surface Rent	WONGOR INVESTMENT AND MINING CORPORATION LIMITED	3,859	WONGOR INVESTMENT AND MINING CORPORATION LIMITED
Members of Parlement	MPs	Surface rental	SL Mining	10,292	MPs
Maramapa Chiefdom	CHIEFDOM COUNCIL	Surface Rent	SL Mining	911	CHIEFDOM COUNCIL
Port Loko District Council	DISTRICT COUNCIL	Surface Rent	SL Mining	37,500	DISTRICT COUNCIL
Port Loko District Council	DISTRICT COUNCIL	Surface Rent	SL Mining	565	DISTRICT COUNCIL
Landowners	Landowners	Surface Rent	SL Mining	26,944	SL Mining
Paramount chief	Paramount chief	Surface Rent	SL Mining	8,083	SL Mining
Members of Parlement	MPs	Surface rental	Sierramin bauxite Limited	7,848	MPs
Members of Parlement	MPs	Surface rental	Sierramin bauxite Limited	3,872	MPs
Maramapa Chiefdom	CHIEFDOM COUNCIL	Surface Rent	Sierramin bauxite Limited	9,702	CHIEFDOM COUNCIL
Maforki Ciefdom	CHIEFDOM COUNCIL	Surface Rent	Sierramin bauxite Limited	2,380	CHIEFDOM COUNCIL
Port Loko District Council	DISTRICT COUNCIL	Surface Rent	Sierramin bauxite Limited	14,512	DISTRICT COUNCIL
Port Loko District Council	DISTRICT COUNCIL	Surface Rent	Sierramin bauxite Limited	3,577	DISTRICT COUNCIL
Port Loko District Council	DISTRICT COUNCIL	Surface Rent	Sierramin bauxite Limited	46,827	DISTRICT COUNCIL
Members of Parlement	MPs	Surface rental	Sierra Rutile Limited	16,792	MPs
Members of Parlement	MPs	Surface rental	Sierra Rutile Limited	23,938	MPs
BONTHE DISTRICT COUNCIL	DISTRICT COUNCIL	Surface rental	Sierra Rutile Limited	35,907	DISTRICT COUNCIL
MOYAMBA DISTRICT COUNCIL	DISTRICT COUNCIL	Surface rental	Sierra Rutile Limited	56,385	DISTRICT COUNCIL
UPPER BANTA CHIEFDOM	CHIEFDOM COUNCIL	Surface rental	Sierra Rutile Limited	7,265	CHIEFDOM COUNCIL
LOWER BANTA CHIEFDOM	CHIEFDOM COUNCIL	Surface rental	Sierra Rutile Limited	9,527	CHIEFDOM COUNCIL
BAGRUWA CHIEFDOM	CHIEFDOM COUNCIL	Surface rental	Sierra Rutile Limited	20,798	CHIEFDOM COUNCIL
IMPERI CHIEFDOM	CHIEFDOM COUNCIL	Surface rental	Sierra Rutile Limited	22,799	CHIEFDOM COUNCIL
JONG CHIEFDOM	CHIEFDOM COUNCIL	Surface rental	Sierra Rutile Limited	1,139	CHIEFDOM COUNCIL
Landowners	Landowners	Surface Rent	Sierra Rutile Limited	384,550	Sierra Rutile Limited
Paramount chief	Paramount chief	Surface Rent	Sierra Rutile Limited	115,365	Sierra Rutile Limited
Members of Parlement	MPs	Surface rental	SIERRA MINERALS HOLDING.1	10,175	MPs
BONTHE DISTRICT COUNCIL	DISTRICT COUNCIL	Surface rental	SIERRA MINERALS HOLDING.1	1,654	DISTRICT COUNCIL
MOYAMBA DISTRICT COUNCIL	DISTRICT COUNCIL	Surface rental	SIERRA MINERALS HOLDING.1	15,262	DISTRICT COUNCIL
UPPER BANTA CHIEFDOM	CHIEFDOM COUNCIL	Surface rental	SIERRA MINERALS HOLDING.1	6,116	CHIEFDOM COUNCIL
LOWER BANTA CHIEFDOM	CHIEFDOM COUNCIL	Surface rental	SIERRA MINERALS HOLDING.1	2,420	CHIEFDOM COUNCIL
KPANDA KEMOH CHIEFDOM	CHIEFDOM COUNCIL	Surface rental	SIERRA MINERALS HOLDING.1	1,102	CHIEFDOM COUNCIL
BUMPEH NGO CHIEFDOM	CHIEFDOM COUNCIL	Surface rental	SIERRA MINERALS HOLDING.1	2,874	CHIEFDOM COUNCIL
Paramount chief	Paramount chief	Surface rental	SIERRA MINERALS HOLDING.1	21,226	SIERRA MINERALS HOLDING.1

Recipient	Recipient category	Revenue Stream	Mining company	USD	Reporting entity
Landowners	Landowners	Surface rental	SIERRA MINERALS HOLDING.1	70,753	SIERRA MINERALS HOLDING. 1
KENEMA DISTRICT COUNCIL	DISTRICT COUNCIL	Surface rental	SIERRA DIMOND	6,922	DISTRICT COUNCIL
Landowners	Landowners	Surface rental	SIERRA DIMOND	25,387	SIERRA DIMOND
Paramount chief	Paramount chief	Surface rental	SIERRA DIMOND	5,077	SIERRA DIMOND
Landowners	Landowners	Surface rental	SIERRA DIMOND	2,161	SIERRA DIMOND
Paramount chief	Paramount chief	Surface rental	SIERRA DIMOND	432	SIERRA DIMOND
Nimikor Chiefdom	CHIEFDOM COUNCIL	Surface Rent	Meya mining	49,800	CHIEFDOM COUNCIL
Maramapa Chiefdom	CHIEFDOM COUNCIL	Surface Rent	Marampa Mining company	22,641	CHIEFDOM COUNCIL
Maforki Ciefdom	CHIEFDOM COUNCIL	Surface Rent	Marampa Mining company	2,088	CHIEFDOM COUNCIL
Members of Parlement	MPs	Surface rental	Koidu Limited	6,870	MPs
koidu New Sembehun City Council	CHIEFDOM COUNCIL	Surface Rent	Koidu Limited	6,864	CHIEFDOM COUNCIL
Kono District Council	DISTRICT COUNCIL	Surface Rent	Koidu Limited	3,435	DISTRICT COUNCIL
Landowners	Landowners	Surface rental	Koidu Limited	34,348	Koidu Limited
Paramount chief	Paramount chief	Surface rental	Koidu Limited	10,304	Koidu Limited
Landowners	Landowners	Surface Rent	Kingho Mining Comapany Limited	20,583	Kingho Mining Comapany Limited
Paramount chief	Paramount chief	Surface Rent	Kingho Mining Comapany Limited	6,175	Kingho Mining Comapany Limited
DISTRICT COUNCIL	DISTRICT COUNCIL	Surface Rent	Kingho Mining Comapany Limited	6,175	Kingho Mining Comapany Limited
CHIEFDOM COUNCIL	CHIEFDOM COUNCIL	Surface Rent	Kingho Mining Comapany Limited	4,117	Kingho Mining Comapany Limited
MPs	MPs	Surface Rent	Kingho Mining Comapany Limited	4,117	Kingho Mining Comapany Limited
Simiria Chiefdom	CHIEFDOM COUNCIL	Surface Rent	DAYU MINING COMPANY LIMITED	1,750	CHIEFDOM COUNCIL
Tonkolili District Council	DISTRICT COUNCIL	Surface Rent	DAYU MINING COMPANY LIMITED	1,698	DISTRICT COUNCIL
<b>Total</b>				<b>1,254,746</b>	

## Annex 8: Employment figures reported by in-scope mining companies disaggregated by mining company and gender

	Nationals		Foreign employees		Total
	Male	Female	Male	Female	
SIERRA RUTILE LIMITED	2,434	218	50	5	2,707
KOIDU LIMITED	833	17	184	15	1,049
SIERRA MINERALS HOLDINGS NO.1 LIMITED	592	31	32	2	657
S.L MINING LTD	531	116	60	1	708
KINGHO INVESTMENT LIMITED	5	6	4	3	18
TONKOLILI IRON ORE (SL) LIMITED					-
MEYA MINING LTD	239	20	26	4	289
DAYU MINING COMPANY LIMITED	161	41			202
H. M. DIAMONDS	7	3	2	-	12
AFRICAN RAILWAY & PORT SERVICES					-
SIERRAMIN BAUXITE (SL) LIMITED					-
TONGUMA LIMITED					-
SIERRA DIAMONDS LIMITED	60	7	47	-	114
WONGOR INVESTMENT AND MINING CORPORATION LTD	-	-	10	-	10
<b>Total</b>	<b>4,862</b>	<b>459</b>	<b>415</b>	<b>30</b>	<b>5,766</b>

## Annex 9: Beneficial ownership declaration

Company	Listed company	Stock exchange	Full legal name of Beneficial Owner	Date of birth	Nationalities	Country of residence	Type of interest or control	Description of interest or control	Percentage interest (exact)	Directly or indirectly held?	If interest is indirectly held, Intermediate legal owner	Is this individual politically exposed person (PEP)?
Sierra Rutile Limited	No	N/A	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP
KOIDU LIMITED	No	NA	Benjamin Steinmetz	02/04/1956	French / Israeli	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Agnes Steinmetz	05/03/1958	French / Israeli	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Merav Steinmetz-Schwartz	01/10/1982	French / Israeli	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Avner Steinmetz	02/08/1984	French / Israeli	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Michal Steinmetz	25/11/1986	French / Israeli	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Nadav Steinmetz	22/04/1993	French / Israeli	United Kingdom	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
Sierra Mineral Holdings I Limited	No	NA	Olga Volokhova	11/01/1975	Israeli	Israel	Shareholding	Indirect shareholding	25.60%	Indirectly	Global Aluminium Limited	No
SL MINING LIMITED	No	NA	Craig Fuad Dean	05/03/1973	USA / Switzerland	USA	Other influence or control	NP	NP	NP	NP	NP
Kingho Mining Company Limited	No	NA	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP
MEYA MINING LIMITED	No	NA	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP
DAYU MINING COMPANY LIMITED	No	NA	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP
H. M. DIAMONDS	No	NA	HESHAM MACKIE	06/04/1969	SIERRA LEONEAN	Sierra Leone	Shareholding	Direct interest	90.00%	N/A	N/A	NP
			OUSSAMA MATAR	06/09/1974	LEBANESE	Sierra Leone	Shareholding	Direct interest	10.00%	N/A	N/A	NP
TONGUMA LIMITED	No	NA	Benjamin Steinmetz	02/04/1956	French / Israeli	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No

Company	Listed company	Stock exchange	Full legal name of Beneficial Owner	Date of birth	Nationalities	Country of residence	Type of interest or control	Description of interest or control	Percentage interest (exact)	Directly or indirectly held?	If interest is indirectly held, Intermediate legal owner	Is this individual politically exposed person (PEP)?
			Agnes Steinmetz	05/03/1958	French / Israeli	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Merav Steinmetz-Schwartz	01/10/1982	French / Israeli	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Avner Steinmetz	02/08/1984	French / Israeli	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Michal Steinmetz	25/11/1986	French / Israeli	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Nadav Steinmetz	22/04/1993	French / Israeli	United Kingdom	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
Sierra Diamonds Limited	No	NA	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP
WONGOR INVESTMENT AND MINING CORPORATION LIMITED	No	NA	SHAO GUOLONG	01/10/1986	CHINESE	ITALY	Shareholding	Direct interest	51.00%	N/A	N/A	No
			LIANG XIAOHAO	18/02/1973	CHINESE	PORTUGAL	Shareholding	Direct interest	49.00%	N/A	N/A	N/A

NP: Not provided

NA: Not applicable

## Annex 10: Legal ownership declaration

Company	TIN	Date of the company establishment	Company's Capital (in USD)	Contact address	Legal owner's legal name	%	Company / individual	Country of registration /Information	Type of company	Company identifier type	Company Identifier	Registration authority
Sierra Rutile Limited	1000005453	27th June, 1975	12,970,000	110 Wilkinson Road, Freetown Sierra Leone	Sierra Rutile Holdings Limited	99%	Company	British Virgin Island	Private registered company	Company registration number/ID	99548	Rigistrar of Company of the British Virgin Island
					SRL Acquisition No.3 Limited	1%	Company	British Virgin Island	Private registered company	Company registration number/ID	436691	Rigistrar of Company of the British Virgin Island
KOIDU LIMITED	1001358-5	06/09/2010	52,000,000	84 WILKINSON ROAD FREETOWN SIERRA LEONE	Octea Mining Limited	100%	Company	Guernsey	Private registered company	Company registration number/ID	65910	Guernsey Registry
Sierra Mineral Holdings I Limited	1000001938	2008	3,400,000	52 Wellington Street	GLOBAL ALUMINIUM LIMITED	100%	Company	British Virgin Island	Private registered company	Company registration number/ID	544624	SHRM TRUSTEES BVI LIMITED
SL MINING LIMITED	1082357-0	26/10/2016	NP	26 MAIN MOTOR ROAD FREETOWN SIERRA LEONE	Gerald Iron Ore Limited	100%	Company	British Virgin Island	Private registered company	Company registration number/ID	1877080	Registrar of Corporate Affairs
Kingho Mining Company Limited	1117961-0	01/01/2019	NP	97 Signal Hill Road, Wilberforce, Freetown	Kingho Investment Company Limited	100%	Company	Sierra Leone	Private registered company	Company registration number/ID	SLE290716K INGH1600235	Corporate Affairs Commission
MEYA MINING LIMITED	1081040-2	26/07/2019	1,000	16 Leoville, L'Hommie Street, Port Louis, Republic of Mauritius.	Trustco Resource (Pty) Limited	51%	Company	Namibia	Private registered company	Company registration number/ID	2015/0081	Registrar of Companies-Namibia
					Germinate (SL) Limited	49%	Company	Sierra Leone	Private registered company	Company registration number/ID	SLE180816 GERM1600404	Corporate Affairs Commission-Sierra Leone
DAYU MINING COMPANY LIMITED	1091650-2	05/09/2017	1,000,000	SIX MILE, WATERLOO, FREETWON	DAYU MINING COMPANY LIMITED	100%	Company	Sierra Leone	Private registered company	Company registration number/ID	SL050917D AYUM02045	Corporate Affairs Commission-Sierra Leone
H. M. DIAMONDS	1000351-9 / 1000000192		NP	5 LIGHTFOOT BOSTON	HESHAM MACKIE	90%	individual	N/A	N/A	N/A	N/A	N/A

Company	TIN	Date of the company establishment	Company's Capital (in USD)	Contact address	Legal owner's legal name	%	Company / individual	Country of registration /Information	Type of company	Company identifier type	Company Identifier	Registration authority
		30th JANUARY 2007		STREET, FREETOWN, SIERRA LEONE	OUSSAMA MATAR	10%	individual	N/A	N/A	N/A	N/A	N/A
TONGUMA LIMITED	1030730-0	15 March 2012	10,050,000	84 WILKINSON ROAD FREETOWN SIERRA LEONE	Octea Mining Limited	100%	Company	Guernsey	Private registered company	Company registration number/ID	65910	Guernsey Registry
Sierra Diamonds Limited	1009710-01	15th April 2004	50,000	3 Cole Street, Murray Town, Freetown	NP	NP	NP	NP	NP	NP	NP	NP
WONGOR INVESTMENT AND MINING CORPORATION LIMITED	1103502-2	25 July 2018		190G, WILKINSON ROAD, FREETOWN	SHAO GUOLONG	51%	individual	N/A	N/A	N/A	N/A	N/A
					LIANG XIAOHAO	49%	individual	N/A	N/A	N/A	N/A	N/A

NP: Not provided

NA: Not applicable

## Annex 11: Data completeness and assurance

MINING COMPANIES	RT Excel sheet submitted ?	Beneficial ownership declaration	Submission of Certified and signed reporting Templates	Signed Beneficial Ownership declaration	Audited Financial Statements 2019
1 Sierra Rutile Limited	Yes	Yes	Yes	No	Yes
2 KOIDU LIMITED	Yes	Yes	Yes	Yes	Yes
3 Sierra Minerals Holdings No.1 Limited	Yes	Yes	Yes	Yes	Yes
4 S.L MINING LTD	Yes	Yes	No	Yes	No
5 kingho Investment Limited	Yes	Yes	Yes	No	No
6 Tonkolili Iron Ore (SL) Limited	Yes	Yes	Yes	No	No
7 MEYA MINING LTD	Yes	Yes	Yes	No	Yes
8 DAYU MINING COMPANY LIMITED	Yes	Yes	Yes	No	Yes
9 H. M. DIAMONDS	Yes	Yes	Yes	Yes	Yes
10 African Railway & Port Services	Yes	Yes	Yes	No	No
11 Sierramin Bauxite (SL) Limited	No	No	No	No	No
12 Tonguma Limited	Yes	Yes	Yes	Yes	Yes
13 Sierra Diamonds Limited	Yes	No	Yes	No	Yes
14 WONGOR INVESTMENT AND MINING CORPORATION LTD	Yes	Yes	Yes	Yes	No

## Annex 12: Disbursements made from DACDF to chiefdoms during FY 2019

Chiefdom Council	Revenu Stream	Receipt number	Amount USD
Sandor	DACDF		17,096
Gbense	DACDF		27,921
Nimikoro	DACDF		32,841
Tankoro	DACDF		15,718
Gbaneh	DACDF		1,941
Gorama Kono	DACDF		2,138
Nimiyama	DACDF		12,372
Kamara	DACDF		19,654
Gorama Mende	DACDF		5,877
Falla Wandor	DACDF		9,223
Simbaru	DACDF		9,814
Kandu Leppiama	DACDF		10,010
Small Bo	DACDF		2,335
Guara	DACDF		2,925
Lower Bambara	DACDF		22,410
Malegohun	DACDF		9,420
Dama	DACDF		3,515
Langrama	DACDF		1,941
Koya	DACDF		2,138
Nongowa	DACDF		10,010
Nomo	DACDF		1,744
Dodo	DACDF		2,531
Baoma	DACDF		16,112
Tikonko	DACDF		10,207
Lugbu	DACDF		3,122
Jaiama Bongor	DACDF		3,712
Badjia	DACDF		3,122
Jaima	DACDF		1,744

Chiefdom Council	Revenu Stream	Receipt number	Amount USD
Kakua	DACDF		2,335
Komboya	DACDF		2,335
Bumpeh Ngao	DACDF		3,909
Makpele	DACDF		6,665
Sorogbema	DACDF		3,122
Galines	DACDF		3,122
Perri	DACDF		2,335
Sowa	DACDF		1,744
Barrie	DACDF		2,925
Panga	DACDF		1,941
Kabonde	DACDF		1,744
Malen	DACDF		2,531
Bum	DACDF		2,335
Kpanda Kemoh	DACDF		1,744
Njaluahun	DACDF		3,319
Penguia	DACDF		2,335
Luawa	DACDF		1,941
Jawei	DACDF		3,712
Malema	DACDF		4,106
Magbema	DACDF		2,728
Masongbala	DACDF		1,744
Sella Limba	DACDF		1,941
Sanda Loko	DACDF		2,335
Kallian	DACDF		1,744
Masimera	DACDF		1,744
<b>Total</b>			<b>328,029</b>

## Annex 13: Mandatory social payments

Company	Beneficiary (Nom, position)	Beneficiary region	Cash payment			In Kind payment (Project)		Date	Legal basis (Ref of the agreement, Order, decree, etc.)
			Description	Amount (USD)	Date	Description	Project cost incurred during 2019		
Sierra Rutile Limited	Various crop owners	Imperi,Bagruwa, LowerBamta,etc	Crop compensation	590,249	Various dates			Mining agreement	
	Agricultural Development Fund	Imperi,Bagruwa, LowerBamta,etc	Crop compensation	153,070	19/03/2019				
	Community Development Agreement	Imperi,Bagruwa, LowerBamta,Jong and Upper Banta	2019 payment	89,063	19/03/2019			Community Development Agreement	
KOIDU LIMITED	Various beneficiaries	Koidu	Scholarship Awards	47,724	25/02/2019				
Sierra Minerals Holdings No.1 Limited	SMHL CDC	Moyamba District	Undertake Community Projects	174,956	29/03/2019			Community Development Agreement: 1% of Our Bauxite Revenue:	
	SMHL CDC	Moyamba District	Undertake Community Projects	153,242	05/04/2019			Community Development Agreement: 1% of Our Bauxite Revenue:	
	SMHL CDC	Moyamba District	Undertake Community Projects	220,780	31/05/2019			Community Development Agreement: 1% of Our Bauxite Revenue:	
	SMHL CDC	Moyamba District	Undertake Community Projects	187,170	31/07/2019			Community Development Agreement: 1% of Our Bauxite Revenue:	
	SMHL CDC	Moyamba District	Undertake Community Projects	151,260	04/09/2019			Community Development Agreement: 1% of Our Bauxite Revenue:	
	SMHL CDC	Moyamba District	Undertake Community Projects	140,841	11/10/2019			Community Development Agreement: 1% of Our Bauxite Revenue:	
	Various Farmers	Moyamba	Crop compensation to Various Farmers	419,354	Various dates			Agreement with Land Owners/Crop Rates	
DAYU MINING COMPANY LIMITED	MARANDA LAND RENT	MARANDA	MINING &TRANSPORT	5,660	2019-2-19			Community Development Agreement	
	MASUMBIRIE LAND RENT	MASUMBIRIE	MINING &TRANSPORT	6,690	2019-1-17			Community Development Agreement	
	MASUMBIRIE LAND RENT	MASUMBIRIE	MINING &TRANSPORT	6,175	2019-12-18			Community Development Agreement	
	EMPLOYEE DOMITORY RENT	MASUMBIRIE	EMPLOYEE RESIDENCE	4,117	2019-1-22			Community Development Agreement	
	MASUMBIRIE WATER PIPE PROJECT	MASUMBIRIE	COMMUNICITY WATER DISTRIBUTION			UNDERGOING	33,756	Community Development Agreement	
	MARAMDA HOSIPITAL	MARANDA	COMMINICITY MEDICIAL CARE			UNDERGOING	37,050	Community Development Agreement	
	GBAFAYA COMMUNICITY SCHOOL	GBAFAYA	COMMUNICITY EDUCATION			UNDERGOING	29,845	Community Development Agreement	
	MASUMBIRIE BRIDAGE	MASUMBIRIE	COMMUNICITY CONMUTE AND MATERIAL TRANSPORT			UNDERGOING	25,729	Community Development Agreement	
<b>Total</b>				<b>2,350,352</b>			<b>126,380</b>		

## Annex 14: Voluntary social payments

Company	Beneficiary (Nom, position)	Beneficiary region	Cash payment			In Kind payment (Project)		
			Description	Amount (USD)	Date	Description	Project cost incurred during 2019	Date
Sierra Rutile Limited	Educational support to various institutions within the mining community					Educational support to various institutions within the mining community	33,584	
	Various community development supports to the five mining chiefdoms					Various community development supports to the five mining chiefdoms	38,120	
KOIDU LIMITED	Village Resettlement Committee	Koidu	VRC - funding December 2018	1,654	11/01/2019			
	Village Resettlement Committee	Koidu	VRC - funding for January 2019	1,654	07/02/2019			
	Village Resettlement Committee	Koidu	VRC - funding February 2019	1,654	07/03/2019			
	Village Resettlement Committee	Koidu	VRC - funding March 2019	1,654	11/04/2019			
	Village Resettlement Committee	Koidu	VRC - funding April 2019	1,654	08/05/2019			
	Village Resettlement Committee	Koidu	VRC - funding May 2019	1,654	07/06/2019			
	Village Resettlement Committee	Koidu	VRC - funding June 2019	1,654	03/07/2019			
	Village Resettlement Committee	Koidu	VRC - funding for July 2019	1,654	08/08/2019			
	Village Resettlement Committee	Koidu	VRC - funding August 2019	1,654	06/09/2019			
	Village Resettlement Committee	Koidu	VRC - funding September 2019	1,654	11/10/2019			
	Village Resettlement Committee	Koidu	VRC - funding October 2019	1,654	07/11/2019			
	Village Resettlement Committee	Koidu	VRC - funding November 2019	1,654	14/12/2019			
	Village Resettlement Committee	Koidu	VRC - funding December 2019	1,654	30/12/2019			
	Polio Victims Association	Koidu	Polio Victims Association - rice & soup allowance for Jan'2019	91	15/01/2019			
	Polio Victims Association	Koidu	Polio Victims Association - Polio rice & soup allowance	91	15/02/2019			
	Polio Victims Association	Koidu	Polio Victims Association - polio rice and soup allowance	91	14/03/2019			
	Polio Victims Association	Koidu	Polio Victims Association - polio rice & soup allowance April 2019	91	15/04/2019			
	Polio Victims Association	Koidu	Polio Victims Association - polio rice & soup allowance May 2019	91	15/05/2019			
	Polio Victims Association	Koidu	Polio Victims Association - polio rice & soup allowance June 2019	91	17/06/2019			
	Polio Victims Association	Koidu	Polio Victims Association - Rice & Soup allowance for July 2019	91	15/07/2019			
	Polio Victims Association	Koidu	Polio Victims Association - polio rice & soup allowance Aug 2019	91	15/08/2019			
	Polio Victims Association	Koidu	Polio Victims Association - polio rice & soup allowance Sep 2019	91	16/09/2019			
	Polio Victims Association	Koidu	Polio Victims Association - polio rice & soup allowance Oct 2019	91	14/10/2019			
	Polio Victims Association	Koidu	Polio Victims Association - polio rice & soup allowance Nov 2019	91	15/11/2019			
	Polio Victims Association	Koidu	Polio Victims Association - polio rice & soup allowance Dec 2019	91	16/12/2019			
	PC Paul N Saquee V	Koidu	Support to paramount chief	1,492	25/06/2019			
	PC Paul N Saquee V	Koidu	Support to paramount chief	1,492	01/08/2019			
PC Paul N Saquee V	Koidu	Support to paramount chief	1,492	29/08/2019				
PC Paul N Saquee V	Koidu	Support to paramount chief	1,492	08/10/2019				
PC Paul N Saquee V	Koidu	Support to paramount chief	1,492	13/11/2019				
PC Paul N Saquee V	Koidu	Support to paramount chief	1,492	13/12/2019				
Tankoro Chiefdom	Koidu	Assistance to Tankoro Chiefdom for E.T.T Nyandebo's 40th Day Ceremony	1,142	15/04/2019				
Ministry of Mines	Freetown	Rehabilitation of the Ministry of Mines	43,739	25/02/2019				
Students	Koidu	Kimbadu bus service Jan'19	3,615	29/01/2019				

Company	Beneficiary (Nom, position)	Beneficiary region	Cash payment			In Kind payment (Project)		
			Description	Amount (USD)	Date	Description	Project cost incurred during 2019	Date
	Students	Koindu	Kimbadu Enterprise - Bus Service for March 2019	4,178	01/04/2019			
	Students	Koindu	Kimbadu Bus Service for April 2019	3,939	29/04/2019			
	Students	Koindu	Kimbadu Enterprise - Bus Service for May 2019	4,177	31/05/2019			
	Students	Koindu	Kimbadu Enterprise & General Service	2,854	19/08/2019			
	Students	Koindu	Bus Service for August 2019	5,981	04/09/2019			
	Students	Koindu	Kimbadu Enterprise & General Services - 0003 Bus Service for September 2019	2,193	10/10/2019			
	Students	Koindu	Kimbadu Enterprise & General Services - Bus Service for October 2019	4,376	13/11/2019			
	Students	Koindu	040/Kimbadu Enterprise & General Services - Bus Service for November 2019	3,960	13/12/2019			
S.L MINING LTD			Community rice donation programme Lunsar Town 23rd Jan 2019	1,127				
			Per diem for crop compensation work at K&R Ridge	448				
			Replacement of 42 damaged chairs-Community Relations accident	225				
			Allowance to officials for resolve community grievance at section of haul road	381				
			Rice 50kg Bag Tastu for Lunsar Community)	23,341				
DAYU MINING COMPANY LIMITED	MASUMBIRIE WATER PIPE PROJECT ASSEMBLE	MASUMBIRIE	COMMUNICITY WATER DISTRIBUTION	68	2019-1-13			
	COMPENSON FOR THE ROAD TO MARANDA	MARANDA	COMMUNICITY TRANSPORATION	144	2019-1-19			
	MASUMBIRIE SCHOOL FOOTBALL MATCH	MASUMBIRIE	FOOTBALL MATCH	103	2019-12-6			
Sierra Diamonds Limited	Lower Bambara Chiefdom	Lower Bambara, Kenema District	Road repair from Mano Junction to Tongo (Labour cost, fuel and use of equipment)	6,555				
WONGOR INVESTMENT AND MINING CORPORATION LTD	COMMUNITY YOUTH	FOOTBALL GALA	KUMARO, NIMIKORO CHIEFDOM, KONO	3,880	2019.11.13			
<b>Total</b>				<b>147,973</b>			<b>71,704</b>	

## Annex 15: Environmental expenditure

Company	Beneficiary (Nom, position)	Beneficiary region	Cash payment		
			Description	Amount (USD)	Date
Sierra Rutile Limited	African Sanke Bite Institute	Bonthe and Moyamba Districts	Snake handling training	174,637	10/10/2019
	Ardent Fire Protection Ghana	Bonthe and Moyamba Districts	Training on fire protection system	3,973	10/01/2019
	Australian Nyclar Scientist	Bonthe and Moyamba Districts	Analysis of radioactivity	2,110	02/07/2019
	Biotope	Bonthe and Moyamba Districts	Biodiversity action plan	29,874	04/07/2019
	Digby wells	Bonthe and Moyamba Districts	Mokula Environmental assessment and other analysis report	15,111	12/12/2019
	Earth System	Bonthe and Moyamba Districts	Sembehum EShIA report	98,128	08/04/2019
	Earth System	Bonthe and Moyamba Districts	Eshia update consultation	55,088	14/06/2019
	Earth System	Bonthe and Moyamba Districts	Sembehum EShIA report	36,453	02/09/2019
	Earth System	Bonthe and Moyamba Districts	Eshia update consultation	21,609	29/10/2019
S.L MINING LTD	Environmental Management Venture	Lunsar	Wet season biodiversity survey	108,855	13/12/2019
	Environmental Management Venture	Lunsar	final payment on FPR SLM 1588-QUARTERLY ENVIRONMENT REPORTS	3,837	04/03/2019
	Environmental Management Venture	Lunsar	ENVIRONMENTAL MANAGEMENT PLAN) 60% advance	7,338	22/03/2019
	Environmental Management Venture	Lunsar	40% payment ENVIRONMENTAL MANAGEMENT PLAN	4,892	15/04/2019
	Environmental Management Venture	Lunsar	Payment to Environmental Management Ventures for consultancy fee for liaison with EPA on dredging permits and community negotiation)	1,890	29/05/2019
WONGOR INVESTMENT AND MINING CORPORATION LTD	Environmental Management Venture	Lunsar	EPA Compliance expense work	17,132	17/01/2019
	Integrated Geo-Information and Environmental Management Services Limited	Freetown, SL	Environmental Consultancy Service	25,840	
	Integrated Geo-Information and Environmental Management Services Limited	Freetown, SL	Environmental Consultancy Service	19,375	
	Integrated Geo-Information and Environmental Management Services Limited	Freetown, SL	Environmental Consultancy Service	20,000	
	Integrated Geo-Information and Environmental Management Services Limited	Freetown, SL	Environmental Consultancy Service	15,997	
	Integrated Geo-Information and Environmental Management Services Limited	Freetown, SL	Environmental Consultancy Service	12,107	
	Integrated Geo-Information and Environmental Management Services Limited	Freetown, SL	Environmental Consultancy Service	5,093	
<b>Total</b>				<b>679,340</b>	

### Annex 16: Template used for evaluation of oil & gas license application

Petroleum Directorate

### Fourth Petroleum Licensing Round -Evaluation instrument

Applicant Company: .....

	BIDDING FACTOR	STANDARD/EXPECTATION	REMARK				SCORE
			Below expectation (1-2 mark)	Meets expectation (3-5 marks)	Exceeds expectation (6-8 marks)	Significantly exceeds expectation (9-10 marks)	
TECHNICAL PROPOSAL	<i>Technical understanding of block/basin area (maximum of 20 marks)</i>	Details of existing geotechnical data sets available over the block/basin area and how these have been processed and incorporated in proprietary studies performed in preparation of the bid. (Quantity of data purchased and/or duration of Data Room Visit).					
		Results of analysis performed demonstrating overall block prospectivity. This should include, as far as possible, results and discussion of relevant seismic studies and interpretations (including maps, hydrocarbon systems and advanced seismic and other remotely sensed techniques such as inversion, anomaly/attribute analysis satellite imagery, etc) leading to the evolved play ideas and any specific leads/prospects.					
			Below expectation (0-1 mark)	Meets expectation (2-3 marks)	Exceeds expectation (4 marks)	Significantly exceeds expectation (5 marks)	SCORE
	<i>Exploration expertise (maximum of 30 marks)</i>	Description of the bidder's in-house technical know-how. In Particular, details of quantity and quality of resources (in-house vs. contracted out)					

		with relevant qualifications as well as experience in the regional or similar basin play types (geology, geophysics, reservoir engineering and other necessary specialist skills) to give proper effect to the proposed work programme:						
		<ul style="list-style-type: none"> <li>▪ Exploration geology and geophysics</li> </ul>						
		<ul style="list-style-type: none"> <li>▪ Reservoir geology and engineering</li> </ul>						
		<ul style="list-style-type: none"> <li>▪ Exploration well design, drilling and completion</li> </ul>						
		<ul style="list-style-type: none"> <li>▪ Sources of external resources to supplement in-house resources, and how will these be managed</li> </ul>						
		<ul style="list-style-type: none"> <li>▪ company policy regarding the use of new technology and company track record in introducing technology to new operations</li> </ul>						
			<i>Below expectation (0-1 mark)</i>	<i>Meets expectation (2-3 marks)</i>	<i>Exceeds expectation (4 marks)</i>	<i>Significantly exceeds expectation (5 marks)</i>	<b>SCORE</b>	
	<b>Operational experience (maximum of 25 marks)</b>	<i>Detailed information on petroleum licenses or similar rights currently or previously held by the bidder as operator or non-operator partner setting out the following details:</i>						
		Block name, location (onshore or offshore), acreage, percentage interest in block, primary resource(s) sought						
		Details of exploration wells, well TD, water depth/distance from well to shore (for offshore)						
		Description of production wells and facilities (e.g. subsea vs. Platform completion), water depth/distance from well to shore (for offshore)						
		Where non-operator, description of involvement in management, decision making and liability for the operation of the asset						

			Below expectation (1 mark)	Meets expectation (2 marks)	Exceeds expectation (3-4 marks)	Significantly exceeds expectation (5-6 marks)	SCORE
<p><b>Work Programme (include timing as a function of months/years from award) - maximum of 50 marks</b></p>	Quantity of 2D seismic reflection reprocessing (in line-km and line spacing). Include estimate of coverage of concession (as a percentage, including discussion on how reprocessing techniques best target plays/leads/prospects. Include a map showing proposed 2D lines over the extent of the Block area						
	Quantity of 3D seismic reflection reprocessing (km <sup>2</sup> ), including estimate of coverage of Block (as a percentage) and discussion on how reprocessing techniques best target plays/leads/prospects. (Information should include a map showing proposed area of 3D reprocessing over the extent of the Block area).						
	Quantity of 2D seismic reflection acquisition, including estimate of coverage of Block (as a percentage) and discussion on how acquisition parameters best target play/prospects.(Information should include a map showing proposed 2D lines over the extent of the Block area)						
	Quantity of 3D seismic reflection acquisition (in km <sup>2</sup> , including estimate of coverage of Block (as a percentage) and discussion on how acquisition parameters best target plays/leads/prospects. (information should include a map showing proposed area of 3D acquisition over the extent of the block area)						
	Quantity and overall coverage (as a percentage) of other new geophysical data acquisition e.g. CSEM, gravity, magnetic surveys etc						
	Quantity (e.g. number of existing wells and/or samples analyzed) and coverage of stratigraphic, reservoir, petro physical and/or other geological, geophysical, or geochemical studies						
	Description of how the proposed technical work programme will clarify understanding of the full petroleum potential of the permit area and reduce technical risk to drillable levels. Information may include a definition of levels of certainty that would enable drilling to proceed						

		Number, and timing of committed and proposed wells, highlighting any dependencies on results of the planned technical work. <i>(Note: proposed well drilling dates should be as realistic as possible, taking into account the proposed exploration programme, drilling consent requirements of other agencies as EPA and possibly MOFED, number of available seismic acquisition drilling season windows, and vessel/rig mobilization schedules)</i>					
		Extent to which bidder has investigated or mitigated risks associated with securing exploration equipment and resources (in particular seismic equipment and drilling rigs) to support work programme commitments					
			<i>Below expectation (0-1 mark)</i>	<i>Meets expectation (2-3 marks)</i>	<i>Exceeds expectation (4 marks)</i>	<i>Significantly exceeds expectation (5 marks)</i>	<b>SCORE</b>
	<i>HSE Management-maximum 10 marks.</i>	Description of applicant's commitment to the conduct of EIA and implementation of environmental management plan.					
		Description of applicant's level of commitment to Safety management practices including measures for the prevention and management of occupational injury, as well as prevention of oil spills, Blow Outs, and emergency response preparedness.					
	<b>BIDDING FACTOR</b>	<b>ASSESSMENT TOOLS</b>	<b>SCORE</b>				
			<i>Less than US\$ 250M (0-4 marks)</i>	<i>US\$ 250M--500M (5-9 Marks)</i>	<i>US\$ 500M-1B (10-14 marks)</i>	<i>US\$ 1B - 5B (15-19 marks)</i>	<i>More than US\$ 5B (20 marks)</i>
<b>Financial capability (90 marks)</b>	<i>COMPANY VALUE -</i>	<i>Net Worth / Market Capitalization: 20 Marks</i>					
	<b>Applicant(s) has sufficient liquidity and access to external funding sources to finance work program in relation to the Block applied for and in relation to any other permit it holds in Sierra Leone or internationally.</b>	<b>Did Company (Or Parent Company) Provide Three (3) years Audited Financial Statements? (If Un-Audited Financial Statements were presented it counts as "No"): 10 Marks</b>	Yes ( 6-10 marks)			No/Not sure ( 1-5 Marks)	

	Applicant possess the financial capability to fulfill its contractual proposals in addition to work obligations up to the completion of at least one exploration well						
			<i>Below expectation (0-4 marks)</i>	<i>Meets expectation (5-6 marks)</i>	<i>Exceeds expectation (7-9 marks)</i>	<i>Significantly exceeds expectation (10 marks)</i>	SCORE
	<i>Has Applicant provided a definite plan for the financing of the work and contractual obligations and is the plan satisfactory? 10 Marks</i>						
			<i>Below expectation (0-4 marks)</i>	<i>Meets expectation (5-6 marks)</i>	<i>Exceeds expectation (7-9 marks)</i>	<i>Significantly exceeds expectation (10 marks)</i>	
	<i>Debt/Equity Ratio (Industry Standard is 0.5): 10 Marks</i>						
			Yes ( 4-10 marks)		No ( 0-3 Marks)		
	<i>Are Average Net Profits over 3 years greater than 4 times the Average Yearly Work and Contractual Obligation. 10 Marks</i>						
			Yes ( 4-10 marks)		No( 0-3 Marks)		
	<i>Does the Company have any contingent liability or other commitments that will significantly impact on its ability to fund or carry out operations : 10 Marks</i>						
			Yes ( 4-10 marks)		No ( 0-3 Marks)		
	<i>Are Current Assets less Current Liabilities greater than \$250 Million US Dollar: 10 Marks</i>						
	<i>Are Net Cash Flows greater than \$250 Million US Dollars: 10 Marks</i>						
		<b>BIDDING FACTOR</b>	<b>STANDARD/EXPECTATION</b>	<i>Below expectation (0-4 marks)</i>	<i>Meets expectation (5-6 marks)</i>	<i>Exceeds expectation (7-9 marks)</i>	<i>Significantly exceeds expectation (10 marks)</i>
<b>REMARK</b>							

Commercial proposal (30 marks)	Does the Applicant offer any additional Commercial Terms apart from their fiscal obligation?	Proposed Commitment to Extension and other Bonus payments 10 marks					
	Social projects shall be scored based on whether pledges are tied to any activity (e.g. discovery) and more importantly the time to start and completion.	Size and timing of Social Program Offered- 10 Marks					
		Commitment to fulfilment of local content requirement 10 Marks					
		<b>REMARK</b>					<b>SCORE</b>
Management Structure 10 Marks			<b>YES ( 3-5 marks)</b>		<b>No (0-2 marks)</b>		
	Additional Issues Considered by Evaluator	Is management structure robust. Are there clear relationships established between Applicant and Partners (Any company including Associate, Affiliate or Parent mentioned in Application) - 5 Marks					
		Any other issue considered by the evaluator: 5 Marks					
	<b>TERMINAL FACTOR</b>		<b>REMARK</b>				
	Rationale for Disqualification of bidder	If applicant or share holder held any license issued by an authority in Sierra Leone, and the obligations of those permit(s), Licenses(s) were not met, which resulted in the cancellation of Permit/License, was evidence provided to show that the earlier failure was irrelevant to the current situation and that default would not occur in the current application, and is Evaluator satisfied that default will not re-occur if this new license is issued to the company					
		Has any information the applicant provided in its bid been found to be untrue, or considered an intent to deceive the State					
		Has any information come to the attention of the evaluator through his/her own due diligence that would cause the evaluator to have grave concerns about granting a License to the Applicant					

Name Evaluator.....Signature .....Date.....

## Annex 17: Diamond exports volume and value by parcel, by exporter, by country destination and amount of 3% diamond export tax for each parcel

CERTIFICATE NO.	PARCEL CODE	EXPORTER	DESTINATION	CARAT	VALUES US\$	3% DUTY	ROYALTY IN LIEU OF LICENSE	REC. NO	CORPORATE TAX	CORP. REC. NO.
P-005058	02-19/AJ-03	ACCESS JEWELLERY TRADING (SL) LIMITED	USA	16	60,000	1,800		1,923	180	1,890
P-005155	10-19/AG-01	AFRICA GLOBAL ENTERPRISE	HONG KONG	7	7,992	240		065	24	1,892
P-005060	02-19/AT-07	ALLOTROPES DIAMOND CO LTD	BELGIUM	474	181,649		12,715	1,926	545	1,894
P-005122	07-19/BG-01	BERYL GRACE LIMITED	BELGIUM	48	58,685	1,761		89		
P-005132	08-19/BG-02	BERYL GRACE LIMITED	UAE	33	32,477	974		013	97	1,896
P-005086	04-19/CM-06	CONTINENTAL AFRICA MINERALS LTD	USA	88	220,989	6,630		2,081	663	1,898
P-005182	12-19/CR-01	CROCODILE MINING (SL) LIMITED	BELGIUM	134	9,525,330	285,760	435,000	140	28,576	1,901
P-005062	02-19/DT-03	DIATRADE (SL) LIMITED	BELGIUM	166	138,329	4,150		1,930	415	1,904
P-005071	03-19/DT-04	DIATRADE (SL) LIMITED	BELGIUM	197	122,652	3,680		1,949	368	1,907
P-005109	06-19/DT-05	DIATRADE (SL) LIMITED	BELGIUM	119	202,042	6,061		62	606	1,909
P-005150	10-19/DT-06	DIATRADE (SL) LIMITED	BELGIUM	94	178,677	5,360		054	536	1,912
P-005149	10-19/FM-01	FORWARD MINING & INVESTMENT LIMITED	BELGIUM	248	50,015	1,500		052	150	1,916
P-005154	10-19/FM-02	FORWARD MINING & INVESTMENT LTD	UAE	54	32,763	983		063	98	1,918
P-005172	11-19/FM-03	FORWARD MINING AND INVESTMENT LIMITED	UAE	52	25,373	761		106	76	1,920
P-005148	10-19/GF-02	GEMFAIR (SL) LIMITED	UK	523	327,346	9,820		050	982	782
P-005048	01-19/HM-427	H. M. DIAMONDS	BELGIUM	12,237	3,981,031	119,431		1,897	11,943	1,924
P-005066	02-19/HM-428	H. M. DIAMONDS	BELGIUM	12,949	3,727,859	111,836		1,939	11,184	1,929
P-005083	04-19/HM-429	H. M. DIAMONDS	BELGIUM	8,635	3,026,989	90,810		2,079	9,081	1,927
P-005096	05-19/HM-430	H. M. DIAMONDS	BELGIUM	10,633	3,792,098	113,763		2,104		
P-005106	05-19/HM-431	H. M. DIAMONDS	BELGIUM	8,736	3,306,843	99,205		056	9,921	1,931
P-005121	07-19/HM-432	H. M. DIAMONDS	BELGIUM	8,837	3,308,676	99,260		91	9,926	1,933
P-005127	08-19/HM-433	H. M. DIAMONDS	BELGIUM	6,826	2,470,383	74,111		003	7,411	1,935
P-005143	09-19/HM-434	H. M. DIAMONDS	BELGIUM	9,079	1,840,019	55,201		41	5,520	1,937
P-005152	10-10/HM-435	H. M. DIAMONDS	BELGIUM	9,166	1,452,713	43,581		061	4,358	1,940
P-005156	10-19/HM-436	H. M. DIAMONDS	BELGIUM	4,347	1,056,441	31,693		072	3,169	1,944
P-005185	12-19/HM-437	H. M. DIAMONDS	BELGIUM	11,320	3,980,769	119,423		135	11,942	2,052
P-005055	02-19/HT-02	HANYANG TRADING COMPANY LIMITED	REPUBLIC OF KOREA	19	71,400	2,142		1,917	214	1,946
P-005056	02-19/HT-03	HANYANG TRADING COMPANY LIMITED	REPUBLIC OF KOREA	127	42,760	1,283		1,919	128	1,948
P-005085	04-19/HT-04	HANYANG TRADING COMPANY LIMITED	HONG KONG	97	22,510	675		2,083	68	1,950
P-005163	10-19/KT-01	K T AFRICAN LIMITED	BELGIUM	17	39,095	1,173		088	117	2,055
P-005118	07-19/KB-1665	KASSIM BASMA GEMS	UAE	834	369,277	11,078		83	1,108	2,058
P-005119	07-19/KB-1666	KASSIM BASMA GEMS	BELGIUM	58	297,653	8,930		85	893	2,060
P-005120	07-19/KB-1667	KASSIM BASMA GEMS	BELGIUM	62	117,360	3,521		87	352	2,062
P-005129	08-19/KB-1668	KASSIM BASMA GEMS	BRAZIL	24	55,093	1,653		008		
P-005133	08-19/KB-1669	KASSIM BASMA GEMS	LEBANON	25	39,175	1,175		015	118	2,063
P-005135	08-19/KB-1670	KASSIM BASMA GEMS	UAE	3,278	685,168	20,555		021	2,056	2,066
P-005139	09-19/KB-1671	KASSIM BASMA GEMS	UAE	73	40,828	1,225		31	122	2,068
P-005142	09-19/KB-1672	KASSIM BASMA GEMS	BELGIUM	898	476,383	14,291		39	1,429	2,070
P-005146	09-10/KB-1673	KASSIM BASMA GEMS	HONG KONG	472	80,000	2,400		46	240	2,074
P-005151	10-19/KB-1674	KASSIM BASMA GEMS	AUSTRIA	21	70,000	2,100		057	210	2,072

CERTIFICATE NO.	PARCEL CODE	EXPORTER	DESTINATION	CARAT	VALUES US\$	3% DUTY	ROYALTY IN LIEU OF LICENSE	REC. NO	CORPORATE TAX	CORP. REC. NO.
P-005153	10-19/KB-1675	KASSIM BASMA GEMS	USA	20	28,895	867		059	87	2,080
P-005167	11-19/KB-1677	KASSIM BASMA GEMS	ITALY	22	50,000	1,500		96	150	2,078
P-005171	11-19/KB-1678	KASSIM BASMA GEMS	UAE	633	160,592	4,818		110	482	2,084
P-005175	11-19/KB-1679	KASSIM BASMA GEMS	UAE	2,819	455,088	13,653		117	1,365	2,082
P-005181	12-19/KB-1680	KASSIM BASMA GEMS	BELGIUM	825	302,671	9,080		133	908	2,086
P-005186	12-19/KB-1681	KASSIM BASMA GEMS	BELGIUM	23	49,535	1,486		138	149	2,090
P-005188	12-19/KB-1682	KASSIM BASMA GEMS	BELGIUM	2,667	43,720	1,312		144	131	2,092
P-005043	01-19/KB-1638	KASSIM M BASMA	BELGIUM	83	268,616	8,058		1,889	806	2,094
P-005044	01-19/KB-1639	KASSIM M BASMA	BELGIUM	26	32,810	984		1,891	98	2,096
P-005047	01-19/KB-1640	KASSIM M BASMA	HONG KONG	154	127,653	3,830		1,895		
P-005050	01-19/KB-1641	KASSIM M BASMA	LEBANON	56	182,195	5,466		1,903	547	2,100
P-005051	02-19/KB-1642	KASSIM M BASMA	UAE	6,018	695,739	20,872		1,906	2,087	2,098
P-005054	02-19KB-1643	KASSIM M BASMA	BELGIUM	157	224,425	6,733		1,915	673	2,103
P-005063	02-19/KB-1644	KASSIM M BASMA	USA	24	46,000	1,380		1,932	138	2,105
P-005065	02-19/KB-1645	KASSIM M BASMA	BELGIUM	896	590,756	17,723		1,936	1,772	2,107
P-005067	03-19/KB-1646	KASSIM M BASMA	ITALY	83	24,815	744		1,943	74	2,109
P-005068	03-19/KB-1647	KASSIM M BASMA	HONG KONG	267	216,446	6,493		2,051	649	2,111
P-005072	03-19/KB-1648	KASSIM M BASMA	UAE	3,741	500,129	15,004		2,054	1,500	2,114
P-005073	03-19/KB-1649	KASSIM M BASMA	UAE	389	242,592	7,278		2,056	728	5,116
P-005078	03-19/KB-1650	KASSIM M BASMA	BELGIUM	78	141,830	4,255		2,065	425	2,118
P-005080	03-19/KB-1651	KASSIM M BASMA	UK	70	33,620	1,009		2,069	101	2,120
P-005081	03-19/KB-1652	KASSIM M BASMA	BELGIUM	485	505,057	15,152		2,073	1,515	053
P-005084	04-19/KB-1653	KASSIM M BASMA	SWITZERLAND	8	29,450	884		2,077	88	055
P-005088	04-19/KB-1654	KASSIM M BASMA	UAE	1,701	45,920	1,378		2,089	138	057
P-005089	04-19/KB-1655	KASSIM M BASMA	UAE	13,420	1,172,623	35,179		2,091	3,518	059
P-005090	04-19/KB-1656	KASSIM M BASMA	BRAZIL	71	71,810	2,154		2,093	215	62
P-005094	05-19/KB-1657	KASSIM M BASMA	BELGIUM	167	263,564	7,907		2,097	791	63
P-005095	05-19/KB-1658	KASSIM M BASMA	BELGIUM	678	546,970	16,409		2,102		
P-005098	05-19/KB-1659	KASSIM M BASMA	USA	16	34,611	1,038		2,108	104	66
P-005101	05-19/KB-1660	KASSIM M BASMA	BELGIUM	61	104,448	3,133		5,115	313	68
P-005103	05-19/KB-1661	KASSIM M BASMA	UAE	4,475	511,890	15,357		2,119	1,536	70
P-005104	05-19/KB-1662	KASSIM M BASMA	BELGIUM	648	580,259	17,408		052	1,741	74
P-005111	06-19/KB-1663	KASSIM M BASMA	BELGIUM	69	25,000	750		65	75	77
P-005112	06-19/KB-1664	KASSIM M BASMA	SWITZERLAND	318	64,146	1,924		67	192	79
P-005157	10-19/KB-1676	KASSIM M BASMA	BELGIUM	733	269,802	8,094		074	809	82
P-005075	03-19/SP-01	KATHRIN ANIK RUSSNER	GERMANY	1	671	20	23	2,061	2	84
P-005100	05-19/KL-01	KLATA (SL) LIMITED	NETHERLANDS	31	36,050	1,081		2,113	108	86
P-005107	05-19/KL-02	KLATA (SL) LIMITED	NETHERLANDS	66	35,186	1,056		058	106	88
P-005046	01-19/KH-145	KOIDU LIMITED	SWITZERLAND	51,844	8,113,817		527,398		24,341	92
P-005061	02-19/KH-146	KOIDU LIMITED	SWITZERLAND	66,762	9,159,854		595,390		27,480	90
P-005076	03-19/KH-147	KOIDU LIMITED	SWITZERLAND	54,499	10,162,848		660,585		30,489	94
P-005092	05-19/KH-148	KOIDU LIMITED	SWITZERLAND	73,060	10,837,018		704,406			
P-005110	06-19/KH-149	KOIDU LIMITED	SWITZERLAND	53,979	8,724,076		567,065		26,172	98
P-005124	07-19/KH-150	KOIDU LIMITED	SWITZERLAND	70,779	11,322,735		735,978		33,968	001
P-005130	08-19/KH-151	KOIDU LIMITED	SWITZERLAND	61,356	10,906,944		708,951		32,721	004

CERTIFICATE NO.	PARCEL CODE	EXPORTER	DESTINATION	CARAT	VALUES US\$	3% DUTY	ROYALTY IN LIEU OF LICENSE	REC. NO	CORPORATE TAX	CORP. REC. NO.
P-005140	09-19/KH-152	KOIDU LIMITED	SWITZERLAND	57,061	10,047,705		653,101		30,143	006
P-005160	10-19/KH-153	KOIDU LIMITED	SWITZERLAND	77,747	12,538,736		815,018		37,616	009
P-005179	12-19/KH-154	KOIDU LIMITED	SWITZERLAND	68,747	11,342,027		737,232			
P-005176	11-19/LI-01	LEO INVESTMENT (SL) LIMITED	BELGIUM	404	289,839	8,695		120	870	011
P-005180	12-19/SP-03	MALTE KIRCHNER	GERMANY	2	950	29	33	126	3	014
P-005053	02-19/MT-16	METALS & MINERALS TRADING (SL) LIMITED	BELGIUM	29	100,000	3,000		1,911	300	016
P-005074	03-19/MT-17	METALS & MINERALS TRADING (SL) LIMITED	CHINA	14	59,096	1,773		2,059	177	018
P-005079	03-19/MT-18	METALS & MINERALS TRADING (SL) LIMITED	GERMANY	15	36,000	1,080		2,067	108	022
P-005087	04-19/MT-19	METALS & MINERALS TRADING (SL) LIMITED	USA	46	82,245	2,467		2,085	247	25
P-005091	05-19/MT-20	METALS & MINERALS TRADING (SL) LIMITED	GERMANY	37	40,376	1,211		2,095	121	28
P-005115	06-19/MT-21	METALS & MINERALS TRADING (SL) LIMITED	USA	84	72,000	2,160		76	216	30
P-005117	07-19/MT-22	METALS & MINERALS TRADING (SL) LIMITED	USA	46	39,980	1,199		81	120	32
P-005131	08-19/MT-23	METALS & MINERALS TRADING (SL) LIMITED	SWEDEN	19	35,000	1,050		010		
P-005136	09-19/MT-24	METALS & MINERALS TRADING (SL) LIMITED	CHINA	53	34,000	1,020		24	102	35
P-005137	09-19/MT-25	METALS & MINERALS TRADING (SL) LIMITED	SOUTH AFRICA	45	56,570	1,697		27	170	40
P-005159	10-19/MT-26	METALS & MINERALS TRADING (SL) LIMITED	BELGIUM	24	54,582	1,637		078	164	42
P-005161	10-19/MT-27	METALS & MINERALS TRADING (SL) LIMITED	CHINA	44	79,849	2,395		081	240	38
P-005166	11-19/MT-28	METALS & MINERALS TRADING (SL) LIMITED	JAPAN	44	20,000	600		94	60	45
P-005169	11-19/MT-29	METALS & MINERALS TRADING (SL) LIMITED	GERMANY	30	45,238	1,357		101	136	47
P-005183	12-19/MT-30	METALS & MINERALS TRADING (SL) LIMITED	USA	9	22,850	686		128	69	49
P-005184	12-19/MT-31	METALS & MINERALS TRADING (SL) LIMITED	HONG KONG	56	43,802	1,314		131	131	051
P-005189	12-19/MT-32	METALS & MINERALS TRADING (SL) LIMITED	JAPAN	36	185,007	5,550		147	555	053
P-005190	12-19/MT-33	METALS & MINERALS TRADING (SL) LIMITED	INDIA	42	75,707	2,271		149	227	055
P-005191	12-19/MT-34	METALS & MINERALS TRADING (SL) LIMITED	SOUTH AFRICA	6	11,192	336		152	34	058
P-005192	12-19/MT-35	METALS & MINERALS TRADING (SL) LIMITED	ENGLAND	21	31,401	942		154	94	062
P-005049	01-19/ME-12	MEYA MINING LIMITED	BELGIUM	3,036	668,921		46,824	1,900	2,007	060
P-005057	02-19/ME-13	MEYA MINING LIMITED	BELGIUM	1,097	260,522		18,237	1,921	782	064
P-005108	06-19/ME-14	MEYA MINING LIMITED	BELGIUM	2,253	747,914	3,740	48,614	61	2,244	066
P-005069	03-19/MJ-06	MONJED MAROUF JAWAD	BELGIUM	827	885,547	26,566		1,945	2,657	073
P-005093	05-19/MJ-07	MONJED MAROUF JAWAD	BELGIUM	1,926	947,612	28,428		2,099	2,843	075
P-005105	05-19/MJ-08	MONJED MAROUF JAWAD	BELGIUM	675	232,989	6,990		054	699	071
P-005113	06-19/MJ-09	MONJED MAROUF JAWAD	BELGIUM	69	296,037	8,881		69	888	079
P-005123	07-19/MJ-10	MONJED MAROUF JAWAD	BELGIUM	31	109,683	3,290		93		
P-005165	11-19/NG-01	NB GLOBAL INVESTMENTS INC.	SOUTH AFRICA	5	10,522	316		92	32	082
P-005177	11-19/NG-02	NB GLOBAL INVESTMENTS INC.	UK	6	8,685	261		122	26	087
P-005052	02-19/OR-01	ORPALL (SL) LIMITED	SWITZERLAND	78	71,848	2,155		1,908	216	089
P-005082	03-19/OR-02	ORPALL (SL) LIMITED	SWITZERLAND	255	55,353	1,661		2,071	166	91
P-005097	05-19/PD-02	PASHUPATI DIAMONDS & GEMS (SL) LIMITED	USA	61	48,833	1,465		2,106	146	93
P-005174	11-19/PK-01	PATRICK KOROMA	UAE	20	17,600	528		115	53	95
P-005045	01-19/PM-28	PLUTO MINING COMPANY (SL) LIMITED	BELGIUM	35	770,000	23,100		1,893	2,310	97
P-005064	02-19/PM-29	PLUTO MINING COMPANY (SL) LIMITED	BELGIUM	107	233,555	7,007		1,934	701	99
P-005070	03-19PM-30	PLUTO MINING COMPANY (SL) LIMITED	BELGIUM	34	70,821	2,125		1,947	212	102
P-005077	03-19/PM-31	PLUTO MINING COMPANY (SL) LIMITED	ISRAEL	20	173,599	5,208		2,063	521	105
P-005102	05-19/PM-32	PLUTO MINING COMPANY (SL) LIMITED	ISRAEL	31	353,735	10,612		2,117	1,061	111
P-005114	06-19/PM-33	PLUTO MINING COMPANY (SL) LIMITED	BELGIUM	36	89,969	2,699		73	270	107

CERTIFICATE NO.	PARCEL CODE	EXPORTER	DESTINATION	CARAT	VALUES US\$	3% DUTY	ROYALTY IN LIEU OF LICENSE	REC. NO	CORPORATE TAX	CORP. REC. NO.
P-005125	07-19/PM-34	PLUTO MINING COMPANY (SL) LIMITED	ISRAEL	21	51,782	1,553		97	155	114
P-005126	07-19/PM-35	PLUTO MINING COMPANY (SL) LIMITED	USA	22	20,000	600		100	60	116
P-005134	08-19/PM-36	PLUTO MINING COMPANY (SL) LIMITED	BELGIUM	34	140,000	4,200		017	420	118
P-005141	09-19/PM-37	PLUTO MINING COMPANY (SL) LIMITED	ISRAEL	14	45,852	1,376		34	138	121
P-005144	09-19/PM-38	PLUTO MINING COMPANY (SL) LIMITED	USA	51	20,000	600		36	60	123
P-005164	11-19/PM-39	PLUTO MINING COMPANY (SL) LIMITED	BELGIUM	347	170,032	5,101		90	510	125
P-005178	11-19/PM-40	PLUTO MINING COMPANY (SL) LIMITED	BELGIUM	66	108,284	3,249		124		
P-005193	12-19/PM-41	PLUTO MINING COMPANY (SL) LIMITED	SWEDEN	20	53,740	1,612		156	161	127
P-005194	12-19/PM-42	PLUTO MINING COMPANY (SL) LIMITED	BELGIUM	155	200,012	6,000		158	600	134
P-005168	11-19/RI-01	RABBIT INVESTMENT LLC.	USA	435	73,131	2,194		98	219	141
P-005173	11-19/RP-01	ROUGH & POLISH GEMS (SL) LIMITED	UAE	1,360	251,692	7,551		113	755	130
P-005145	09-19/SD-01	SCINTILLATING DIAMONDS (SL) LIMITED	BELGIUM	1,053	117,179	3,515		44	352	132
P-005187	19-19/SD-03	SCINTILLATING DIAMONDS (SL) LIMITED	BELGIUM	1,072	101,356	3,041		142	304	136
P-005162	10-19/SD-02	SCINTILLATING DIAMONDS (SL) LTD	BELGIUM	853	136,923	4,108		086	411	139
P-005128	08-19/SM-06	SEA-WRIGHT MINING COMPANY LIMITED	USA	357	246,485		17,254	005	739	143
P-005138	09-19/SG-01	SIERRA GEMS & METALS TRUST (S.G.M.T)	BELGIUM	179	29,954	899		29	90	145
P-005170	11-19/SG-02	SIERRA GEMS & METALS TRUST (S.G.M.T)	BELGIUM	307	66,037	1,981		104	198	148
P-005147	09-19/SP-02	SUGIYAMA SHINYA	BELGIUM	1	400	12	14	48	1	151
P-005059	02-19/TG-06	TONGUMA LIMITED	BELGIUM	542	41,541		2,700	1,928	125	153
P-005099	05-19/WM-01	WISSAM MROUE	BELGIUM	1,909	332,991	9,990		2,110	999	155
P-005116	06-19/WM-02	WISSAM MROUE	BELGIUM	1,554	357,723	10,732		80	1,073	157
P-005158	10-19/WM-03	WISSAM MROUE	BELGIUM	696	233,620	7,009		070	701	159

## Annex 18: Government revenues from other mining companies and diamond and gold exporters and dealers

Tax payer	Diamond & Gold Export duty	Diamond & Gold Exporters license	DIAMOND DEALER LICENCE	Exploration license	Import and Export duties	Licence Fee	Mineral Resources Royalty	Mining license	Monitoring fee (\$)	PAYE	Payroll Tax	W/H 5% Contract	Grand Total
Diatrade (SL) Limited	19 251	35 000											54 251
ORPALL (SL) LIMITED	7 448	42 500											49 948
N.B. Global Investment INC		47 500											47 500
RABBIT INVESTMENT LLC.	3 334	42 500											45 834
Gemfair (SL) Limited	9 820	35 000											44 820
LEO INVESTMENT (SL) LIMITED	8 695	35 000											43 695
SERRARUS MINING & EXPLORATION				43 221									43 221
ROUGH & POLISH GEMS (SL) LIMITED	7 551	35 000											42 551
CONTINENTAL AFRICA MINERALS LTD	6 630	35 000											41 630
2D Seismic Survey						34 155			6 831				40 986
SIERRA GEMS & METALS TRUST (S.G.M.T)	2 880	35 000											37 880
Beryl Grace Limited	2 735	35 000											37 735
KLATA (SL) LIMITED	2 137	35 000											37 137
West Africa Natural Resources				36 659									36 659
AFRICA GLOBAL ENT		35 000											35 000
Beach Holiday/Patrick Koroma		35 000											35 000
Continental Mining co ltd		35 000											35 000
FORWARD MINING&INVESTMENT LTD		35 000											35 000
Scintillating Diamond (SL) Ltd		35 000											35 000
DOJO RESOURCES(SL)LTD				32 800									32 800
Jyork Industries Inc Limited				32 800									32 800
Dojo Gold Mining (US\$)						24 330			4 866				29 196
BEYOND MINING EXPLOSIVES KOIDU LTD						23 625			4 725				28 350
ALGOM RESOURCES LTD.			5 980		286			1		13 276	154	5 186	24 883
CHINESE FUJIAN CO. LTD.		5 000					19 355						24 355
Kasino Mining Company Ltd..						18 270			3 654				21 924
Perfect International Co Ltd		5 000		6 619			9 616						21 235
Aberdeen Gold & Diamond				20 150									20 150
SABBOUR MINERALS TRADING COMPANY LIMITED	12 006	7 500											19 506
Fantasy Development (SL) Ltd		5 000					13 051						18 051
SOLID ROCK MINING&EXPLORATION				17 585									17 585
CKH Mining Company Limited						14 420			2 884				17 304
Mass Energy Mining Company Limited						14 420			2 884				17 304
Northern Mining Company Limited						14 420			2 884				17 304
A. A. B. S. INVESTMENT & TRADING GROUP (SL) LTD	15 157												15 157
Gold Generous Industrial				14 786									14 786
MARAMCO (SL) LIMITED	7 105	7 500											14 605
LAKE INC. LIMITED	6 143	7 500											13 643
Precise (SL) Limited	4 268	7 500											11 768
K MINERALS & FARMING LTD	11 234												11 234
Mourne Mining Limited				10 770									10 770
SCINTILLATING DIAMONDS (SL) LIMITED	10 664												10 664
LEE COMPANY LTD							5 455	5 000					10 455
MANTLE MINERAL RESOURCES				9 937									9 937
SIERRA SAND MINING COMPANY LIMITED		5 000					4 927						9 927
BANDAWOR MINING COMPANY (SL) LTD	2 033	7 500											9 533

Tax payer	Diamond & Gold Export duty	Diamond & Gold Exporters license	DIAMOND DEALER LICENCE	Exploration license	Import and Export duties	Licence Fee	Mineral Resources Royalty	Mining license	Monitoring fee (\$)	PAYE	Payroll Tax	W/H 5% Contract	Grand Total
BROTHER-UNION COMPANY(SL)		5 000					4 231						9 231
Krowork Au Limited	1 526	7 500											9 026
UCHE OG-BONNA		6 000	3 000										9 000
Jasal Minerals (SL) Limited	1 426	7 500											8 926
Hassan Jihad Saad		6 000	2 500										8 500
Guang Yuan (SL) Ltd				8 272									8 272
PERSEFONA (SL) LIMITED	414	7 500											7 914
MAKKAH TREASURES				7 815									7 815
Gemini Int'l Resources				7 600									7 600
Abdul Salam/Continental Mining		7 500											7 500
ADVANTAGE PARTNERS LIMITED		7 500											7 500
Atlas Industries (SL) Ltd		7 500											7 500
Bumblebee SL Limited		7 500											7 500
HANGI TANGIKORA		7 500											7 500
Luxee (SL) Limited		7 500											7 500
SELLEM INDUSTRIES SL. LTD.		7 500											7 500
Shefaf Limited		7 500											7 500
Solidar Global Company Ltd		7 500											7 500
TAI HOLDING LTD		7 500											7 500
Hong Peng Resources		5 000		2 184									7 184
Hongwu Chen			7 000										7 000
Mehmet Suat Acar			7 000										7 000
Nermin Saitovic			7 000										7 000
PRADEEP HANBHAI BORADA			7 000										7 000
WILHELMUS MARTINUS TIJSSSEN			7 000										7 000
Interim (SL) Limited				6 676									6 676
MONTE ORE MINING COMPOUND LTD				6 494									6 494
Nedoil Limited						5 190			1 038				6 228
Aim,an Taleb		6 000											6 000
Amandio Filomeno De Matos		6 000											6 000
Dhavaï Rajni Kant		6 000											6 000
Harshad J. Shah		6 000											6 000
HELMUT MARIO DETTWELLER		6 000											6 000
Mohamed Mansour		6 000											6 000
Said Qasim Razavi		6 000											6 000
SION (SL) LIMITED	5 607												5 607
NEW ENGLAND VILLE		5 000											5 000
UZZIEL COMPANY SL LTD		5 000											5 000
LUCKY HUGE TRADE (SL) LIMITED	4 829												4 829
HANYANG TRADING COMPANY LIMITED	4 100												4 100
WEST AFRICAN COLTAN EXPORT(SL)LTD							3 494						3 494
Ali Hassan Khalifa Ismail			3 000										3 000
Awa Ngom			3 000										3 000
Kahaba Ceesay			3 000										3 000
Ahmed Tejan Barrie			2 500					77					2 577
JOSEPH SAAD MICHEAL			2 500					77					2 577
MOSES TOMMY BAYOH			2 500					77					2 577
BOROMA										2 161		352	2 513
ALEXE GABRIEL A KUMBU-SMART			2 500										2 500
Alhai Ibrahim Conteh			2 500										2 500

Tax payer	Diamond & Gold Export duty	Diamond & Gold Exporters license	DIAMOND DEALER LICENCE	Exploration license	Import and Export duties	Licence Fee	Mineral Resources Royalty	Mining license	Monitoring fee (\$)	PAYE	Payroll Tax	W/H 5% Contract	Grand Total
Alhaji Abu Sesay			2 500										2 500
ALHAJI MOHAMED JALLOH				2 500									2 500
ALI FAWAZ HEJAZI			2 500										2 500
AMADU ISHMEAL WURIE			2 500										2 500
Hawa Roselyn Siafa			2 500										2 500
Ibrahim Morlai Jawara			2 500										2 500
Mohamed Abbas			2 500										2 500
MOHAMED H SHUMAN			2 500										2 500
MOHAMED J. AWADA			2 500										2 500
MOHAMED L SESAY			2 500										2 500
Mohamed S Dakhalallah			2 500										2 500
Sallieu Sow			2 500										2 500
THIERNO HAMIDOU BAH			2 500										2 500
GOLDARAMA (SL)LIMITED				2 209									2 209
SIA JARIEURD							2 162						2 162
MUSTAPHA NABAY			2 000										2 000
SAMSON AMBROSE			1 000				884						1 884
ACCESS JEWELLERY TRADING (SL) LIMITED	1 800												1 800
NB GLOBAL INVESTMENTS INC.	1 641												1 641
FORWARD MINING & INVESTMENT LIMITED	1 500												1 500
PASHUPATI DIAMONDS & GEMS (SL) LIMITED	1 465												1 465
K T AFRICAN LIMITED	1 173												1 173
Alie Kamara			1 000					77					1 077
MOHAMED A SHOW			1 000					77					1 077
Abdulai Wahab Daboh			1 000										1 000
Abubakarr Sow			1 000										1 000
Adham El-Ali			1 000										1 000
ADULAI B JALLOH			1 000										1 000
AHMED TALIB			1 000										1 000
AIMAN JAWARD			1 000										1 000
ALHAJI ALUSINE SAMURA			1 000										1 000
Alhaji Bakarr Sillah			1 000										1 000
Alhaji Ibrahim Sesay			1 000										1 000
ALHAJI ISSA KANU			1 000										1 000
Alhaji Jabbie			1 000										1 000
Alhaji Kargbo			1 000										1 000
Alhassan Jalloh			1 000										1 000
Ali Talib			1 000										1 000
ALIE DUKURAY			1 000										1 000
Alie Hassan Dayeck			1 000										1 000
ALPHA JALLOH BUNDU			1 000										1 000
Angello Denish Karim			1 000										1 000
BANGALI TUNKARA			1 000										1 000
Bashiru Jalloh			1 000										1 000
Bashiru Kabba			1 000										1 000
Bassam Hamka			1 000										1 000
Bellie Tunkara			1 000										1 000
CHRISTOS CHARATSARIS								1 000					1 000
FRANCIS ABOUD			1 000										1 000
Hassan Antar			1 000										1 000

Tax payer	Diamond & Gold Export duty	Diamond & Gold Exporters license	DIAMOND DEALER LICENCE	Exploration license	Import and Export duties	Licence Fee	Mineral Resources Royalty	Mining license	Monitoring fee (\$)	PAYE	Payroll Tax	W/H 5% Contract	Grand Total
HASSAN MANSOUR			1 000										1 000
Hassan Mroue			1 000										1 000
Hayssam Diab			1 000										1 000
Ibrahim Fofanah			1 000										1 000
IBRAHIM HADARRA SHERIFF			1 000										1 000
Ishmail Shamseddine			1 000										1 000
JAMAL N MANSOUR			1 000										1 000
John Joe Amara Bangalie			1 000										1 000
John Karim			1 000										1 000
Lanfia Kabba			1 000										1 000
Mansoor Kelikkodan								1 000					1 000
Mohamed Alusine			1 000										1 000
MOHAMED BELLA DUMBUYA			1 000										1 000
Mohamed Fofanah			1 000										1 000
Mohamed Gassimu			1 000										1 000
Mohamed Karim			1 000										1 000
Mohamed Keita			1 000										1 000
MOHAMED KHALIL			1 000										1 000
Mohamed Lamin Kakay			1 000										1 000
MOHAMED N FAWAZ			1 000										1 000
MONZER M TAWARD			1 000										1 000
MUSTAPHA FOFANAH			1 000										1 000
Nassim George Nassim			1 000										1 000
NOUR MANSOUR			1 000										1 000
Philimon Tamba Abu			1 000										1 000
Samir Abdallah Saad			1 000										1 000
Sherieff Bah			1 000										1 000
Sorie Sannoh			1 000										1 000
Sulaiman Barrie			1 000										1 000
Taliby Kaba			1 000										1 000
TARAIK MANSOUR			1 000										1 000
Umaru Barrie			1 000										1 000
USMAN MANSARAY			1 000										1 000
Wurie Bella Sow			1 000										1 000
YAHIA FOUAD			1 000										1 000
FORWARD MINING & INVESTMENT LTD	983												983
FORWARD MINING AND INVESTMENT LIMITED	761												761
ADVANTAGE PARTNERS (SL) LIMITED	714												714
PATRICK KOROMA	528												528
AFRICA GLOBAL ENTERPRISE	240												240
HAGI TANKIKORA	197												197
Yusuf Bangura								185					185
SAIDU SESAY								154					154
CHERNOR MADANIE BAH			77										77
LAMIN A KABBA								77					77
Abdul Aziz Kante								77					77
Abdul Kafar Jalloh								77					77
Abdulai Kanu								77					77
ABDULRAHMAN ABASS KAMARA			77										77
ABIBATU I SANKOH								77					77

Tax payer	Diamond & Gold Export duty	Diamond & Gold Exporters license	DIAMOND DEALER LICENCE	Exploration license	Import and Export duties	Licence Fee	Mineral Resources Royalty	Mining license	Monitoring fee (\$)	PAYE	Payroll Tax	W/H 5% Contract	Grand Total
Ahmed Nehme								77					77
Alhaji Dauda Koroma								77					77
ALHAJI MOHAMED ALLIE								77					77
Alhaji Mohamed Sisay								77					77
Amadu Poty Jalloh								77					77
Ammanuel Tommy Kowa								77					77
Bai A.W. Karbgo								77					77
Dauda Condekeh								77					77
EDWARD SAMA								77					77
Fatmata Haja Daramy								77					77
Foday Sankoh								77					77
Foray Amara Thonroka								77					77
HAGI TANGIKORA								77					77
HASSAN A KANU								77					77
Ibrahim A. Jalloh								77					77
Ibrahim Bah								77					77
Ibrahim Ballah								77					77
IBRAHIM BARRIE								77					77
IBRAHIM FOFANA								77					77
Ibrahim Jalloh								77					77
Idrissa Mansaray								77					77
ISSA JALLOH								77					77
JOHN DAVIES								77					77
Kadijatu Isha Jalloh								77					77
KARIFA KALLON								77					77
KOMBA BASSIE			77										77
Midupeh Marian Peters								77					77
Mohamed Bah								77					77
Mohamed Hajie Sillah								77					77
Mohamed Sorie Sesay								77					77
MOMOH BANGURA								77					77
Muctarr Barrie								77					77
Murana Sillah								77					77
MUSTAPHA GEORGE								77					77
MUSTAPHA NGIAKOH			77										77
Osman Conteh								77					77
OSMAN SESAY			77										77
Peter Davies								77					77
RAYOND BINDI								77					77
THEOPHILUS OBIE ANDREW								77					77
Wurie Jalloh								77					77
Yusifu Koroma								77					77
Issa Alimamy Kamara								62					62
Mohamed Kamara								62					62
Abdul Conteh			31										31
Abdul Jalloh								31					31
Abdul Katokoh								31					31
Abdulai Bangura								31					31
Abdulai Barrie								31					31
Abubakarr Bah								31					31

Tax payer	Diamond & Gold Export duty	Diamond & Gold Exporters license	DIAMOND DEALER LICENCE	Exploration license	Import and Export duties	Licence Fee	Mineral Resources Royalty	Mining license	Monitoring fee (\$)	PAYE	Payroll Tax	W/H 5% Contract	Grand Total	
Abubakarr Santigie Kargbo								31					31	
ABUBAKARR YATA-BARRIE			31										31	
Alie Sannoh			31										31	
Alieu Sesay								31					31	
ALPHA K JALLOH								31					31	
Alusine Barrie								31					31	
ALYSIOUS CONTEH MANSА			31										31	
Amadu Kallon								31					31	
Aruna Conteh								31					31	
Borbor Tommy								31					31	
Foday Kamara								31					31	
Fodie Amara Yarjah								31					31	
Hassan Samuel Kamara								31					31	
Ibrahim Khalil Jalloh								31					31	
Ibrahim Turay								31					31	
Ishera Jalloh								31					31	
Issa Tholley								31					31	
Issa Conteh								31					31	
James Gbla								31					31	
Lamin Bundu								31					31	
Malikie Tamba								31					31	
MOHAMED . BAH			31										31	
Mohamed Lamin Bah								31					31	
Mohamed Madu Conteh								31					31	
Mohamed Mansaray								31					31	
Mohamed Mohmoud Kpaka								31					31	
Mohamed Said Jongo								31					31	
Mohamed Sheriff			31										31	
Mohamed Tunkara								31					31	
Morlai Sesay								31					31	
MOSES TURAY			31										31	
Mustapha Kamara								31					31	
Osman M Kanu								31					31	
Osman Sillah								31					31	
Peter Sesay								31					31	
Posman Abdul Kamara								31					31	
MALTE KIRCHNER	29												29	
KATHRIN ANIK RUSSNER	20												20	
SUGIYAMA SHINYA	12												12	
SUSANNE S BAMBEY MUNKELT	5												5	
ALLOTROPES DIAMOND CO LTD	-												-	
<b>Total</b>	<b>168 059</b>	<b>816 500</b>	<b>162 582</b>		<b>269 077</b>	<b>286</b>	<b>148 830</b>	<b>63 174</b>	<b>12 327</b>	<b>29 766</b>	<b>15 437</b>	<b>154</b>	<b>5 538</b>	<b>1 691 731</b>

## Annex 19: Persons involved in the preparation of SLEITI 2019 report

Independent Administrator	
Mark Henderson	Partner - BDO UK LLP
Ben Toorabally	Director - BDO UK LLP
Hedi Zaghouani	Manager - BDO UK LLP
Maher Kabsi	Team Leader - BDO UK LLP
SLEITI Secretariat	
Mohamed Baimba Koroma	National Coordinator
Deborah Dixon-Massaquoi	Secretary, SLEITI
Alie Brima Kamara	Data Collection Officer
National Minerals Agency (NMA)	
Yusuf Dauda Suma	NMA EITI focal person
Mohamed Sallie Bah	Precious Minerals Trading Directorate EITI focal person
Petroleum Directorate (PD)	
Amadu Mansaray	PD EITI focal person
Sabieu Sahid Conteh	Accounting Manager
National Revenues Authority (NRA)	
Mohamed Jalloh	NRA EITI focal person
Ministry of Mines & Mineral Resources (MMMR)	
Daniel Gbondo Esq	Minerals Policy Advisor
Environmental Protection Agency (EPA)	
Ramatu B Massaquoi	EPA EITI focal person
Ministry of Finance (MoF)	
Mohamed Salisu	MoF EITI focal person