

Minutes

These Minutes capture the purpose and agreed outcomes of the 52nd meeting of the EITI Board.

MINUTES OF THE 52ND EITI BOARD MEETING

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52-1 Welcome and adoption of the agenda

The **EITI Board Chair, Rt Hon. Helen Clark** opened the meeting and welcomed the Board members to the EITI's 52nd Board meeting. She thanked the Board members and their alternates for continual engagement despite the challenges of meeting virtually and expressed her hope that an in-person Board meeting might be possible in June 2022. The Chair reminded the Board to contribute to the proceedings on the basis of mutual respect in the interest of making progress and arriving at decisions on long-standing items of business, notably the revised company expectations and the validation of the Philippines. In this spirit, she urged that there be clear agreement between the Board member and their alternate on who will speak on specific agenda items to keep discussion manageable.

The draft Board meeting agenda was approved.

The Chair thanked Board members leaving the Board:

- Mr Dominic Emery, Chief of Staff, BP, who will be retiring at the end of April 2022. This Board meeting is the last that Mr Emery attends as an alternate Board member representing the companies' constituency.
- Ms Dyveke Rogan, Senior Analyst at Norwegian Bank Investment Management, who will be moving to a new position with the Government of Norway at the end of March. This Board meeting is the last that Ms Rogan attends as a Board member representing the financial institutions sub-constituency.
- Ms Laura Rópolo, Undersecretary of Mining Development, Ministry of Production, Argentina will be stepping down as an alternate Board member representing the implementing countries constituency.

The Chair welcomed new Board members to their first Board meeting:

- Mr Samou SIDIBE, National Coordinator, Mali who succeeded Mr Django COULIBALY as an alternate Board member in November representing the implementing countries' constituency.
- Ms Valery BRION, Director, Department of Finance, Philippines who succeeded Teresa HABITAN as an alternate Board member in January representing the implementing countries' constituency.

52-2 Report from the Secretariat

Board paper 52-2-A: Implementation Progress Report

Mark Robinson presented the Implementation Progress Report for the period October 2021 to January 2022. He flagged to the Board that the Secretariat has focused its activities throughout this period on capacity building and implementation support that speaks to the priorities of implementing countries throughout this period. The International Secretariat (IS) has also devoted significant effort on devising work plan priorities for 2022.

He continued that since the Board reviewed the last Implementation Progress Report (IPR) in

October, the COVID-19 pandemic continued to impact EITI implementation. There were changes to the EITI membership with Gabon re-joining the EITI and the Board agreeing to lift the suspension of the Central African Republic (CAR). CAR and other EITI implementing countries such as Afghanistan, Burkina Faso, Chad, Ethiopia, Guinea, Mali, Mozambique, and Myanmar, continue to face significant hurdles linked to political instability or internal conflict. The Secretariat continues to monitor these cases and the risks posed to EITI stakeholders closely and will continue to provide regular updates to the Board Chair and the Board. A paper on how EITI engages in the context of political instability will be prepared for Board consideration through the Implementation Committee.

Francisco Paris, Regional Director for LAC at the International Secretariat provided an overview of the political instability in Peru:

- The deadline for Peru's 2019-2020 EITI Report was extended to 31 March 2022 and its Validation is scheduled to commence on 1 April 2022. However, with the continuous political instability, including numerous high-level changes in the lead agency hosting EITI implementation, the International Secretariat's assessment is that there is no adequate preparation for Validation to proceed as planned on 1 April. It is therefore recommended that the International Secretariat proceeds with a targeted review of Requirement 1 to be reviewed by the Implementation Committee. This assessment is expected to identify actions which could help restore effective EITI implementation. However, should it identify challenges around the sign-up criteria, the Secretariat will consider recommending to the Board via the Implementation Committee a temporary suspension of Peru to allow for a reboot of the EITI process and resume effective implementation.

Board members from Peru agreed that while political instability stalled the EITI process, CSO and industry representatives continue to be actively engaged in the production of the 2019-2020 Report. They also added that Government's inability to respond to this situation, as well as other issues related to the extractives sector (in particular the environmental crisis resulted by an oil spill in January 2022), demonstrate the need for increased promotion of extractives governance and environmental transparency by the EITI.

Nassim Bennani, Regional Director for Francophone Africa at the International Secretariat provided an overview of the political instability in Burkina Faso and Mali:

- The situation in Burkina Faso remains relatively calm since the military coup took place in January 2022. While implementation has stalled the administrative work of the EITI continues. The Chair of the EITI Board [issued a statement](#) urging the new regime to adhere to the EITI Standard, including the civil society protocol. It is still premature to have a complete assessment of the viability of EITI implementation in Burkina Faso under the military regime. The Secretariat has briefed the Rapid Response Committee which is monitoring the situation closely.
- The situation in Mali has deteriorated further following the coup. ECOWAS, the African Union and the European Union have all suspended the country or imposed sanctions due to delayed elections. EITI implementation continued in this transition period, but the 2019 Report is yet to be published. Validation is due to commence on 1 April 2022. There are concerns related to insecurity, the presence of multiple armed groups and lack of transparency of licenses issued under the military regime. Following a recommendation by the International Secretariat, the Board did not object that Validation goes ahead as planned, with an increased scrutiny of the civil society protocol and adherence to Requirement 2, including to ensure full disclosure of contracts and licenses issued or transferred during the military regime in the last 18 months. If it is manifestly clear during

the Validation that significant aspects of the EITI Principles and requirements are not adhered to, the Validation Committee would likely recommend to temporarily suspend Mali.

Board members thanked the Secretariat for the comprehensive report on the EITI implementing countries and raised the following points:

- Industry representatives sought clarity as to why some implementing countries, especially those taking part in the Opening Extractives programme, are adopting high thresholds on beneficial ownership data. The Secretariat clarified that some implementing countries still follow FATF regulations which require a 25% threshold but the EITI has been encouraging countries to lower the threshold to capture more granular information. Some of these disclosures with lower thresholds are already adopted in a few EITI reports. The IS further noted that while the EITI Standard is silent on thresholds, the consistent guidance from the Secretariat has been to adopt lower thresholds to align with emerging best practice.
- Industry representatives sought more information about progress with accelerating systematic disclosures and challenges related to it. The IPR summarises varying success in implementing systematic disclosures across all implementing countries in the face of challenges created by COVID-19 pandemic. A request was made to investigate whether the data a systematic disclosures template could be further developed to bring about consistency in how it can support systematic disclosures the reporting process and enhance progress on this agenda.
- Implementing countries asked to increase capacity building and engagement on energy transition and environmental issues, while civil society representatives expressed concern over the environmental consequences of oil spills, highlighting the importance of environmental disclosures in country reporting.

Actions:

- The Secretariat to continue monitoring the situation in politically instable and fragile contexts and report to the Board.
- The Secretariat to proceed with the Validation of Mali with close scrutiny of transparency in licensing under the military regime.
- The Secretariat to proceed with the assessment of Requirement 1 for Peru and report to the Implementation Committee.
- The Secretariat to consider scaling up plans for training on the implications of the energy transition in its upcoming capacity building activities.

Board paper 52-2-B: Outreach Progress Report (OPR)

Andrew Irvine presented the report. In summary: Angola continues to progress on its EITI candidature application and is likely to submit its candidature application in March 2022. There is continued engagement with Governments of Jamaica, Lebanon, South Africa and Tunisia to further their candidature applications. IS has continued its outreach to financial institutions, including banks involved in trade finance to support the EITI and further engage on the EITI's efforts on transparency in commodity trading.

Francess Alghali, Board member representing implementing countries, added that she attended the EITI Energy Dialogue at Africa Oil Week alongside the IS. She noted that it was well attended by implementing countries who were enthusiastic about engaging with EITI to ensure that energy transition becomes a hallmark in implementing the Standard. Efforts were made in building consensus as to how different countries can intervene, given how differently countries are approaching future energy development. The meeting was a first step in engaging implementing countries as to how we can use the Standard in energy transition.

Board members thanked the Secretariat for the report and raised following points:

- Implementing countries agreed on the growing need to ensure energy transition becomes part of the EITI Standard.
- Industry representatives raised concerns in relation to disclosures of beneficial ownership data through the revised company expectations noting that most commodity traders are privately owned. Discussions are expected to be challenging in efforts to expand the list of commodity traders supporting the EITI in light of these expectations.
- CSO representatives welcomed the preparation of the new candidature application from Angola, noting the importance of a free and fair nomination of CSO representatives to the newly created MSG. It was also noted that the Government has initially proposed the appointment of three CSO members, but this had been clarified to the Government by the Secretariat as being a constituency-led process. The CSO constituency in Angola has now approved the composition of the CSO slate on the MSG. The Secretariat will facilitate a meeting between Angolan CSOs and EITI CSO Board members to address this concern and other issues concerning CSO engagement in the EITI process.

52-3 Report from the World Bank

Zubin Bamji, Program Manager for the World Bank's Global Gas Flaring Reduction Partnership (GGFR), presented the World Bank Group's (WBG) report to the EITI Board. He noted that EGPS (Extractives Global Programmatic Support) is currently supporting EITI implementation through 14 active grants and 9 grants in preparation. New grants to support EITI will be endorsed by the EGPS Partnership Council in February 2022. He provided further detail on WBG's support towards disclosures around small-scale artisanal mining and gender and welcomed feedback from the EITI International Board.

Board members raised the following points:

- As with previous reports to the EITI Board, CSO representatives raised concerns around WBG's inability to disclose information around financial support to civil society organisations in grant-recipient countries. Mr Zubin responded that while WBG is not equipped to providing funding to CSO's directly, it has done so in the past by engaging with local organisations and providing indirect funding through governments.
- Supporting country representatives raised concerns around the inadequate provision of funding towards EITI implementation. It was noted that the report submitted to the EGPS Partnership Council meeting earlier in the week showed that less than 50% of the grant funding was dedicated towards EITI implementation with only one grant of the 9 for

consideration earmarked for EITI implementation, which goes against the commitment in the grant agreement.

- Given the challenges around responding to this query, Board members proposed that an EITI Board's Implementation Committee engages with the WBG ahead of their submission of their report to the Board in June in order to address the areas of concern raised by supporting countries.

Actions:

- Secretariat to explore, together with the WBG, ways in which EITI International Board can be better informed of the ongoing EGPS activities in support of EITI implementation.

52-4 Report from the Implementation Committee

Board Paper 52-4-A: Process for refining the EITI Standard (for decision)

Erica Westenberg, Co-Chair of the Implementation Committee presented the paper which outlines the process for revising the EITI Standard ahead of the 9th EITI Global Conference in mid-2023. The process proposed to be approved by the Board includes the creation of a working group that will further define the areas of scope of refinements. Over the period 2019 to date, the Board has already made clarifications with respect to its strategic priorities, revised Validation guide and procedures, the assessment of EITI sign-up steps, reporting deadlines, contract transparency which do not yet have agreed language in the Requirements. Additionally, a review of the EITI requirements may be timely given the impact of the global COVID-19 pandemic on EITI disclosures.

It was suggested that the Board approach any refinements to the EITI Standard as a two-stage approach. The Board could agree the process for considering refinements to the EITI Standard and task a working group to define the scope of any refinements to the Standard. The working group would report to the Implementation Committee, which would then make recommendations for the Board's consideration. The key deliverable of the working group will be a Board paper containing proposals/recommendations to be considered by the Board in its discussion of options for refining the EITI Standard at its 53rd meeting in June 2022. The Implementation Committee would oversee elaboration of the final draft, for Board consideration at a virtual or in-person meeting in February 2023.

Board members supported the idea of creating a technical working group for addressing the changes in the Standard and raised the following points:

- A creation of a technical working group was welcomed by civil society representatives. However, concerns were raised by the companies' constituency on the need for a working group which might result in protracted conversations around the revisions to the Standard. Erica clarified that the working group would be proposed to be composed of the Board members to ensure representation of all constituency views.
- CSO representatives urged to consider three principles throughout the process: (1) Revise the Standard based on Board decisions taken since 2019; (2) Include provisions on energy transition; (3) Ensure the Standard considers areas the EITI is currently lagging behind on, such as gender mainstreaming and, environmental responsibility.

Actions:

- The Secretariat to develop the scope of refinements to the EITI Standard ahead of the 53rd Board meeting in June 2022 with full consultation of relevant constituencies and stakeholders.
- The Secretariat to follow-up the recommendation on the creation of the Working Group on refinements to the EITI Standard following the 53rd Board meeting in June 2022.

Board Paper 52-4-B: Lessons learned from innovations in EITI reporting (for discussion)

Ian Mwiinga, Co-Chair of the Implementation Committee, presented the paper. He reminded the Board that at its 50th meeting in June 2021, the Board agreed to extend the pilot on alternative approaches to reporting and measures relating to flexible reporting to 2022. Based on 14 countries' publication of "flexible" EITI Reports and two countries' publication of pilot EITI Reports based on alternative approaches to reconciliation to date, the International Secretariat has identified a set of emerging lessons learned from the different reporting options. This paper presented to the Board provides preliminary findings from the review of innovative approaches to reporting. It was noted that the Secretariat found that, following flexibility measures introduced by the Board, almost one-third of implementing countries have modified their disclosure and reporting practices. The "flexible" EITI Reports have costed significantly less than conventional reconciliation reports (44% cost reduction on average) and the quality of reporting remains relatively the same.

Ian continued that the findings have also shown that the timeliness of EITI reporting measured by the last fiscal year covered has improved with the transition to "flexible" EITI Reports. The timeliness of reporting has remained constant for the two countries participating in the pilot. The coverage and comprehensiveness of EITI reporting of financial data on company payments and/or government revenues has not declined significantly under "flexible" EITI Reports. The use of EITI reporting to monitor evolutions in systematic disclosures has increased markedly in the two countries piloting alternatives to conventional reconciliation. The transition from conventional to "flexible" and pilot alternative approaches to EITI reporting has not resulted in a deterioration in the reliability of data related to company payments and/or government revenues, as assessed by MSGs. The paper documents some of the lessons from this work and identifies some priorities for improving implementation support and guidance.

Board members thanked the Committee and the Secretariat for the detail and raised the following points:

- Board members sought more detail on the impact of the Validation and whether flexible approach led to a quicker and more effective Validation process. They also requested details on how flexible approach to reporting has affected systematic disclosures. The IS clarified that outcomes presented in this paper are based on 14 countries that have published reports using the flexible approach. They are yet to go through their Validation which is why the impact of Validation in flexible approaches to reporting have not yet been reported on.
- CSO representatives noted a negative trend in data quality provided through flexible approach to reporting. While efforts are continuously made by the members of the MSG's,

Board members are urged to consider lessons learnt to ensure that the experience of 29 countries with adequate data quality can be used across all implementing countries.

The Secretariat noted that it would continue to encourage countries to use flexible approaches to EITI reporting and report to the Board on the outcomes and impact of Validation, as well as the quality of data. **Actions:**

- The Secretariat to continue to monitor the progress on flexible approaches to reporting and update progress to the Board at 53rd Board meeting in June 2022.

52-5 Report from the Validation Committee

Board Paper 52-5: Report from the Validation Committee

Alex Gordy, on behalf of Stephen Douglas, presented the Validation Committee's report to the Board, noting the three items for decision on the Validations of Albania and Guinea as well as launching a review of lessons learned from the first Validations under the new Validation model, and a fourth item for discussion with a possible decision on the Validation of the Philippines. Stephen Douglas added that the Board concluded a total of 11 Validations in 2021. Three of these (Cameroon, Suriname and Ukraine) were Validations under the old model. Four decisions related to the Validations of Requirement 2.5 on beneficial ownership only, concerning the cases of Armenia, Germany, Nigeria and Norway. Finally, four decisions were taken in relation to Validations under the new model, which were the Validations of Senegal, the United Kingdom, the Netherlands and Zambia.

Representatives from Albania recused themselves. Alex Gordy introduced the Validation Committee's recommendation that Albania had achieved a 'moderate' score in its implementation of the 2019 Standard, with a recommended 24 months before its next Validation. The Board considered progress on the six previous corrective actions and new aspects of the EITI Standard, as well as improvements in systematic disclosures and focus on energy transition issues. The Board approved the recommendation from the Validation Committee.

Representatives from Guinea recused themselves. Stephen Douglas introduced the Validation Committee's recommendation that Guinea had achieved a 'high' overall score in its implementation of the 2019 Standard, with a recommended 24 months before its next Validation. Hugo Paret provided detail on the findings in Guinea's Validation, noting that the overall score reflects an average of the three component scores on (1) stakeholder engagement, (2) transparency and (3) outcomes and impact. Guinea has achieved a 'high' score on the 'outcomes and impact' and 'stakeholder engagement' components and a 'moderate' score on the 'Transparency' component. The Board approved the recommendation from the Validation Committee.

Representatives from the Philippines recused themselves. Stephen Douglas introduced an update on the Validation Committee's draft recommendation on the Validation of the Philippines. The Validation Committee had reached consensus on the assessments of all EITI Requirements. Despite consensus on the assessments, there was no agreement on the suspension of the Philippines given the assessment of Requirement 1.3 as 'partly met', in accordance with Article 5 of Chapter 4 of the EITI Standard. Alex Gordy introduced the proposed options for the Board's

consideration.

The Board Chair sought constituency views on the assessment of Requirement 1.3 before the Board could move on to the discussion of the consequences of the assessment. Board members agreed on the assessment of 'partly met' overall, with one dissenting view. However, strong objections to the suspension of the Philippines as a consequence of the assessment of Requirement 1.3 as 'partly met' were made from the implementing and supporting countries' constituencies. It was therefore agreed that a Negotiation Committee chaired by the Executive Director would meet at the closing of Day 1 of the Board meeting and discuss the possible compromises on consequences of the assessment of Requirement 1.3 as 'partly met' as well as the timeframe for the Philippines' Validation. The Committee would then be asked to present its recommendation to the Board on Day 2 of the Board meeting.

The Board Chair welcomed Board members and their alternates to the second day of the Board meeting. She noted that the Negotiation Committee met following the discussions from the first day and affirmed clear support from all four constituencies for the assessment of 'partly met' on Requirement 1.3 relating to the civil society protocol. She added that the safeguard mechanism in the EITI Standard would dictate that the country is temporarily suspended following 'partly met' on this requirement. She therefore asked the Board to share their views on the Philippines's suspension in accordance with article 5 of the safeguards.

Board members representing civil society expressed their support for the implementation of provisions of the EITI Standard requiring the suspension of the Philippines. However, Board members representing implementing and supporting countries, as well as industry, opposed immediate suspension, asking for its deferral until corrective actions could be assessed, possibly at the end of 2022.

The Secretariat outlined the options available to the Board for decision-making in the absence of consensus based on the Articles of Association. It noted that a Board vote to suspend the Philippines would be unlikely to command majority support, concluding that the recommendation based on the views expressed at the Negotiation Committee, was for the Implementation Committee to rigorously monitor progress on Requirement 1.3 in line with the corrective action agreed by the Board in October 2021. This could take place in six months, with the Implementation Committee reporting to the Board in October 2022 on progress on implementation of the corrective actions of 1.1 and 1.3. Lack of evidence on progress could result in a Board motion for the Philippines to be temporarily suspended from the EITI. A proposal was also made for the next Validation of the Philippines to start in a shorter time frame of 12 months rather than 24 months. The proposal would be for the Board to consider a resolution that the Philippines is not suspended from the EITI pending clear progress on Requirement 1.3 through these actions.

Board members raised the following points:

- CSO representatives expressed serious concern with the proposal. They reiterated their strong support for adhering to requirements of the EITI Standard, i.e., suspending Philippines with immediate effect.
- Implementing countries, as well as industry representatives supported the recommendation.
- Supporting country representatives supported the deferral of suspension but asked for a

longer period for the Government and MSG to appropriately address the corrective actions. The Secretariat noted that while addressing some of the corrective actions would be stalled until after the Presidential Elections in May 2022, most of them are of administrative nature and could be launched already.

Having received no support for this option, the Chair moved that the Board agree the Validation assessment on the Philippines, including 'partly met' on Requirement 1.3, deferring its decision to enforce the safeguard mechanism and the implications of the suspension to its 54th meeting in October 2022. She noted that at that point the Board will have the opportunity to review progress on the corrective actions. CSO representatives raised concern around the communication of this language and suggested additions to the Board statement to clarify that while the Board decided that the assessment of Requirement 1.3 on civil society engagement is partly met, it did not agree to enforce the safeguard mechanism in accordance with Article 5 of Chapter 4 of the EITI Standard. With this clarification added to the language, the Board agreed the decision presented in Annex B. The Chair thanked the Board for reaching a consensus on this challenging issue.

The Board Chair invited Stephen Douglas to present the Validation Committee's recommendation to launch a review of lessons learned from the first Validations under the new model. Stephen noted that the Validation Committee recommends that the Board reactivates the Validation review working group originally established in 2019 with the aim of reviewing lessons learned from the first year of implementing the new Validation model. The suggestion is that the working group would meet monthly, with a view to reporting back to the Validation Committee in May. Each of the four constituencies were asked to nominate two members to the working group. The Validation Committee would present the work of the Validation review working group to the Board at its 53rd meeting in June 2022.

The Board approved the recommendation from the Validation Committee.

Actions:

- The Chair to write to the Governments of Albania, Guinea and Philippines announcing the Board's decision.
- The Secretariat to publish the results of the Validation of Albania, Guinea and Philippines including the supporting documentation.
- The Implementation Committee to report on progress in implementing corrective actions related to stakeholder engagement in the Philippines at the 54th Board meeting in October. The Board to consider the application of the safeguards in Article 5 of Chapter 4 of the EITI Standard in the Validation of the Philippines at the 54th Board meeting. The next Validation of the Philippines would commence in 12 months, on 1 April 2023.
- The Validation Committee to launch a review on lessons learned from the first Validations under the new Validation model. Each constituency to nominate two members each to the working group.

52-6 Report from the Finance Committee

Board Paper 52-6: 2021 EITI Annual Accounts, KPIs and Q1 2022 Forecast (for discussion)

Dominic Emery presented the paper, noting that the overall financial situation of the Secretariat remains strong. In 2021, the Secretariat received revenue of USD 8.7m and incurred expenditures of USD 7.9m against an approved budget of USD 8.5m resulting in a budget surplus of USD 0.8m. The budget surplus was mainly due to reduced travel and absence of in-person Board meetings in 2021. The Finance Committee recommends to the Board that reserve fund is increased by NOK 4.5m to from NOK 18m to NOK 22.5m, equivalent to USD 2.5m (from USD 2.0m) as a prudent move to maintain 3 months cover on expenses and to reflect the increased liabilities related to staffing and uncertainties related to project specific funding. The Finance Committee also recommends that the remaining cumulative budget surplus is to be earmarked towards funding for the Global Conference in 2023, in line with the previous recommendation put forward by the Committee to the Board.

Board members sought clarification on the required steps for identifying a Board committee, possibly the Finance Committee or a working group to take the lead on working with the World Bank on the information it provides to the Board ahead of its meetings. The Secretariat agreed on the need for improved coordination between the EITI and the World Bank in order to give a fuller account to the Board on the funds allocated to support for EITI implementation but noted that WBG has their own governance structure in place through the Partnership Council. The Secretariat will seek to reach an agreement on next steps and report back to the Committee.

In closing remarks for the Finance Committee, the Secretariat and Board Chair thanked Dominic for providing guidance to the Secretariat on its finances throughout his chairmanship.

Actions:

- The Secretariat to seek agreement with the World Bank on the information provided through the WBG's report to the EITI Board ahead of its meetings.

52-7 Report from the Governance and Oversight Committee

Oleksiy Orlovsky introduced the Audit Report, noting that the audit was carried out successfully. With the GOC being satisfied with the draft report, the Committee recommends that Board members sign the report, in line with the Norwegian law. Oleksiy invited Stian Tørrestad to present the Auditor's opinion. Mr. Tørrestad noted that the audit opinion is unmodified, and all process improvements recommended last year were successfully implemented.

The EITI's 2021 Audited Accounts were approved.

Board Paper 52-7: Improving the Expectations for EITI Supporting Companies (for decision)

Oleksiy presented the GOC's recommendation on revisions to the company expectations, noting

that the GOC was tasked by the Board in October 2021 to provide recommendations to the Board on (1) changes to clarify and strengthen the Expectations and (2) how to address instances where supporting companies are not meeting the Expectations. The recommendations are the result of significant discussion before the GOC, informed by a dedicated Reference Group and Secretariat-led consultations with all constituencies on these issues. The recommendations provided in Board Paper 52-7 were agreed by consensus and represent the recommendations of the GOC to the Board.

Andy Irvine presented the paper, summarizing the recommendations in the paper.

Board members congratulated the Secretariat and the GOC for being able to present recommendations agreed by all constituencies. They made the following points:

- Industry representatives welcomed the revisions to the company expectations but expressed the following concerns. Attaching the severe and unique penalty of ineligibility for Board membership meant that these were not expectations as applied in the EITI Standard which had no consequences for non-compliance. This compromised parity of treatment for all constituencies, particularly as some of the expectations had global application beyond the remit of the EITI Standard. The assessment process would inevitably be interpretive and could place the Secretariat in an awkward position of judgement, making industry Board nominations vulnerable to challenge from other constituencies, negatively impacting Board collegiality. Board members agreed on the importance of providing continuous support to industry representatives on understanding the Expectations, in particular through guidance/webinars/calls to ensure consistent implementation.
- Financial institutions shared the communique [received](#) from the Emerging Markets Investor Alliance (EMIA)¹ on 14 February 2022, in which they expressed support for the proposed revisions to the company expectations and their belief that all companies should adhere to the Expectations.
- CSO representatives welcomed many aspects of the revised Expectations, but noted concerns around language that remained open to different interpretations and that could create potential 'loopholes', noting that further clarifications should be made in relation to: (1) supporting companies not undertaking activities (including lobbying) that would undermine the EITI; (2) clarifying what 'practical barriers' are in Expectation 3, and supporting companies should demonstrate their actions on remedying the barriers; and (3) compliance with Expectations should be a strict requirement for Board membership. CSO Board members suggested that clarifications could be made in the guidance for supporting companies or in the EITI Secretariat's criteria for assessing the Expectations.

¹ EMIA is a US-based not-for-profit that holds educational events for investors on topics related to transparency and anticorruption amongst other things.

- Implementing and supporting country representatives welcomed the revisions to the Expectations and further discussion on how to hold each other accountable.

The revised Company Expectations set out in the Board Paper were approved. The Chair welcomed this development, noting that the Expectations are clearer and stronger, presenting supporting companies with an opportunity for leadership. The Chair reiterated that Supporting Companies would not be expected to behave in a manner that undermines EITI's goals, and that such – including lobbying for weaker reporting regimes – would not be in line with these Expectations. The International Secretariat committed to produce guidance for companies in interpreting the expectations to guide reporting for the 2023 assessment.

Actions:

- The Annual Accounts to be signed and the Audit Report to be finalised and published online.
- Company Expectations to be published online.
- Secretariat to provide guidance to supporting companies on interpreting the Expectations.
- Secretariat to proceed with the next assessment, ahead of the 2023 Global Conference.

53rd EITI Board meeting and 6th EITI Members' meeting

Mark Robinson briefed the Board about the upcoming Board meeting plans. He reminded the Board members that the next Board meeting is planned in Brussels for 16-17 June 2022, with the venue and logistical arrangements to be confirmed in the coming weeks. Board members are asked to reserve 15 June for pre-Board and side meetings. Updates on the 54th Board meeting in October will also be provided shortly, most likely in Oslo.

Closed door session

The Board in closed session discussed the performance assessment of the Executive Director for 2021, which had been undertaken by the Board Chair. The Board approved the Chair's summary. Based on feedback from Constituency Leads, the Executive Directors contract is to be reviewed to ensure appropriate sequencing with respect to the Global Conference to be held in mid- 2023.

Annex A – Board country decisions

Board decision on Albania

Albania has achieved a moderate overall score in implementing the 2019 EITI Standard (82 points). The overall score reflects an average of the three component scores on "Stakeholder engagement", "Transparency" and "Outcomes and impact".

The EITI Board commends Albania for achieving a high score on "Outcomes and impact" (87 points). This reflects Albania EITI's contributions to policy dialogue and reform on issues relevant to the extractive industries, including to the development of beneficial ownership and mining legislation as well as environmental regulations. The Board commends the Albanian EITI's emphasis on issues relevant to energy transition, including reporting on the hydropower sector, and for ensuring that EITI objectives are aligned with national priorities for the extractive industries. Albanian stakeholders, particularly civil society, have used EITI data on subnational revenues and transfers to support policy engagement. The Board encourages Albania EITI to expand open data disclosures to enhance the impact of implementation by ensuring inter-operability of EITI data with other government disclosure systems. Albania was awarded 2.5 additional points for the effectiveness and sustainability of EITI implementation.

On "Transparency", Albania reached a moderate score (77 points). Albania has made commendable efforts to build on existing systematic disclosures to improve the comprehensiveness of EITI reporting, although challenges remain in opening up subnational revenue collection from the extractive industries. The Board welcomes the improvements in disclosures related to state participation and encourages Albania to expand the use of EITI reporting to track the future contributions of gas transit revenues associated with the newly commissioned Trans-Adriatic Pipeline. Albania has made progress on new aspects of the 2019 EITI Standard related to contract transparency, beneficial ownership, project level reporting and environmental payments, although further efforts are required to ensure granular disclosures that meet stakeholder demands for information on these aspects of extractive industry governance. The Board encourages Albania to explore further opportunities to restructure annual EITI reporting and build on its open data and cadastre portals to add value to existing systematic disclosures by government and companies.

Albania achieved a moderate component score also on "Stakeholder engagement" (83 points). Stakeholders have effectively used the EITI platform for public debate on reform of the extractive industries. The government remains fully engaged in EITI implementation, while civil society has gradually expanded its engagement, outreach, and coordination with the broader constituency. However, the Board notes evidence of the weakening of industry participation in EITI and highlights the opportunity for companies to use EITI implementation to improve their corporate performance on environmental, social and governance indicators. The multi-stakeholder group has overcome challenges caused by the Covid-19 pandemic to retain oversight of all aspects of EITI implementation, although further efforts to consider gender aspects of representation in EITI implementation are

encouraged.

*The Board has determined that Albania will have until a next Validation commencing on **1 April 2024** to carry out corrective actions regarding industry engagement (Requirement 1.2), contract and license allocation (Requirement 2.2), contracts (Requirement 2.4), beneficial ownership (Requirement 2.5), comprehensiveness (Requirement 4.1), subnational payments (Requirement 4.6), disaggregation (Requirement 4.7), data reliability (Requirement 4.9), social and environmental expenditures (Requirement 6.1) and follow-up on EITI recommendations (Requirement 7.3). Failure to demonstrate progress on Outcomes and impact, Stakeholder engagement and Transparency in the next Validation may result in temporary suspension in accordance with Article 6 of the EITI Standard. In accordance with the EITI Standard, Albania's MSG may request an extension of this timeframe or request that Validation commences earlier than scheduled.*

Full Board decision is available [here](#).

Board decision on Guinea

Guinea has achieved a high overall score in implementing the 2019 EITI Standard (88 points). The overall score reflects an average of the three component scores on "Stakeholder engagement", "Transparency" and "Outcomes and impact".

The EITI Board commends Guinea for achieving a high score on "Outcomes and impact" (91 points). While the COVID-19 pandemic slowed the pace of the MSG's dissemination of EITI findings, Guinea EITI has contributed to policy dialogue and reform on extractive industry issues. The Board encourages Guinea to sustain its transition towards open-format EITI disclosures to strengthen the impact of implementation and improving the inter-operability of EITI data with existing government and company disclosure systems. Guinea EITI has an opportunity to more closely link its annual work planning with national priorities and its annual review of outcomes and impact, integrating a greater results-based approach to monitoring and evaluation.

On "Transparency", Guinea reached a moderate score (83 points). The Board commends Guinea for improvements in government systematic disclosures of extractive data including on production, exports and licenses, which also covers the important artisanal mining sector and is among the timeliest set of disclosures of EITI data. Guinea has established its annual EITI reporting as an authoritative centralised source of data on the extractive industries. The Board welcomes new disclosures on resource-backed loan agreements, environmental impacts and local content that is in high demand by national stakeholders. By more comprehensively addressing newer aspects of the EITI Standard related to beneficial ownership and project-level reporting as well as improving transparency in license allocations and subnational payments, Guinea has the opportunity of enhancing the EITI's role as a source of public data necessary to assess the rules and practices of extractive industry governance.

Guinea achieved a high component score on "Stakeholder engagement" (90 points). Guinea has broadened civil society engagement in EITI implementation and reinvigorated the industry constituency's participation. All constituencies on the MSG now appear to represent their broader constituencies and are actively engaged in all aspects of implementation. The Board encourages the MSG to exercise continued vigilance to ensure that the EITI remains a robust transparency and accountability mechanism following the political transition since September 2021. While there have been reports of isolated incidents of potential retribution to critical expression on natural resource governance in the context of political tensions in the 2019-2020 period, these do not appear to have affected stakeholders substantially engaged in EITI implementation. However, the Board urges the MSG to closely monitor any allegations of breaches of the EITI Protocol: participation of civil society to ensure that there are no legal, regulatory or practical barriers to civil society's engagement in all aspects of the EITI process.

The Board has determined that Guinea will have until a next Validation commencing on 1 April 2024 to carry out corrective actions regarding contract and license allocations (Requirement 2.2), contracts (Requirement 2.4), beneficial ownership (Requirement 2.5), disaggregation (Requirement 4.7) and direct subnational payments (Requirement 4.6). Failure to demonstrate progress on Transparency in the next Validation may result in temporary suspension in accordance with Article 6 of the EITI Standard. In accordance with the EITI Standard, Guinea's MSG may request an extension of this timeframe or request that Validation commences earlier than scheduled.

Full Board decision is available [here](#).

Board decision on the Philippines

The Philippines has achieved a moderate overall score in implementing the 2019 EITI Standard (80 points). The overall score reflects an average of the three component scores on "Stakeholder engagement", "Transparency" and "Outcomes and impact". The Board decided that the assessment of requirement 1.3 on civil society engagement is partly met. However, the Board did not reach a consensus on the enforcement of the safeguard mechanism in accordance with Article 5 of Chapter 4 of the EITI Standard. The Board encourages the Government of the Philippines and all stakeholders to take urgent actions to implement the corrective actions. The Board will closely monitor and review of progress in October 2022.

The Philippines achieved a fairly low component score also on "Stakeholder engagement" (68 points). The MSG is exercising its oversight role effectively. The government and extractive companies have mostly sustained a high level of commitment. However, weaknesses in the engagement of some government agencies are affecting the comprehensiveness of disclosures and the follow-up of recommendations.

The EITI Board finds that there have been breaches of the EITI Protocol: Participation of civil society related to freedoms of expression, operation and association in the period under review and finds that Requirement 1.3 on civil society engagement is partly met. However, despite the significance of these breaches, the Board did not reach consensus on the consequences of the assessment of Requirement 1.3 at this time and will revisit the issue in its review

of progress in addressing corrective actions related to stakeholder engagement. The Board clarified that the safeguard requirements remain in force and this decision cannot constitute a precedent. Civil society is actively engaged in EITI implementation both through the MSG and as users of extractive sector data. However, the Board expresses its deep concern over the alleged intimidation and reported extra-judicial killings of a number of civil society activists and journalists possibly linked to their interventions or stated positions around the sites of extractive operations or on issues concerning extractive investments, as well as the apparent use of the 2020 Anti-Terrorism Act to justify attempts at police or judicial action or intimidation which may have interrupted or had a chilling effect on the exercise of rights guaranteed by the EITI's civil society protocol. These breaches of freedom of expression, operation and association, in some regions of the country, have had an impact on civil society's ability to work on EITI-related topics and undertake EITI-related activities as defined in the EITI Protocol: Participation of civil society. The Board strongly urges the Government to implement the prescribed corrective actions to address each of these issues and requires the MSG to closely monitor the environment for civil society participation in all aspects of EITI implementation. The MSG must ensure robust oversight of progress on all aspects of the corrective action related to the environment for civil society participation in the EITI process, by working with relevant government agencies. Failure to demonstrate progress on corrective actions related to government and civil society engagement during the Board's review of progress in October 2022 would result in temporary suspension. The Board reserves the right to consider allegations of serious new breaches of the EITI Protocol: Participation of civil society ahead of the next Validation, which could result in suspension, and will track progress in addressing the corrective actions related to civil society engagement through its Implementation Committee.

On "Transparency", the Philippines reached a moderate score (76 points). The Philippines has made commendable efforts to strengthen data management systems for subnational transfers and payments, and to promote systematic disclosures. The comprehensiveness of publicly available information on, for example, licenses and contracts, beneficial owners and government revenues should be further improved.

The EITI Board commends the Philippines for achieving a very high score on "Outcomes and impact" (97 points). This reflects the MSG's efforts to ensure that the EITI informs debates about nationally relevant topics, such as subnational transfers and social payments. The MSG has adapted its outreach activities in light of the COVID-19 pandemic and has strived to make data accessible. The Philippines was awarded three additional points for the effectiveness and sustainability of EITI implementation.

*In addition to the Board's review of progress on corrective actions related to government engagement (Requirement 1.1) and civil society engagement (Requirement 1.3) in October 2022, the Board has determined that the Philippines will have until the next Validation commencing on **1 April 2023** to carry out corrective actions regarding government engagement (Requirement 1.1), civil society engagement (Requirement 1.3), contract and license allocations (Requirement 2.2), register of licenses (Requirement 2.3), contracts (Requirement 2.4), beneficial ownership (Requirement 2.5), state participation (Requirement 2.6), comprehensiveness (Requirement 4.1), subnational transfers (Requirement 5.2), social expenditures (Requirement 6.1).*

Failure to demonstrate progress on "Stakeholder engagement" and "Transparency" in the next Validation may result in temporary suspension in accordance with Article 6 of the EITI Standard. In accordance with the EITI Standard, the Philippines' MSG may request an extension of this timeframe or request that Validation commences earlier than scheduled.

Full Board decision is available [here](#).

Annex B– Participant List – 52nd EITI Board meeting

Chair

Rt Hon. Helen CLARK

Countries

Implementing Countries

Mr Ruslan BAIMISHEV, Deputy Minister, Ministry of Industry and Infrastructure Development, Kazakhstan

Alt: **Ms Viktoriia GNATOVSKA**, Director of Energy and Resource Efficiency Policy Formation Directorate, Ministry of Energy, Ukraine

Ms Awa Marie COLL-SECK, Minister of State, Senegal

Alt: **Mr Samou SIDIBE**, National Coordinator, Mali

Mr Sampe L. PURBA, Natural Resource Economics Advisor to the Minister of Energy and Mineral Resources, Indonesia

Alt: **Ms Valery Joy BRION**, Assistant Secretary, Department of Finance, Philippines

Mr Ian Chitumba MWIINGA, National Coordinator, EITI Secretariat, Zambia

Alt: **Ms Francesc ALGHALI**, Minister of State, Office of the Vice-President, Sierra Leone

Ms Agnès Solange ONDIGUI OWONA, EITI National Coordinator, Ministry of Finance, Cameroon

Alt: **Mr Michel OKOKO**, National Coordinator, EITI Secretariat, Republic of Congo

Mr Sherwin LONG, National Coordinator, EITI Secretariat, Trinidad & Tobago

Alt: **Ms Laura RÓPOLO**, Undersecretary of Mining Development (Subsecretaria de Desarrollo Minero), Ministry of Production, Argentina

Supporting Countries

Mr Rinaldo JEANTY, Director General and Chief Inspector of Explosives, Lands and Minerals Sector, Natural Resources, Canada

Alt: **Ms Kimberly HARRINGTON**, Director, Office of Policy Analysis and Public Diplomacy, Bureau of Energy Resources, Department of State, USA

Mr Taco WESTERHUIS, Coordination of international Circular Economy and Commodities policies, DG International Cooperation, Directorate for Inclusive Green Growth (IGG), Netherlands

Alt: **Mr François GAVE**, Special Representative for Corporate Social Responsibility and the Social Dimension of Globalisation at the Ministry of Europe and Foreign Affairs, France

Ms Christine DETAILLE, Head of Unit Transitional Development and Governance, Ministry of Foreign Affairs, Foreign Trade and Development Cooperation, Belgium

Alt: **Ms Melissa SÄILÄ**, Programme Director, Taxation for Development Action, Unit for Development Finance and Private Sector Cooperation, Ministry of Foreign Affairs, Finland

Civil Society Organisations

Mr César GAMBOA, Executive Director, Derecho, Ambiente y Recursos Naturales, Perú

Alt: **Mr Óscar PINEDA**, Community Organising Coordinator, Project on Organizing, Development, Education and Research (PODER), Mexico

Mr Brice MACKOSSO, Secrétaire Permanent, Commission Justice et Paix, Republic of Congo
Alt: **Mr Mtwalo MSONI**, National Coordinator, Publish What You Pay (PWYP), Zambia

Ms Cielo MAGNO, Bantay Kita/PWYP Philippines; Associate Professor University of the Philippines, Philippines
Alt: **Ms Diana El KAISSY**, Programme Director, The International Republican Institute (IRI), Lebanon

Mr Oleksiy ORLOVSKY, Programme Director, International Renaissance Foundation, Ukraine
Alt: **Ms Mariya LOBACHEVA**, Executive Director, Echo - Public Association, Kazakhstan

Ms Erica WESTENBERG, Director of Governance Programs, Governance Institute (NRGI)
Alt: **Mr Simon TAYLOR**, Co-founder and Director, Global Witness

Companies including Investors

Mr James NICHOLSON, Head of Corporate Responsibility, Trafigura Group
Alt: **Ms Dyveke ROGAN**, Senior Analyst, Norwegian Bank Investment Management (NBIM)

Mr Stuart BROOKS, Manager, International Relations, Chevron
Alt: **Mr Matt GOBUSH**, Senior Advisor for Public and Government Affairs, Exxon Mobil Corporation

Mr Erik NÜRNBERG, Senior Legal Policy Adviser, Equinor
Alt: **Mr Stephen DOUGLAS**, Senior Adviser to the President, Exploration & Production, Total

Mr James ENSOR, Executive Director, BHP Billiton Foundation

Alt: **Mr Carlos ARANDA**, Manager Technical Services, Southern Peru Copper Corporation

Mr Alan McLEAN, Executive Vice President Taxation and Corporate Structure, Royal Dutch Shell plc
Alt: **Mr Dominic EMERY**, Vice President, Group Strategic Planning, BP

Mr Lawrence DECHAMBENOIT, Global Head of External Affairs, Rio Tinto
Alt: **Mr Richard MORGAN**, Head of Government Relations, Anglo American

Board Secretary

Mr Mark ROBINSON, Executive Director, EITI International Secretariat, Oslo

Observers

Ms Fernanda ÁVILA, Secretary of Mines, Ministry of Productive Development, Argentina

Ms Alena BAASCH, Policy Officer, Federal Ministry for Economic Affairs and Climate Action, Germany

Mr Zubin BAMJI, Acting Practice Manager, World Bank

Mr Torge BARTSCHT, Intern, D-EITI Secretariat, Germany

Mr Joe BARDWELL, Campaigns Manager, Publish What You Pay (PWYP), UK

Ms Maria Emilia BERAZATEGUI, Campaigns Coordinator, Publish What You Pay (PWYP), UK

Ms Ingvild BERGSKAUG, Senior Advisor, Department of Energy & Environment, The Norwegian Agency for Development Cooperation (NORAD), Norway

Mr Jelle BEZEMER, EITI National Coordinator, Netherlands

Ms Rachel BONFANTE, Senior Advisor ESG (Environnement, Social, Governance) Engagement
Chevron

Ms Kathryn CASSON, Chief Adviser, Civil Society and Outreach, Rio Tinto

Ms Jackie CULLEN, Senior Legal Counsel, Social Responsibility, Shell Canada Services Limited,
Canada

Mr Sören DENG, Head of Division, Energy, Infrastructure and Raw Materials, Federal Ministry for
Economic Cooperation and Development, Germany

Ms Marième Anna DIAWARA, EITI National Coordinator, Senegal

Ms Sophie DONSZELMANN, Senior Programme Officer, International Council on Mining and
Metals (ICMM), United Kingdom

Mr Peter ELLEHØJ, Special Advisor Anti-Corruption, Ministry of Foreign Affairs, Denmark

Mr Mustapha FALL, Legal Advisor, EITI Senegal

Ms Sophie GIRKE, Advisor at the Extractives for Development Programme (X4D), GIZ, Germany

Ms Rosie HARDCARE, Personal Assistant, EITI Chair

Ms Hidemi ISHIKURA, Assistant Director, Resource Security Division, Ministry of Foreign Affairs,
Japan

Ms Sekular JAGODA, Desk Officer, Taxation for Development Action Unit for Development Finance
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Ms Andrea JUENEMANN, National Coordinator D-EITI, Head of Unit, Federal Ministry for Economic
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Mr Fred KABANDA, Division Manager, Extractives, African Development Bank, African Natural
Resources Centre (ANRC), Cote D'Ivoire

Mr Henrik LUNDEN, Senior Advisor, Department of Energy & Environment, The Norwegian Agency
for Development Cooperation (NORAD), Norway

Ms Vicki MAK-ROMO, Office of Policy Analysis and Public Diplomacy, Bureau of Energy Resources,
Department of State, USA

Mr Jason MANNIKAM, Senior Manager, Extractive Sector Transparency Measures Act Program,
Natural Resources, Canada

Mr Thomas MASBOU, Policy Officer, Extractives Industry Governance, Ministry of Europe and
Foreign Affairs, France

Ms Aubrey MENARD, Senior Policy Advisor, Extractive Industries Transparency, Oxfam America

Ms Svitlana MIZINA, Adviser, GIZ, Ukraine

Mr Daniel MULÉ, Policy Lead, Extractive Industries Tax and Transparency, Oxfam America

Ms Larysa MYKYTKO, State expert, Directorate of Energy and Resource Efficiency Policy, Ministry
of Energy, Ukraine

Mr Hiroshi NAKAMURA, Deputy Director, Ministry of Foreign Affairs, Japan

Ms Olesia NEKHOROSHO, EITI National Coordinator, Ukraine

Ms Emily NICKERSON, Senior Policy Advisor, Natural Resource Governance (NRCan), Canada

Ms Carly OBOTH, Interim Director, Publish What You Pay (PWYP), USA

Mr Orji Ogbonnaya ORJI, Executive Secretary, EITI, Nigeria

Ms Irene PASQUA, Directorate General for International Partnerships, European Commission (ec), Belgium

Mr Papa Alioune Badara PAYE, Secrétaire Permanent Adjoint & Responsable Gestion des Données, Secrétariat Technique - Comité National ITIE, Senegal

Mr Jean-Louis PONT, Policy Expert, Transitional Development and Governance Unit (D5.2), Foreign Affairs, Foreign Trade and Development Cooperation, Belgium

Mr Sergio PIAZZARDI, Policy Officer, Directorate-General for International Partnerships – DG INTPA, Unit E2 – Micro-economic analysis, investment climate, private sector, trade and employment, European Commission, Belgium

Mr Boris RAEDER, Head of D-EITI Secretariat, Germany

Mr Sven Ulrich RENNERT, EGPS Program Manager, World Bank, USA

Ms Haley RICE, Consultant, Publish What You Pay (PWYP), UK

Ms Fanie THIBEAULT, Senior Advisor, Natural Resources and Governance, Foreign Affairs, Trade and Development, Canada

Ms Lusine TOVMASYAN, Head, Extractive Industries Transparency Initiative (EITI) Secretariat, Armenia

Mr Stian TØRRESTAD, Director, Audit & Assurance, KPMG AS, Norway

Mr Pasquale VETTA, Head for Human Rights, Transparency and Global Sustainability Issues, Sustainability Department, ENI

Mr Jürg VOLLENWEIDER, Deputy Head, Macroeconomic Support Division, State Secretariat for Economic Affairs (SECO), Switzerland

Mr David Waigwa WACHIRA, EITI unit liaison, World Bank, USA

EITI International Secretariat

Ms Brenda Jay ANGELES MENDOZA, Country Manager, Asia

Ms Chiugo AGHAJI, Country Officer, Francophone Africa

Ms Marie AH-LIME, Admin Officer, Francophone Africa

Mr Bady Mamadou BALDÉ, Deputy Executive Director & Africa Director

Mr Nassim BENNANI, Interim Director, Francophone Africa

Ms Christina BERGER, Disclosure

Ms Natalia BEREZYUK, HR & Operations Officer

Mr Emanuel BRIA, Asia Officer

Mr Emmanuel Aguilar BURGOA, Country Officer, Latin America & the Caribbean

Mr Mark BURNETT, Europe and Policy Manager

Ms Lucia CIRIMELLO, Programme Manager, Opening Extractives

Ms Clémence CONTENSOU, Advisor, Francophone Africa

Mr Alex GORDY, Director, Disclosure

Ms Rachel HOLLARS, Communications Officer
Mr Andrew IRVINE, Legal and Corporate Engagement Director
Ms Sylvia JOHANSEN, Finance Manager
Ms Joanne JONES, Director, Communications
Ms Shemshat KASIMOVA, Projects & Board Liaison Manager
Ms Lydia KILPI, Director, Disclosure Group
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Ms Gay ORDENES, Asia Director and Anti-corruption lead
Ms Monica OSORIO, Admin Officer, LAC/Asia
Mr Hugo PARET, Technical Officer
Mr Francisco PARIS, Director, Latin America & the Caribbean
Ms Leila PILLIARD, Communications Manager
Ms Jeanette REINERTSEN, HR Manager & Operations Manager
Ms Sandra ROJAS, Policy and Programme Admin Officer
Mr Sebastian SAHLA, Policy Advisor
Ms Ines SCHJOLBERG MARQUES, Policy Director
Ms Olesia TOLOCHKO, Interim Disclosure Manager
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Ms Anlaug ØVERGAARD ØSTBY, Executive Asst. & Comms Officer