# EITI MOZAMBIQUE

### **EXTRACTIVE INDUSTRY TRANSPARENCY INITIATIVE**

# **Fourth Reconciliation Report - Year 2011**



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The present report has been prepared based on the requirements and information provided by you and by the institutions/entities and companies included in the sample set which have been defined for the Fourth Reconciliation Report of the Extractive Industry Transparency Initiative in Mozambique (EITI).

The conclusions and recommendations of this report have been obtained on the basis of our work methodology and extractive industry knowledge, being that the decision to implement them as well as the methods of implementation are under MEITI's full responsibility.

If the present report is disclosed to entities whose opinion is considered, INTELLICA shall not assume any liability before such entities.

The MEITI's Fourth Reconciliation Report of has been prepared pursuant to the contract entered into between the parties.

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# **List of Acronyms and Abbreviations**

AD Silver

AQU Aquamarine
AT Tax Authority

AU Gold
BER Beryl
BI Bismuth

BOE Barrel of Oil Equivalent

BME Base Metals

C Mining Concession

CAS Cassiterite
CB Columbite

CIF Cost, Insurance and Freight

COA Coal

COM Coal and Associated Minerals

CU Copper

DGI Directorate General for Taxation

DIA Diamond

DNM National Directorate of Mines

National Directorate of Treasure

DOT Dolerite

EITI Extractive Industry Transparency Initiative

EME Emerald

ENH National Hydrocarbon Company

EPCC Exploration and Production Concession Contract

FE Iron

GAR Grenades
GEM Gems
GJ Gigajoule
GRP Graphite
GYP Plaster
HSA Heavy Sands

ICE Specific Excise Duty

IGEPE Institute of Management of State Holdings

ILM Ilmenite

INP Oil National Institute

IRN National Reconstruction Tax

IRPC Corporate Tax
IRPS Income Tax

ISPC Simplified Tax for Small Taxpayers

ISV Vehicle Tax

IVA Value Added Tax

L Prospection and Research License

LI Lithium

LST Limestone

MA Manganese

MEITI Extractive Industry Transparency Initiative in Mozambique

MGJ Million Gigajoules
MI Associated Minerals

MIREM Ministry of Mineral Resources

MICOA Ministry for the Coordination of Environmental Affairs

MNP Precious Minerals

MNS Semi-precious Minerals

MPS Precious and Semi-precious Minerals

NB Niobium

NI Nickel

PB Lead

PD Palladium

PHO Phosphates

PME Precious Metals

PT Platinum

QTZ Quartz

REE Rare Sands

RUT Rutile

SAN Sand

SADC Southern Africa Development Community

STO Construction stone

TAM Tantalite and Associated Minerals

TAN Tantalite

TCF Trillion Cubic Feet

TI Titanium
TOP Topaz

#### LIST OF ACRONYMS AND ABBREVIATIONS

TOU	Tourmaline
U	Uranium
V	Vanadium
ZN	Zinc
ZR	Zircon

### **Executive Summary**

The Fourth Reconciliation Report of the Extractive Industry Transparency Initiative (EITI) in Mozambique was drafted between 9<sup>th</sup> December 2013 and 14<sup>th</sup> March 2014 by INTELLICA's team in accordance with its Terms of Reference (Annex 1).

The work performed consisted in the reconciliation of the States' receipts with the payments made by companies in the extractive industry in Mozambique, during the period between 1st January and 31st December 2011.

In the sample definition process, there were initially excluded companies/projects operating in the mining sector in order to exploit the resources and use them as raw materials in the contract work production process, as is the case of the Acosterras Moçambique, Lda stone quarry, the Cimentos de Moçambique, SA, a cement production company, and the mineral water industry companies that include the processing of this resource, being the case of Refregerantes Vumba, Lda, a soft drink company. Then, there were also excluded those companies whose payments made in 2011 are below the materiality determined by the MEITI's Coordination Committee, i.e., payments of less than 500.000,00 MT. So, for the reconciliation process, only those companies that have payments greater than or equal to 500.000,00MT were taken into account.

Through this process, from a total of 144 companies/projects operating in mining, oil and gas, only 39 companies/projects are operating, of which 23 belong to the mining sector and 16 to the hydrocarbons sector.

The data collection process was carried out through reporting templates sent to both the companies selected as well as State institutions responsible for tax collection and duties paid by the extractive sector.

After the compilation of the data obtained and before the beginning of the reconciliation of the difference between the totals receipts confirmed by the State and the totals of payments declared by the companies, the materiality defined by MEITI was higher, i.e., it was higher than 3% of the total revenues reported by State institutions (value in Metical). Therefore, the reconciliation was made and after that the segregated difference in mining and hydrocarbon area was 9.202.171,01MT (1,0%) and 4.609.447,31MT (0,2%), respectively, as shown in the table 1 below:

Table 1: Difference between Collected and Disbursed Totals

Description	State	Company	Difference	% 1,0%		
Description	State	Company	Amount	%		
Mineral Sector	960.670.978,58	951.468.807,57	9.202.171,01	1,0%		
Hydrocarbon Sector	2.108.893.251,78	2.104.283.804,47	4.609.447,31	0,2%		
General Total	3.069.564.230,36	3.055.752.612,04	13.811.618,32	0,4%		

The reconciliation process was rigorous, so adjustments were made only upon presentation of relevant supporting documents by the entities which were requested.

At the end of the process, the State institutions confirmed having received a total of 3.069.564.230,36MT and the companies/projects in the extractive industry declared the payment of 3.055.752.612,04MT, which makes a difference of 13.811.618,32MT. Making a comparative analysis it can be said that State institutions have confirmed 13.811.618,32MT more than the declared by the companies of this industry. This difference lies at 0,4% below the total confirmed by the State i.e. the difference is below the materiality set for the reconciliation process.

The detail of difference identified in table 3 of which significant differences were selected in order to provide a detailed explanation about the same as table 2 below:

Table 2: Differences by Company/Project

Company	Difference	Non- Reconcilable Difference	Difference in Reconciliation	Explanation of Differences
AFRIFOCUS RESOURCES, LDA	749.610,00	-	749.610,00	The company did not respond to the survey.
HIGHLAND AFRICAN MINING COMPANY, LDA	- 2.879.006,97		- 2.879.006,97	The company declares Production Tax payment above the confirmed by AT (Tax Authority). This payment was made in Quelimane.
KENMARE MOMA MINING (MAURITIUS), LDA	1.856.921,30	-	1.856.921,30	The company declares Production Tax payment below the confirmed by AT. This payment was made in Angoche.
PATEL MINING CONCESSION, LIMITADA	561.043,52	-	561.043,52	The company did not respond to the survey.

Company	Difference	Non- Reconcilable Difference	Difference in Reconciliation	Explanation of Differences
RIO TINTO MINING AND EXPLORATION, LDA	- 1.397.983,79	-	- 1.397.983,79	The company declares Surface Tax payment below the confirmed by AT.
TWIGG EXPLORATION E MINING LDA	743.687,69	-	743.687,69	The company declares an amount below the confirmed by AT in respect of the Surface Tax.
VALE MOÇAMBIQUE	9.484.368,60	-	9.484.368,60	The company declares IRPS payment below the confirmed by AT, referring to December de 2010, paid in 2011.
EMPRESA NACIONAL DE HIDROCARBONETOS, EP	10.639.880,77	-	10.639.880,77	The company does not declare most of the Tax on Oil production confirmed by the State.
STATOIL OIL & GAS MOZAMBIQUE AS	- 6.600.792,36	- 4.790.602,35	- 1.810.190,01	The company declares more than confirmed by AT, an amount related to Individuals Income Tax concerning tax payment by a company employee using his Tax Contributor Number (NUIT) and for this reason AT does not present such records.

The reconciled differences were mostly due to the following reasons:

- Filling in the reporting templates base on supposition that the data refers to the financial year instead of the calendar year, what causes the omission of same payments, namely, the payments made in January, 2011, related to the last months of 2010 (December and November);
- Non transcription of the amounts contained in the payment notes/reports of receipts for the reporting templates;
- Incorrect transcription of the amounts contained in the payment notes/reports of receipts for the reporting templates.

The summary of receipts confirmed by the State institutions and the payments declared by each company, at the end of the reconciliation is presented in the table below:

Table 3: Summary of the State Receipts and Payments by Companies

No	Company Name	State	Difference Company		ce	
—	Company Name		——————————————————————————————————————	Amount	%	
Mini	ng Sector					
1	ÁFRICA GREAT WALL MINING DEVELOPMENT COMPANY, LDA	925.580,00	904.630,00	20.950,00	2%	
2	AFRIFOCUS RESOURCES, LDA	749.610,00	-	749.610,00	100%	
3	BIWORLD INTERNATIONAL, LIMITED	1.615.966,35	1.548.844,94	67.121,41	4%	
4	CAPITOL RESOURCES, LIMITADA	5.733.428,00	5.696.590,32	36.837,68	1%	
5	COMPANHIA CARVOEIRA DE SAMOA, LDA	2.019.006,90	2.111.655,00	- 92.648,10	-5%	
6	ENRC MOZAMBIQUE, LIMITADA	33.547.221,15	33.586.799,85	- 39.578,70	0%	
7	ETA STAR MOZAMBIQUE, SA	1.722.659,07	1.803.084,14	- 80.425,07	-5%	
8	HIGHLAND AFRICAN MINING COMPANY, LDA	14.475.296,51	17.354.303,48	- 2.879.006,97	-20%	
9	JSPL MOZAMBIQUE MINERAIS, LIMITADA	3.094.609,28	3.211.278,66	- 116.669,38	-4%	
10	JSW NATURAL RESOURCES MOZAMBIQUE, LDA	1.011.266,00	1.128.486,00	- 117.220,00	-12%	
11	KENMARE MOMA MINING (MAURITIUS), LDA	148.290.386,40	146.433.465,10	1.856.921,30	1%	
12	MIDWEST ÁFRICA, LIMITADA	1.643.975,00	1.881.004,00	- 237.029,00	-14%	
13	MINAS MOATIZE, LDA-TETE	4.753.386,01	4.879.718,61	- 126.332,60	-3%	
14	MOZAMBIQUE MINERALS, LIMITED	1.751.537,00	1.741.537,00	10.000,00	1%	
15	PATEL MINING CONCESSION, LDA	561.043,52	-	561.043,52	100%	
16	RIO TINTO BENGA, LTD	122.267.216,40	121.463.037,85	804.178,55	1%	
17	RIO TINTO ZAMBEZE, LTD	45.123.207,64	45.826.651,96	- 703.444,32	-2%	
18	RIO TINTO MINING AND EXPLORATION, LDA	3.151.217,05	4.549.200,84	- 1.397.983,79	-44%	
19	ROVUMA RESOURCES, LDA	8.286.340,85	8.132.501,27	153.839,58	2%	
20	TWIGG EXPLORATION E MINING LDA	958.602,01	214.914,32	743.687,69	78%	
21	VALE MOÇAMBIQUE	483.163.788,49	473.679.419,89	9.484.368,60	2%	
22	VALE PROJECTOS E DESENVOLVIMENTO MOÇAMBIQUE, LDA	71.688.448,18	70.558.705,47	1.129.742,71	2%	
23	NCONDEZI	4.137.186,77	4.762.978,87	- 625.792,10	-15%	
Hydı	rocarbons Sector					
1	ANADARKO MOÇAMBIQUE ÁREA 1, LIMITADA	719.442.009,93	719.480.164,00	- 38.154,07	0%	
2	COMPANHIA MOÇAMBICANA DE HIDROCARBONETOS, SARL	264.740.164,10	264.224.396,54	515.767,56	0%	

	Company Name	State	Company	Difference	e
140	Company Name	State	company	Amount  1 10.639.880,77  8 - 7.587,94  4 62.136,15  5 - 18.925,40  4 5.984,00  7 - 302,20   0  2  0 - 85.792,00	%
3	EMPRESA NACIONAL DE HIDROCARBONETOS, EP	29.142.223,78	18.502.343,01	10.639.880,77	37%
4	ENI EAST AFRICA SPA	139.963.022,14	139.970.610,08	- 7.587,94	0%
5	PETRONAS ROVUMA BASIN	63.763.652,79	63.701.516,64	62.136,15	0%
6	PETRONAS CARIGALI MOZAMBIQUE E & P, LTD.	71.321,15	90.246,55	- 18.925,40	-27%
7	SASOL PETROLEUM SOFALA, LDA	47.007.004,94	47.001.020,94	5.984,00	0%
8	SASOL PETROLEUM TEMANE, LDA	254.354.466,57	254.354.768,77	- 302,20	0%
9	SASOL PETROLEUM MOÇAMBIQUE, LDA	-	-	-	0%
10	SASOL PETROLEUM M-10, LDA	2.722.000,00	2.722.000,00	-	0%
11	SASOL PETROLEUM MOZAMBIQUE EXPLORATION	29.825.236,42	29.825.236,42	-	0%
12	BUZI HYDROCARBONS	7.835.367,00	7.921.159,00	- 85.792,00	-1%
13	STATOIL OIL & GAS MOZAMBIQUE AS	17.062.722,74	23.663.515,10	- 6.600.792,36	-39%
14	SASOL PETROLEUM SENGALA, LDA	5.444.000,00	5.444.000,00	-	0%
15	SASOL GÁS	3.736.202,71	3.598.969,92	137.232,79	4%
16	ROMPCO	523.783.857,50	523.783.857,50	-	0%
	Subtotal Mining Sector	960.670.978,58	951.468.807,57	9.202.171,01	1,0%
	Subtotal Hydrocarbons	2.108.893.251,78	2.104.283.804,47	4.609.447,31	0,2%
	General Total	3.069.564.230,36	3.055.752.612,04	13.811.618,32	0,4%

The various stages of the preparation work of the Fourth MEITI'S Reconciliation Report in Mozambique were followed up by the Executive Secretary of the institution, Mr. Milagre Langa and the Public Relations Officer, Mr. Hélder Sindique, who gave their valuable contribution to the preparation of this report.

### 1 Introduction

The Transparency Initiative in the Extractive Industry (EITI) was launched officially in 2002, on the Head of State and Government Summit, in South Africa, and has as a fundamental principle to enhance transparency and responsible management of extractive industry revenues. The main tools for this purpose are the verification of mining companies' payments and the State's receipts, through a monitoring process carried out by a joint body involving the Government, companies and civil society, designated EITI's Coordination Committee.

It is intended that the accession to EITI will allow the countries to have a better resource management and contributes to ensure an economic and political stability, through a better investment atmosphere, a greater transparency of the State's revenues from the extractive sector. In Mozambique the initiative has its focus on the sectors of oil, gas and mining.

The first report of reconciliation of payments from extractive industry companies and the State's receipts was submitted on 2011 and was related to the year 2008. In this year, the EITI International Board's assessment indicated that although the country had demonstrated significant progress for accession as a member of the EITI, there was still the need to improve certain indicators contained in the array of adhesion to the initiative.

In the following year, the second MEITI'S Report was drafted, and it focuses on the extractive industry companies' payments and receipts of the State, made in 2009. In October 2012, Mozambique is declared abiding country, according to the MEITI'S International Board's assessment, as it is currently.

The accession of Mozambique to EITI comes at a strong context of extractive sector with high levels of activity for the prospection, exploration and exploitation of mineral resources, with emphasis on the discoveries of important natural gas reserves in the Rovuma basin, totaling approximately 190 trillion cubic feet (TCF) in place<sup>1</sup>, and if proved it can place Mozambique among the countries with the largest reserves of natural gas in the world. Several existing prospection have increased its installed capacity, and new concessions are being assigned in various areas.

<sup>&</sup>lt;sup>1</sup> The gas initially in place integrates the recoverable gas (which can be extracted from the rock) and which is not possible to extract. It should be noted that the degree of recoverability, known as factor of recoverability, depends on the specific characteristics of the deposits and the technology used for the extraction of the resource.

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The development of large enterprises of coal mining in Moatize and Benga (Tete), natural gas in Pande and Temane (Inhambane), heavy sands in Moma (Nampula) and of other metals, industrial minerals and precious and semi-precious stones, has been and it is still one of the driving factors of the country's economy for decades to come.

It is in this context and within the framework of the implementation of the third phase of the Extractive Industry Transparency Initiative (EITI), that INTELLICA was hired by the Mozambican Government, through the Ministry of Mineral Resources (MIREM), for the production of the MEITI'S Fourth Reconciliation Report in Mozambique concerning the calendar year 2011.

# 2 Methodology

### 2.1 Work Objectives

The goal of this work is preparing the MEITI's Fourth Reconciliation Report, i.e., perform the reconciliation of the receipts of the State with the payments of the extractive industry in Mozambique for the period between 1st January to 31st December 2011.

### 2.2 Scope of Work

The scope of work is defined in the Terms of Reference (Annex 1), and comprises the fulfilment of the following activities:

- Research and mapping of extractive industry (mining, oil and gas) operating in Mozambique;
- Identification of payment types and description of existing income flows in the extractive sector of Mozambique, including specimen payments, social payments, donations and those of different nature;
- Identification of all the State institutions responsible for the collection of revenues and other payments made by the companies in the extractive sector;
- Identification of extractive industry companies and State institutions to be included in the
   Fourth Reconciliation Report, based on materiality set for this purpose;
- Obtaining and compilation of the data relating to payments and receipts by the extractive industry companies and State institutions, respectively. The data was obtained through the filling in of the reporting templates previously submitted and sent to the entities;
- Reconciliation between the receipts confirmed by State institutions and the payments declared by companies.

### 2.3 Work Methodology

With a view to achieving the goals and scope of this work, the research and mapping of existing extractive industry companies in Mozambique was carried out. The mapping was done based on

the Mineral Cadastre from the National Directorate of Mines (DNM) and the Data Base of industries that operate in the field of hydrocarbons in Mozambique, made available by the National Petroleum Institute (INP). This information was made available to INTELLICA by MEITI. The collected data was then matched with the sample of the MEITI's Third Reconciliation Report, in order to ensure that companies/projects selected in the MEITI's Third Reconciliation Report were included in the MEITI's Fourth Reconciliation Report, according to MEITI's methodology.

The mapping of the extractive industry companies (mining, oil and gas), includes a total of 144 companies, of which 128 belong to mining area and 16 belong to the area of hydrocarbons. Individually, mining companies may hold more than one license of mining concession, so the mineral cadaster made available by the National Directorate of Mines consists of 137 mining concessions which were subsequently grouped by companies/project.

The requirements of the Coordination Committee impose the companies in the hydrocarbons sector to be entirely included in the reconciliation process, irrespective of the amount of payments made during the year, as the volume of investments and payments made in the hydrocarbons sector are generally very significant. For the mining sector, two criteria have been taken into account as established by the MEITI for the selection of undertakings to be integrated in the process of reconciliation:

- Only companies operating in the mining area should be selected for the process of reconciliation; and at the discretion of the MEITI'S Coordination Committee, the companies that are not included in this group and those which use the resources exploited for the production process/endeavors should be excluded, as is the case of the Acosterras Moçambique, Lda stone quarry, the Cimentos de Moçambique, SA, a cement production company, and the mineral water industry companies that include the processing of this resource, being the case of Refregerantes Vumba, Lda, a soft drink company. This exclusion is due to the fact that these companies have as object, the final transformation of the resource exploited or its incorporation into the production of other goods that allows obtaining information on the contribution of resources initially operated in the sector;
- Only the companies which have payments greater than or equal to 500.000,00 MT should be selected for the reconciliation process, although all of them should be mentioned throughout

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the report. This selection was made pursuant to the responses of the State institutions identified as responsible for the collection of taxes, fees and contributions.

Thus, in the first criterion above mentioned, the initial 144 companies/projects were reduced to 55 companies/projects, and in the second criterion they were reduced to 39 companies/projects, of which 23 in the mining sector and 16 in the hydrocarbons sector. A total of 105 companies/projects were excluded for failing to fulfil the selection criteria established by the MEITI.

With regard to State institutions, there were identified the Directorate General of Taxation (DGI), the National Petroleum Institute (INP), the Institute of Management of State Holdings (IGEPE) and the Hydrocarbons National Company, a public company (ENH), for being the institutions responsible for receiving, among others, taxes, fees and contributions specific to the extractive sector.

The reconciliation process was initiated after the selection of undertakings/extractive industry projects and identification of State institutions responsible for the collection of taxes, rates and contributions and preceded to the sending of the reporting templates to each one of them. The reporting templates of the Fourth Reconciliation Report follow the same pattern as those submitted under the MEITI'S Third Reconciliation Report, so the MEITI'S Coordinating Committee did not consider it necessary to conduct a training workshop on the filling in of the referred templates, having INTELLICA carried out the training directly and individually to companies and State institutions during the process of data collection.

Along with the reporting templates, the requests for filling in the forms were accompanied by a credential, where it is made a brief introduction of MEITI and the data collection process in the context of the preparation of the Fourth Reconciliation Reports as well as the introduction of INTELLICA, the company duly authorized for the collection of the necessary data.

The reporting templates were delivered to recipients based on the field of activity (mining sector or hydrocarbons sector), and there has been a differentiation between the extractive industry companies and State institutions.

The maximum period for handover of the requested data was defined in the aforementioned credential, which is 31<sup>st</sup> January 2014, however part of the companies sent it after the fixed date. And in extreme cases, we have not received any information, even after several attempts, and in

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these cases the companies are subject to fines, and if it is a recurrent situation they incur the risk of losing their licenses.

The data received from the State institutions and from the selected companies was introduced in a database created by INTELLICA, what enabled the preparation of the tables and graphs presented in the report.

The data insertion received through the reporting templates in the database, was accompanied by the confrontation of the entered data with payment proof copies, on the side of enterprises and the State with printing of maps taken from payment billing control system from DGI, the data map of natural gas and condensate production and the spread sheet from INP, the IGEPE'S Accounts Report and the proof of payment of the benefit of bidding price of Buzi Hydrocarbons from ENH.

This process of confirmation of the entered data has eliminated the risk of typing errors in the Database and identified the inconsistencies between the reporting templates and the relevant supporting documents. In the case of inconsistencies, the entity in question was contacted and the appropriate adjustments were made. For several times inconsistencies between the dates of payment and reporting period were identified, as in the case of payments made during the period following the reporting relating to the 2011.

With the entered data, the comparison of data reported by the State with the information reported by companies was carried out. This work was developed for each type of tax, fee and/or contribution. The differences resulting from the comparison were reconciled on the basis of existing data and that required to the entities involved in the process. Any adjustment/reconciliation was made upon presentation of legally accepted supporting documents/proof.

The MEITI'S Coordination Committee has proceeded with the monitoring of the entire process through reports of the current state of affairs drafted and regularly submitted, until the Reconciliation Report delivery date.

In general terms, the drafting of the Fourth Reconciliation Report has complied with the following parameters:

METHODOLOGY

#### Taxes, Fees and Contributions Covered

For reconciliation purposes, the taxes, fees and contributions selected as described in Chapter 5, were considered, namely the Corporate Income Tax (IRPC), the Individual Income Tax (IRPS), Tax on the Surface, Mining Production Tax, Oil Production Tax, Tax on Production in Kind<sup>2</sup>, Capacity Building Fund, Social Projects' Fund, Bidding Price, Institutional Contribution and Dividends.

#### **Extractive Industry Sectors Involved**

The reconciliation exercise within the Fourth Reconciliation Report was limited to extractive industry companies, from mining and hydrocarbons (oil and gas) sectors.

#### Reporting Year

The Fourth Reconciliation Report covers the State's receipts and payments made by companies in the calendar year 2011. Only the amounts actually paid and received during the year 2011 were considered, regardless of the period to which they relate.

#### Report Type

This is a Reconciliation Report based on data collected from a sample of extractive industry companies and the States institutions, through reporting templates accompanied by supporting documents that show the receipts confirmed and declared payments. The differences identified during the reconciliation work were duly investigated, with reference to the materiality determined by MEITI in the value of 3% of the total revenue collected and confirmed by the State, value from which the differences were investigated.

#### Ways of Presenting Data

The data presented in this report are disaggregated by companies/projects and by taxes, fees and other contributions.

<sup>2</sup> For the Fourth Reconciliation Report purposes, the Oil Production Tax was disaggregated in cash and in kind.

#### **Currency of the Report**

The currency used in the report is the national currency, the Metical. In cases where payments were made in foreign currency (US Dollar), the selling rate of exchange was used as published in the Bank of Mozambique's exchange rate bulletin n° 251/11, dated 30 December 2011, which was 27,22MT.

#### Payments in Kind

Sasol Petroleum Temane, Lda is the only company from the sample that carried out payment in kind, in this specific case through the cash payment of the tax on production (Royalties). This information was analyzed based on the comparison of the data made available by the company and by the INP. The data were given in Giga Joule (GJ) and for report purposes were converted into US Dollars using a weight factor in use by the INP. The quantities reported by the Government as well as by Sasol Petroleum Temane, Lda are shown below in Table 4:

Table 4: Payments in Kind (Royalties)

Period	Quantities(GJ)	Amounts in USD	Amounts in MT
January	206.041,19	138.047,60	3.757.655,60
February	183.666,10	123.056,29	3.349.592,13
Marsh	309.466,25	207.342,39	5.643.859,79
April	300.650,10	201.435,57	5.483.076,13
May	227.826,61	152.643,83	4.154.965,02
June	300.231,87	201.155,35	5.475.448,71
July	299.840,15	200.892,90	5.468.304,75
August	337.972,53	226.441,60	6.163.740,22
September	347.699,74	232.958,83	6.341.139,24
October	294.245,38	197.144,40	5.366.270,69
November	315.662,79	211.494,07	5.756.868,57
December	380.476,81	254.919,46	6.938.907,77
Total	3.503.779,52	2.347.532,28	63.899.828,62

#### **Materiality**

For the drafting of the Fourth Reconciliation Report, the MEITI Coordination Committee determined that the discrepancies identified between the receipts confirmed by the State and payments declared by companies under 3% of the total of revenue reported by the State will not be subject to additional reconciliation. In figures, this percentage corresponds to 92.086.926,91MT.

#### **Deliverables**

The Terms of Reference for the drafting of the Fourth Reconciliation Report as well as the service agreement between the parties, refers to the items that should be delivered as mentioned on the following Table 5:

Table 5: List of Deliverables

Nº	Deadlines	Deliverables	
1	End of 1st week	Inception report	
2	End of 4th week	Draft scoping report and survey questionnaires	
3	End of 4th week	Presentation of the draft scoping report, training of stakeholders, training material and a guide for completing survey questionnaires	
4	End of 6th week	Final scoping report and submission of survey questionnaires	
5	End of 6th week	Report on stakeholders' training	
6	End of 12th week	Draft of the Reconciliation Report	
7	End of 13th week	Reconciliation meeting with MSG	
8	End of 13th week	Report on the reconciliation meeting with MSG	
9	End of 14th week	Final Reconciliation Report	

However, at the beginning of the work, the list of items to be delivered was modified based on a decision of the MEITI Coordination Committee.

Based on previous reports, it was noted that the contributions from companies in the mining industry that are still in their exploration and research phase is significant, but the Reconciliation Report only included companies with mining concessions. Therefore, there was no need for drafting a scoping report as set in the Terms of Reference.

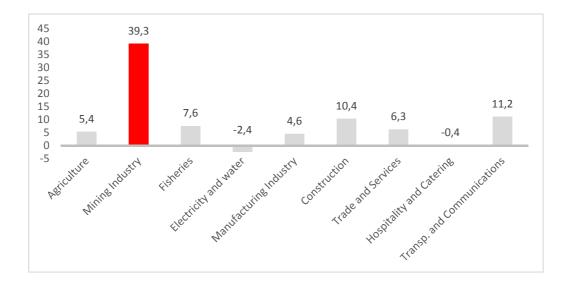
The training of stakeholders was conducted during the data collection process.

### 3 Mining Industry in Mozambique

In recent years, the Mozambican economy has experienced an annual average growth above the average figures found in the Sub-Saharan region and the world, mainly boosted by the launch of aluminum production in 2011 in Beluluane District of Boane (province of Maputo) by Mozal, mineral coal production in Moatize and Benga (province of Tete) in 2011 by Vale and 2012 by Rio Tinto, natural gas production in Pande and Temane (province of Inhambane) in 2004 by Sasol and by the increase of Foreign Direct Investment (IDE) associated to the mega-projects; notably, apart from those previously mentioned, the investment made in the prospecting and research of Natural Gas in the Rovuma Basin. In 2012, Gross Domestic Product (GDP) growth was at 7.4%, with a robust growth of the mining industry of approximately 40%; although its weight in the Mozambican economy (GDP) is still low, estimated at around 2%, based on data from the Bank of Mozambique.

Within the context of the recent discoveries of mineral resources and hydrocarbons, the mining industry is expected to play a decisive role for the future of the country's economy.

Graph 1 shows the performance of the economy by sector of activity in 2012:



Graph 1: Annual Growth by Sector of Activity - 2012 (%)

Source: Bank of Mozambique, July 2013

In Mozambique, the mining sector currently shows high levels of prospecting and research activities with significant discoveries of natural gas reserves in the Rovuma Basin, which if extracted will place Mozambique among the leading producers and exporters of natural gas in the

world. Still in the hydrocarbons sector and within the scope of research and evaluation activities, significant tradable quantities of liquid hydrocarbons (light oil) were discovered in 2013 in Inhassoro (Mozambique Basin, onshore) which could lead to the production of Liquefied Petroleum Gas (GPL), based on MIREM's supporting document for the Head of State's Annual Briefing on the General Review of the Nation.

The expansion of the Moma (Nampula) heavy sands project, the Pande and Temane (Inhambane) natural gas Project, as well as Moatize (Tete) coal undertakings are all part of the evolution of the mining sector. The new mining undertakings in the Chingodzi and Benga coal mine have increased the number of coal mines in industrial quantities in the Tete province.

The Pande and Temane gas undertakings in the province of Inhambane (the only natural gas production project in the country) have recently registered a production expansion from 120 MGJ/year to 183 MGJ/year. The gas is processed in Temane, around 95% of the production is exported to South Africa and the remaining parte is consumed in Mozambique and traded by the ENH which conducts distribution in Vilanculos, Inhassoro, Govuro and the archipelago of Bazaruto, and by MGC which conducts distribution to industrial corporations in the cities of Matola and Maputo.

With regard to heavy sands, production has started in Angoche and an experimental production has equally started in Inhassunge. The production of ilmenite, rutile and zircon deriving from the extraction of heavy sands has been growing every year, reaching an estimated installed capacity of 800.000 tons in 2011. Kanmare Moma Mining (Mauritius), strated-up with the expansion of its capacity to 1.200.000 tones. There are recent discoveries of industrial minerals and basic metals in the provinces of Nampula, Cabo Delgado, Manica and Tete; particularly the iron-vanadium and titanium project in Tete, with an estimated 750 million tons of mapped reserves.

The rapid expansion of the mining sector has resulted in revision of the Petroleum Act and the Mining Act and their submission in the Parliament of the Republic of Mozambique, where both legislations are deemed to be approved still in the course of the seventh session. The taxation legislation applied in the sector is under discussion, and on its conclusion will be submitted to the Council of Ministers for approval and later submitted to the National Assembly. Furthermore, there is an increasing concern over training in the field of geo-sciences as well as mining and oil engineering, which resulted in the introduction of new courses in higher learning institutions in the

country and the allocation of scholarships to Mozambican technicians for training abroad, the scholarships are in part funded by companies operating in the mining industry in the country.

It is expected that the mineral resources found in the country would contribute to the economic, social and cultural development of Mozambique. That is why the Government drafted the <u>Policy and Strategy for Mineral Resources</u>, approved on the 42<sup>a</sup> ordinary section of the Council of Ministers, dated 17 December 2013, so that the management and extraction of resources be conducted in a more sustainable and transparent manner, thereby bringing advantages and benefits to the economic development and transformation of the country.

This strategy is based on the following pillars:

- Improve the geological and mining knowledge of the existing mineral resources present on the soil and subsoil, in inland waters, offshore, on the continental shelf and in exclusive economic zone, where the Government has sovereignty and jurisdiction in conformity with international law;
- Make mineral resources one of the main taxpayer for economic industrialization and development, the diversification and transformation of the economy, and improve the balance of payment of the country;
- Optimize production and add value to mineral resources in the country;
- Preserve and protect the environment by establishing the necessary technical and economic conditions;
- Promote the participation of the national private sector (corporate and associations) by conceding preemptive rights to Mozambicans in cases where mineralize ore bodies of certain economic values are identified;
- Ensure institutional development.

To complement the abovementioned tools, the following are being drafted or pending approval:

 <u>Natural Gas Master Plan</u> which undertakes to map and identify the monetization options of the Rovuma Basin natural gas, as well as define the guidelines for the execution of the respective projects;

- Policy on Corporate Social Responsibility (RSE) is designed so as to make the mining and oil industry become more strategic through its RSE programs and provide support to Government Goals in terms of long-term sustainable economic growth and the reduction of poverty. This Policy was approved during the 4th Session of the Council of Ministers, on 18 February 2014;
- Tariff Methodology for High Pressure Transmission Gas pipelines which aims at monitoring
  and regulating tariffs for natural gas transportation and take all measures deemed necessary
  to ensure that these are consistent with the adopted methodology.

Law n° 15/2011, dated 10 August, the Public-Private Partnership Act (PPP), was approved in 2011, which aims at providing transparency to the mining industry, by establishing that all contracts entered into should, after the entry into force of the Act, become public. Although this specific legislation does not have any retroactive effect, there are contracts that are being entered into before the entry into force of the Act; such is the case with the Sofala Block Research and Production Contract (for hydrocarbons) or the Prospection, Research, Development and Production Contract for heavy minerals in Moma, Gongole and Quinga (mines), both available on the Ministry of Mineral Resources' website<sup>3</sup>.

In 2003, through funding from the World Bank, the Government of Mozambique developed a Portal Website on Mining Cadaster (registry) in an attempt to increase transparency and promote investments into the mining sector. The portal<sup>4</sup> is made up of two platforms, the first one for public consultations which allows seeing all mining titles and contracts in the Mozambican territory, mining concessions, mining certificates, prospecting and research licenses, recognition licenses, and the authorization of mineral resources for construction. The second one, called *FlexiCadaster*, is a file/document management system which allows interested parties to follow the handling of their files/cases online.

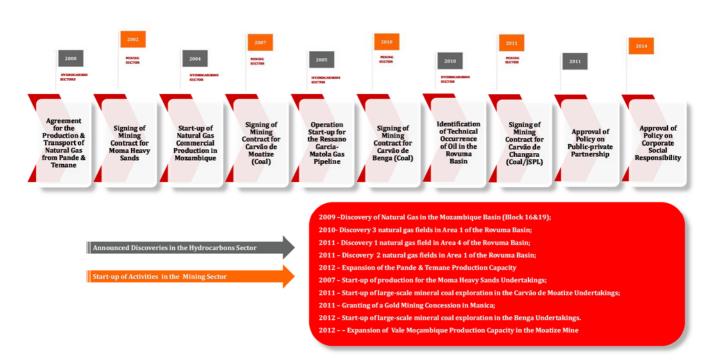
The recent milestones in the mining industry in Mozambique are shown in Figure 1, highlighting the mining contract entered into for the Moma heavy sands in 2002, the start-up of the commercial production of natural gas in Mozambique in 2004, and the signature of the mining contract for Moatize coal in 2007.

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<sup>&</sup>lt;sup>3</sup> www.mirem.gov.mz

<sup>&</sup>lt;sup>4</sup> http://portals.flexicadastre.com/Mozambique

Figure 1: Recent Milestones of the Mining Industry in Mozambique



Source: INTELLICA

### **4** Selected Extractive Sector Companies

The mapping process for companies in the extractive sector, for those in the mining sector and in the hydrocarbons sector, resulted in a list of 144 companies/projects (Annex 2). From the total, 128 are in the mining sector and 16 are in the hydrocarbons sector.

In accordance with MEITI criteria, the reconciliation report should only include companies in the extractive sector, namely in the mining, oil and gas area. Thus, it was imperative to screen the companies that were mapped, excluding those that were not part of this group. Therefore, it was discovered that a certain number of these companies do not operate in the mining, oil or gas area or use the extracted product as raw material for the process of industrial transformation/contract work activity. These companies/projects were therefore excluded in conformity with MEITI's Coordinating Committee.

As a result, the sample of companies in the mining sector was reduced from the initial 144 to 55 companies/projects, 39 of which operating in the mining sector and 16 in the hydrocarbons sector. It is worth mentioning that this exercise was only possible through the analysis of the object of each company/project that comprised the universe of the mapped companies/projects.

From the total of 55 companies/projects, it was necessary to conduct an additional exercise for the 39 companies and projects operating in the mining sector. All receipts confirmed by State institutions through the inquiries were analyzed in order to verify if the companies complied with the materiality requirements established by MEITI, which determines that only companies which carried out payments of more than 500.00,00 MT would be considered in the reconciliation process, although the remaining companies should be mentioned throughout the report.

Thus, after compiling the data received from Government institutions, it was found that only 23 companies/projects operating in the mining sector complied with the materiality, in other words, 16 companies/projects were excluded from the sample, as shown in the Table 6 below.

**Table 6: Companies Excluded Based on the Materiality Criterion** 

No	Name of Company	Resources	Payment
1	HAIYU (MOZAMBIQUE) MINING CO., LDA	AU, REE, TI, ZR	-
2	MOTA MINERAL MOÇAMBIQUE	COA	-
3	MONTEPUEZ RUBY MINING, LDA	BEM, STO	-
4	MINERAL RESOURCES MOÇAMBIQUE, LDA	BEM, COA, DOT	-
5	HS MINING, LDA	COA	210.000,00
6	OMEGACORP MINERAIS, LDA	MI, TI	489.699,41
7	AFRIMINAS MINERAIS, LDA	AG, BME, FE, MA, AU, PME	30.000,00
9	ESSAR MINAS DE MOÇAMBIQUE, LDA		198.671,32
9	GLOBAL MINERAL RESOURCES (MOZAMBIQUE), LDA		-
10	JSW ADMS CARVÃO LIMITADA	COA, COM	-
11	MAGMAS DE MOÇAMBIQUE, LIMITADA	COA, FE, MI, BME	10.000,00
12	MANICA LANDS CORPORATION, LIMITADA	COA	175.207,00
13	MIMOC - MINERAIS INDUSTRIAIS DE MOÇAMBIQUE, LDA	AU, CAS, CB, TAN, TOU, PT	187.080,00
14	MOZAMBIQUE GEMS, LDA	AQU, MPS, TOU	-
15	RIO TINTO CHANGARA, LTD	СОМ	6.284,42
16	TANTALUM MINERAÇÃO E PROSPECÇÃO LIMITADA	AG, AU, BME, CU, GRP, NI, PB	378.183,74
TOTAL			1.685.125,89

It should be noted that this exercise was not extended to companies operating in the hydrocarbons sector as one of the MEITI requirements states that all companies in the hydrocarbons sector should be included in the reconciliation report, regardless of the payments made to the Government in the year referred to in the reconciliation.

The excluded companies/projects shown in Table 6 above represent 0,06% of the total of the receipts confirmed by State institutions with regard to companies operating in the mining and hydrocarbons sector as illustrated in Graph 2 below:

Graph 2: Proportion of the Companies Excluded from the Reconciliation Process



The sample which was initially made up of 144 companies/projects was reduced to 39 companies/projects that were included in the reconciliation process within the scope of drawing up MEITI's Fourth Report. Among these, 23 companies/projects operate in the mining sector and 16 in the hydrocarbons sector.

The following tables show the companies and projects and their respective resources/exploited products referring to the year 2011, segregated by sector:

## 4.1 Companies in the Mining Sector

**Table 7: Sample of the Mining Sector** 

No	Name of Company	Resources/Products
1	ÁFRICA GREAT WALL MINING DEVELOPMENT COMPANY, LIMITADA	CU, AU, AG, CO, NI, LST, FE, TI
2	AFRIFOCUS RESOURCES, LDA	MI, TI
3	BIWORLD INTERNATIONAL, LIMITED	AU, LST
4	CAPITOL RESOURCES, LIMITADA	BME, MI, PME, FE, PGM, TI, V, AU,
5	COMPANHIA CARVOEIRA DE SAMOA, LDA	COA
6	ENRC MOZAMBIQUE, LIMITADA	COA, MI, PPS, PME, REE, BME, MPS, MNP, MNS,
7	ETA STAR MOZAMBIQUE, SA	COA
8	HIGHLAND AFRICAN MINING COMPANY, LDA	AQU, BER, EME, GAR, MOR, TAN, TOP, TOU, TAM
9	JSPL MOZAMBIQUE MINERAIS, LIMITADA	COA
10	JSW NATURAL RESOURCES MOZAMBIQUE, LDA	COA, FE, MI, BME,
11	KENMARE MOMA MINING (MAURITIUS), LDA	HSA
12	MIDWEST ÁFRICA, LIMITADA	BME, COA, DOT
13	MINAS MOATIZE, LDA-TETE	COA
14	MOZAMBIQUE MINERALS, LIMITED	AU, BME, GEM, TAN, FE, PB, PHO, ZN, COA, DIA, U

No	Name of Company	Resources/Products
15	NCONDEZI	COA
16	PATEL MINING CONCESSION, LIMITADA	AU, BER, BI, LI, NB, TAN, MAR, PME,
17	RIO TINTO BENGA, LTD	COM, COA, MI
18	RIO TINTO ZAMBEZE, LTD	СОМ
19	RIO TINTO MINING AND EXPLORATION, LDA	TI, ILM, RUT, ZR
20	ROVUMA RESOURCES, LDA	AU, CU, NI, PB, PT, ZN, PD, AG, NI, SN, BME
21	TWIGG EXPLORATION E MINING LDA	CU, NI, PT, AG, AU, GRP, PB, U, ZN, BME, PME
22	VALE MOÇAMBIQUE	APA, COA
23	VALE PROJECTOS E DESENVOLVIMENTO MOÇAMBIQUE, LDA	COA, AU, BME, PME, MIND, MI

### 4.2 Companies in the Hydrocarbons Sector

**Table 8: Sample of the Hydrocarbons Sector** 

No	Name of Company	Resources/Products	Area
1	ANADARKO MOÇAMBIQUE ÁREA 1, LIMITADA	Hydrocarbons	Onshore and offshore Area 1 – Rovuma Basin
2	BUZI HYDROCARBONS	Hydrocarbons	■ Búzi Block – Mozambique Basin
3	CMH, SA	Hydrocarbons	Pande/Temane Block - Mozambique Basin
4	ENH, EP	Hydrocarbons	<ul> <li>Onshore, Area 1, Area 4, Area 2&amp;5, Area 3&amp;6 – Rovuma Basin</li> <li>Pande/Temane, Block 16&amp;19, Sofala, Búzi, Area A – Mozambique Basin</li> </ul>
5	ENI EAST AFRICA SPA	Hydrocarbons	Area 4 – Rovuma Basin
6	PETRONAS ROVUMA BASIN	Hydrocarbons	■ Area 3&6 – Rovuma Basin
7	PETRONAS CALIGARI MOZAMBIQUE E & P, LTD <sup>5</sup>	Hydrocarbons	Area 3&6 – Rovuma Basin
8	ROMPCO	Hydrocarbons	<ul> <li>Temane (Pande/Temane - Mozambique Basin) to Secunda (Republic of South Africa)</li> </ul>
9	SASOL GÁS	Hydrocarbons	<ul> <li>Temane (Pande/Temane - Mozambique Basin) to Secunda (Republic of South Africa)</li> </ul>
10	SASOL PETROLEUM M-10, LDA	Hydrocarbons	■ Block M-10 – Mozambique Basin
11	SASOL PETROLEUM MOÇAMBIQUE, LDA	Hydrocarbons	Pande /Temane Block - Mozambique Basin
12	SASOL PETROLEUM MOZAMBIQUE EXPLORATION	Hydrocarbons	<ul> <li>Area A – Mozambique Basin</li> </ul>
13	SASOL PETROLEUM SENGALA, LDA	Hydrocarbons	Block Sofala – Mozambique Basin

<sup>&</sup>lt;sup>5</sup> Petronas Caligari Mozambique E & P, LTD and Petronas Rovuma Basin are two projects with different Taxpayer Identification Numbers (NUIT) but which belong to a single company (Petronas) that undertakes prospecting and research activities in Area 3 & 6 in the Rovuma Basin, along with the ENH and in Area A with SASOL.

No	Name of Company	Resources/Products		Area
14	SASOL PETROLEUM SOFALA, LDA	Hydrocarbons	•	Block 16&19 – Mozambique Basin
15	SASOL PETROLEUM TEMANE, LDA	Hydrocarbons	-	Block Pande/Temane – Mozambique Basin
16	STATOIL OIL & GAS MOZAMBIQUE AS	Hydrocarbons	•	Area 2&5 - Rovuma Basin

### 4.3 Characteristics of the Selected Companies/Projects

Apart from the activities described in Chapter 2 on the scope of the work, it was deemed necessary to collect data on the activities undertaken by the selected companies to be included in the Fourth Reconciliation Report.

The process of requesting additional data relating to the characteristics of the selected companies/projects was carried out after sending the reporting templates, however, without any obligation from the companies/projects to provide the additional information requested. As such, only the companies/projects listed in Table 9 below responded to the request:

**Table 9: Activities Undertaken by Companies** 

Name of Company	Activity	Location	Purpose	Number of Employees
ANADARKO MOÇAMBIQUE ÁREA 1, LIMITADA	Hydrocarbons Prospecting & Research	Rovuma Basin	Domestic Consumption & Export	-
BUZI HYDROCARBONS	Hydrocarbons Prospecting & Research	Mozambique Basin	Domestic Consumption & Export	13
EMPRESA NACIONAL DE HIDROCARBONETOS, EP	Hydrocarbons Prospection, Research, Production, Transport & Commercialization.	Rovuma Basin & Mozambique Basin	Domestic Consumption & Export	128
ENI EAST AFRICA SPA	Hydrocarbons Prospecting & Research	Rovuma Basin	Domestic Consumption & Export	13
ENRC MOZAMBIQUE, LIMITADA	Mineral Coal Research & Exploitation	Tete Province	Domestic Consumption & Export	83
HIGHLAND AFRICAN MINING COMPANY, LDA	Tantalite Research & Exploitation	Zambézia Province	Domestic Consumption & Export	481 in the mine
JSW NATURAL RESOURCES MOZAMBIQUE, LDA	Mineral Coal Prospection, Research & Exploitation	Tete Province	Domestic Consumption & Export	4
KENMARE MOMA MINING (MAURITIUS), LDA	Heavy Sands Exploitation	Nampula Province	Export	1630

Name of Company Activity		Location	Purpose	Number of Employees
MIDWEST ÁFRICA, LIMITADA	Mineral Coal Exploitation	Tete Province	Domestic Consumption & Export	19
MINAS MOATIZE, LDA	Mineral Coal Exploitation	Tete Province	Domestic Consumption & Export	-
PETRONAS CARIGALI MOZAMBIQUE E & P, LTD.	Hydrocarbons Prospecting & Research	Rovuma Basin	Domestic Consumption & Export	-
PETRONAS ROVUMA BASIN	Hydrocarbons Prospecting & Research	Rovuma Basin	Domestic Consumption & Export	-
ROMPCO	Transportation of Hydrocarbons	Through the gas pipeline that goes from Temane (Inhambane) to Secunda (Republic of South Africa)	Transportation of Hydrocarbons	-
ROVUMA RESOURCES, LDA	Mining Prospecting & Research	Cabo Delgado Province	Domestic Consumption & Export	57
SASOL GÁS	Service Provision to ROMPCO	Mozambique Basin	Domestic Consumption & Export	40
SASOL PETROLEUM M-10, LDA	Hydrocarbons Prospecting & Research	Mozambique Basin	Domestic Consumption & Export	-
SASOL PETROLEUM MOÇAMBIQUE, LDA	Hydrocarbons Prospecting & Research	Mozambique Basin	Domestic Consumption & Export	-
SASOL PETROLEUM MOZAMBIQUE EXPLORATION	Hydrocarbons Prospecting & Research	Rovuma Basin	Domestic Consumption & Export	-
SASOL PETROLEUM SENGALA, LDA	Hydrocarbons Prospecting & Research	Mozambique Basin	Domestic Consumption & Export	-
SASOL PETROLEUM SOFALA, LDA	Hydrocarbons Prospection, Research, Production, Transport & Commercialization.		Domestic Consumption & Export	-
SASOL PETROLEUM TEMANE, LDA	UM TEMANE, LDA Hydrocarbons Prospecting & Research		Domestic Consumption & Export	123
STATOIL OIL & GAS MOZAMBIQUE AS	TATOIL OIL & GAS MOZAMBIQUE AS  Mineral Coal Research & Exploitation		Domestic Consumption & Export	-
VALE MOÇAMBIQUE  Tantalite Research & Exploitation		Zambézia Province	Domestic Consumption & Export	-

In 2011 only five companies/projects that were selected for the reconciliation process were at the exploitation and production stage, namely: Vale Moçambique; Highland African Mining Company,

Lda; Minas de Moatize, Lda; Kenmare Moma Mining (Mauritius), Lda; and Sasol Petroleum Temane, Lda. The following tables show details of the production of each company:

**Table 10: Minas Moatize's Production** 

2011	Production (tons)	
Month	Crude Coal	
January	4.655	
February	212	
March	5.351	
April	4.710	
May	2.392	
June	0	
July	0	
August	0	
September	0	
October	0	
November	0	
December	0	
Total	17.320	

**Table 11: Highland African Mining Company's Production** 

Year	Production(lbs de Ta₂o₅)	
2011	83.303,00	

Table 12: Vale Moçambique's Production<sup>6</sup>

Year	Type of Coal	Production (tons)
2011	Thermal Coal	141.000,00
2011	Coking Coal	816.000,00

Table 13: Kenmare Moma Mining (Mauritius)'s Production

2011	IP1	IP2	IP3	IP4	Premium Zircon	Standard Zircon	Special Zircon	Rutile
January	11.957	31.437	11.899	8.201	0	2.326	1.046	454
February	16.914	25.969	8.476	7.679	0	2.430	580	416
March	15.594	27.169	11.165	7.389	0	2.830	1.053	625
April	14.272	23.597	9.851	5.104	0	2.410	729	474
May	13.486	19.431	17.476	7.442	0	2.787	651	537
June	6.515	10.877	8.793	3.024	0	2.413	593	590
July	6.763	13.849	10.447	3.578	0	2.137	875	576

<sup>&</sup>lt;sup>6</sup> According to MIREM.

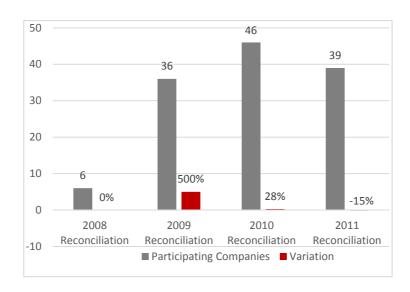
2011	IP1	IP2	IP3	IP4	Premium	Standard	Special	Rutile
					Zircon	Zircon	Zircon	
August	14.423	20.192	14.832	5.664	0	2.419	618	535
September	11.616	24.621	14.273	6.855	0	2.382	962	621
October	10.537	25.463	9.347	5.237	0	1.704	749	538
November	13.287	26.997	11.484	5.753	0	1.921	994	553
December	12.600	30.856	9.884	4.519	0	1.791	961	536
Totals	147.964	280.459	137.928	70.444	0	27.550	9.811	6.455

Table 14: Sasol Petroleum Temane's Production

2011	Gas Produced (GJ)
January	11.034.027,13
February	10.801.168,97
March	11.511.925,99
April	11.690.052,91
May	8.696,472,83
June	10.666.565,83
July	10.707.763,24
August	10.972.068,68
September	11.637.429,61
October	12.182.098,75
November	11.282.347,76
December	10.373.929,79
Total	131.555.851,49

### 4.4 Comparative Analysis

The three previous MEITI'S Reconciliation Reports showed an increasing trend in the number of selected companies. In the first report, there were 6 companies, the second 36, and the third report included 46 companies. For the Fourth Reconciliation Report, 39 companies and projects were selected, which shows a reverse trend if compared to the previous ones, as shown in the Graph 3 below:



**Graph 3: Trend in the Number of Participating Companies** 

The total number of companies/projects operating in the mining sector which was included in the sample for the reconciliation process is also part of the Third Reconciliation Report. It is a different case for companies operating the hydrocarbons sector, which increased and now include 4 more companies: Sasol Gas, Sasol Petroleum Moçambique Exploration, Petronas Rovuma Basin and the Republic of Mozambique Pipeline Company (ROMPCO).

ROMPCO is a company detained by SASOL (50%), the *Companhia Moçambicana de Gasoduto, SA* (CMG), an affiliated of ENH representing the Mozambican Government (25%), and iGas, a subsidiary of the South African Energy Fund (25%). The latter is the company responsible for the transportation of natural gas from Pande and temane (Inhambane – Mozambique) through a gas pipeline that connects Temane to Secunda (Souht Africa), an activity included within the oil and gas Midstream value chain. The company was included in the Fourth Reconciliation Report under the inclusion of Midstream<sup>7</sup> activities as a result of MEITI new rules.

With regard to the remaining companies operating in the hydrocarbons sector included for the first time in this report (Sasol Gas, Sasol Petroleum Moçambique Exploration and Petronas Rovuma Basin), their identification was undertaken during the reconciliation process, through the data collected. It should be noted that these companies were not part of the list of companies operating in the hydrocarbons sector provided by the MEITI.

<sup>&</sup>lt;sup>7</sup> Midstream refers to transport and refinement activities.

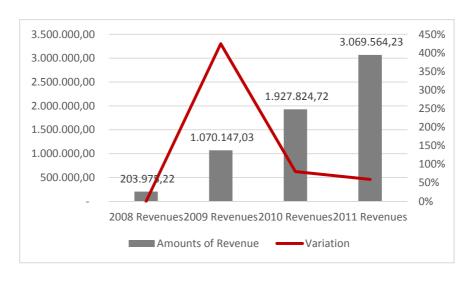
The list of companies that were not included in the sample of the Fourth Reconciliation Report as compared to the Third Reconciliation Report is shown in Table 15 below:

Table 15: Companies of the 3rd Report Excluded from the 4th Report

No	Name of Company	
1	Acosterras Moçambique, LDA	
2	Afriminas Minerais, Lda	
3	Essar Minas de Moçambique, Lda	
4	Global Mineral Resources (Mozambique), Lda	
5	MAGMAS de Moçambique, Limitada	
6	Manica Lands Corporation, Limitada	
7	MIMOC – Minerais Insdustriais de Moçambique	
8	Mozambique Gems, Lda	
9	OMEGACORP Minerais Limitada	
10	Rio Tinto Changara, Ltd	
11	Tantalum Mineração e Prospeção Limitada	

These companies were excluded as their payment made in 2011 are under the materiality level of 500.000,00MT, with the exception of Acosterras Moçambique, Lda, whose amount confirmed by the State increased to 1.765.446,62 MT. However, the latter utilizes the resources exploited in its production process, as a result the amounts of the contributions for the company's final operational objectives create distortions in respect of the contribution of the extractive industry for State revenue.

Despite the reduction in the number of selected companies/projects, the revenue confirmed by the State relating to the year 2011 showed a significant increase estimated at 59%, as shown in the Graph 4 below:



**Graph 4: Benchmarking of Revenue Reported (in thousands of MT)** 

Although, the extractive industry currently represents an insignificant part of the GDP of Mozambique (2%), the scenario described above indicates that it will continue to play a crucial role for the future economic growth of the country.

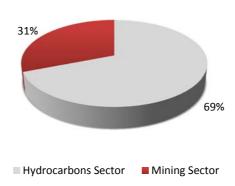
An analysis of the revenues reported by the State, by area, enables to ascertain that although the hydrocarbons sector has a lesser number of companies when compared to the mining sector; it contributes for more revenues to the State, as shown in Table 16 below:

Table 16: Contribution per Sector

Sector	Amount (State)	%
Mining Sector	960.670.978,58	31%
Hydrocarbons Sector	2.108.893.251,78	69%
Total	3.069.564.230,36	100%

As a percentage, the revenues of the hydrocarbons sector represent 69% of the total of receipts confirmed by the State, as shown in Graph 5 below:

**Graph 5: Share of Payments by Sector** 



# 5 Taxes, Fees e Contributions

Within the scope of the MEITI, the reconciliation of the State's receipts and of payments carried out by companies in the extractive sector, relating to revenues collected by the State through taxes, fees and contributions arising from upstream<sup>8</sup> and midstream activities of the extractive sector.

The current chapter makes a brief presentation on the incidence of taxes, fees and contributions of the Mozambican Taxation System and the specific excise duty for the extractive sector. For reconciliation purposes, a set of taxes, fees and contributions were selected and will be presented in sub-chapter 5.3.

# 5.1 Taxes of the Mozambican Tax System

The Mozambican State obtains a series of revenues to carry out expenditures that are essentially meant to satisfy public needs, and such revenues derive broadly from the collection of charges which may be in the form of taxes, fees or contributions, or sale and exploitation of equity assets pertaining to the public domain.

The Tax System into force in Mozambique comprises a set of taxes described in Figure 2 below, in other words, the National Tax System and the Municipal Tax System, which in turn are subdivided into various taxes and fees in line with the classification which may be adopted in compliance with Law  $n^{\circ}$  15/2002, dated 26 June.

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<sup>&</sup>lt;sup>8</sup> Upstream includes exploration, development, production and transportation activities (from 16 bars for hydrocarbons sector).

The Taxation System into force in Mozambique integrates the following set of taxes (Figure 2):

Figure 2: Mozambican Tax System

#### 5.1.1 National Tax System

The Current Tax system into force is the product of a reform in 1989, and according to Law No. 15/2002, dated 26 June (Based on Tax Law) and Law No. 2/2006 dated 22 of March (General Taxation Law), respects principles of generality, equality of legality, of no retroactivity, material justice and efficiency and simplicity of the taxation system, it does not have space for charging taxes that have not been established by law.

Taxes in the national tax system are classified in:

- Direct Taxes which directly fall upon the revenue/income or wealth (IRPC and IRPS and gambling tax);
- Indirect Taxes, which indicate income of the final consumer through its respective level of expense (VAT);
- Other Taxes.

#### 5.1.1.1 Direct Tax on Income and Wealth

### 5.1.1.1.1 Corporate Income Tax (IRPC)

Corporate Income Tax is a direct tax which falls upon obtained income, even coming from unlawful acts in the taxation period, by taxable persons.

Taxable Persons on Corporate Income Tax (IRPC) are:

- Commercial or civil law companies having a commercial form, cooperatives, public companies and legal persons of private or public law with head offices or effective management in the Mozambican territory;
- Entities without a legal personality, with head offices or effective management in the Mozambican territory whose revenues are not taxable on the income tax or on corporate income tax directly on the ownership of individuals or corporations;
- Entities with or without legal personality, without head offices neither effective management in the Mozambican territory.

Taxable persons resident or with permanent establishment in Mozambique are taxable to a rate of 32%, except agricultural activities which benefit from a reduced 10% until 31st December 2015. Being income of entities without head offices and effective management in the Mozambican territory and without permanent establishment in Mozambique, to which they may be attributed, these are taxed with a levied tax rate of 20%, except for income derived from telecommunication service provision and international transportation, as well as those from the assembling and installation of equipment carried out by respective entities which are subject to a charge of 10%.

To underline that in the extractive industry, corporate tax to be applied may differ from what is mentioned above, according to the terms of contracts signed with the Government/State.

## 5.1.1.1.2 Individual Income Tax (IRPS)

Individual Income Tax is a direct tax which falls upon annual global value of income, even when coming from unlawful acts. These taxes are on the following categories:

First Category: income of dependent work;

- Second Category: Business related and professional income;
- Third Category: Capital and surplus value income;
- Fourth Category: property income;
- Fifth Category: other incomes.

The Individual Income Tax is payable by individuals which reside in the Mozambican territory and for those who are not residing in it but get income in the country. Annual general rates between 10% and 32% by tax brackets. Non-residents are taxed by withholding Tax levy charge of 20%.

The Law No. 20/2013, dated 23 September, which came into force from 1<sup>st</sup>January2014, revokes the Law No. 33/2007, dated 31 December.

#### 5.1.1.2 Indirect Tax system

#### 5.1.1.2.1 Value Added Tax (VAT)

Transmissions/transfer of goods and services provisions in the national territory on onerous basis by a taxable person, acting as such, is subject to Value Added Tax (VAT). The VAT rate is 17% and is for the following taxable persons:

- Individuals or corporations residing or with stable establishment or representation in the
  national territory, who independently and usually undertake profitable and non-profitable
  production, commercial activities or provision of services, including extractive activities,
  agricultural activities, sylvan activities, livestock and fishery;
- Individuals or corporations which undertaking an activity, also do independently any taxable operation since that activity complies with the law on real incidence of Industrial Contribution or Work Income Tax;

Individuals or corporations non-residents and without stable establishment or representation who in an independent way carry out any taxable operation, as long as their business related activities, wherever they take place, or when they take place, independently of that connection, such operation fulfil the assumptions of Industrial Contribution, real incidence or on Work Income Tax;

TAXES, FEES E CONTRIBUTIONS

- Individuals or corporations, that according to the taxation legislation import goods;
- Individuals or corporations who in invoice or equivalent documents mention value added tax.

## 5.1.1.2.2 Specific Excise Duty (ICE)

Specific Excise Duties falls upon determined goods such as tobacco, alcohol and vehicles, produced in the national territory or imported. This tax falls upon the producer or importer, only one time.

Tax fees are "ad valorem" or specific, or a combination of these two, taking into account the nature of goods to be taxed and social, economic nature or general or special prevention to undertake in each case.

#### 5.1.1.2.3 Custom Duties

Custom Duties fall upon the value (determined in terms of applicable custom duties) of commodities, imports and exports through national territories borders; for this effect it is defined as "Taxation Territory". For importing, the reference is based on the rule of CIF values (Cost, Insurance and Freight) and the duties vary between 2, 5% e 25%.

Products coming from SADC countries have been benefiting from gradual reduction of taxation duties.

#### **5.1.1.3** Other Taxes

#### 5.1.1.3.1 Stamp Duty

Stamp Duty fall upon documents, contracts, books, papers and acts designated in the attached table to the respective code. Applicable duties in agreement with the nature of different acts and taxation facts and the possibility or not of determining the respective value, this is characterized by "ad valorem" (percentages or per thousand proportion) or fixed quantitative (specific duties).

In case of common economic interest of various entities, duties are proportionally divided for all of them.

#### 5.1.1.3.2 Tax on Successions and Donation Tax

Tax on Succession and Donation Tax falls upon free of charge transmissions/transfers on the property rights for personal estate and property, designated as inheritance, legacy, donation or by any legal business which gives property free of charge between living parties, even in cases where property is transmitted separately from usufruct, use or housing.

The duty is paid by individuals who in a free of charge manner acquire property of given goods, even if the right of usufruct is constituted, the use or housing in favor of somebody else. The tax is paid in charges which vary from 2% to 10%.

## 5.1.1.3.3 National Reconstruction Tax (IRN)

National Reconstruction Tax is legally defined as "representing minimal contribution of each citizen for public expenditures". This tax fall upon everyone residing in the national territory, even being foreigners, when age, occupational and fitness circumstances for work and other conditions established in the Code are met.

Taxes duties are established in annual bases by the Minister who oversights financial area, through proposals from each Provincial Government, diversified in order to answer development degree and prevailing socio economic conditions in each district or region.

With Municipal Taxation System into force in 2001, incidence of this tax was reduced to none municipality areas in the country, which are formally exempted from this tax "taxpayers which prove payment or exemption of Personal Municipal Tax in territorial circumstances of respective residence".

#### 5.1.1.3.4 Simplified Tax for Small Scale Taxpayers (ISPC)

Simplified Tax for Small scale Taxpayers is applied for individuals and corporations who undertake agricultural, industrial or commercial activities and hawkers, wholesalers, retailers, kiosks, market displays, provision of services including small scale exporters and importers. One of the conditions for registering in this regime is to do annual sales less than 2,500,00.00MT.

Taxable persons of this tax pay quarterly a duty of 3% of their sales volume, if prefer, they may pay 75,000.00 MT divided in quarterly instalments.

#### 5.1.2 Municipal Tax System

Law No. 1/2008, dated 16 January redefines financial, budgetary, and patrimonial regime of local municipalities, as well as reformulates Municipal Taxation System, initially instituted by Law No. 11/97, dated 31 May. Following is the description of essential elements for each of the tributes which are currently integrated or it is foreseen that will be integrated in the Country Municipal taxing system.

#### 5.1.2.1 Vehicle Municipal Tax (ISV)

Vehicle Municipal Tax falls upon the use and fruition of vehicles which are next mentioned, vehicles registered in competent services in the national territory of the Republic of Mozambique or independently of registration, once hundred and eighty days counting from the entry in the same territory pass, if these vehicles circulate or are used in normal conditions of their utilization:

- Light Duty and Heavy Duty vehicles with twenty five years of existence or less;
- Passengers Motorcycles with or without side with fifteen years or less;
- Aircrafts with particular use engine;
- Boats for recreational use with particular use engine.

Taxes Duties are in Decree No. 19/2002, dated 13 June and are determined according to the following criteria: used fuel, engine cylinder, potentiality of the vehicle, voltage, antiquity (number of years) and maximum authorized weight for taking off.

#### 5.1.2.2 Municipal Transfer Tax

Municipal Transfer Tax falls upon free of charge transfers on onerous transfer of ownership rights or equivalent rights on property estate considering for that effect, urban buildings situated in the national territory. Taxable persons of Municipal Transfer are individuals or corporation to whom ownership rights of urban buildings are transferred.

Taxable Value for Municipal transfer Tax is made of declared transfer or patrimonial or urban property according to the highest amount, unless this is removed from market normal price; transfer tax charge is 2%.

#### 5.1.2.3 Municipal Personal Tax (IPA)

Taxable persons of Municipal Personal Tax are all national and foreign citizens residing in the respective municipality between 18 to 60 years old and occupational, work fitness circumstances and others conditions established by law are verified on them.

Municipal Personal Taxes in force annually in each municipality are set in Law No. 1/2008, dated 16 January are the following:

- 4% for Municipalities at level A;
- 3% for Municipalities at level B;
- 2% for Municipalities at level C;
- 1% for Municipalities and towns and villages at level D.

#### 5.1.2.4 Municipal Property Tax

Municipal Property Tax falls upon objectively the property of urban buildings situated in the territory of the respective municipality. Subjectively Municipal Property Tax fall upon titleholders of property rights from 31 December of the previous year to which it belongs, it is presumed that those titleholders are the one whose names are registered in the real estate registration or that they may hold any title on that date.

Municipal Property Taxes which are applied to property value as the following:

- 0,4%, when it is about residential property;
- 0,7%, when it is about buildings for commercial and industrial nature or for independent professional activities, as well as for other purposes.

In the case where the buildings are for more than one purpose, the tax is calculated based on the one that has more onerous charges.

#### 5.1.2.5 Other Taxations Revenues

Municipalities may charge taxes for issued licenses and for economic activities such as the use and exploitation of municipal soil, provision of services to the public, licensing and trade, among others.

Procedures for charging of duties are established by the Municipal Council or by the population from respective municipality and it is a role of Municipal Assembly to establish, through the proposal of the Municipality Mayor on the amount of respective taxes.

#### 5.1.3 Taxes, Fees and Specific Contributions in the Extractive Industry

Taking into account the principle of Taxing Lawfulness, the legislator has foreseen the possibility for the Mozambican Taxing System to be supplemented with specific taxes and charges, what occur in the Extractive Industry.

According to Law No. 11/2007 and Law No. 12/2007, both dated 28 of June, which establish specific terms which falls upon mining and oil activities, respectively as the figure below illustrates.

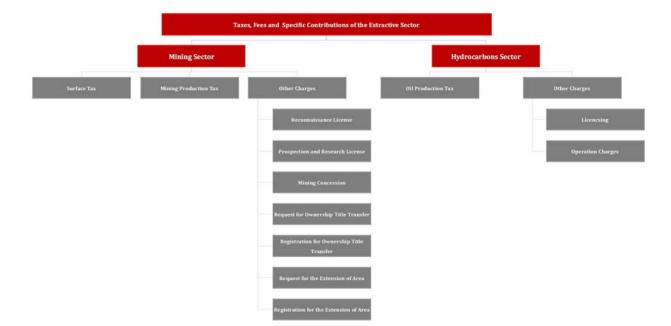


Figure 3: Taxes, Fees and Specific Contributions of the Extractive Sector

It should be underlined that tax legislation for the mining and hydrocarbon sector, the Law No. 11/2007 and Law No. 12/2007, both dated 28 June, are under the process of discussion and revision, and will later be sent for approval by the Ministers Cabinet, and then will be submitted to the Parliament for Approval.

## 5.1.3.1 Mining Sector

Individuals or corporations that operate a mining activity, including mineral water, apart of other taxes and charges which integrate the National Taxation System, including the municipality, are

under the terms of Law No. 11/2007, from 27 of June, subjected to two specific taxes, namely Tax on Mining Production and Surface Tax.

#### 5.1.3.1.1 Mining Production Tax

Mining Production Tax falls upon the value of mining product resulting from mining activity carried out in the national territory.

Applied charges vary according to extracted mineral and it is graduated between 3% and 10% as it is next illustrated:

- 10% For diamonds, precious metals (gold. Silver platinum) and precious stones;
- 6% For semi-precious stones;
- 5% For basic minerals;
- 3% For Coal and remaining mineral products.

#### 5.1.3.1.2 Surface Tax

Taxable persons of Surface Tax are individuals and corporations, holders of Reconnaissance license, Prospection and Research License, mining concession or mining certificate.

This tax is paid in annual basis and falls upon the area subjected to reconnaissance license, prospection and research license, mining concession or mining certificate measured in kilometers squares or hectares and in the case of mineral gas, falls upon each mining title.

Tax obligation is considered comprised from taxation of the area subjected to Reconnaissance license, Prospection and Research License, mining concession or mining certificate.

Applied taxes are based on fixed annual quantitative, differentiated according to the corresponding nature, title and graduated in direct reason of rights antiquity, as it is detailed in the table 17 below:

**Table 17: Charges Applicable on Surface Tax** 

Description	Amount(MT/Km²)
Reconnaissance License:	
<ul> <li>Diamonds</li> </ul>	10,00
Other Minerals	25,00

Description	Amount(MT/Km²)
Prospection and Research License for all minerals:	
■ In the 1 <sup>st</sup> and 2 <sup>nd</sup> years	250,00
In the 3rd year	625,00
■ In the 4 <sup>th</sup> and 5 <sup>th</sup> years	1.300,00
■ In the 6th year	1.500,00
■ In the 7th year	2.000,00
■ In the 8th year	2.500,00
■ In the 9 <sup>th</sup> and 10 <sup>th</sup> year	3.000,00
Mining Concession:	
For mineral water (each ownership title)	70.000,00
For other mineral resources:	
- From 1 <sup>st</sup> to 5 <sup>th</sup> year	2.500,00
- From 6th year on	5.000,00
Mining Certificate:	
• 20-100 Hectares	10.000,00
■ 101-200 Hectares	30.000,00
• 201-300 Hectares	30.000,00
• 301-400 Hectares	40.000,00
• 401-500 Hectares	50.000,00

## 5.1.3.1.3 Various Charges

Charges applied to mineral area result from legislation that establishes procedures related to mineral titles transfer, namely, Decree No. 28/2003, dated 17 June which approves Regulation of Mines Law:

Payable charges are the one presented on the table 18 below:

**Table 18: Charges Applied to Mining Sector** 

Description	Amount (MT)
Reconnaissance License:	
Charge for requesting registration	2.000,00
Charge for requesting registration	850,00
Prospection and Research License	
Charge for requesting registration	2.000,00
Charge for requesting registration	850,00
Charge for late submission of extension stay request	600,00
<ul><li>Extension Stay Charge</li></ul>	500,00

Description	Amount (MT)
Mining Concession	
Charge for requesting registration	2.000,00
Charge for issue of ownership title	1.200,00
Charge for late submission of extension stay request	600,00
Extension Stay Charge	850,00
Fee for ownership transfer request	
Prospection and Research License	5.000,00
Mining Concession	5.000,00
Mining Certificate	2.500,00
Ownership title Transfer Registration Charge	
Prospection and Research License	850,00
<ul><li>Mining Concession</li></ul>	850,00
Mining Certificate	250,00
Registration charge for extending remit request	
<ul> <li>Prospection and Research License</li> </ul>	1.000,00
<ul><li>Mining Concession</li></ul>	2.000,00
Mining Certificate	750,00
Authenticated copy of any certified license	200,00
Authenticated copy/extract of any registration in archives(per page)	200,00

#### 5.1.3.2 Hydrocarbons Sector

Individuals or corporations who practice oil activities in the country, apart from other taxes that integrate National Taxation System, including municipalities; they are subject to Law No. 12/2007, dated 27 June, on Oil Production.

#### 5.1.3.2.1 Oil Product Tax

The tax falls upon total quantity of oil extracted on mineral deposits, measured from the first Government established measurement station, including amount of oil lost as result of operation deficiency or negligence.

The taxation base for that is the amount of produced oil, determined on the basis of the considered average prices and that may have been sold by the producer and their contractors, what corresponds to the tax to be paid, having as reference international prices of main international centers for oil exportation.

As a rule, it is paid in cash, the Government may opt to be paid in kind, a part or the whole, unless it is a concession granted before the Law No. 12/2007 dated 27 June came into force, (In case the taxes of contracted services are maintained), Tax applied to natural gas is 6% and for oil is 10%.

#### 5.1.3.2.2 Different Charges

Charges on hydrocarbon area result from the Decree No.24/2004, dated 20 of August, which approves Regulation of Oil Operations, respective charges are on the Table 19 below:

**Table 19: Charges Appied in Hydrocarbons** 

Description	Amount (MT)
Request for granting of rights or oil operations	500.000,00
Assessment of the request for renewal of Contract Concession	125.000,00
Assessment of Development Plan, unless it is a concession contract for construction and operation of pipelines	500.000,00
Authorization of oil facilities operation	125.000,00
Approval of demobilization plan	250.000,00

### 5.1.3.2.3 Other Payments and Contributions for Extractive Industry

Contracts on the scope of prospection and research of natural resources activities establish a number of payments and conditions for awarding and concession of licenses. The exercising of this activity has environmental impacts; therefore, it has as assumption environmental licensing.

These conditions are associated with payments to the Government which can be classified in the following way:

- <u>Signature Bonus</u>: varies between 0,5% to 5 % of the cost of assets assigned to the project. This
  payment is done once with contract signature;
- <u>Production Bonus</u><sup>9</sup>: These are payments made by Government concessionaire in the beginning of production, when production of contract area achieves for the first time, in a month period a daily average of 20.000 BOE<sup>10</sup> and each time that production in the contract area achieves for first time in a month period, an average additional tranche of 50.000 BOE per day;

<sup>&</sup>lt;sup>9</sup> Exploration and Production Concession Contract (EPCC) - 4th Round

<sup>&</sup>lt;sup>10</sup>Barrel of Oil Equivalent

- Environmental License<sup>11</sup>: It is a certification of environmental feasibility of a proposed activity, issued by The Ministry for Environmental Action (MICOA), through competent bodies for that effect;
- <u>Production Tax</u>: falls upon all production in the Mozambican territory, from production development area. This tax may be paid in cash and/or in kind;
- <u>Contribution for Institutional Capacity Building</u><sup>12</sup>: These are payment made by the concessionaire to the Government, foreseen by both parties, this is conceived for institutional support and training programs or training in the Government;
- <u>Contribution for Social Projects Fund</u><sup>7</sup>: These are payments made by the Concessionaire to the Government, foreseen in contracts between both parties, conceived for social projects for citizens living in areas covered by oil operations;
  - <u>Dividends/Shares paid to Government</u>: It is about submission of profits belonging to Government, arising or related to the undertaking of a public entity which is represented by it;
  - Added Value<sup>13</sup>: Added Values are made of obtained gains, which are not considered as commercial, industrial, capital or property income, they results from: a) Onerous alienation with capital reduction and other transferable securities; b) Onerous Alienation of intellectual or industrial property or experience acquired in commercial, industrial or scientific sectors, when it is not the original title holder for the current holder; c) Onerous Transfer of contract positions or other rights related to real estate goods;
- Bidding Price: Buzi Hydrocarbons has a purchase and sales contract signed with a ENH, where
  one of the terms is the annual Bid Price in an amount of USD100.000,00 which must be paid
  in two consecutive years (2010 e 2011);

<sup>&</sup>lt;sup>11</sup> Decree No. 45/2004, dated 29 September.

<sup>12</sup> EPCC Model - 4th Round

<sup>&</sup>lt;sup>13</sup> Code of Corporation Tax and Personal Income Tax

• Contribution for Institutional Capacity Building<sup>14</sup>: These are payments made by the Concessionaire to the Government foreseen in the contracts between both parts, conceived for institutional support.

## 5.2 Tax Benefits

The Law No. 4/2009, dated 12 January, foreseen tax benefits applied to investments carried out by individuals or corporations, on the scope of Law No. 3/93, as long as they are duly registered for that effect.

Tax benefits foreseen in the above mentioned code are namely:

- Deduction to taxable business:
- Deduction to assessment (tax);
- Amortization and accelerated reintegration;
- Tax Credit per investment;
- Exemption;
- Reduction of taxes charges and delay for their payment.

Above mentioned tax benefits are also enjoyed by:

- Investments carried out on the scope of Investments Law, in commercial and industrial activities developed in rural areas;
- In wholesalers and retailers in new infrastructures built for that effect;
- In the Transforming and Assembling Industry.

The Law No. 13/2007 incorporates tax incentive regime of mining and oil areas. The law consider as tax benefits, tax measures foreseen on it which implies a reduction of the amount to be paid in tax in force, with the aim to stimulate mining and oil activities in favour of economic and social benefit.

#### <u>Incentives for Enterprises in the Mining Sector</u>

Enterprises carried out in accordance to this law, for 5 years, counting from the initial date of mining exploration, benefit from exemption of:

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<sup>&</sup>lt;sup>14</sup>EPCC Model – 4th Round

- Customs Duties paid in importing of equipment for prospection and research or mineral exploration classified under class K of Customs Tariff;
- Customs Duties paid in importing of goods composed in the Annex of the current law, equivalent to class K of Customs Tariff.

### <u>Incentives for Enterprises in the Hydrocarbon Sector</u>

Enterprises carried out under this law, for 5 years, counting from the approval date of development plan will benefit from exemption of:

- Customs Duties paid in importing of equipment to be utilized in oil operations, classified under class K of Customs Tariff;
- Customs Duties paid in importing detonating explosives, fuses and similar machines and appliances for explosives outburst. As well as equipment for topographical, geodesic and geological reconnaissance and survey inland and sea with the purpose of oil operations.

## 5.3 Revenues to be Considered in the Report

The brief presentation of taxes, fees and contributions collected by Mozambican Government demonstrate different receipts susceptive to be analyzed on the scope of compilation of MEITI's Fourth Reconciliation Report.

However, similarly to previous reports, it is not justified the inclusion of total revenues collected by the State in the current report. In one hand, the fact that a part of them contribute with lower amounts, which did not justify a detailed reconciliation. In other hand, the available time for elaboration of reconciliation obliges a rationalization of available time with information considered as relevant.

Conclusion on taxes to select was done as base of responses obtained along the process of collection of information in extractive industry companies and in Government institutions. Excluded taxes present irrelevant value for this report (e.g. Environmental License) or simply they do not occur (e.g. Added Values).

For the effect of this report, they will be object of reconciliation, revenues from taxes, charges and contributions presented in Figure 4 below:

**Figure 4: Taxes, Fees and Contributions** 

1	IRPC
2	IRPS
3	Surface Tax
4	Mining Production Tax
5	Oil Production Tax
6	Oil Production Tax in Kind
7	Capacity Building Fund
8	Social Project's Fund
9	Institutional Contribution
10	Bidding Price
11	Dividends

# **6 Entities Responsible for Collection of Taxes**

The Law No. 9/2002, dated 12 February and subsequent legislation determine that, unless there are rare exceptions, payment of relevant taxes and charges for this reconciliation, in rule, it occurs at Tax General Directorate level which collects them through large scale Taxpayers Unit and Taxation Directorate.

As norm, usually payments are made by companies in the Taxing Directorate, where companies have their social headquarters. However, sometimes payments of taxes, namely those on workers income are made in locations where there is a delegation of that company, as the legislation does not hinder that.

A part of payments, such as institutional contributions, contributions for institutional capacity building funds and contributions for social projects funds are directly paid in the National Property Institute (INP) during celebration of contracts and during the period that activity takes place in companies. Other results are from dividends of social participations retained by the Government through IGEPE or directly by the Ministry of Finances (National Directorate of Treasure).

In the reconciliation process it was verified that Buzi Hydrocarbons has a purchases and sales contract with ENH, where one of the provisions determine payment of annual Bid Price in an amount of USD100.000,00 which must be paid in two consecutive years (2010 and 2011).

Institutions responsible for collection of taxes and charges in the extractive sector are listed in figure 5 below:

Corporate Income Tax

Individual Income Tax

Surface Tax

Mining Production Tax

Oil Production Tax

Oil Production Tax in Kind

IGEPE

ENH

Bidding Price

Figure 5: Entities Responsible for Collection of Taxes, Fees and Contributions

The flow for revenue payment considered in the Fourth Reconciliation Report is described in Table 20 below:

**Table 20: Flow of Revenues Payments** 

Tax	Charge	Periodicity	Calculation Base	Entity Responsible for Collection
Corporation Income Tax/IRPC	32%	Annual	Business Profit	DGI
Corporation Income Tax/IRPC – Withholding Tax	10% - 20%	Monthly/ Other	Income of none resident entity	DGI
Individual Income Tax/IRPS	10% - 32%	Monthly/ Other	Obtained Remuneration	DGI
Surface Tax	10MT - 3.000MT	Annual	Type of title, are of activity	DGI
Mining Production Tax	3% - 10%	Monthly/ Other	Extracted Mineral	DGI
Oil Production Tax	6% - 10%	Monthly/ Other	Extracted Hydrocarbon	DGI
Contribution for Institutional Capacity Building Fund	Amount specified in the contract	Annual	Amount Specified in the Contract	INP
Contribution for Social Projects Fund	Amount specified in the contract	Annual	Amount Specified in the Contract	INP
Institutional Contribution	Amount specified in the contract	Annual	Amount Specified in the Contract	INP
Bidding Price	Amount specified in the contract	Annual	Amount Specified in the Contract	DNT/INP/ENH
Dividends	Profit/Shareholders Deliberation	Annual	Government Participation	DNT/IGEPE

## 7 Reconciliation Process

# 7.1 Companies that did not respond to the Inquiry

Reporting templates were sent to 39 selected companies to integrate the Fourth Reconciliation Report. However, from this number only 37 companies have answered the survey; what corresponds to 99, 93% of total receptions confirmed by the Government.

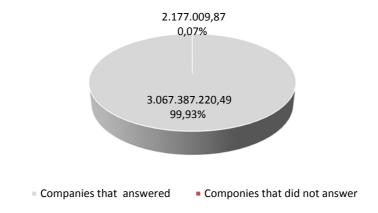
Therefore, answers from 2 companies were not obtained, what represents 0,07% of total receptions confirmed by the Government, using as basis answers from Government Institutions, as it is illustrated the balance on Table 21 and in Graph 6 below:

**Table 21: Proportion of Answers Received from Selected Companies** 

Description	Amount (MT)
Companies that answered the Survey:	
Mining Sector	958.493.968,71
Hydrocarbon Sector	2.108.893.251,78
Sub-total of companies that answered the survey	3.067.387.220,49
Companies that did not answer the Survey:	
Mining Sector	2.177.009.87
Hydrocarbon Sector	-
Sub-total of companies that did not answer the survey	2.177.009.87
Total	3.069.564.230,36

Companies that answered the survey represent about 99, 93% of receptions confirmed by the State, as illustrated on the Graphic 6 below:

**Graph 6: Proportion of Companies' Answers** 



Companies that answered the survey are listed on Table 22 below:

Table 22: Companies that did not answered the Survey

No	Company Name	Resource/Product
1	AFRIFOCUS RESOURCES, LDA	MI, TI
2	PATEL MINING CONCESSION, LIMITADA	AU, BER, BI, LI, NB, TAN, MAR, PME

Contacts and addresses of companies that did not answer the survey were obtained by the technical team, which made it possible to contact them. So, although they were located, these companies did not send the requested information.

Companies that did not answer the survey may be penalized by paying fines and, if it is a recurrent situation, may lose license.

Therefore, the Fourth Reconciliation Report is composed of 37 companies that have answered the survey, as the Table 23 below illustrates:

Table 23: Companies which Responded to the Inquiry

No	Company Name	Sector
1	ÁFRICA GREAT WALL MINING DEVELOPMENT COMPANY, LIMITADA	Mining
2	BIWORLD INTERNATIONAL, LIMITED	Mining

No	Company Name	Sector
3	CAPITOL RESOURCES, LIMITADA	Mining
4	COMPANHIA CARVOEIRA DE SAMOA, LDA	Mining
5	ENRC MOZAMBIQUE, LIMITADA	Mining
6	ETA STAR MOZAMBIQUE, SA	Mining
7	HIGHLAND AFRICAN MINING COMPANY, LDA	Mining
8	JSPL MOZAMBIQUE MINERAIS, LIMITADA	Mining
9	JSW NATURAL RESOURCES MOZAMBIQUE, LDA	Mining
10	KENMARE MOMA MINING (MAURITIUS), LDA	Mining
11	MIDWEST ÁFRICA, LIMITADA	Mining
12	MOZAMBIQUE MINERALS, LIMITED	Mining
13	MINAS MOATIZE, LDA	Mining
14	NCONDEZI	Mining
15	RIO TINTO BENGA, LTD	Mining
16	RIO TINTO ZAMBEZE, LTD	Mining
17	RIO TINTO MINING AND EXPLORATION, LDA	Mining
18	ROVUMA RESOURCES, LDA	Mining
19	TWIGG EXPLORATION E MINING LDA	Mining
20	VALE MOÇAMBIQUE	Mining
21	VALE PROJECTOS E DESENVOLVIMENTO MOÇAMBIQUE, LDA	Mining
22	ANADARKO MOÇAMBIQUE ÁREA 1, LIMITADA	Hydrocarbons
23	BUZI HYDROCARBONS	Hydrocarbons
24	CMH, SARL	Hydrocarbons
25	ENH, EP	Hydrocarbons
26	ENI EAST AFRICA SPA	Hydrocarbons
27	PETRONAS CARIGALI MOZAMBIQUE E & P, LTD.	Hydrocarbons
28	PETRONAS ROVUMA BASIN	Hydrocarbons
29	ROMPCO	Hydrocarbons
30	SASOL GÁS	Hydrocarbons
31	SASOL PETROLEUM M-10, LDA	Hydrocarbons

No	Company Name	Sector
32	SASOL PETROLEUM MOÇAMBIQUE, LDA	Hydrocarbons
33	SASOL PETROLEUM MOZAMBIQUE EXPLORATION	Hydrocarbons
34	SASOL PETROLEUM SENGALA, LDA	Hydrocarbons
35	SASOL PETROLEUM SOFALA, LDA	Hydrocarbons
36	SASOL PETROLEUM TEMANE, LDA	Hydrocarbons
37	STATOIL OIL & GAS MOZAMBIQUE AS	Hydrocarbons

# 7.2 Revenues Confirmed by the State and Declared by Companies

The receipts confirmed by State institutions in relation to payments declared by selected companies for the reconciliation process are shown in the following Table 24:

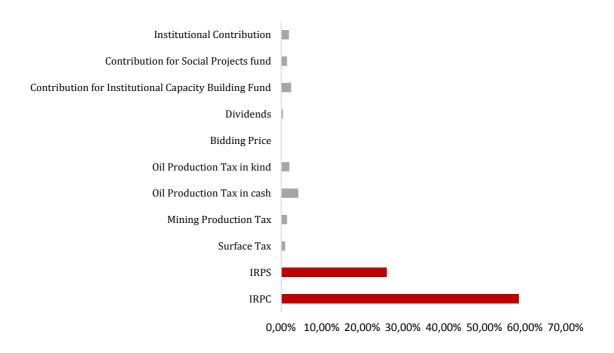
Table 24: Tax, Fees and Contributions Confirmed by the State

Descrição	Mineira	Hidrocarbonetos	Total	%
Corporate Tax	179.653.429,54	1.617.076.008,27	1.796.729.437,81	58,53%
Income Tax	703.394.033,65	97.031.393,54	800.425.427,19	26,08%
Surface Tax	31.411.142,17	-	31.411.142,17	1,02%
Mining Production Tax	46.212.373,22	-	46.212.373,22	1,51%
Oil Production Tax in cash	-	130.885.988,39	130.885.988,39	4,26%
Oil Production Tax in kind	-	63.899.828,62	63.899.828,62	2,08%
Bidding Price	-	2.722.000,00	2.722.000,00	0,09%
Dividends	-	14.582.318,21	14.582.318,21	0,48%
Contribution for Institutional Capacity Building Fund	-	76.576.141,02	76.576.141,02	2,49%
Contribution for Social Projects fund	-	46.273.727,80	46.273.727,80	1,51%
Institutional Contribution	-	59.845.845,93	59.845.845,93	1,95%
Total	960.670.978,58	2.108.893.251,78	3.069.564.230,36	100,00%

The reconciliation process of receipts confirmed by state intuitions and payments declared by the selected companies of the extractive industry are presented in the following tables.

The graphic representation of the weight of taxes, fees and contributions on receipts confirmed by state intuitions is illustrated in Graph 7 below:

**Graph 7: Distribution of Receipt Confirmed by the State** 



The analysis of above data in Graph 7 shows that the Corporate Income Tax represents around 59% of the receipts confirmed by the State, and Individual Income Tax around 25%. However, each one of the other taxes, fees and contributions represents a weight of less than 5%.

Table 25: Reconciliation Process of Receipts Confirmed by the State and Payments declared by Companies in the Mining Sector

No	Company Name	Pre-Recon	ciliation	Reconc	iliation	I	Pos- Reconciliation	
	Company Name	State	Company	State	Company	State	Company	Difference
1	ÁFRICA GREAT WALL MINING DEVELOPMENT COMPANY, LIMITADA	925.580,00	904.630,00	-	-	925.580,00	904.630,00	20.950,00
2	AFRIFOCUS RESOURCES, LDA	749.610,00	-	-	-	749.610,00	-	749.610,00
3	BIWORLD INTERNATIONAL, LIMITED	1.615.966,35	1.548.844,94	-	-	1.615.966,35	1.548.844,94	67.121,41
4	CAPITOL RESOURCES, LIMITADA	2.333.662,00	5.696.590,32	3.399.766,00	-	5.733.428,00	5.696.590,32	36.837,68
5	COMPANHIA CARVOEIRA DE SAMOA, LDA	2.111.810,95	2.111.655,00	- 92.804,05	-	2.019.006,90	2.111.655,00	- 92.648,10
6	ENRC MOZAMBIQUE, LIMITADA	33.547.221,15	48.114.856,85	-	- 14.528.057,00	33.547.221,15	33.586.799,85	- 39.578,70
7	ETA STAR MOZAMBIQUE, SA	1.722.659,07	1.803.084,14	-	-	1.722.659,07	1.803.084,14	- 80.425,07
8	HIGHLAND AFRICAN MINING COMPANY, LDA	14.255.096,51	17.354.303,48	220.200,00	-	14.475.296,51	17.354.303,48	- 2.879.006,97
9	JSPL MOZAMBIQUE MINERAIS, LIMITADA	2.348.062,89	3.291.789,49	746.546,39	- 80.510,83	3.094.609,28	3.211.278,66	- 116.669,38
10	JSW NATURAL RESOURCES MOZAMBIQUE, LDA	1.011.266,00	1.128.486,00	-	-	1.011.266,00	1.128.486,00	- 117.220,00
11	KENMARE MOMA MINING (MAURITIUS), LDA	152.943.047,40	146.433.465,10	- 4.652.661,00	-	148.290.386,40	146.433.465,10	1.856.921,30
12	MIDWEST ÁFRICA, LIMITADA	1.653.975,00	1.881.004,00	- 10.000,00	-	1.643.975,00	1.881.004,00	- 237.029,00
13	MINAS MOATIZE, LDA-TETE	4.753.386,01	4.879.718,61	-	-	4.753.386,01	4.879.718,61	- 126.332,60
14	MOZAMBIQUE MINERALS, LIMITED	1.855.744,00	1.741.537,00	- 104.207,00	-	1.751.537,00	1.741.537,00	10.000,00
15	PATEL MINING CONCESSION, LIMITADA	561.043,52	-	-	-	561.043,52	-	561.043,52
16	RIO TINTO BENGA, LTD	36.847.932,09	121.463.037,85	85.419.284,31	-	122.267.216,40	121.463.037,85	804.178,55
17	RIO TINTO ZAMBEZE, LTD	19.619.727,31	45.826.651,96	25.503.480,33	-	45.123.207,64	45.826.651,96	- 703.444,32

#### RECONCILIATION PROCESS

	Company Name	Pre-Recon	ciliation	Reconc	iliation	Pos- Reconciliation			
		State	Company	State	Company	State	Company	Difference	
18	RIO TINTO MINING AND EXPLORATION, LDA	3.151.217,05	4.549.200,84	-	-	3.151.217,05	4.549.200,84	- 1.397.983,79	
19	ROVUMA RESOURCES, LDA	5.893.203,08	8.132.501,27	2.393.137,77	-	8.286.340,85	8.132.501,27	153.839,58	
20	TWIGG EXPLORATION E MINING LDA	958.602,01	214.914,32	-	-	958.602,01	214.914,32	743.687,69	
21	VALE MOÇAMBIQUE	505.173.144,55	488.860.860,02	- 22.009.356,06	- 15.181.440,13	483.163.788,49	473.679.419,89	9.484.368,60	
22	VALE PROJECTOS E DESENVOLVIMENTO MOÇAMBIQUE, LDA	469.679,41	70.690.705,47	71.218.768,77	- 132.000,00	71.688.448,18	70.558.705,47	1.129.742,71	
23	NCONDEZI	4.137.186,77	6.253.178,87	-	- 1.490.200,00	4.137.186,77	4.762.978,87	- 625.792,10	
	Total Mining Sector	798.638.823,12	982.881.015,53	162.032.155,46	- 31.412.207,96	960.670.978,58	951.468.807,57	9.202.171,01	

# 7.2.2 Hydrocarbons Sector

Table 26: Reconciliation Process of Receipts Confirmed by the State and Payments declared by Companies in the Hydrocarbons Sector

No	Company Name	Pre-Recon	ciliation	Reconc	iliation	Pos- Reconciliation			
		State	Company	State	Company	State	Company	Difference	
1	ANADARKO MOÇAMBIQUE ÁREA 1, LIMITADA	709.187.651,93	719.480.164,00	10.254.358,00	-	719.442.009,93	719.480.164,00	- 38.154,07	
2	COMPANHIA MOÇAMBICANA DE HIDROCARBONETOS, SARL	264.740.164,10	264.224.396,54	-	-	264.740.164,10	264.224.396,54	515.767,56	
3	EMPRESA NACIONAL DE HIDROCARBONETOS, EP	29.142.223,78	13.881.935,02	-	4.620.407,99	29.142.223,78	18.502.343,01	10.639.880,77	
4	ENI EAST AFRICA SPA	139.963.022,14	139.970.610,08	-	-	139.963.022,14	139.970.610,08	- 7.587,94	
5	PETRONAS ROVUMA BASIN	63.763.652,79	63.701.516,64	-	-	63.763.652,79	63.701.516,64	62.136,15	

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#### RECONCILIATION PROCESS

No	Company Name	Pre-Recon	ciliation	Reconci	iliation	Pos- Reconciliation			
		State	Company	State	Company	State	Company	Difference	
6	PETRONAS CARIGALI MOZAMBIQUE E & P, LTD.	71.321,15	77.389,68	-	12.856,87	71.321,15	90.246,55	- 18.925,40	
7	SASOL PETROLEUM SOFALA, LDA	47.007.004,94	47.001.020,94	-	-	47.007.004,94	47.001.020,94	5.984,00	
8	SASOL PETROLEUM TEMANE, LDA	248.516.397,29	253.313.840,04	5.838.069,28	1.040.928,73	254.354.466,57	254.354.768,77	- 302,20	
9	SASOL PETROLEUM MOÇAMBIQUE, LDA	-	-	-	-	-	-	-	
10	SASOL PETROLEUM M-10, LDA	-	69.909,65	2.722.000,00	2.652.090,35	2.722.000,00	2.722.000,00	-	
11	SASOL PETROLEUM MOZAMBIQUE EXPLORATION	16.215.236,42	16.215.236,42	13.610.000,00	13.610.000,00	29.825.236,42	29.825.236,42	-	
12	BUZI HYDROCARBONS	7.835.367,00	7.921.159,00	-	-	7.835.367,00	7.921.159,00	- 85.792,00	
13	STATOIL OIL & GAS MOZAMBIQUE AS	17.062.722,74	23.663.515,10	-	-	17.062.722,74	23.663.515,10	- 6.600.792,36	
14	SASOL PETROLEUM SENGALA, LDA	-	559.469,90	5.444.000,00	4.884.530,10	5.444.000,00	5.444.000,00	-	
15	SASOL GÁS	3.736.202,71	3.598.969,92	-	-	3.736.202,71	3.598.969,92	137.232,79	
16	ROMPCO	523.783.857,50	391.391.782,30	-	132.392.075,20	523.783.857,50	523.783.857,50	-	
	Total Hydrocarbons Sector	2.071.024.824,50	1.945.070.915,23	37.868.427,28	159.212.889,24	2.108.893.251,78	2.104.283.804,47	4.609.447,31	

# RECONCILIATION PROCESS 7.2.3 Corporate Income Tax (IRPC)

**Table 27: Reconciliation Process of Corporate Income Tax by Companies** 

		Pro	e-Reconciliation		Recon	ciliation	Pos- Reco	nciliation	Final
No	Company Name	State	Company	difference	State	Company	State	Company	Differences
Minii	ng Sector								
1	ÁFRICA GREAT WALL MINING DEVELOPMENT COMPANY, LIMITADA	-	-	-	-	-	-	-	-
2	AFRIFOCUS RESOURCES, LDA	-	-	-	-	-	-	-	-
3	BIWORLD INTERNATIONAL, LIMITED	1.419.068,55	1.342.675,22	76.393,33	-	-	1.419.068,55	1.342.675,22	76.393,33
4	CAPITOL RESOURCES, LIMITADA	45.000,00	-	45.000,00	-	-	45.000,00	-	45.000,00
5	COMPANHIA CARVOEIRA DE SAMOA, LDA	-	280.762,00	- 280.762,00	-	-	-	280.762,00	- 280.762,00
6	ENRC MOZAMBIQUE, LIMITADA	26.112.159,15	38.514.741,00	- 12.402.581,85	-	- 13.968.812,00	26.112.159,15	24.545.929,00	1.566.230,15
7	ETA STAR MOZAMBIQUE, SA	838.171,38	842.171,38	- 4.000,00	-	-	838.171,38	842.171,38	- 4.000,00
8	HIGHLAND AFRICAN MINING COMPANY, LDA	100.264,16	282.221,84	- 181.957,68	-	-	100.264,16	282.221,84	- 181.957,68
9	JSPL MOZAMBIQUE MINERAIS, LIMITADA	30.000,00	-	30.000,00	-	-	30.000,00	-	30.000,00
10	JSW NATURAL RESOURCES MOZAMBIQUE, LDA	-	-	-	-	-	-	-	-
11	KENMARE MOMA MINING (MAURITIUS), LDA	11.429.313,00	11.255.175,00	174.138,00	- 174.138,00	-	11.255.175,00	11.255.175,00	-
12	MIDWEST ÁFRICA, LIMITADA	30.000,00	20.000,00	10.000,00	- 10.000,00	-	20.000,00	20.000,00	-
13	MINAS MOATIZE, LDA-TETE	99.999,99	100.000,00	- 0,01	-	-	99.999,99	100.000,00	- 0,01
14	MOZAMBIQUE MINERALS, LIMITED	10.000,00	-	10.000,00	-	-	10.000,00	-	10.000,00
15	PATEL MINING CONCESSION, LIMITADA	-	-	-	-	-	-	-	-
16	RIO TINTO BENGA, LTD	12.937.969,74	11.676.543,28	1.261.426,46	-	-	12.937.969,74	11.676.543,28	1.261.426,46
17	RIO TINTO ZAMBEZE, LTD	4.160.985,90	4.160.985,95	- 0,05	-	-	4.160.985,90	4.160.985,95	- 0,05
18	RIO TINTO MINING AND EXPLORATION, LDA	1.410.301,04	1.099.500,84	310.800,20	-	-	1.410.301,04	1.099.500,84	310.800,20

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#### RECONCILIATION PROCESS

.,		Pro	e-Reconciliation		Recond	ciliation	Pos- Reco	nciliation	Final
No	Company Name	State	Company	difference	State	Company	State	Company	Differences
19	ROVUMA RESOURCES, LDA	52.774,32	-	52.774,32	-	-	52.774,32	-	52.774,32
20	TWIGG EXPLORATION E MINING LDA	6.438,61	2.026,32	4.412,29	-	-	6.438,61	2.026,32	4.412,29
21	VALE MOÇAMBIQUE	74.162.766,71	70.152.993,91	4.009.772,80	-	3.951.934,80	74.162.766,71	74.104.928,71	57.838,00
22	VALE PROJECTOS E DESENVOLVIMENTO MOÇAMBIQUE, LDA	-	46.378.883,36	- 46.378.883,36	46.378.882,46	-	46.378.882,46	46.378.883,36	- 0,90
23	NCONDEZI	613.472,53	616.072,53	- 2.600,00	-	-	613.472,53	616.072,53	- 2.600,00
Hydr	ocarbons Sector								
1	ANADARKO MOÇAMBIQUE ÁREA 1, LIMITADA	562.813.072,00	562.813.072,00	-	-	-	562.813.072,00	562.813.072,00	-
2	COMPANHIA MOÇAMBICANA DE HIDROCARBONETOS, SARL	237.221.367,43	237.176.348,58	45.018,85	-	-	237.221.367,43	237.176.348,58	45.018,85
3	EMPRESA NACIONAL DE HIDROCARBONETOS, EP	217.334,40	1.311.562,08	- 1.094.227,68	-	-	217.334,40	1.311.562,08	- 1.094.227,68
4	ENI EAST AFRICA SPA	101.677.770,00	101.677.769,82	0,18	-	-	101.677.770,00	101.677.769,82	0,18
5	PETRONAS ROVUMA BASIN	60.951.941,89	60.945.794,10	6.147,79	-	-	60.951.941,89	60.945.794,10	6.147,79
6	PETRONAS CARIGALI MOZAMBIQUE E & P, LTD.	-	-	-	-	-	-	-	-
7	SASOL PETROLEUM SOFALA, LDA	47.007.004,94	47.001.020,94	5.984,00	-	-	47.007.004,94	47.001.020,94	5.984,00
8	SASOL PETROLEUM TEMANE, LDA	50.929.592,63	50.929.592,62	0,01	-	-	50.929.592,63	50.929.592,62	0,01
9	SASOL PETROLEUM MOÇAMBIQUE, LDA	-	-	-	-	-	-	-	-
10	SASOL PETROLEUM M-10, LDA	-	69.909,65	- 69.909,65	-	- 69.909,65	-	-	-
11	SASOL PETROLEUM MOZAMBIQUE EXPLORATION	16.215.236,42	16.215.236,42	-	-	-	16.215.236,42	16.215.236,42	-
12	BUZI HYDROCARBONS	-	-	-	-	-	-	-	-
13	STATOIL OIL & GAS MOZAMBIQUE AS	13.439.017,14	12.215.862,88	1.223.154,26	-	-	13.439.017,14	12.215.862,88	1.223.154,26
14	SASOL PETROLEUM SENGALA, LDA	-	559.469,90	- 559.469,90	-	- 559.469,90	-	-	-
15	SASOL GÁS	2.819.813,92	2.649.679,92	170.134,00	-	-	2.819.813,92	2.649.679,92	170.134,00

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#### RECONCILIATION PROCESS

No	Company Name	Pre-Reconciliation			Reconciliation		Pos- Reconciliation		Final
NU		State	Company	difference	State	Company	State	Company	Differences
16	ROMPCO	523.783.857,50	391.391.782,30	132.392.075,20	-	132.392.075,20	523.783.857,50	523.783.857,50	-
	Subtotal Mining Sector	133.458.685,08	186.724.752,63	- 53.266.067,55	46.194.744,46	- 10.016.877,20	179.653.429,54	176.707.875,43	2.945.554,11
	Subtotal Hydrocarbons Sector	1.617.076.008,27	1.484.957.101,21	132.118.907,06	-	131.762.695,65	1.617.076.008,27	1.616.719.796,86	356.211,41
	Overall Total	1.750.534.693,35	1.671.681.853,84	78.852.839,51	46.194.744,46	121.745.818,45	1.796.729.437,81	1.793.427.672,29	3.301.765,52

## RECONCILIATION PROCESS

# 7.2.4 Individual Income Tax (IRPS)

Table 28: Reconciliation Process of Individual Income Tax by Company

			Pre-Reconciliation		Reconci	liation	Pos- Reco	nciliation	Final
No	Company Name	State	Company	Difference	State	Company	Difference	State	Differences
Minii	ng Sector								
1	ÁFRICA GREAT WALL MINING DEVELOPMENT COMPANY, LIMITADA	-	-	-	-	-	-	-	-
2	AFRIFOCUS RESOURCES, LDA	-	-	-	-	-	-	-	-
3	BIWORLD INTERNATIONAL, LIMITED	40.507,80	37.649,72	2.858,08	-	-	40.507,80	37.649,72	2.858,08
4	CAPITOL RESOURCES, LIMITADA	1.810.032,00	1.928.850,32	- 118.818,32	-	-	1.810.032,00	1.928.850,32	- 118.818,32
5	COMPANHIA CARVOEIRA DE SAMOA, LDA	1.029.410,95	748.493,00	280.917,95	- 92.804,05	-	936.606,90	748.493,00	188.113,90
6	ENRC MOZAMBIQUE, LIMITADA	2.593.462,00	4.758.515,85	- 2.165.053,85	-	- 559.245,00	2.593.462,00	4.199.270,85	- 1.605.808,85
7	ETA STAR MOZAMBIQUE, SA	884.487,69	880.912,76	3.574,93	-	-	884.487,69	880.912,76	3.574,93
8	HIGHLAND AFRICAN MINING COMPANY, LDA	14.154.832,35	14.582.205,93	- 427.373,58	220.200,00	-	14.375.032,35	14.582.205,93	- 207.173,58
9	JSPL MOZAMBIQUE MINERAIS, LIMITADA	2.318.062,89	3.291.789,49	- 973.726,60	746.546,39	- 80.510,83	3.064.609,28	3.211.278,66	- 146.669,38
10	JSW NATURAL RESOURCES MOZAMBIQUE, LDA	1.011.266,00	1.011.266,00	-	-	-	1.011.266,00	1.011.266,00	-
11	KENMARE MOMA MINING (MAURITIUS), LDA	97.511.734,00	92.115.716,00	5.396.018,00	- 5.386.018,00	-	92.125.716,00	92.115.716,00	10.000,00
12	MIDWEST ÁFRICA, LIMITADA	202.384,00	202.384,00	-	-	-	202.384,00	202.384,00	-
13	MINAS MOATIZE, LDA-TETE	3.998.254,10	4.016.062,09	- 17.807,99	-	-	3.998.254,10	4.016.062,09	- 17.807,99
14	MOZAMBIQUE MINERALS, LIMITED	1.845.744,00	1.741.537,00	104.207,00	- 104.207,00	-	1.741.537,00	1.741.537,00	-
15	PATEL MINING CONCESSION, LIMITADA	561.043,52	-	561.043,52	-	-	561.043,52	-	561.043,52
16	RIO TINTO BENGA, LTD	23.795.962,35	109.672.494,57	- 85.876.532,22	85.419.284,31	-	109.215.246,66	109.672.494,57	- 457.247,91
17	RIO TINTO ZAMBEZE, LTD	14.402.991,41	40.611.366,01	- 26.208.374,60	25.503.480,33	-	39.906.471,74	40.611.366,01	- 704.894,27
18	RIO TINTO MINING AND EXPLORATION, LDA	1.380.426,01	1.663.915,00	- 283.488,99	-	-	1.380.426,01	1.663.915,00	- 283.488,99

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#### RECONCILIATION PROCESS

N	Common N		Pre-Reconciliation		Reconci	liation	Pos- Reco	nciliation	Final
No	Company Name	State	Company	Difference	State	Company	Difference	State	Differences
19	ROVUMA RESOURCES, LDA	5.840.428,76	5.845.375,94	- 4.947,18	-	-	5.840.428,76	5.845.375,94	- 4.947,18
20	TWIGG EXPLORATION E MINING LDA	212.113,40	186.288,00	25.825,40	-	-	212.113,40	186.288,00	25.825,40
21	VALE MOÇAMBIQUE	425.265.478,54	413.871.244,47	11.394.234,07	- 22.009.356,06	- 20.381.824,93	403.256.122,48	393.489.419,54	9.766.702,94
22	VALE PROJECTOS E DESENVOLVIMENTO MOÇAMBIQUE, LDA	469.679,41	15.546.742,61	- 15.077.063,20	16.244.892,31	-	16.714.571,72	15.546.742,61	1.167.829,11
23	NCONDEZI	3.523.714,24	4.146.906,34	- 623.192,10	-	-	3.523.714,24	4.146.906,34	- 623.192,10
Hydr	ocarbons Sector								
1	ANADARKO MOÇAMBIQUE ÁREA 1, LIMITADA	32.050.734,00	36.899.092,00	- 4.848.358,00	4.848.358,00	-	36.899.092,00	36.899.092,00	-
2	COMPANHIA MOÇAMBICANA DE HIDROCARBONETOS, SARL	12.936.478,46	12.485.729,75	450.748,71	-	-	12.936.478,46	12.485.729,75	450.748,71
3	EMPRESA NACIONAL DE HIDROCARBONETOS, EP	11.486.281,96	12.570.372,94	- 1.084.090,98	-	-	11.486.281,96	12.570.372,94	- 1.084.090,98
4	ENI EAST AFRICA SPA	8.343.524,34	8.350.840,26	- 7.315,92	-	-	8.343.524,34	8.350.840,26	- 7.315,92
5	PETRONAS ROVUMA BASIN	89.847,00	33.722,54	56.124,46	-	-	89.847,00	33.722,54	56.124,46
6	PETRONAS CARIGALI MOZAMBIQUE E & P, LTD.	71.321,15	77.389,68	- 6.068,53	-	12.856,87	71.321,15	90.246,55	- 18.925,40
7	SASOL PETROLEUM SOFALA, LDA	-	-	-	-	-	-	-	-
8	SASOL PETROLEUM TEMANE, LDA	20.250.117,86	25.047.560,85	- 4.797.442,99	4.797.140,55	-	25.047.258,41	25.047.560,85	- 302,44
9	SASOL PETROLEUM MOÇAMBIQUE, LDA	-	-	-	-	-	-	-	-
10	SASOL PETROLEUM M-10, LDA	-	-	-	-	-	-	-	-
11	SASOL PETROLEUM MOZAMBIQUE EXPLORATION	-	-	-	-	-	-	-	-
12	BUZI HYDROCARBONS	1.030.367,00	1.116.159,00	- 85.792,00	-	-	1.030.367,00	1.116.159,00	- 85.792,00
13	STATOIL OIL & GAS MOZAMBIQUE AS	221.357,22	5.011.959,57	- 4.790.602,35	-	-	221.357,22	5.011.959,57	- 4.790.602,35
14	SASOL PETROLEUM SENGALA, LDA	-	-	-	-	-	-	-	-
15	SASOL GÁS	905.866,00	949.290,00	- 43.424,00	-	-	905.866,00	949.290,00	- 43.424,00

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No	Company Name		Pre-Reconciliation		Reconci	liation	Pos- Reco	Final	
NO	Company Name	State	Company	Difference	State	Company	Difference	State	Differences
16	ROMPCO	-	-	-	-	-	-	-	-
	Subtotal Mining Sector	602.852.015,42	716.859.715,10	- 114.007.699,68	100.542.018,23	- 21.021.580,76	703.394.033,65	695.838.134,34	7.555.899,31
	Subtotal Hydrocarbons Sector	87.385.894,99	102.542.116,59	- 15.156.221,60	9.645.498,55	12.856,87	97.031.393,54	102.554.973,46	- 5.523.579,92
	Overall Total	690.237.910,41	819.401.831,69	- 129.163.921,28	110.187.516,78	- 21.008.723,89	800.425.427,19	798.393.107,80	2.032.319,39

Table 29: Reconciliation process of Surface Tax by Company

		-	Pré-Reconciliação		Reconc	iliação	Pós-Reco	nciliação	Final
No	Company Name	State	Company	difference	State	Company	State	Company	Differences
Mini	ng Sector								
1	ÁFRICA GREAT WALL MINING DEVELOPMENT COMPANY, LIMITADA	925.580,00	904.630,00	20.950,00	-	-	925.580,00	904.630,00	20.950,00
2	AFRIFOCUS RESOURCES, LDA	749.610,00	-	749.610,00	-	-	749.610,00	-	749.610,00
3	BIWORLD INTERNATIONAL, LIMITED	156.390,00	168.520,00	- 12.130,00	-	-	156.390,00	168.520,00	- 12.130,00
4	CAPITOL RESOURCES, LIMITADA	478.630,00	3.767.740,00	- 3.289.110,00	3.399.766,00	-	3.878.396,00	3.767.740,00	110.656,00
5	COMPANHIA CARVOEIRA DE SAMOA, LDA	1.082.400,00	1.082.400,00	-	-	-	1.082.400,00	1.082.400,00	-
6	ENRC MOZAMBIQUE, LIMITADA	4.841.600,00	4.841.600,00	-	-	-	4.841.600,00	4.841.600,00	-
7	ETA STAR MOZAMBIQUE, SA	-	80.000,00	- 80.000,00	-	-	-	80.000,00	- 80.000,00
8	HIGHLAND AFRICAN MINING COMPANY, LDA	-	507.458,80	- 507.458,80	-	-	-	507.458,80	- 507.458,80
9	JSPL MOZAMBIQUE MINERAIS, LIMITADA	-	-	-	-	-	-	-	-
10	JSW NATURAL RESOURCES MOZAMBIQUE, LDA	-	117.220,00	- 117.220,00	-	-	-	117.220,00	- 117.220,00
11	KENMARE MOMA MINING (MAURITIUS), LDA	2.404.410,40	3.219.275,10	- 814.864,70	820.068,00	-	3.224.478,40	3.219.275,10	5.203,30
12	MIDWEST ÁFRICA, LIMITADA	1.421.591,00	1.658.620,00	- 237.029,00	-	-	1.421.591,00	1.658.620,00	- 237.029,00
13	MINAS MOATIZE, LDA-TETE	-	-	-	-	-	-	-	-
14	MOZAMBIQUE MINERALS, LIMITED	-	-	-	-	-	-	-	-
15	PATEL MINING CONCESSION, LIMITADA	-	-	-	-	-	-	-	-
16	RIO TINTO BENGA, LTD	114.000,00	114.000,00	-	-	-	114.000,00	114.000,00	-
17	RIO TINTO ZAMBEZE, LTD	1.055.750,00	1.054.300,00	1.450,00	-	-	1.055.750,00	1.054.300,00	1.450,00
18	RIO TINTO MINING AND EXPLORATION, LDA	360.490,00	1.785.785,00	- 1.425.295,00	-	-	360.490,00	1.785.785,00	- 1.425.295,00

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No	Company Name		Pré-Reconciliação		Reconc	iliação	Pós-Reco	nciliação	Final
NO	Company Name	State	Company	difference	State	Company	State	Company	Differences
19	ROVUMA RESOURCES, LDA	-	2.287.125,33	- 2.287.125,33	2.393.137,77	-	2.393.137,77	2.287.125,33	106.012,44
20	TWIGG EXPLORATION E MINING LDA	740.050,00	26.600,00	713.450,00	-	-	740.050,00	26.600,00	713.450,00
21	VALE MOÇAMBIQUE	1.872.675,00	624.225,00	1.248.450,00	-	1.248.450,00	1.872.675,00	1.872.675,00	-
22	VALE PROJECTOS E DESENVOLVIMENTO MOÇAMBIQUE, LDA	-	8.765.079,50	- 8.765.079,50	8.594.994,00	- 132.000,00	8.594.994,00	8.633.079,50	- 38.085,50
23	NCONDEZI	-	1.490.200,00	- 1.490.200,00	-	- 1.490.200,00	-	-	-
	Total	16.203.176,40	32.494.778,73	- 16.291.602,33	15.207.965,77	- 373.750,00	31.411.142,17	32.121.028,73	- 709.886,56

# RECONCILIATION PROCESS 7.2.6 Mining Production Tax

Table 30: Reconciliation Process of Mining Production Tax by Company

	Common North	1	Pre-Reconciliation	1	Reconc	iliation	Pos- Reco	nciliation	Final Differences
No	Company Name	State	Company	Difference	State	Company	State	Company	Final Differences
Minin	g Sector								•
1	ÁFRICA GREAT WALL MINING DEVELOPMENT COMPANY, LIMITADA	-	-	-	-	-	-	-	-
2	AFRIFOCUS RESOURCES, LDA	-	-	-	-	-	-	-	-
3	BIWORLD INTERNATIONAL, LIMITED	-	-	-	-	-	-	-	-
4	CAPITOL RESOURCES, LIMITADA	-	-	-	-	-	-	-	-
5	COMPANHIA CARVOEIRA DE SAMOA, LDA	-	-	-	-	-	-	-	-
6	ENRC MOZAMBIQUE, LIMITADA	-	-	-	-	-	-	-	-
7	ETA STAR MOZAMBIQUE, SA	-	-	-	-	-	-	-	-
8	HIGHLAND AFRICAN MINING COMPANY, LDA	-	1.982.416,91	- 1.982.416,91	-	-	-	1.982.416,91	- 1.982.416,91
9	JSPL MOZAMBIQUE MINERAIS, LIMITADA	-	-	-	-	-	-	-	-
10	JSW NATURAL RESOURCES MOZAMBIQUE, LDA	-	-	-	-	-	-	-	-
11	KENMARE MOMA MINING (MAURITIUS), LDA	41.597.590,00	39.843.299,00	1.754.291,00	87.427,00	-	41.685.017,00	39.843.299,00	1.841.718,00
12	MIDWEST ÁFRICA, LIMITADA	-	-	-	-	-	-	-	-
13	MINAS MOATIZE, LDA-TETE	655.131,92	763.656,52	- 108.524,60	-	-	655.131,92	763.656,52	- 108.524,60
14	MOZAMBIQUE MINERALS, LIMITED	-	-	-	-	-	-	-	-
15	PATEL MINING CONCESSION, LIMITADA	-	-	-	-	-	-	-	-
16	RIO TINTO BENGA, LTD	-	-	-	-	-	-	-	-
17	RIO TINTO ZAMBEZE, LTD	-	-	-	-	-	-	-	-
18	RIO TINTO MINING AND EXPLORATION, LDA	-	-	-	-	-	-	-	-
19	ROVUMA RESOURCES, LDA	-		-	-	-	-	-	-

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No	Company Name	I	Pre-Reconciliation	ı	Reconci	lliation	Pos- Reco	- Final Differences	
NU	Company Name	State	Company	Difference	State	Company	State	Company	Final Differences
20	TWIGG EXPLORATION E MINING LDA	-	-	-	-	-	-	-	-
21	VALE MOÇAMBIQUE	3.872.224,30	4.212.396,64	- 340.172,34	-	-	3.872.224,30	4.212.396,64	- 340.172,34
22	VALE PROJECTOS E DESENVOLVIMENTO MOÇAMBIQUE, LDA	-	-	-	-	-	-	-	-
23	NCONDEZI	-		-	-	-	-	-	-
	Total	46.124.946,22	46.801.769,07	- 676.822,85	87.427,00	-	46.212.373,22	46.801.769,07	- 589.395,85

Table 31: Reconciliation Process of the Oil Production Tax by Company

	C	I	Pre-Reconciliation		Recon	ciliation	Pos- Reco	nciliation	Einel Difference
No	Company Name	State	Company	Difference	State	Company	State	Company	Final Differences
Hydro	carbons Sector								
1	ANADARKO MOÇAMBIQUE ÁREA 1, LIMITADA	-	-	-	-	-	-	-	-
2	COMPANHIA MOÇAMBICANA DE HIDROCARBONETOS, SARL	-	-	-	-	-	-	-	-
3	EMPRESA NACIONAL DE HIDROCARBONETOS, EP	17.438.607,42	-	17.438.607,42	-	4.620.407,99	17.438.607,42	4.620.407,99	12.818.199,43
4	ENI EAST AFRICA SPA	-	-	-	-	-	-	-	-
5	PETRONAS ROVUMA BASIN	-	-	-	-	-	-	-	-
6	PETRONAS CARIGALI MOZAMBIQUE E & P, LTD.	-	-	-	-	-	-	-	-
7	SASOL PETROLEUM SOFALA, LDA	-	-	-	-	-	-	-	-
8	SASOL PETROLEUM TEMANE, LDA	113.436.858,18	113.436.858,18	-	-	-	113.436.858,18	113.436.858,18	-
9	SASOL PETROLEUM MOÇAMBIQUE, LDA	-	-	-	-	-	-	-	-
10	SASOL PETROLEUM M-10, LDA	-	-	-	-	-	-	-	-
11	SASOL PETROLEUM MOZAMBIQUE EXPLORATION	-	-	-	-	-	-	-	-
12	BUZI HYDROCARBONS	-	-	-	-	-	-	-	-
13	STATOIL OIL & GAS MOZAMBIQUE AS	-	-	-	-	-	-	-	-
14	SASOL PETROLEUM SENGALA, LDA	-	-	-	-	-	-	-	-
15	SASOL GÁS	10.522,79	-	-	-	-	10.522,79	-	10.522,79
16	ROMPCO	-	-	-	-	-	-	-	-
		-							
	Total	130.885.988,39	113.436.858,18	17.438.607,42	-	4.620.407,99	130.885.988,39	118.057.266,17	12.828.722,22

Table 32: Reconciliation Process of Oil Production Tax in kind by Company

	Company Name	Pre	-Reconciliation		Recond	iliation	Pos- Reco	nciliation	Final Differences
No	Company Name	State	Company	difference	State	Company	State	Company	Final Differences
Hydroca	rbons Sector								
1	ANADARKO MOÇAMBIQUE ÁREA 1, LIMITADA	-	-	-	-	-	-	-	-
2	COMPANHIA MOÇAMBICANA DE HIDROCARBONETOS, SARL	-	-	-	-	-	-	-	-
3	EMPRESA NACIONAL DE HIDROCARBONETOS, EP	-	-	-	-	-	-	-	-
4	ENI EAST AFRICA SPA	-	-	-	-	-	-	-	-
5	PETRONAS ROVUMA BASIN	-	-	-	-	-	-	-	-
6	PETRONAS CARIGALI MOZAMBIQUE E & P, LTD.	-	-	-	-	-	-	-	-
7	SASOL PETROLEUM SOFALA, LDA	-	-	-	-	-	-	-	-
8	SASOL PETROLEUM TEMANE, LDA	63.899.828,62	63.899.828,39	0,23	-	-	63.899.828,62	63.899.828,39	0,23
9	SASOL PETROLEUM MOÇAMBIQUE, LDA	-	-	-	-	-	-	-	-
10	SASOL PETROLEUM M-10, LDA	-	-	-	-	-	-	-	-
11	SASOL PETROLEUM MOZAMBIQUE EXPLORATION	-	-	-	-	-	-	-	-
12	BUZI HYDROCARBONS	-	-	-	-	-	-	-	-
13	STATOIL OIL & GAS MOZAMBIQUE AS	-	-	-	-	-	-	-	-
14	SASOL PETROLEUM SENGALA, LDA	-	-	-	-	-	-	-	-
15	SASOL GÁS	-	-	-	-	-	-	-	-
16	ROMPCO	-	-	-	-	-	-	-	-
	Total	63.899.828,62	63.899.828,39	0,23	-	-	63.899.828,62	63.899.828,39	0,23

Table 33: Reconciliation Process of Dividends by Company

	Comment Name	Pr	e-Reconciliation		Reconcil	ation	Pos- Reco	nciliation	Final
Número	Company Name	State	Company	difference	State	Company	State	Company	Differences
Mining Se	ector								
1	ÁFRICA GREAT WALL MINING DEVELOPMENT COMPANY, LIMITADA	-	-	-	-	-	-	-	-
2	AFRIFOCUS RESOURCES, LDA	-	-	-	-	-	-	-	-
3	BIWORLD INTERNATIONAL, LIMITED	-	-	-	-	-	-	-	-
4	CAPITOL RESOURCES, LIMITADA	-	-	-	-	-	-	-	-
5	COMPANHIA CARVOEIRA DE SAMOA, LDA	-	-	-	-	-	-	-	-
6	ENRC MOZAMBIQUE, LIMITADA	-	-	-	-	-	-	-	-
7	ETA STAR MOZAMBIQUE, SA	-	-	-	-	-	-	-	-
8	HIGHLAND AFRICAN MINING COMPANY, LDA	-	-	-	-	-	-	-	-
9	JSPL MOZAMBIQUE MINERAIS, LIMITADA	-	-	-	-	-	-	-	-
10	JSW NATURAL RESOURCES MOZAMBIQUE, LDA	-	-	-	-	-	-	-	-
11	KENMARE MOMA MINING (MAURITIUS), LDA	-	-	-	-	-	-	-	-
12	MIDWEST ÁFRICA, LIMITADA	-	-	-	-	-	-	-	-
13	MINAS MOATIZE, LDA-TETE	-	-	-	-	-	-	-	-
14	MOZAMBIQUE MINERALS, LIMITED	-	-	-	-	-	-	-	-
15	PATEL MINING CONCESSION, LIMITADA	-	-	-	-	-	-	-	-
16	RIO TINTO BENGA, LTD	-	-	-	-	-	-	-	-
17	RIO TINTO ZAMBEZE, LTD	-	-	-	-	-	-	-	-
18	RIO TINTO MINING AND EXPLORATION, LDA	-	-	-	-	-	-	-	-
19	ROVUMA RESOURCES, LDA	-	-	-	-	-	-	-	-

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	ATION PROCESS	Pro	e-Reconciliation		Reconcil	iation	Pos- Reco	nciliation	Final
Número	Company Name	State	Company	difference	State	Company	State	Company	Differences
20	TWIGG EXPLORATION E MINING LDA	-	-	-	-	-	-	-	-
21	VALE MOÇAMBIQUE	-	-	-	-	-	-	-	-
22	VALE PROJECTOS E DESENVOLVIMENTO MOÇAMBIQUE, LDA	-	-	-	-	-	-	-	-
23	NCONDEZI	-	-	-	-	-	-	-	-
Hydrocar	bons Sector			-	-	-	-	-	-
1	ANADARKO MOÇAMBIQUE ÁREA 1, LIMITADA	-	-	-	-	-	-	-	-
2	COMPANHIA MOÇAMBICANA DE HIDROCARBONETOS, SARL	14.582.318,21	14.562.318,21	20.000,00	-	-	14.582.318,21	14.562.318,21	20.000,00
3	EMPRESA NACIONAL DE HIDROCARBONETOS, EP	-	-	-	-	-	-	-	-
4	ENI EAST AFRICA SPA	-	-	-	-	-	-	-	-
5	PETRONAS ROVUMA BASIN	-	-	-	-	-	-	-	-
6	PETRONAS CARIGALI MOZAMBIQUE E & P, LTD.	-	-	-	-	-	-	-	-
7	SASOL PETROLEUM SOFALA, LDA	-	-	-	-	-	-	-	-
8	SASOL PETROLEUM TEMANE, LDA	-	-	-	-	-	-	-	-
9	SASOL PETROLEUM MOÇAMBIQUE, LDA	-	-	-	-	-	-	-	-
10	SASOL PETROLEUM M-10, LDA	-	-	-	-	-	-	-	-
11	SASOL PETROLEUM MOZAMBIQUE EXPLORATION	-	-	-	-	-	-	-	-
12	BUZI HYDROCARBONS	-	-	-	-	-	-	-	-
13	STATOIL OIL & GAS MOZAMBIQUE AS	-	-	-	-	-	-	-	-
14	SASOL PETROLEUM SENGALA, LDA	-	-	-	-	-	-	-	
15	SASOL GÁS	-	-	-	-	-	-	-	-
16	ROMPCO	-	-	-	-	-	-	-	-
	Subtotal Mining Sector	-	-	-	-	-	-	-	-

# intellica d'

Número	Company Name	Pro	e-Reconciliation		Reconcili	ation	Pos- Reco	nciliation	Final
Numero	Company Name	State	Company	difference	State	Company	State	Company	Differences
	Subtotal Hydrocarbons Sector	14.582.318,21	14.562.318,21	20.000,00	-	-	14.582.318,21	14.562.318,21	20.000,00
	Overall Total	14.582.318,21	14.562.318,21	20.000,00	-	-	14.582.318,21	14.562.318,21	20.000,00

## RECONCILIATION PROCESS

# 7.2.10 Contribution for Capacity Building Fund

Table 34: Reconciliation Process of the Capacity Building Fund by Company

	C	Pr	e-Reconciliation		Reconci	iliation	Pos- Reco	nciliation	Final Differences
No	Company Name	State	Company	difference	State	Company	State	Company	Final Differences
Hydro	carbons Sector								
1	ANADARKO MOÇAMBIQUE ÁREA 1, LIMITADA	29.942.000,00	29.942.000,00	-	-	-	29.942.000,00	29.942.000,00	-
2	COMPANHIA MOÇAMBICANA DE HIDROCARBONETOS, SARL	-	-	-	-	-	-	-	-
3	EMPRESA NACIONAL DE HIDROCARBONETOS, EP	-	-	-	-	-	-	-	-
4	ENI EAST AFRICA SPA	16.331.863,90	16.332.000,00	- 136,10	-	-	16.331.863,90	16.332.000,00	- 136,10
5	PETRONAS ROVUMA BASIN	-	-	-	-	-	-	-	-
6	PETRONAS CARIGALI MOZAMBIQUE E & P, LTD.	-	-	-	-	-	-	-	-
7	SASOL PETROLEUM SOFALA, LDA	-	-	-	-	-	-	-	-
8	SASOL PETROLEUM TEMANE, LDA	-	-	-	1.040.928,73	1.040.928,73	1.040.928,73	1.040.928,73	-
9	SASOL PETROLEUM MOÇAMBIQUE, LDA	-	-	-	-	-	-	-	-
10	SASOL PETROLEUM M-10, LDA	-	-	-	2.722.000,00	2.722.000,00	2.722.000,00	2.722.000,00	-
11	SASOL PETROLEUM MOZAMBIQUE EXPLORATION	-	-	-	13.610.000,00	13.610.000,00	13.610.000,00	13.610.000,00	-
12	BUZI HYDROCARBONS	4.083.000,00	4.083.000,00	-	-	-	4.083.000,00	4.083.000,00	-
13	STATOIL OIL & GAS MOZAMBIQUE AS	3.402.348,38	6.435.692,65	- 3.033.344,27	-	-	3.402.348,38	6.435.692,65	- 3.033.344,27
14	SASOL PETROLEUM SENGALA, LDA	-	-	-	5.444.000,00	5.444.000,00	5.444.000,00	5.444.000,00	-
15	SASOL GÁS	-	-	-	-	-	-	-	-
16	ROMPCO	-	-	-	-	-	-	-	-
	Total	53.759.212,28	56.792.692,65	- 3.033.480,37	22.816.928,73	22.816.928,73	76.576.141,02	79.609.621,38	- 3.033.480,37

# RECONCILIATION PROCESS 7.2.11 Contribution for Social Projects Fund

Table 35: Reconciliation Process of Social Projects Fund by Company

		F	Pre-Reconciliation		Recon	ciliation	Pos- Reco	nciliation	— Final Differences
No	Company Name	State	Company	Difference	State	Company	State	Company	Final Differences
Hydrod	earbons Sector								
1	ANADARKO MOÇAMBIQUE ÁREA 1, LIMITADA	29.942.000,00	29.942.000,00	-	-	-	29.942.000,00	29.942.000,00	-
2	COMPANHIA MOÇAMBICANA DE HIDROCARBONETOS, SARL	-	-	-	-	-	-	-	-
3	EMPRESA NACIONAL DE HIDROCARBONETOS, EP	-	-	-	-	-	-	-	-
4	ENI EAST AFRICA SPA	13.609.863,90	13.610.000,00	- 136,10	-	-	13.609.863,90	13.610.000,00	- 136,10
5	PETRONAS ROVUMA BASIN	2.721.863,90	2.722.000,00	- 136,10	-	-	2.721.863,90	2.722.000,00	- 136,10
6	PETRONAS CARIGALI MOZAMBIQUE E & P, LTD.	-	-	-	-	-	-	-	-
7	SASOL PETROLEUM SOFALA, LDA	-	-	-	-	-	-	-	-
8	SASOL PETROLEUM TEMANE, LDA	-	-	-	-	-	-	-	-
9	SASOL PETROLEUM MOÇAMBIQUE, LDA	-	-	-	-	-	-	-	-
10	SASOL PETROLEUM M-10, LDA	-	-	-	-	-	-	-	-
11	SASOL PETROLEUM MOZAMBIQUE EXPLORATION	-	-	-	-	-	-	-	-
12	BUZI HYDROCARBONS	-	-	-	-	-	-	-	-
13	STATOIL OIL & GAS MOZAMBIQUE AS	-	-	-	-	-	-	-	-
14	SASOL PETROLEUM SENGALA, LDA	-	-	-	-	-	-	-	-
15	SASOL GÁS	-	-	-	-	-	-	-	-
16	ROMPCO	-	-	-	-	-	-	-	-
	Total	46.273.727,80	46.274.000,00	- 272,20	-	-	46.273.727,80	46.274.000,00	- 272,20

**Table 36: Reconciliation Process for Institutional Contribution by Company** 

	Company Name	F	re-Reconciliation	1	Reconciliation		Pos- Reconciliation		
No	Company Name	State	Company	Difference	State	Company	State	Company	Final Differences
Hydrocarb	ons Sector								
1	ANADARKO MOÇAMBIQUE ÁREA 1, LIMITADA	54.439.845,93	59.884.000,00	- 5.444.154,07	5.406.000,00	-	59.845.845,93	59.884.000,00	- 38.154,07
2	COMPANHIA MOÇAMBICANA DE HIDROCARBONETOS, SARL	-	-	-	-	-	-	-	-
3	EMPRESA NACIONAL DE HIDROCARBONETOS, EP	-	-	-	-	-	-	-	-
4	ENI EAST AFRICA SPA	-	-	-	-	-	-	-	-
5	PETRONAS ROVUMA BASIN	-	-	-	-	-	-	-	-
6	PETRONAS CARIGALI MOZAMBIQUE E & P, LTD.	-	-	-	-	-	-	-	-
7	SASOL PETROLEUM SOFALA, LDA	-	-	-	-	-	-	-	-
8	SASOL PETROLEUM TEMANE, LDA	-	-	-	-	-	-	-	-
9	SASOL PETROLEUM MOÇAMBIQUE, LDA	-	-	-	-	-	-	-	-
10	SASOL PETROLEUM M-10, LDA	-	-	-	-	-	-	-	-
11	SASOL PETROLEUM MOZAMBIQUE EXPLORATION	-	-	-	-	-	-	-	-
12	BUZI HYDROCARBONS	-	-	-	-	-	-	-	-
13	STATOIL OIL & GAS MOZAMBIQUE AS	-	-	-	-	-	-	-	-
14	SASOL PETROLEUM SENGALA, LDA	-	-	-	-	-	-	-	-
15	SASOL GÁS	-	-	-	-	-	-	-	-
16	ROMPCO	-	-	-	-	-	-	-	-
	Total	54.439.845,93	59.884.000,00	- 5.444.154,07	5.406.000,00	-	59.845.845,93	59.884.000,00	- 38.154,07

Table 37: Bidding Price Paid by Buzi to ENH

	Company Name	F	re-Reconciliation	n	Reconciliation		Pos- Reconciliation		
No	Company Name	State	Company	Difference	State	Company	State	Company	Final Differences
Hydrocarb	ons Sector								
1	ANADARKO MOÇAMBIQUE ÁREA 1, LIMITADA	-	-	-	-	-	-	-	-
2	COMPANHIA MOÇAMBICANA DE HIDROCARBONETOS, SARL	-	-	-	-	-	-	-	-
3	EMPRESA NACIONAL DE HIDROCARBONETOS, EP	-	-	-	-	-	-	-	-
4	ENI EAST AFRICA SPA	-	-	-	-	-	-	-	-
5	PETRONAS ROVUMA BASIN	-	-	-	-	-	-	-	-
6	PETRONAS CARIGALI MOZAMBIQUE E & P, LTD.	-	-	-	-	-	-	-	-
7	SASOL PETROLEUM SOFALA, LDA	-	-	-	-	-	-	-	-
8	SASOL PETROLEUM TEMANE, LDA	-	-	-	-	-	-	-	-
9	SASOL PETROLEUM MOÇAMBIQUE, LDA	-	-	-	-	-	-	-	-
10	SASOL PETROLEUM M-10, LDA	-	-	-	-	-	-	-	-
11	SASOL PETROLEUM MOZAMBIQUE EXPLORATION	-	-	-	-	-	-	-	-
12	BUZI HYDROCARBONS	2.722.000,00	2.722.000,00	-	-	-	2.722.000,00	2.722.000,00	-
13	STATOIL OIL & GAS MOZAMBIQUE AS	-	-	-	-	-	-	-	-
14	SASOL PETROLEUM SENGALA, LDA	-	-	-	-	-	-	-	-
15	SASOL GÁS	-	-	-	-	-	-	-	-
16	ROMPCO	-	-	-	-	-	-	-	-
	Total	2.722.000,00	2.722.000,00	-	-	-	2.722.000,00	2.722.000,00	-

# 8 Summary of the Reconciliation

The amounts confirmed by state institutions and declared by the extractive sector companies after the process of reconciliation show a difference in favor of the State, in the amount of 13.811.618,32MT, in other words, state institutions confirmed having received much more, around 0,4% when compared to the amount declared by the companies, as detailed in Table 38 below:

Difference **Description** State **Company** Amount % Mining Sector 960.670.978,58 951.468.807,57 9.202.171,01 1,0% **Hydrocarbons Sector** 2.108.893.251,78 2.104.283.804,47 4.609.447,31 0,2% **Total** 3.069.564.230.36 3.055.752.612.04 13.811.618.32 0.4%

Table 38: Details of the Reconciliation Process

The reconciled differences were mostly due to the following reasons:

- Filling in the reporting templates base on supposition that the data refers to the financial year instead of the calendar year, what causes the omission of same payments, namely, the payments made in January, 2011, related to the last months of 2010 (December and November);
- Non transcription of the amounts contained in the payment notes/reports of receipts for the reporting templates;
- Incorrect transcription of the amounts contained in the payment notes/reports of receipts for the reporting templates.

The summary of receipts confirmed by the State institutions and the payments declared by each company, at the end of the reconciliation is presented in the Table 39 below:

Table 39: Summary of the State Receipts and Payments by Companies

No	Company Name	State	Company	Difference	
NU	Company Name	State	Company	Value	%
Mini	ng Sector				
1	ÁFRICA GREAT WALL MINING DEVELOPMENT COMPANY, LDA	925.580,00	904.630,00	20.950,00	2%
2	AFRIFOCUS RESOURCES, LDA	749.610,00	-	749.610,00	100%
3	BIWORLD INTERNATIONAL, LIMITED	1.615.966,35	1.548.844,94	67.121,41	4%
4	CAPITOL RESOURCES, LIMITADA	5.733.428,00	5.696.590,32	36.837,68	1%
5	COMPANHIA CARVOEIRA DE SAMOA, LDA	2.019.006,90	2.111.655,00	- 92.648,10	-5%
6	ENRC MOZAMBIQUE, LIMITADA	33.547.221,15	33.586.799,85	- 39.578,70	0%
7	ETA STAR MOZAMBIQUE, SA	1.722.659,07	1.803.084,14	- 80.425,07	-5%
8	HIGHLAND AFRICAN MINING COMPANY, LDA	14.475.296,51	17.354.303,48	- 2.879.006,97	-20%
9	JSPL MOZAMBIQUE MINERAIS, LIMITADA	3.094.609,28	3.211.278,66	- 116.669,38	-4%
10	JSW NATURAL RESOURCES MOZAMBIQUE, LDA	1.011.266,00	1.128.486,00	- 117.220,00	-12%
11	KENMARE MOMA MINING (MAURITIUS), LDA	148.290.386,40	146.433.465,10	1.856.921,30	1%
12	MIDWEST ÁFRICA, LIMITADA	1.643.975,00	1.881.004,00	- 237.029,00	-14%
13	MINAS MOATIZE, LDA-TETE	4.753.386,01	4.879.718,61	- 126.332,60	-3%
14	MOZAMBIQUE MINERALS, LIMITED	1.751.537,00	1.741.537,00	10.000,00	1%
15	PATEL MINING CONCESSION, LDA	561.043,52	-	561.043,52	100%
16	RIO TINTO BENGA, LTD	122.267.216,40	121.463.037,85	804.178,55	1%
17	RIO TINTO ZAMBEZE, LTD	45.123.207,64	45.826.651,96	- 703.444,32	-2%
18	RIO TINTO MINING AND EXPLORATION, LDA	3.151.217,05	4.549.200,84	- 1.397.983,79	-44%
19	ROVUMA RESOURCES, LDA	8.286.340,85	8.132.501,27	153.839,58	2%
20	TWIGG EXPLORATION E MINING LDA	958.602,01	214.914,32	743.687,69	78%
21	VALE MOÇAMBIQUE	483.163.788,49	473.679.419,89	9.484.368,60	2%
22	VALE PROJECTOS E DESENVOLVIMENTO MOÇAMBIQUE, LDA	71.688.448,18	70.558.705,47	1.129.742,71	2%
23	NCONDEZI	4.137.186,77	4.762.978,87	- 625.792,10	-15%
Hydı	rocarbons Sector				
1	ANADARKO MOÇAMBIQUE ÁREA 1, LIMITADA	719.442.009,93	719.480.164,00	- 38.154,07	0%
2	COMPANHIA MOÇAMBICANA DE HIDROCARBONETOS, SARL	264.740.164,10	264.224.396,54	515.767,56	0%
3	EMPRESA NACIONAL DE HIDROCARBONETOS, EP	29.142.223,78	18.502.343,01	10.639.880,77	37%
4	ENI EAST AFRICA SPA	139.963.022,14	139.970.610,08	- 7.587,94	0%
5	PETRONAS ROVUMA BASIN	63.763.652,79	63.701.516,64	62.136,15	0%

#### SUMMARY OF THE RECONCILIATION

No No	Company Name	State	Company	Difference	
140	Company Name	State	company	Value	%
6	PETRONAS CARIGALI MOZAMBIQUE E & P, LTD.	71.321,15	90.246,55	- 18.925,40	-27%
7	SASOL PETROLEUM SOFALA, LDA	47.007.004,94	47.001.020,94	5.984,00	0%
8	SASOL PETROLEUM TEMANE, LDA	254.354.466,57	254.354.768,77	- 302,20	0%
9	SASOL PETROLEUM MOÇAMBIQUE, LDA	-	-	-	0%
10	SASOL PETROLEUM M-10, LDA	2.722.000,00	2.722.000,00	-	0%
11	SASOL PETROLEUM MOZAMBIQUE EXPLORATION	29.825.236,42	29.825.236,42	-	0%
12	BUZI HYDROCARBONS	7.835.367,00	7.921.159,00	- 85.792,00	-1%
13	STATOIL OIL & GAS MOZAMBIQUE AS	17.062.722,74	23.663.515,10	- 6.600.792,36	-39%
14	SASOL PETROLEUM SENGALA, LDA	5.444.000,00	5.444.000,00	-	0%
15	SASOL GÁS	3.736.202,71	3.598.969,92	137.232,79	4%
16	ROMPCO	523.783.857,50	523.783.857,50	-	0%
	Subtotal Mining Sector	960.670.978,58	951.468.807,57	9.202.171,01	1,0%
	Subtotal Hydrocarbons Sector	2.108.893.251,78	2.104.283.804,47	4.609.447,31	0,2%
	Overall Total	3.069.564.230,36	3.055.752.612,04	13.811.618,32	0,4%

# 9 Analysis of the Information Used

The reconciliation of the receipts confirmed by the State institutions and payment declared by the extractive industry companies, made during the year 2011, was preceded by collecting information through the reporting templates, followed by the compilation of the information collected on a database for analysis.

During this process, MEITI's Coordinating Committee's recommendations were taken into account, stating that the companies should send the inquiry files along with copies of document supporting each payment made or, alternatively, present an audit firms' certification.

Even though some of the selected companies have been audited, some chose to send the proof of payment, which came to be of great help in the reconciliation exercise as it allowed comparing the information received from the companies with data confirmed by the state.

### 9.1 Reporting Templates

The reporting templates were prepared to make possible disaggregating information by tax and by each receipt/payment made with a descriptive detail of monthly guide used for the payment of taxes, fees or contributions, for example the date of payment, number of pay sheet and amount paid.

This model of information presentation made possible comparing and validating each data provided by the parties; and in case of disagreement, requested explanation.

## 9.2 Information Made Available by State Institutions

The State institutions responsible to collect tax, duties and contributions for the Fourth Reconciliation Report filled in the specific inquiry sheets for the State report and differences by the mining or hydrocarbons area.

The reporting templates where followed by the respective supported documents. On DGI case, the entity responsible to collect the most part of the State tax revenue, each inquiry file had as attachment the receipt reports of this unit extracted directly from the tax revenue collect system. The INP attached the reporting templates, the production database map of natural gas and including the map of income revenue. IGEPE presented their account report of 2011, as support the reported

information. The ENH didn't fill in the sheet of inquiry, forwarding the proof of payment of tender price carried out by Buzi Hydrocarbons.

It should be noted that during the process of reconciliation was necessary to appeal to information of other fiscal areas where the companies/projects had or have delegations. However there was a need to ask for new information by DGI because of disagreement upon taxpayers' identification number on State reporting templates and inquired companies. This situation resulted in significant differences and were later reconciled.

## 9.3 Information Made Available by the Companies

The extractive industrial companies, forwarded the information asked in the reporting templates with the demanded detail, or else tax and carried out payment documents

The companies posted copes of sheets and other prove of tax payment, rates and declared contributions. In the course of the process of reconciliation were asked other support documents, when was considered relevant, to clarify the audited differences.

Considering what is established on n° 1 e n° 2, Decree n° 32/90, of December 7, the companies operating in the country on especial tributary and cambial regime are obligated to present os balance of payments and results certificated by independent audit firm and professionally suitable. This obligation is extensive to the foreign companies, defined as having residence or headquarters out of the country. From this obligation, appear the possibly of companies with prove that have been audited not having to attach the reporting templates and payment documents, unless in a situation of clarification of incorporated differences. So, even without the compulsory, the inquired companies supply in total, the support tax payments, fees and contribution documents reported which helped to prove exactly the received information.

## 10 Published Contracts

In 2011 was approve the law n° 15/2011, of August the 10, law of Public, Private Partnership (PPP), witch as contributed for transparency of extractive sector, by determine with celebrated contracts, from the entry vigor of the law, and should be published. Even though this law does not have retroactive effects, contracts have been celebrated before the entry vigor of this law.

The published contracts up to the emission date of the fourth reconciliation report are the ones available on the *website*<sup>15</sup> from the Ministry of Mineral Recourses, available on Table 40:

**Table 40: Extractive Industry Published Contracts** 

Nº	Title of Contracts of Extractive Industry	Sector
1	Concession Contract for Research and Production on Area 2&5 between the Government and StatolHydro	Hydrocarbons
2	Contract of Oil Production–Campus Grave of Pande and Temane	Hydrocarbons
3	Concession Contract for Research and Production between the Government and Hydro Oil&Gas AS and ENH EP for Area 2&5 of Rovuma Block	Hydrocarbons
4	Concession Contract for Research and Production for Area "A" Onshore	Hydrocarbons
5	Concession Contract for Research and Production on Area 3 & 6 <i>Offshore</i> - Rovuma Basin between government and Petronas	Hydrocarbons
6	Concession Contract for Research and Production on Area 4 & 6 <i>Offshore</i> - Rovuma Basin between government and ENI	Hydrocarbons
7	Concession Contract for Research and Production on Area 4 & 6 <i>Offshore</i> - Rovuma Basin between government and Anadarko	Hydrocarbons
8	Concession Contract for Research and Production for Sofala Block	Hydrocarbons
9	Concession Contract, Research, Development and Production of Heave Minerals between government and KENMARE MOMA MINING (MAURITIUS), LDA	Mining

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<sup>15</sup>www.mirem.gov.mz

## 11 Conclusions and Recommendations

#### 11.1 Conclusions

The Fourth Reconciliation Report of MEITI aims to reconciling the receipts from the State with the payments from the companies deriving from the extractive industry, in the period between 1 January and 31 December 2011.

Therefore having as a base the information available by State institutions and from selected companies/projects for the present report, the following was disclosure:

- The net weight deference prevailing after the reconciliation exercise is 13.811.618,32MT, or else, the State institutions confirmed having received much more income, around 0,4% total relative to the amount declared by the companies;
- The deference's, adjusted/reconciled are provided from the following situations:
- Filling in the reporting templates base on supposition that the data refers to the financial year instead of the calendar year, what causes the omission of same payments, namely, the payments made in January, 2011, related to the last months of 2010 (December and November);
- Non transcription of the amounts contained in the payment notes/reports of receipts for the reporting templates;
- Incorrect transcription of the amounts contained in the payment notes/reports of receipts for the reporting templates.
- Two companies did not respond to the inquiry, using government database, they represent 0,07% of receipts confirmed by the government, making an amount of 2.177.009, 87MT;
- An increase of 59% of receipts from the extractive industry has been verified, being the sector of hydrocarbons represents 69% of total receipt reported by the State and the mining sector 31%.

#### 11.2 Recommendations

The reconciliation process was conduced/performed within the work plan defined on the Term of Reference, except situations like delayed on the devolution of reporting templates filled in by the companies inquired and the fact that some answer from the State did not correspond exactly to the selected companies, allowing a high level of initial deference's witch where later adjusted/reconciled.

From the difficulties along the elaboration of the MEITI's Fourth Reconciliation Report the following recommendations are:

- The selection criterion excluded companies from reconciliation process that made payment inferior to 500.000MT, based on the information received by the State is legitimate, however was verified that the information reported by the State could represent only a fraction of total payments effectuated by companies/projects, existing on cases like this the risk of excluding companies/projects with incomplete database. This situation occur because the collecting system control is decentralized, so is recommended that the Ministry of Finances implement a programmed that will allow centralization of information relative to the collected amount;
- The programmed used by the Ministry of Finance should allow to collect all information required to the payments carried out by the companies. Along the reconciliation Process it has been pointed out sometimes that the information facilitated by the State was directed only to one of company's/projects brunch, or that although the name of the company/project matched the request, the NUIT and receipts confirmed by state institutions did not correspond to the respective company/project. This situation occur because the collecting control system is decentralized that's why is not always possible to obtain the completed information;
- Regular update of MIREM and DGI database, extensive to the list of contacts of companies and their representatives;
- The Reconciliation Report should be related to the previous year to avoid difficult associated to difficult access to the files of previous exercises. This difficult was verify in companies with high number of transitions along the year;

#### CONCLUSIONS AND RECOMMENDATIONS

• The Tax Authority should carry out reconciliation exercises between the State recorded receipts and payments made by the companies, in order to promptly identify irregularity situations, and perform the required adjustments.

ATTACHMENTS

# Attachments

# Annex 1: Terms of Reference

#### **TERMS OF REFERENCE**

For Consulting Services: Selection of firm to carry out Scoping Study and production of the fourth MEITI Report

#### 1. Background

1.1 EITI is a global coalition of governments, companies, civil society, and investors committed to implement standardized and internationally recognized procedures for transparency in natural resource management. EITI programs help civil society groups, media and public at large to systematically review and assess what is being paid by the companies to, and received by government agencies. By making information on payments and revenues public, EITI improves trust among these groups and reduces risk of conflict and promote stability, which are essential in attaining sustainable economic development.

1.2 The Government of the Republic of Mozambique issued made a commitment to implement to increase transparency and accountability in the management of extractive industries. On May 15, 2009, Mozambique became an EITI Candidate Country, and on May 2011 submitted to the EITI International Secretariat the first validation report in order to verify if the process of implementation of the Initiative is in line with the principles and criteria for membership of the same. Successful validation leads to achieving EITI Compliant status.

1.3 In sequence the Board of EITI Secretariat concluded that Mozambique has made Meaningful Progress in implementing EITI. They agreed that Mozambique would retain his status as a Candidate country until February 2013, subject to a clearly defined and agreed work plan for achieving compliant status, including a schedule of its next Validation. Completed EITI Validation which assessed its compliance with EITI principles and standards.

1.4 The implementation of the EITI in Mozambique is steered by a thirteen member Coordinating Committee. The Committee is headed by the Vice Minister of Mineral Resources, Abdul Razak Noormohamed and includes four representatives each selected by government, civil society, and the extractive companies. The work of the Committee is coordinated by a National Coordinator based in the Ministry of Mineral Resources. The Committee is supported by a Secretariat with staff and premises that are not part of the Ministry of Mineral Resources. The Secretariat is responsible for the day-to-day implementation of activities under the guidance of the Coordinating Committee.

1.5 On March 30, 2012 Mozambique produced and launched its second EITI Report. To comply with the 2011 edition of the EITI Rules that require the country to produce EITI reports annually and

cover data no older than the second to last complete accounting period, the third Reconciliation Report for the year 2010 went public on December 28, 2012.

1.6 On October 26, 2012 the EITI Board declared Mozambique "Compliant" with the EITI standard, making Mozambique the 16th EITI compliant country. The Mozambique government is fully committed to the EITI goals and standards and, having achieved the compliance status, will focus its efforts on maintaining and further improving the process for annual disclosure and reconciliation of all revenues from the extractive industries as well as on building stakeholders' capacity to meaningfully contribute to and strengthen the Initiative.

1.7 The Coordinating Committee is responsible for the adoption of the EITI Board recommendations to Post Compliant Countries and must ensure the country's revalidation within 3 years. These recommendations include among others, reconciliation of payments made by extractive companies to the Government and revenues received by the Government. The EITI Rules require that this task is undertaken by an independent Reconciler. To date, Mozambique has undertaken three reconciliation exercises (2008, 2009 and 2010).

1.8 The MEITI-Secretariat wishes to engage a qualified and experienced consultant (the "Consultant") to prepare the Fourth EITI Reconciliation Report of Mozambique according **to The EITI Rules** (2011 Edition). The consultant should also be cognizant of the EITI Standard (2013). Whilst this is not yet required, it would make sense for Mozambique to use the exercise as a 'practice run' for some of the new requiremeths and areas for encouragement. The Consultant will carry out reconciliation of payments made by mining, oil, and gas companies against revenues received by the Government, as provided in the EITI Guidelines for Reconciler.

### 2. Scope of Services

The assignment that the Consultant will undertake constitutes the following components which are crucial to undertaking successful reconciliation:

#### A. SCOPING STUDY

i) Survey all extractive (oil, gas and mining) companies operating in Mozambique including potential small scale mining and provide list with their names, sectorial focus, and nature of operation (upstream/downstream). Categorize/group on basis of the type of operation (exploration or production) and scale of operation (e.g., US\$100,000 – US\$1,000,000 turnover/year).

- ii) Identify the types of payments and income streams existing in the extractive sector in Mozambique.
- iii) Identify the existence of in-kind payments, infrastructure provisions and other barter arrangements, and social payments and donations in Mozambique's extractive sector. If they exist, recommend how to handle in the Reconciliation report in accordance with the EITI Rules (2011 Edition).
- iv) Provide a map outlining the payment flows within the extractive industry in Mozambique, including payments and transfers to/from local and district levels of government.
- v) Recommend the materiality threshold that shall be used to determine the extractive companies that shall be covered in the Reconciliation Report.
- vi) Establish a list of all Government Agencies receiving payments from extractive industries.
- vii) Establish a list of the extractive companies and Government agencies to be included in the Reconciliation Report. For each company, identify;
  - Company's Tax Payer Identification Number
  - Type of company i.e. exploration, mining, quarrying, oil/gas, trading, etc
  - Type of license(s) held and the license number(s)
  - The company's main products
  - Company's location(s)
  - Companies reporting for the first time.
- viii) Re-design or modify reporting templates in accordance with the results of the scoping study if necessary.
- ix) Establish with the MSG whether to include beneficial ownership of the corporate entities and contracts (new, existing, full or redacted).
- x) Submit a draft scoping report and draft reporting templates to MEITI-MSG (Multi-Stakeholders Group) for scrutiny and approval.
- xi) Prepare a final scoping report incorporating comments and suggestions made by MEITI-MSG.

#### B. Training for Reporting Government Agencies and Extractive Companies

- i. Organize a one-day training workshop for the extractive companies and government agencies reporting in Third Reconciliation Report. Extractive companies and government agencies to have a clear understanding of the information to be provided.
- ii. The extractive companies and government agencies to understand that only cash based payments and not accrual based payments will be used in the report.
- iii. The requirement for data extracted from audited financial statements to meet international auditing standards to be explained.
- iv. Provide guidelines for completing reporting templates and demonstrate how to properly fill in reporting templates, including providing clarifications on the use of cash based (not accrual based) payments.
- v. Discuss and agree the type of evidence required for each payment stream.
- vi. Explain the timeline and deadline for completing reporting templates.

#### C. Reporting Exercise

- i. Review the existing reporting templates and update them in accordance with the agreed scope of coverage for the fourth EITI Report.
- ii. Government and company reports must be based on accounts audited to international standards. Reporting government entities and companies are requested to have their reporting forms certified by their auditor before submitting them to the reconciler. In the cases where data has not been certified or audited to international standards, the reconciler must request supporting documentation (i.e. audited financial statements, receipts, banking records) to verify the veracity of company and government data.
- iii. Distribute the reporting template directly to each Government agency and to each of the extractive companies.
- iv. Collect the reporting template directly from each Government agency and from each of the extractive companies.
- v. Obtain any additional information from the extractive companies and government agencies necessary to carry out the reconciliation, including requesting any missing data.
- vi. Discuss with MEITI-MSG how to address any specific issues that may arise which are related to meeting validation.
- vii. Taking into account the recommendations contained in Mozambique's Third EITI Reconciliation Report and the EITI Standard (2013), analyze and reconcile all material payments by extractive companies to the Government and material receipts by the

- Government from extractive companies for the period of January 1, 2011 to December 31, 2011.
- viii. Propose a mechanism for following up unresolved discrepancies between the companies and the government.
  - ix. Produce a report that reflects above. The reconciler shall work with both parties to explain and resolve any discrepancies between the payments and receipts. The report shall highlight the reconciled discrepancies and the unresolved discrepancies and recommend action to be taken on the unresolved discrepancies.

#### x. The report must:

- Include an overview of EITI and the extractive sector in Mozambique. This should include a description of the legal framework and fiscal regime governing the extractive industries; any significant exploration activities in 2011; the contribution of the extractive industries to the economy for 2011; a description of the distribution of revenues; a description of the financial arrangements between the government and the state-owned enterprises (SOEs), including their beneficial ownership; and any other areas agreed for inclusion by the multistakeholder group, including wider beneficial owner and contracts (see EITI Standard Requirement 3 (2013)).
- Include a register of licenses holders and allocations.
- Include the definition of 'material payments and revenues' agreed by MEITI-MSG.
- List and describe the revenue and benefit streams that are included in the report and report the gains on assets sales paid to the Government.
- Include a list of all licensed or registered companies involved in the extractive sector exploration and production, noting which companies participated in the EITI reporting process and those that did not (with an indication of the relative size whether by production or revenue/payments and reasons for non-participation).
- State if any companies or government entities failed to participate in the reporting process,
   and assess whether this is likely to have had a material impact on the stated figures;
- Describe the steps taken by the government and the MSG to ensure that company and government disclosures to the reconciler are based on audited accounts to international standards.

- Describe the methodology adopted by the reconciler to identify discrepancies, and any
  further work to be undertaken by the reconciler, the MSG or the government to explain
  and, if necessary, address any discrepancies that have been identified.
- Include the reconciler's comments on the quality of the data.
- Report production data (quantity and price) and assess how much the companies paid vs. should have paid, if possible.
- Report payments in kind (quantity and price).
- Include companies from the midstream operations (pipelines).
- Disclose information on revenue management and expenditures of the revenues channelled to the INP – National Institute of Petroleum (capacity-building and for social projects Funds).
- Disclose the main terms of the companies contracts (revenue stream), from 2011.
- Explain the procedure and methodology in order to facilitate and prepare future reconciliation exercises; and
- Set out recommendations for how to strengthen the exercise in future.
- xi. A draft report to be submitted to the MSG for approval with a power point presentation on the main findings and recommendations.
- xii. The report shall be published and disseminated to the public in an accessible, comprehensive and comprehensible manner.
- xiii. Produce a summary of the Reconciliation report in a clear and comprehensible manner for wider dissemination to the public.
- xiv. The reconciler shall prepare short and long versions of the reconciliation report in Portuguese and English
- xv. The reconciler shall present the report at a national workshop to be held after its approval by the MEITI MSG.
- xvi. The reconciler must present a version of the main data of the report in Excel or other machine readable format.

#### 3. Work Plan

At the commencement of the assignment, the Consultant shall, within one (1) week after signing the contract, prepare an inception report detailing work plan for the implementation of the entire assignment including a Completed Desk Review of the Detailed Field-Work Plan for scoping component and submit the plan to the MEITI Secretariat for approval before proceeding to implement it.

The Inception Report will outline detailed research methodology (including a detailed presentation of the assignment and participatory research technologies to be employed), including a detailed report outline, key questions to be investigated, a proposed evaluation strategy, participatory analysis and instruments to be used. The Inception Report should also include an initial literature review and preliminary stakeholder analysis.

#### 4. Deliverables

#### 4.1 Scoping Report

At the end of the fourth (4th) week after contract signing, the Consultant shall submit to the Client through MEITI Coordinator a draft Scoping Report and reporting templates in three (3) Portuguese hard copies and one electronic (MS Words) copy. The Client will review the draft Report and reporting templates and submit comments in two days for consultant to compile and submit final report (billing Portuguese and English) and reporting templates (Portuguese and English) at the end of fifth (5th) week after contract signing.

#### 4.2 Stakeholder's Training

On the sixth (6th) week after commencement of the assignment, the Consultant shall provide a specialized training on the assignment to at least thirty (50) nominated representatives of the Government entities and Extractive Companies covering the trainer's assessment of the scope of training and recommendations. The developed training materials and guidelines for completion of the reporting templates shall be presented during the training session. The Client shall coordinate the training, nominate the candidates and bear the cost of the workshop

#### 4.3 Draft Final Reconciliation Report

The draft Reconciliation Report shall be prepared on the twelfth (12th) week after commencement of the assignment and submitted to the client in four (4) hard copies (billing Portuguese and English) and one electronic (MS Words) copy. It will address all key tasks towards the end of assignment representing key aspects as given in the Terms of Reference with recommendations for

future course of action that ensure successful implementation of the Action Plans resulting from the assignment. This draft report will be the basis of seeking guidance from the Client and other stakeholders. The comments from Client shall be incorporated into the Final Draft Report within four (4) days upon receipt of such comments.

### 4.4 Reconciliation meeting with MSG

The reconciliation workshop shall be conducted in Maputo, on the thirteenth (13th) week after commencement of the assignment, in which the draft final Reconciliation Report will be discussed and validated by stakeholders. It is anticipated that the workshop resolutions and key contributions of the stakeholders will be reflected in the Final Reconciliation Report. The Client shall coordinate the workshop, nominate the candidates and bear the cost of the session.

The Consultant shall prepare essential inputs and organize a schedule of the workshop and training programs and thereafter submit relevant reports in four (4) hard copies (billing) one electronic (MS Words) copy. The Client shall closely coordinate with the Consultant and hold the responsibility of paying the costs and overall management of the workshop.

## 4.5 Final Report

The Final Reconciliation Report will be prepared and submitted to the Client in four (25) hard copies (billing) and one electronic (MS Words) copy; on the sixteenth week (14<sup>th</sup>) week and specifically one (1) day before the end of the contract by indicating the achievement made during the execution of the assignment and recommendations to MEITI MSG Secretariat.

#### Summary of deliverable schedule

No.	Time from the Start of Assignment	Deliverable
1.	End of 1st week	Inception report
2.	End of 4 <sup>th</sup> week	Draft scoping report and reporting template
3.	End of 4 <sup>th</sup> week	Presentation of draft scoping report, Stakeholder training, training material and a guide for completing reporting template
4.	End of 6 <sup>th</sup> week	Final scoping report and issuing of reporting templates
5.	End of 6 <sup>th</sup> week	Report on stakeholder training

6.	End of 12 <sup>th</sup> week	Draft Final Reconciliation report
7.	End of 13 <sup>th</sup> week	Reconciliation meeting with MSG
8.	End of 13 <sup>th</sup> week	Report of Reconciliation meeting with MSG
9.	End of 14 <sup>th</sup> week	Final Reconciliation report

### 5. Staff Requirements and Qualifications

5.1The Reconciler shall be a local or foreign accounting or audit firm with an international reputation. However, a joint venture between a local and foreign firm is encouraged to promote capacity building in Mozambique. In addition, the Reconciler should be reliable and impartial to all the parties (extractive Companies and Government) involved in the EITI initiative.

5.2 The selecting process of the Reconciler, all interviews or meetings to be held by the reconciler shall be conducted in Portuguese (official language in Mozambique). The inception Report, draft and final Reports must be submitted to the MEITI-MSG for comments in Portuguese and after its approval the English version can be delivered.

#### 5.3 Other preferred qualifications are as follows:

#### a) Team Leader:

- i). Possess Master degree (CPA, ACCA or equivalent) in taxation;
- ii). At least 5 years of experience in the area of taxation in public or corporate accounting;
- iii). Experience in similar EITI reconciliation assignments; and
- iv). Experience in the extractive sector in Africa is required.

### b) One Taxation expert:

- i). Possess graduate degree in accounting or economics;
- ii). At least 3 years of experience in the area of taxation in Africa;
- iii). Experience in similar EITI reconciliation assignments or equivalent experience in the extractive sector in Africa.

#### 6. Administrative Arrangements

The Reconciler shall report to the MEITI-Secretariat and liaise on a day-to-day basis with the Head of the Secretariat on contractual and on all technical matters pertaining to the implementation of the Project. The Head of the Secretariat will be the Reconciler's contact person in the course of implementation of the Project.

### 7. Support to be provided by the MEITI

The MEITI Secretariat will provide the Reconciler with the following support:-

- i). Liaison with the members of the MEITI-MSG;
- ii). Liaison with reporting entities (extractive companies and all the relevant Ministries and Government agencies) to facilitate Reconciler's work;
- iii). Provide any of the reference materials mentioned in this assignment.

### 8. Duration of the Project

The work will be allocated to a total of 14 weeks. The Project shall be completed for a period not exceeding 100 days from the Effective Date of Contract.

# Annex 2: Map of Extractive Industry Companies

No	Company Name	License Type	Resource
Mining	g Sector		
1	12 - STONY LDA	С	AQU, BER, COR, EME, GAR, RUB, SAF, TOU
1	ACOSTERRAS MOÇAMBIQUE, LDA	С	
1	AFRICA GREAT WALL CEMENT MANUFACTURE, LDA	C, L	LST
4	ÁFRICA GREAT WALL MINING DEVELOPMENT COMPANY, LIMITADA	L, C	CU, AU, AG, CO, CU, NI, LST, FE, TI, SAN, ILM
5	AFRIFOCUS RESOURCES, LDA	L, C	MI, TI
	AFRIMINAS MINERAIS, LDA	L, C	AG, AU, COA, CU, FE, MGS, PB, PD, PT, SB, SN, W, ZN
7	AFRICAN MINING & EXPLORATION COMPANY, LDA	С	SAN
8	AGRO - AREIAS, LDA	С	SAN
9	ÁGUA BOA, LIMITADA	С	AGU
10	ÁGUA DO VENGO, LDA	С	AGU
11	ANTÓNIO ALEIXO ROMEU RODRIGUES	С	AGU, GR, STO
12	APOLINÁRIO A. DA COSTA PANGUENE	С	
13	ARA SUL	С	RIO
14	AREEIRO KANIMAMBO, LDA	С	SAN
15	AYLEEK INDÚSTRIA, LIMITADA	L, C	GYP, STO
16	B & A ZAMBÉZIA, LIMITADA (-100%)	С	STO
17	BIWORLD INTERNATIONAL, LIMITED	L, C	LST
18	BOSS TRADING, LDA	С	RIO
19	BRITANOR, S.A (100,00%)	С	STO
21	CASA KWANZA, LDA	С	AGU
22	CENO, LDA	С	F, MI
23	CERÂMICA DE CHANCULO	С	SAN
24	CERAMICA DE VILA PERY LTD	С	CLA
25	CETA CONSTRUÇÕES E SERVIÇOS, S.A	С	STO
26	CHAMBADEJOUS LTD	С	STO
27	CHERIF BRIGHTLAND, LDA	С	GAR, MI, TOU
28	CHINA-MOZAMBIQUE CEMENT & MINING DEVELOPMENT CO. LDA	С	LST
29	CIF - MOZ, LIMITADA	С	LST
30	CIMENTOS DE MOÇAMBIQUE S.A.R.L.	C, L	CLA, LST, DIT,
31	CINAC - CIMENTOS DE NACALA, SA	С	LST
32	CLEAN TECH MINING, LDA	С	AU
33	COGEMO, LDA	С	SANC
34	COMPANHIA MINEIRA DE UELEA	С	TAN, TOU
35	COMPANHIA CARVOEIRA DE SAMOA, LDA	L, C	COA
36	COMPANHIA MINEIRA DO GILÉ S.A.R.L.	C, L	AU, NME, SEM
37	CONSTRUTORA DO TÂMEGA S.A.	С	STO
38	DAMODAR FERRO, LDA	L, C	FE, MI
39	DRUSA, LDA	С	BER, CAU, FEI, GEM, QTZ, SEM, TAN
40	EMIZ- VICTOR DE JESUS DUARTE	С	AU, MOR, TAN
41	ENRC MOZAMBIQUE, LIMITADA	L, C	COA, MI, MPS, PME, REE, BME

No	Company Name	License Type	Resource
42	ENOP	С	STO
43	ESSAR MINAS DE MOÇAMBIQUE, LDA		
44	ETA STAR MOZAMBIQUE, SA	L	COA
45	EURO EXPORT, LDA	С	CB, FEL, TAN, TOU, BER
46	EXPLORATOR, LDA	С	AU
47	EXTRAMAC, LDA	С	STO
48	FÁBRICA DE CERRÂMICA VERMELHA DE INHAMIZUA	С	AGU
49	FÁBRICA DE XAROPES E REFRIGERANTES VUMBA, LDA		
50	FAMA - PROSPECÇÃO E EXPLORAÇÃO MINEIRA, LIMITADA	С	AQU, EME, GAR, MOR, PYR, QTZ, RUB, SAF, TAN
51	G.M.C GOLD MINING CORPORATION, S.A.R.L.	С	AQU, TOU, EME, AU
52	G.S. CIMENTOS, S.A.R.L	С	LST
53	GK ANCUABE GRAPHITE MINE S.A. (-100%)	С	GRP
54	GOLD ONE MOZAMBIQUE, LDA	С	AU, TOU
55	GOLDEN ROYAL EAGLE MOÇAMBIQUE, LDA	С	AGU
56	GLOBAL MINERAL RESOURCES (MOZAMBIQUE), LDA	L	COM
57	GREAT WESTERN MINING, LDA 2	С	AQU, AU, CAS, CB, EME, QTZ, SAF, TAN, TOP, TOU
58	GRINAKER-LTA MOCAMBIQUE LDA NOVO	С	SAN
59	GRUPO MINEIRO ZAMBEZE, LDA	С	AU, GEM, SEM
60	HAIYU (MOZAMBIQUE) MINING CO.,LDA	L, C	AU, REE, TI
61	HIGHLAND AFRICAN MINING COMPANY, LDA	C, L	AQU, BER, EME, GAR, MOR, TAN, TOP, TOU, TAM
62	HS MINING, LIMITADA		COA
63	HUSSEIN ABOOBAKAR	С	AGU
64	ICEMA - INDÚSTRIA CERÂMICA DE MAPUTO, LIMITADA	С	SAB, BEM
65	INDUSTRIA AL - SATAR, LDA	С	AGU
66	INDÚSTRIA EXPLORADORA DE CALCÁRIOS	С	LST
67	INERTES DA ZAMBÉZIA, LDA	С	STO STO
68	JOACO CIMENTOS, LDA	С	STO
69	JSPL MOZAMBIQUE MINERAIS, LIMITADA	L, C	BME, COA, ZR, AU
		L	COA, FE, MI
70	JSW NATURAL RESOURCES MOZAMBIQUE, LDA	L	BME, FE
		L	BME, FE
71	JSW ADMS CARVÃO LIMITADA	С	COM, COA
72	KENMARE MOMA MINING (MAURITIUS) LDA	C, L	HSA
73	LAGOA, MATÉRIAS-PRIMAS, LIMITADA	С	BI, CB, FEL, MIC, TAN, QTZ, TOU
74	LEIRISLENA MOÇAMBIQUE, LDA	С	STO, SANC
75	MAGMAS DE MOÇAMBIQUE, LIMITADA	С	COA, FE, MI, BME
76	MANICA LANDS CORPORATION, LIMITADA	С	COA
77	MARMONTE S.A.R.L.	С	
78	MIDWEST ÁFRICA, LIMITADA	С	BME, COA, DOT
79	MIMOC - MINERAIS INDUSTRIAIS DE MOÇAMBIQUE, LDA	С	AU, CAS, CB, TAN, TOU, PT
80	MINA ALUMINA, LTD	С	AU, BAU, CAU, GB

No	Company Name	License Type	Resource
81	MINAS MOATIZE LIMITADA	С	COA, STO
82	MINERAL RESOURCES MOÇAMBIQUE, LDA	С	AU
83	MONTEPUEZ RUBY MINING, LIMITADA	С	AQU, GAR, RUB, TOU
84	MOTA MINERAL MOÇAMBIQUE, LDA	С	FEL, MI, QTZ
85	MOZAMBIQUE MINERALS, LIMITED	С	AU, BME, GEM, TAN, FE, PB, PHO, ZN, COA
86	MOZAMBIQUE GEMS, LDA	С	AQU, MPS, TOU
87	MULOSA GESTÃO E PARTICIPAÇÕES, LDA	С	STO
88	MYALA RESOURCES, LDA	С	AGU
89	NCONDEZI	С	COA
90	OMEGACORP MINERAIS LIMITADA	С	AU, BER, BI, LI, NB, TAN
91	ORGANIZAÇÕES JOÃO PELEMBE, LDA	С	STO
92	PATEL MINING CONCESSION, LIMITADA	С	
93	P.M. HOLDINGS LTD	С	TAN
94	PARAÍBA MOÇAMBIQUE, LDA	С	AQU, BER, QTZ, TOU
95	PATHFINDER MOÇAMBIQUE, S.A	С	HSa
96	PEDREIRA ABILAR, LDA	С	STO
97	PEDREIRA IDR, LIMITADA	С	STO
98	PEMAR, LDA	С	GR, ORN
99	PENHALONGA ÁGUA PURA DA MONTANHA, LDA	С	AGU
100	RECURSOS DE TANTALITE , LDA	С	BER, TAN
101	REFRIGERANTES VUMBA, LDA	С	AGU
102	RIO TINTO BENGA, LIMITADA -100%	С	COA, MI, U
103	RIO TINTO CHANGARA, LTD	С	COM
104	RIO TINTO ZAMBEZE, LTD	С	COM
105	RIO TINTO MINING AND EXPLORATION, LDA	С	AG, AU, CU, NI, PB, PD, PT, ZN
106	RIOLITOS LDA	С	RIO
107	ROVUMA RESOURCES, LDA	С	TAM
108	SAIBREIRA KANIMAMBO, LDA	С	SAB
109	SB - SABÃO INVESTIMENTOS, LIMITADA (100,00%)	С	TAM
110	SÓ - ÁGUAS, LDA; SOCIEDADE DE ÁGUAS DE MANICA	С	AGU
111	SOCIEDADE AGUA DOS LIBOMBOS	С	AGU
112	SOCIEDADE ÁGUAS DE MOÇAMBIQUE,	С	AGU
113	SOCIEDADE ÁGUAS DE RIBAUÉ, LIMITADA	С	AGU
114	SOCIEDADE ÁGUAS DE SAUA - SAUA	С	AGU
115	SOCIEDADE ÁGUAS FRESCAS, LIMITADA	С	AGU
116	SOCIEDADE AURORA 2000, LDA	С	AU
117	SOCIEDADE MINEIRA DE NUAPARRA, LDA	С	BER, BI, CB, TAN, TOP
118	SOCIEDADE TAMAR, LDA	С	GRP
119	SONIL MOZ, LIMITADA	С	BME, SSA
120	SOPENA - SOCIEDADE DE PEDREIRA DE NACIAIA, LDA	С	STO
121	SULBRITA, LDA	С	STO, GR
122	TANTALUM MINERAÇÃO E PROSPECÇÃO LIMITADA	С	AG, AU, BME, CU, GRP, NI, PB, PME, PT, ZN
122	TANTALUM MINEKAÇAU E PRUSPECÇAU LIMITADA	C	AG, AU, BME, CU, GKP, NI, PB, PME, PT, ZN

No	Company Name	License Type	Resource
123	TRANSPAL, LDA	С	STO
124	TWIGG EXPLORATION E MINING LDA	С	GRP, V
125	VALE MOÇAMBIQUE, LDA	С	AU, BME, COA, MI, MND, PME
126	VALE PROJECTOS E DESENVOLVIMENTO MOÇAMBIQUE, LDA	С	COA
127	VISION 2000, LDA	С	GAR, GEM
128	WOLF GOLD MINING, LIMITADA	С	AU, PT
Hydro	ocarbons Sector		
129	ANADARKO MOÇAMBIQUE ÁREA 1, LIMITADA		Hydrocarbons
130	BUZI HYDROCARBONS		Hydrocarbons
131	COMPANHIA MOÇAMBICANA DE HIDROCARBONETOS, SARL		Hydrocarbons
132	EMPRESA NACIONAL DE HIDROCARBONETOS, EP		Hydrocarbons
133	ENI EAST AFRICA SPA		Hydrocarbons
134	PETRONAS CARIGALI MOZAMBIQUE E & P, LTD.		Hydrocarbons
135	PETRONAS ROVUMA BASIN		Hydrocarbons
136	ROMPCO		Hydrocarbons
137	SASOL GÁS		Hydrocarbons
138	SASOL PETROLEUM M-10, LDA		Hydrocarbons
139	SASOL PETROLEUM MOÇAMBIQUE, LDA		Hydrocarbons
140	SASOL PETROLEUM MOZAMBIQUE EXPLORATION		Hydrocarbons
141	SASOL PETROLEUM SENGALA, LDA		Hydrocarbons
142	SASOL PETROLEUM SOFALA, LDA		Hydrocarbons
143	SASOL PETROLEUM TEMANE, LDA		Hydrocarbons
144	STATOIL OIL & GAS MOZAMBIQUE AS		Hydrocarbons

