

Dear DYLAN and ALEX,

As requested by the EITI-GUINEA Steering Committee, please find below the observations made by the Committee.

The Steering Committee of EITI-GUINEA received the Summary and Draft Validation Report for Guinea on 13 December 2018. Both documents were distributed to all stakeholders for them to read and give their opinion.

The ad-hoc commission responsible for monitoring validation met on 26 December, 2018 to summarize the various observations.

The report of the commission was presented to the Steering Committee on 27 December 2018 for consideration and discussion.

This work has now been completed and I have been asked to send to you the conclusions, which have been reached:

I – Regarding the Summary

The review of the Summary found a large number of syntax issues and mistakes that need to be corrected.

Also, the following observations were made:

- In the first paragraph of page 1, which mentions the classification of GUINEA according to the HDI, the source and year of the data should be specified as well as annual revenue;
- There has never been any question of an agreement based on a system of barter between the Republic of Guinea and a partner, contrary to the statements made in paragraph 4 of the page. All grants of mining rights or mining agreements are in accordance with the spirit and the letter of the Mining Code;
- In context (see page 2), 40 billion tons of bauxite reserves should be replaced by 40 billion tons of resources and it should be noted that GUINEA does not currently mine iron ore. The only attempt at iron ore mining (in Yomboély) was quickly terminated;
- Still on page 2, second paragraph, the information on the different actions and relations of CHINALCO and the Guinean State in the framework of the SIMANDOU project need to be updated.
- In the penultimate paragraph on page 2 it would be better say Seven sub-requirements instead of requirement

RECOMMENDATIONS

I

As per requirement 1.4b, the MSG should update the decree and the ministerial order of 2012 establishing the MSG (Steering Committee) and the Terms of Reference of June 2018

As the four documents concerned do not have the same legal scope or purpose, it does not seem to us to be appropriate to group them into a single document; we do not see a reason for doing this.

In accordance with Requirement 2.2, GUINEA should ensure that the detailed technical and financial criteria for granting and transferring rights are publicly available....

This recommendation is unfounded to the extent that licenses in 2016 were granted in conformity with the procedures provided for by the provisions of the Mining Code and the texts governing its implementation:

a. Cadastral Procedure (2016):

<http://mines.gov.gn/assets/uploads/2017/03/procedure-cadastre-minier.pdf>

b. Decree on management of Rights and Authorisations

<http://mines.gov.gn/docs/PDF/Decret-Portant-Gestion-des-Autorisations-et.pdf>

All texts are on-line on the sites of the Ministry and the CPDM, accessible to the general public; this ensures transparency.

Similarly, the new cadastral procedure (Order A/2016/5002/MMG/SGG, dated 1 September 2016) and its explanatory note have been published in several newspapers and online, including:

<http://mines.gov.gn/communique-nouvelle-procedure-cadastrale;>

<http://mediaguinee.org/ministere-des-mines-et-de-la-geologie-mise-en-place-dune-nouvelle-procedure-cadastrale-communique/>

<http://guinee7.com/mines-note-explicative-de-larrete-portant-mise-en-place-de-la-nouvelle-procedure-cadastrale>

<http://www.newsdeguinee.com/2016/09/07/ministere-des-mines-et-de-la-geologie-une-nouvelle-procedure-cadastrale-mise-en-place>

In addition, applicants who come to the CPDM have all the necessary information for the granting of mining rights and physical copies are also issued to them.

For example, in 2016 prospecting licenses were awarded on a first-come, first-served basis. All operating licenses granted in 2016 were issued in response to requests submitted by holders of prospecting licenses who met the legal requirements, including technical and financial requirements.

Under Requirement 4.3, GUINEA should check whether there are barter agreements....

This recommendation is in no way justified, since, once again, the Republic of Guinea has never practised barter, the granting of mining rights and agreements are in accordance with the provisions of the Mining Code in force.

Under Requirement 4.6, GUINEA should ensure that information on significant direct payments by extractive companies to subnational state entities are exhaustively disclosed.

One of the innovations of the mining code of 2011, amended in 2013, is that local development is taken into account at an unprecedented level. The Code set up the Local Economic Development Fund (FODEL), ensuring greater involvement of localities in socio-economic development, using resources from local wealth extracted by mining companies.

For its implementation, the Head of State issued a decree in October 2017 defining the terms for implementation of the Local Economic Development Fund (FODEL). Subsequent to that, the Ministry for Mines and Geology and the Ministry of for Administration of the Territory and Decentralisation recently issued a joint order defining the terms of use, management and supervision of the FODEL. A mechanism for equitable distribution of the potential shares due to each municipality concerned, as well as a manual for the day-to-day procedures for managing these resources, have also been prepared.

In addition, mayors and municipal councillors had not been elected and/or taken office in 2016, so it was not appropriate to proceed with the payment of the funds generated by this contribution to local development, in order to guarantee the legitimate use of the said funds.

All the conditions having come together, FODEL began to operate on 10 December 2018. All mining companies will make payments due for the year 2016 in coming days.

Under Requirement 6.2, GUINEA should carry out a comprehensive review of all expenses incurred by state-owned enterprises ...

After the financial statements of ANAIM, SOGUIPAMI and ONAP have been certified by an auditor and the Accounts Chamber, in accordance with current legislation, these concerns are broadly taken into account and the financial statements are available online.

Under Requirement 7.3, the MSG should develop a systematic and structured mechanism to monitor the implementation of recommendations ...

The Secretariat has a monitoring and evaluation officer. The MSG appoints a monitoring and evaluation commission each year, and a report on monitoring of the activities together with recommendations is presented to the supervisory board.

- ***You state that the implementation of these mining reforms suffers from a lack of institutional capacity. A report on the institutional review of EITI-GUINEA published in November 2016 established the following:***
- ***A high-quality work plan;***
- ***A significant increase in stakeholder capacities;***
- ***EITI Reports generally acclaimed for their quality;***
- ***Efficient administrative functioning.***

The Guinean government committed to implement EITI in April 2005, towards the end of the Lansana CONTE regime

We do not see the connection between GUINEA's membership of the EITI and the end of General Lansana CONTE's regime in December 2008. This untruth can be found on pages 1 and 2.

EITI- GUINEA could provide the elements for a response to the concerns expressed on this point.

In accordance with Requirement 7.4, the MSG should consider using the annual progress report to evaluate impact of the EITI, going beyond a description of the results and implementation of the work plan....

The EITI-GUINEA annual progress report is the work of all the colleges. It describes the general context that characterised the year. It focuses on implementation of the EITI process in GUINEA. It makes a comprehensive assessment of the annual work and budget plan and presents the financial situation in detail.

It also describes communication, awareness-raising and capacity-building activities.

It also evaluates implementation in comparison with the Requirements. It indicates the difficulties, accompanied by suggestions, and, finally, sets out the prospects after having evaluated the impact.

All of this indicates that our annual progress report is far from being a mere description of the activities carried out and the results.

II - Report on initial data collection and stakeholder consultation.

On the substance and form of the report.

The Multi-stakeholder Group noted that item 1.4 "The establishment and functioning of the multi-stakeholder group" of Requirement 1 "Oversight by the multi-stakeholder group" is scored as inadequate.

Since the Multi-stakeholder Group satisfies all the points of the Requirement 1 and there is no anomaly as regards governance, the MSG, basing itself on the texts, believes that the score should be reviewed from inadequate progress to satisfactory progress.

This is supported by the fact that all the legal rules governing the structure and composition of the MSG are clear and precise, the documents exist and are on the website of EITI-Guinea.

In addition, the Government has guaranteed an environment that is conducive to participation by companies as regards the relevant laws, regulations and administrative rules as well as specific practices for practical implementation of the EITI. The basic rights of business and civil society representatives, who are substantially involved in EITI activities, are respected by representatives of the state on the Steering Committee.

The Government is convinced that there is no obstacle to the participation of companies and civil society in the EITI process. This statement is confirmed by the report on the identification of obstacles to implementation of the EITI in GUINEA. This report concluded that there are no obstacles to implementing the EITI in GUINEA.

The report states that the legal and institutional framework is favourable for implementation of the EITI and that the results achieved as regards transparency and good governance are to the credit of the senior authorities in the country but also and especially to the credit of the members of the steering committee and the executive secretariat, whose commitment and dynamism have never been lacking.

The appointment procedures and the coordination mechanism for each college are carried out in an independent manner without any interference by the Government or the Executive Secretariat.

The Guinea Chamber of Mines represents all mining companies that are carrying out prospecting and development work. This Chamber has the power at any moment to replace the operating companies that were the basis for preparation of the first Guinea EITI reports by any other company in its directory.

The EITI Decree is signed once only. The ToRs of the MSG were recently revised (in April 2018).

The ministerial order on the composition of the multi-stakeholder group and the internal regulations cannot be considered obsolete, as they are regularly updated.

The appointment procedures for industry and civil society are at their discretion.

Finally, it would not be relevant to agree to combine the decree, the ministerial order establishing its composition, its internal regulations and its Terms of Reference, because they are documents of a different legal and administrative nature.

The objective assigned to the National Initiative by Decree D/2012/2014/PRG/SGG is compatible with the 2016 EITI Standard. Unlike many countries, EITI-Guinea is not only a consultative body but also an operational body responsible for "implementing the government's transparency policy." Article 3 of the same Decree does not refer to any EITI framework, but only "to the principles of the International EITI", which is a generic text, compatible with the regular evolution of the regulatory framework of the EITI.

Also, the organisation of EITI-Guinea, structured around a Supervisory Board, (SB-EITI) a Steering Committee (SC-EITI) and an Executive Secretariat, is adapted to the conduct of its various missions.

The Steering Committee (SC-EITI) enjoys a good level of tripartite representation (Government, companies, civil society), and holds meetings regularly.

The position of the the MSG with respect to requirement 1.4 and guidance note No. 14 is as follows:

Specific statement regarding the purpose of the EITI, complying with the Standard, Article 3 of the above-mentioned Decree D/2012/014/PRG/SG.

Roles, rights and responsibilities of the MSG;

- ✓ (1.4 bi) Capable of performing their tasks, applied by the MSG, not explicit in the texts
- ✓ (1.4b ii) Carry out awareness-raising, communication and publication activities (1.4b ii) in compliance with the Standard, Article 3 of the above-mentioned Decree D/2012/014/PRG/SGG and applied by the MSG;
- ✓ Specific responsibilities of members of the Group, in compliance with the Standard (above-mentioned) Article 5 of Decree D/2012/014/PRG/SGG,
- ✓ Sub-group of the Multi-stakeholder Group in compliance with the Standard, Article 5 of the above-mentioned Decree point 2.1 of the ToR of the MSG with the establishment of 3 operational commissions: **Audit and Statistics; Communication and Capacity-Building; and Monitoring and Evaluation.**
- ✓ National Secretariat, in compliance with the Standard, Article 5 of the above-mentioned Decree D/2012/014/PRG/SGG, functional
- ✓ Code of Conduct, Article 25 of the Internal Regulations, applied by the MSG

Approval of work plans, EITI Reports and Annual Progress Reports

- ✓ 1.4b iv, Approval of work plans, in compliance with the Standard, Article 5 of the above-mentioned Decree D/2012/014/PRG/SGG and carried out by the MSG;
- ✓ 1.4b iv, Approval of the appointment of the Independent Director, in compliance with the Standard, Article 3 of the above-mentioned Decree D/2012/014/PRG/SGG ToR of the MSG page 3, carried out by the MSG
- ✓ 1.4b iv, Approval of the Terms of Reference of the Independent Administrator, carried out by the MSG, in compliance with the Standard, Article 3 of the above-mentioned Decree D/2012/014/PRG/SGG
- ✓ 1.4b iv, Approval of EITI Reports, carried out by the MSG, in compliance with the Standard, Article 3 of the above-mentioned Decree D/2012/014/PRG/SGG, carried out by the MSG.
- ✓ 1 4b iv, Approval of Annual Progress Reports carried out by the MSG. ToR of the MSG, Article 2.1 page 3.
- ✓ 1.4 b v, Supervision of the EITI disclosure process, in compliance with the Standard, Article 3 of the Decree, carried out by the MSG.

- ✓ Participation in validation carried out by the MSG Article 3 of the Decree.

Member sitting in the Multi-stakeholder Group;

- ✓ (1.4b vi) Designation and conditions attached to the mandate in compliance with the Standard Article 5 of the Order Articles 2, 4 and 5 of the Internal Regulations Article 15 of the Order Article 4.

The internal governance rules and procedures /Operations and deliberations of the Multi-stakeholder Group; satisfactory

- ✓ (1.4b vii) Meetings are called with sufficient notice and, in general, MSG members appear to have sufficient time to review documents before meetings. Attendance at meetings of a large majority of MSG members is constant. Article 5 of the ToR of the MSG.
- ✓ 1.4b vi Payment to members of the MSG, transparency of the indemnity policy, in compliance with the Standard, Article 15 of the Joint Order. Article 2.4 of the ToR of the MSG. The policy of the Multi-stakeholder Group on per diems 1.4b vi is available to the public on the website of EITI-Guinea;
- ✓ 1.4b vi - 1.4b viii. Decision Making 1.4b vi and keeping of the minutes of debates and decisions 1.4b viii are in compliance. Article 2 of the Order, pages 13 and 19 of the Internal Regulations, Articles 7.2 and 7.3 of the ToR of the MSG

Most of the key concepts set out in Requirement 1.4b are addressed in the 2012 decree, the Order and the Internal Regulations. The ToRs of the MSG of 27 April 2018 incorporate all of the concepts set out in the 2016 EITI Standard. This document was prepared with the effective participation of the EITI International Secretariat (see Gisela 's e-mail).

In this context, the MSG has not only considered updating and enriching the other texts based on the 2016 EITI Standard, but also strengthening the participation of companies in the MSG.

All important points of the MSG are therefore in accordance with Requirement 1.4.b. Based on what has been said, the MSG believes that the validator should review this assessment.

Licensing (2.2)

Requirement 2.2: The Committee considers that Guinea has made satisfactory progress for the following reasons:

- (1) The Committee notes that Guinea has complied with all the points of requirement 2.2.
- (2) The Committee considers that the selection was founded on a risk-based approach used in several countries implementing the EITI. The approach takes the following constraints and elements into account:

- (i) Given the large number of rights awarded in 2016 (144 in total¹), an exhaustive review of all files regarding the issue of rights was not possible given the time and budget constraints for preparation of the EITI 2016 Report;
- (ii) The initial assessment of risks of potential breaches in 2016 based on interviews conducted by the Independent Administrator (IA) with stakeholders did not identify any particular concerns. This evaluation seems to be confirmed by the validation report, which

¹ Page 51 of the EITI Report

states that "none of the stakeholders who were consulted mentioned any particular license issue in 2016, which raised specific concerns";

(iii) In the absence of any specific identified risk, the Committee chose to review a randomly selected sample to verify that no breaches took place in practice; and

(iv) The Committee judged that the sample size, although limited to 4 files, was sufficient to the extent that the review by the IA did not find any significant anomalies that could make it necessary to enlarge the sample.

(3) The Committee notes the need to broaden the review of files on license issues and transfers in the future and commits to consult with stakeholders and technical partners regarding inclusion in the work of a more in-depth review of files for the period 2016-2018.

In conclusion, the Committee considers that, in view of the progressive approach used in the selection of files and in view of the adequate treatment of the other points of Requirement 2.2, Guinea has made satisfactory progress. In addition, the Committee undertakes to carry out better consultation with stakeholders in order to take account of their concerns and to carry out a study of license and transfer files for the period 2016-2018.

Please see all the attached documentation of senior management of the CPDM demonstrating that this rating should move from meaningful progress to **satisfactory progress**.

Barter agreements (4.3)

Requirement 4.3: The Committee finds that Guinea has made satisfactory progress or that this requirement is "not applicable" for the following reasons:

Given the complexity of this type of transactions and to ensure greater transparency, the Committee has implemented a multi-pronged strategy:

(1) Since the appearance of the 2013 Standard, the Committee has worked with civil society and technical partners to make contracts in the extractive industries public. This disclosure, carried out since February 2013, although requiring improvement in order to ensure more systematic disclosure of amendments, represents a first step towards enhancing the comprehensiveness of EITI reports and declarations by entities, which can now be cross-checked against their contractual commitments, notably commitments relating to barter and infrastructure agreements.

(2) Although neither previous reports nor the scoping work for the 2016 report identified any barter or infrastructure agreements in the sense of Requirement 4.3, the Committee decided not to retain the materiality threshold (zero threshold) for the data collection phase for the needs of reconciliation work. The Committee also approved a specific reporting form addressed to all reporting entities within the perimeter.

(3) The Committee considers that the 2016 report does not contain any ambiguity as to the non-existence of barter or infrastructure agreements in the sense of Requirement 4.3. Indeed, the IA confirmed on page 68 of the EITI Report "... that in the context of Guinea, no barter agreement has been signed with extractive companies. The only agreements that have been identified relate to infrastructure projects for transport in the mining sector. These projects are generally carried out by companies for their operating needs or carried out by the State through the ANAIM and made available to companies against a remuneration, which is laid down in mining conventions or in specific agreements." It should be noted that this statement is based both on interviews and on data collected by the IA during the scoping phase, but also on the declarations of reporting entities, which submitted "zero" statements regarding barter/infrastructure transactions. Also, the EITI and

validation reports confirm the non-existence of in-kind payments in the Guinea context.

(4) The assertion of the IA is also clear in asserting that the only agreements identified, which relate to infrastructure projects, were either concluded by companies "for their operating needs" or relate to projects "carried out by the State through the ANAIM and made available to companies against a remuneration, which is laid down in mining conventions or in specific agreements". The Committee considers that these two clarifications are such as to exclude the existence of any form of total or partial compensation, prospecting concessions or concessions for the production of oil, gas or minerals or the physical delivery of raw materials in respect of agreements on the sharing of transport infrastructure, which are listed in the report.

(5) Although ANAIM's agreements on shared-use of infrastructure are not covered by the Standard, the Committee considers that their citation in section 4.1.10 of the Report should resolve any ambiguity regarding the scope and qualification of these transactions. The Committee considers that Guinea has even gone beyond the Standard by publishing the agreements concluded by ANAIM regarding the management of mining transport infrastructure for the first time in the EITI Report. The Committee considers that this disclosure effort should not be considered to be ambiguous. The opinion of stakeholders, which is stated in the validation report, appears to confirm the absence of any ambiguity: "The representatives of government (including state-owned companies), industry and civil society who were consulted all agreed that the costs incurred by private companies such as CBG for infrastructure development and maintenance were not assumed in total or partial exchange for concessions for the prospecting or production of oil, gas or minerals or for physical deliveries of these raw materials."

In conclusion, the Committee considers that the assertion of the IA in the EITI Report, the opinion of stakeholders as well as the approach used for the collection of data on barter agreements and infrastructure are such as to confirm unambiguously the absence of barter or infrastructure agreements in the sense of Requirement 4.3 of the EITI Standard. For this reasons and considering all the points listed above, the Committee requests a review of the evaluation of Requirement 4.6.

Subnational direct payments (4.6)

It should be noted that declarations are made by mining companies unilaterally. There cannot be any discrepancy at this level because they are not in the reconciliation perimeter.

For the future, the MSG proposes recommending strengthening of the capacities (management tools and training) of receivers in rural municipalities that are affected in order to improve accounting management to ensure adequate reporting in accounts books.

Quasi-fiscal expenditures of state-owned companies (6.2)

Requirement 6.2: The Committee finds that Guinea has made satisfactory progress for the following reasons:

(1) Conscious of the issues related to quasi-fiscal expenditures and the reservations expressed by certain parties on the opacity of certain public companies, the Committee decided not to use a materiality threshold for quasi-fiscal expenses. This approach was taken with the dual objective of responding to the lack of data on this type of transaction during the scoping phase and to allow the independent administrator to review and report any transaction during the data collection phase for the purposes of reconciliation work.

To this end, the Committee approved a reporting form that is specific to quasi-fiscal expenditures, which was sent to state-owned companies to confirm or deny the existence of such transactions and to produce the data required by the EITI Standard.

(2) As noted in the Validation Report, the Committee finds that the IA's reconciliation of quasi-fiscal expenditures and other transactions entered into by state-owned companies with the financial reports and accounts of these companies is sufficient to strengthen assurance as to the completeness of the data in the report and to remove any suspicions in this regard. The checks and cross-checks carried out by the IA identified expenditures/transactions by certain state-owned companies that had not been detected during the scoping phase. This is also confirmed by the conclusion stated in the validation report that "all government stakeholders who were consulted, as well as civil society in its pre-Validation² self-evaluation, expressed their satisfaction as to coverage of quasi-fiscal expenditures in the 2016 EITI Report".

(3) The Committee considers that the 2016 EITI Report went beyond the requirements of the Standard to cover all transactions between state-owned companies and the state itself in cases where the transactions fall within the business description of the said companies. Also, all transactions and payments were detailed in the EITI Report, which mentions the beneficiaries and the financial and fiscal impacts of the transactions and payments in current and future financial years.

(4) The Committee considers that the classification in the Validation Report of the repayment of the debt contracted with the SMB for the acquisition of geophysical data is not appropriate for several reasons:

(i) The Committee understands that the classification made in the validation report is based on the IMF's Fiscal Transparency Manual and notes that "information in the public domain is not sufficient to evaluate this categorisation". In this respect, the Committee notes that the use of international standards for the classification of quasi-fiscal expenditures is not expressly required by requirement 6.2 as is the case, for example, for requirements 2.5 and 2.7 of the EITI Standard;

(ii) The Committee considers that the acquisition of geophysical data falls in the scope of the business description of SOGUIPAMI, as conferred by the State, and which includes, among other things, the promotion of mining licenses and the holding of prospecting licenses for promotional purposes;

(iii) The Committee considers that the repayment of the loan in question is not likely to generate an earnings shortfall for SOGUIPAMI. Indeed, it is clearly stated on page 66 of the EITI Report that "the results of the survey will be part of the geological infrastructure that SOGUIPAMI has to exploit under the provisions of Law 006 of 2011". In other words, the geological data obtained will be the property of SOGUIPAMI and will therefore be accounted as an asset in the SOGUIPAMI accounts. This acquisition therefore constitutes an investment for SOGUIPAMI, which will generate future cashflows from promotion of the areas covered by the airborne geophysical survey.

(iv) The Committee believes, apart from the technical classification that the transaction deserves, sufficient information regarding the purpose of the loan and the amount of repayments for 2016 has been disclosed in the EITI Report.

In conclusion, the Committee considers that every effort has been made to remove, as far as possible, the mistrust of certain stakeholders with regard to public companies in general and

² Civil society (May 2018), self-evaluation of pre-validation, p. 49

quasi-fiscal expenditures. Although the Committee does not consider the repayment of the SMB loan as quasi-fiscal expenditure for the reasons indicated above, it remains ready to continue discussions with the International Secretariat in order to provide any additional information to support the elements mentioned above. The Committee is also attentive to the views of all stakeholders to further strengthen its approach to disclosure of quasi-fiscal expenditures in order to best meet the concerns of all stakeholders. For this purpose and considering all the elements listed above, the Committee asks for the evaluation of Requirement 6.2 to be reviewed.

Results and impact

Regarding the **Lessons learned and Follow-up of Recommendations (7.3)**, the points of requirement 7.3 are compliant for the simple and good reason that, given the importance of the evaluation monitoring, the MSG found it necessary to set up the Evaluation Monitoring Commission, to be responsible for monitoring the activities listed in the EITI Action Plan and decisions and recommendations. (See Resolution No. 0011/EITI-G/2014, dated 27/3/2014 ... attached).

At the level of the EITI-GUINEA Secretariat, an Evaluation Monitoring Officer reports regularly to the Evaluation Monitoring Commission of the Steering Committee, of which the officer is the reporter. This Commission meets after the publication of each EITI-Guinea Report, at the midpoint of each implementation of the Annual Work and Budget Plan and/or at the request of a member of the said Commission. In addition a report of follow-up work, a decision and a recommendation are presented to the Supervisory Board.

The Results and Impact of implementation (7.4) should all be Satisfactory Progress

Efforts have been made by the Audit and Statistics Commission of the Steering Committee of EITI-GUINEA to document and evaluate the impact of the EITI after the official publication of each Report.

In this context, in 2015 the MSG, in collaboration with ISADES, carried out a study on community investments made and income paid by mining companies in Guinea. Requirements 7.4a

The MSG has also regularly published the Annual Progress Report, the latest being that of May 2018 for the 2017 report. This annual report meets the 7.4b requirements. Please see the EITI-Guinea website.

Finally, in respect of requirement 7.4c, it should be noted that it is the MSG that enabled Guinea's compliance in July 2014 and that manages the validation of Guinea in 2018.

Other Observations

On page 90, as regards **the opinion of stakeholders**, in the Republic of Guinea only private companies hold TIN (Tax Identification Number) codes.

No government department has a Tax Identification Number. It is the companies or enterprises that are obliged to have a TIN code.

II – On page 2 of the validation report, abbreviation
DNTCP: National Directorate for Treasury and Public Accounting.

Page 6: as explained above, there is a commission for evaluation monitoring of the

recommendations.

Page 7 and 8: Financial statements of state-owned companies are audited and are now available online.

Page 11 and 12: Remove the phrase "Towards the end of the Lansana CONTE regime", which is inappropriate.

Page 12: since 2017 SOGUIPAMI has been represented in the Steering Committee by its deputy CEO. The Steering Committee list is as of 22 June 2010.

Page 15: write supervisory board instead of supervisory committee.

Page 16: the statement that "senior government officials other than members of the EITI Technical Secretariat have not been involved in awareness-raising and dissemination activities" is false, as witnessed by the notice of a meeting signed by the Prime Minister, inviting senior state officials to the meeting of the Supervisory Board.

Page 25: This refers to Order No. 2858/MMG/SGG/2005, dated 20 June 2005 and not to a Decree.

Page 26: the Multi-stakeholder Group is formalised by a Ministerial Order and not by an ordonnance. Appointment procedures and mandate periods are clearly defined in the ToRs and Internal Regulations.

Page 28: an extraordinary meeting can be called by 2/3 of members and not by 2 or 3 members.

Page 29: third paragraph, this is a joint order, there is no joint decree.

Page 86: recommendation No. 9 the annual report of the Accounts Chamber has been published.

Page 96: This is the BCRG and not the BCGR.

Page 111: This refers to an extension of CBG's production capacity and not a GBC expansion project.

Page 116: to be corrected

- Dr. Joachin Lama is Secretary General of the Ministry of Economy and Finance;
- Safiatou L. DIALLO is the Head of the Prime Minister's Office;
- Malick Tidiane TOURE is Assistant Director of the Prime Minister's Office;
- Mrs. SALL Anne Marie Sakho (and not FALL) is part of the Chief Office of BNE;
- Mamadouba SYLLA, Fiscal Advisor of MB;
- Fancinadouno Aly, Chief Office of Customs, Budget Ministry
- Camara Famoro, chief financial officer of the National Petroleum Office (ONAP);
- Honorable Michel Kamano, President of the Economy, Finance and Planning Commission of the National Assembly;
- Mouminy Sylla, Bel Air Mining;
- Aminata Kaba, Bel Air Mining;
- Abdoulaye Sampil, SMB;
- Condé Morifing, CBG;
- Kabinet Diané, ANCG;
- Mohamed Sampil, Bar Association;
- Mohamed Sikhé Camara, Deputy National Director for Decentralisation.

Conkary. 4 January 2019
Executive Secretary of EITI-Guinea
Dr. M. Diaby

[Seal of EITI Executive Secretary]