

# SIERRA LEONE EXTRACTIVE INDUSTRIES TRANSPARENCY INITIATIVE (SLEITI)

**EITI Report  
2020-2021**

**30 March 2023**

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

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## LIST OF ABBREVIATIONS

AFROSAI	African Organization of Supreme Audit Institutions
AML	African Mineral Limited
AML/CFT Act	Anti-Money Laundering and Combating of Financing of Terrorism Act
ASSL	Audit Service Sierra Leone
BGS	British Geological Survey
BO	Beneficial ownership
BSL	Bank of Sierra Leone
CAC	Corporate Affairs Commission
CAGR	Compound Annual Growth Rate
CDA	Community Development Agreement
CDF	Community Development Fund
CGT	Capital Gains tax
CIT	Corporate Income Tax
DACDF	Diamond Area Community Development Fund
DELCO	Sierra Leone Development Company
EIA	Environmental Impact Assessment
EIRA	Extractive Industries Revenue Act
EITI	Extractive Industries Transparency Initiative
EPA	Environmental Protection Agency
FATF	Financial Action Task Force
FIFA	First-in first-assessed
GDP	Gross Domestic Product
GFS	Government Finance Statistics
GoSL	Government of Sierra Leone
GPFS	General Purpose Financial Statements
GST	Goods and Services Tax
HSE	Health Safety and Environmental
IA	Independent Administrator
ILO	International Labour Organization
IMF	International Monetary Fund
INTOSAI	International Organization of Supreme Audit Institutions
IOG	Innoson Oil and Gas
ISRS	International Standard on Related Services
ISSAI	International Standards of Supreme Audit Institutions
ITAS	Integrated Tax Administration System
J4P	Justice for the Poor
LGU	Local Government Unit
LMC	London Mining Company
MAB	Minerals Advisory Board
MCAS	Mining Cadastre Administration System
MCO	Mining Cadastre Office



MDAs	Ministries Department Agencies
MLA	Mining Lease Agreement
MLGCA	Ministry of Local Government and Community Affairs
MMA	Mines and Minerals Act
MMDA	Mines and Minerals Development Act
MMMR	Ministry of Mines & Mineral Resources
MoF	Ministry of Finance
MoU	Memorandum of Understanding
MPs	Members of Parliament
MSG	Multi-Stakeholder Group
NMA	National Minerals Agency
NMJD	Network Movement for Justice and Development
NRA	National Revenue Authority
OCR	Optical character recognition
OECD	Organisation for Economic Co-operation and Development
PAYE	Pay As You Earn
PD	Petroleum Directorate
PEP	Politically Exposed Person
PEPA	Petroleum Exploration and Production Act
RT	Reporting template
SDG	Sustainable Development Goals
SIEROMCO	SierraOre and Metal Company
SL	Sierra Leone
SLEITI	Sierra Leone Extractive Industries Transparency Initiative
SLST	Sierra Leone Selection Trust
SMHL	Sierra Mineral Holdings Limited
SOE	State-Owned Enterprise
SRL	Sierra Rutile Limited
TCF	Trillion cubic feet
TLS	Transport Layer Security
ToR	Terms of Reference
TRG	Titanium Resources Group
USD	United States Dollars
W/H	Withholding tax
WTI	West Texas Intermediate
WTO	World Trade Organisation

# INTRODUCTION

## Extractive Industries Transparency Initiative (EITI)

### Background

The Extractive Industries Transparency Initiative (EITI) was first announced at the World Summit on Sustainable Development in Johannesburg in 2002 (the Earth Summit 2002) and was officially launched in London in 2003.<sup>1</sup>

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

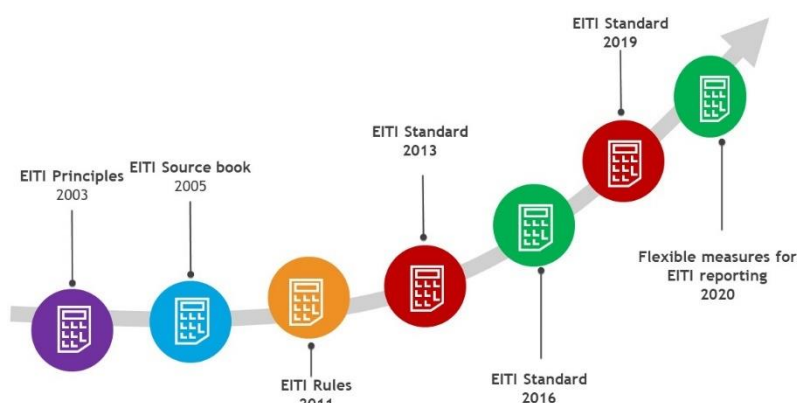
### Evolving normative framework (2003-2020)

From 1 January 2020 onwards, EITI reports should be prepared based on the 2019 EITI Standard (here in after referred to as the “[The EITI Standard](#)”). This is the sixth version of the Standard since the EITI Principles were declared in 2003. Please see Figure 1 below.

The EITI Standard encourages countries to make use of existing reporting systems for EITI data collection and to make the results transparent at source. The 2019 EITI Standard introduced new aspects on environmental, social, and gender impacts. It also broke ground on the disclosure of the identity of the real owners - the ‘beneficial owners’ - of the companies that have obtained rights to extract oil, gas and minerals starting from 2020. The EITI Standard sets out the requirements which countries need to meet to be recognised, first as EITI Candidates and subsequently as EITI Compliant countries.

Recognising the ongoing challenges associated with the COVID-19 pandemic, the EITI Board has issued new measures to provide flexibility in EITI implementation and reporting scheduled for publication in 2021 and 2022.<sup>2</sup>

FIGURE 1: EVOLVING NORMATIVE FRAMEWORK (2003-2020)



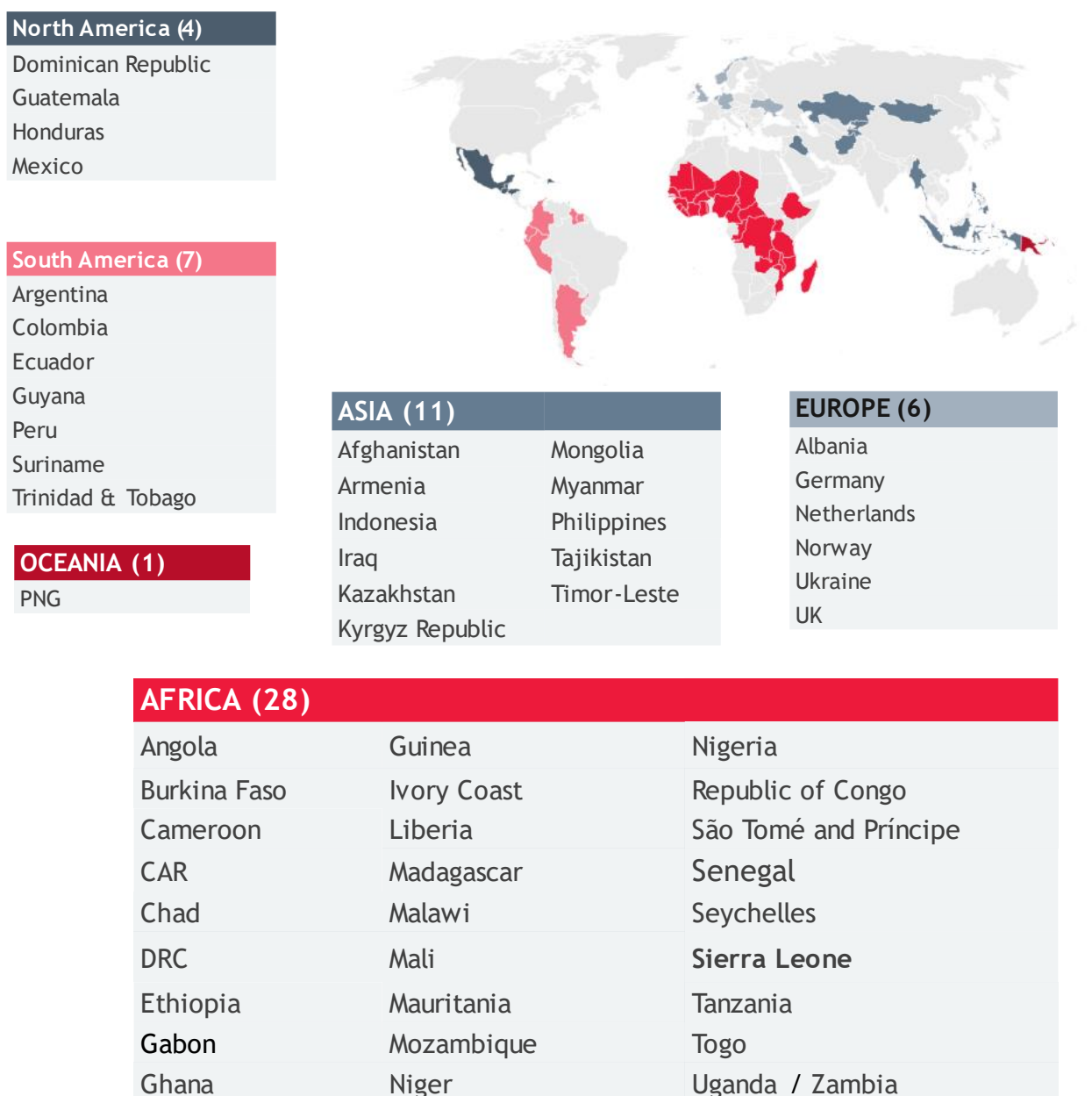
### EITI Implementing countries

<sup>1</sup> For more information on the EITI, please visit their website [here](#).

<sup>2</sup> For more information on these measures, please see [here](#).

EITI is currently being implemented in 57 countries in Africa, Asia, Europe, America and Oceania. Please see Figure 2 below.

FIGURE 2 : MAP OF EITI IMPLEMENTING COUNTRIES



## Independent evaluation of EITI

The EITI International Secretariat published in November 2022 an [independent evaluation of EITI](#). It builds on efforts to strengthen the EITI's approach to documenting, communicating and learning from the results of implementation, in line with recommendations from a 2020 review of international best practice in results measurement and impact evaluation.

The study raised some findings about these points:

- Informing the energy transition
- Supporting open data
- informing investment decisions
- Strengthening revenue mobilisation
- Addressing corruption risks
- Measuring impact

## Refinement of the 2019 EITI Standard

EITI is currently refining its Standard to capture some of the recommendations and points raised during the independent evaluation, and it is expected that the refined Standard will be presented at the upcoming EITI Global conference in June 2023.<sup>3</sup>

## EITI in Sierra Leone<sup>4</sup>

The Government of Sierra Leone (here after referred to as “GoSL”) first announced its intention to join the EITI programme in June 2006 to promote transparency and accountability in the management of its mineral resources. The country formed its first multi-stakeholder group (MSG), the Sierra Leone Extractive Industries Transparency Initiative (SLEITI) in June 2007. Sierra Leone became an EITI Candidate in February 2008, and it became a compliant country in 2014.

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

The **SLEITI Multi-stakeholder Group (MSG)** was set up by a Memorandum of Understanding (MoU) dated 20<sup>th</sup> July 2011. The MoU is a tripartite agreement entered into by the GoSL, Civil Society Organisations jointly or severally, and mining companies operating in Sierra Leone in the Oil, Gas and mineral sectors and is collectively known as the MSG. The [MoU](#) was reviewed and signed on 25<sup>th</sup> March 2021 and this MoU now governs the operations of SLEITI MSG.

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

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

The **SLEITI Secretariat** is responsible for the implementation of planned and approved activities designed by the MSG’s work plan and EITI Standard. Headed by a National

<sup>3</sup> For more information on the 2023 EITI Global Conference, see [here](#).

<sup>4</sup> For more information on EITI in Sierra Leone, see the website [here](#).

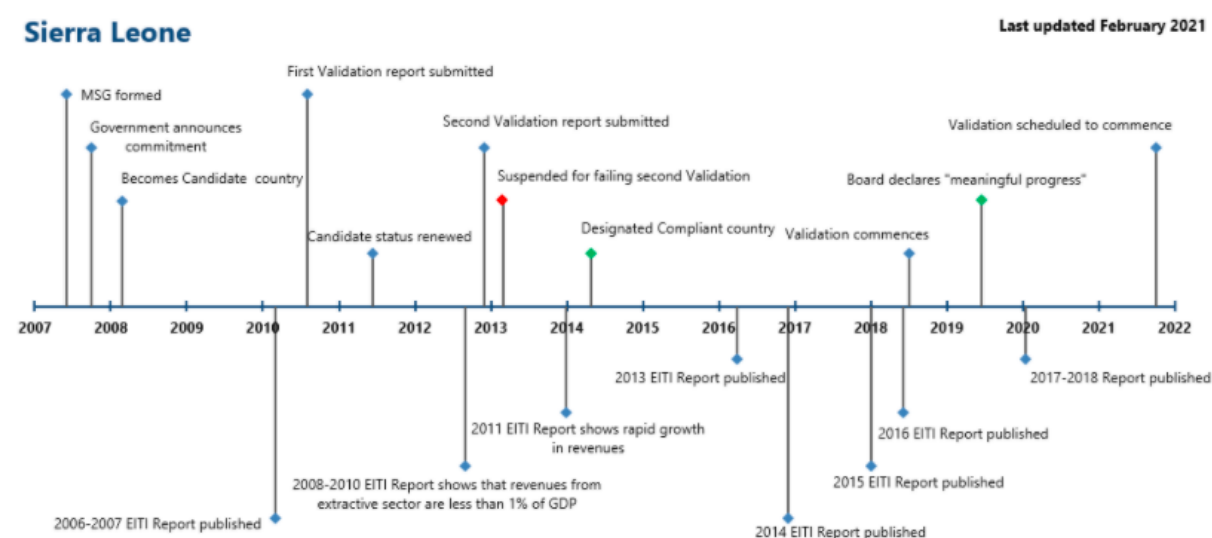
Coordinator, the Secretariat includes key professional staff drawn from several professional backgrounds required for the day-to-day operations of the Secretariat.

The SLEITI process covers two sectors in Sierra Leone: mining and oil & gas. To date ten (10) EITI Independent Administrator reports have been published covering the years from 1 January 2006 to 31 December 2019.

This report is the eleventh EITI report for Sierra Leone which covers the period from 1 January 2020 to 31 December 2021.

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

FIGURE 3: SLEITI TIMETABLE



## EITI Validation

In October 2022, The EITI Board concluded that Sierra Leone has achieved a high overall score (87.5 out of 100 points) in EITI implementation. Despite challenges related to COVID-19, the country has used the EITI to engage with host communities and drive reforms in the extractive sector.<sup>5</sup>

## Scope of Work

BDO LLP has been appointed as Independent Administrator for the preparation of the SLEITI report for the years 2020 and 2021. We have performed our work in accordance with ISRS 4400 (Engagements to perform agreed upon procedures regarding Financial Information). The procedures performed were those set out in the terms of reference as set out in the Contract for Consultants Services.

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

<sup>5</sup> <https://eiti.org/board-decision/2022-48>

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

This Report includes six Sections as follows:

- Executive Summary;
- Approach and Methodology;
- Scope of the SLEITI Report;
- Contextual Information on the Extractive Sectors;
- Analysis of EITI data; and
- Recommendations.

The data reported has been disaggregated by individual project, by company, by government agency and by revenue stream. The amounts in this report are stated in Leones (here after referred to as “Le”), unless otherwise stated. For payments made in other currencies, reporting entities were required to report in the currency of payment. Payments made in USD have been converted to Le. The exchange rate used is in the General Purpose Financial Statements (GPFS) of the Consolidated Fund for the financial years ended 31 December 2020 and 31 December 2021.

- 2020: 1 USD = Le 10,133<sup>6</sup>
- 2021: 1 USD = Le 10,800<sup>7</sup>

Our report includes information received up to **29 March 2023**. Any information received after this date has not, therefore, been included into consideration.

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

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<sup>6</sup> <https://mof.gov.sl/wp-content/uploads/2021/04/Annual-Accounts-2020-Unaudited.pdf>

<sup>7</sup> <https://mofsl.gov.sl/wp-content/uploads/2022/04/Annual-Public-Accounts-202116-th-March-2022-18-3-22-Repaired-reviewed-signed.pdf>

# 1. EXECUTIVE SUMMARY

## 1.1. Objective of the Report

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

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

## 1.2. EITI Flexible Reporting

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

### Flexible EITI reporting

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

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

With Flexible EITI reporting, implementing countries may deviate from the standard procedure for EITI reporting, including reconciliation. In doing so, the country must disclose the following information in their reporting:

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

The SLEITI MSG has agreed to prepare the 2020-2021 SLEITI report based on the flexible EITI reporting.

### 1.3. Key Conclusions

This SLEITI report summarises information about the revenues generated from the extractive industries in Sierra Leone during the years 2020 and 2021 as part of the EITI process. In this context, extractive companies and government agencies report payments, revenues and non-financial (contextual) information respectively.

#### a. EITI scope

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

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

#### b. Revenues Generated from the Extractive Sector

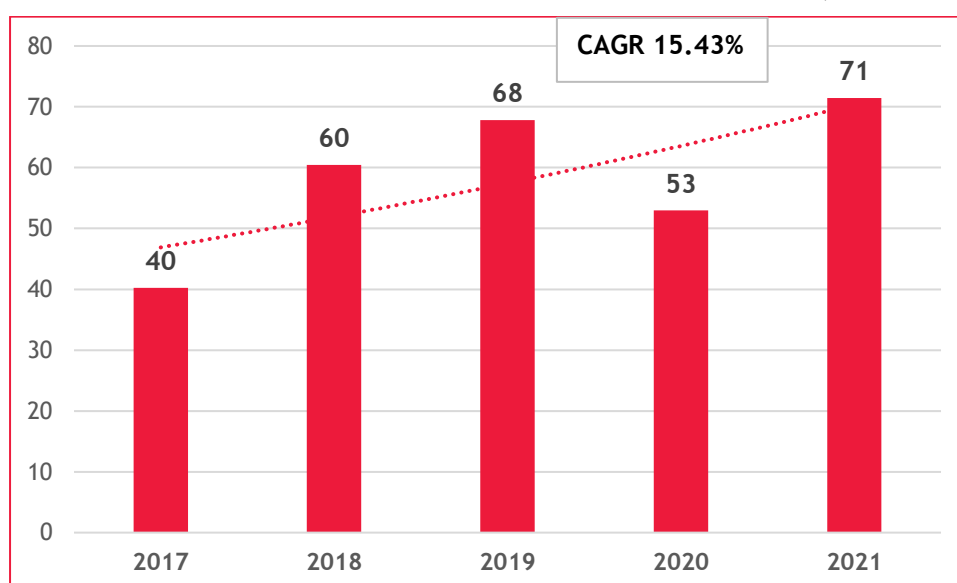
Based on the data collected from government agencies and extractive companies, the total revenues generated from the extractive sector in Sierra Leone (including social and environmental expenditure) amounted to **USD 53 million** and **71 million** respectively in 2020 and 2021, an increase of USD 18 million or 35%.

#### c. Review of the extractive revenues between 2017 and 2021

The average annual increase of the extractive revenues between 2017 and 2021 was 15%. Revenues dropped by 22% between 2020 and 2019 because of the Covid-19 pandemic. During 2021, the figures improved significantly compared with 2020 as mining activities had resumed almost as normal and the prices of most minerals had increased.

The Figure below shows the trend of the extractive revenues over five years (2017-2021).

FIGURE 4: TREND OF THE EXTRACTIVE REVENUES BETWEEN 2017 AND 2021 (IN USD MILLION)





#### d. Breakdown by type of revenue

The analysis of the extractive revenues by type indicates that tax revenues represented approximately **98% and 95%** of the total revenues collected in 2020 and 2021 respectively. Surface rent made by extractive companies to sub-national agencies accounted for less than **1%**. The table and Figures below present the contribution by type of revenue.

TABLE 1: BREAKDOWN OF EXTRACTIVE REVENUES BY TYPE OF PAYMENT (2020 AND 2021)

In USD	Disclosed by	2020	%	2021	%
Tax revenues from in-scope companies	Government agencies	47,405,666	89.26%	63,135,837	88.33%
Tax revenues from out-of-scope companies	Government agencies	3,914,855	7.37%	4,077,097	5.70%
Surface rent	Sub-national agencies	386,665	0.73%	500,752	0.70%
<b>Total tax revenues</b>		<b>51,707,186</b>	<b>97.36%</b>	<b>67,713,686</b>	<b>94.74%</b>
Social payments	Mining companies	1,320,365	2.49%	3,526,302	4.93%
Environmental payments	Mining companies	82,162	0.15%	236,396	0.33%
<b>Total social and environmental payments</b>		<b>1,402,527</b>	<b>2.64%</b>	<b>3,762,699</b>	<b>5.26%</b>
<b>Total</b>		<b>53,109,713</b>	<b>100.00%</b>	<b>71,476,384</b>	<b>100.00%</b>

FIGURE 5: BREAKDOWN OF EXTRACTIVE REVENUES BY TYPE OF PAYMENT (2020)

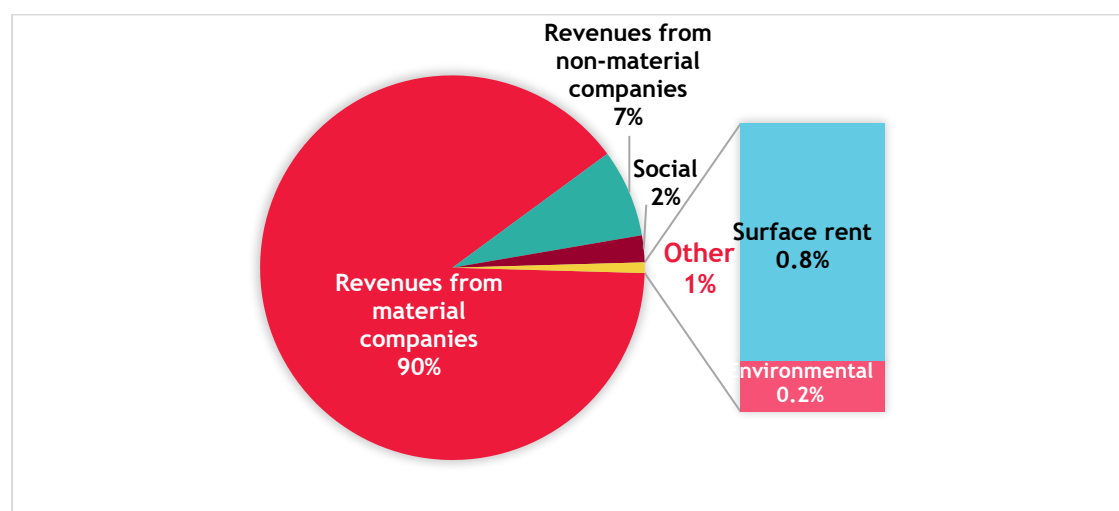
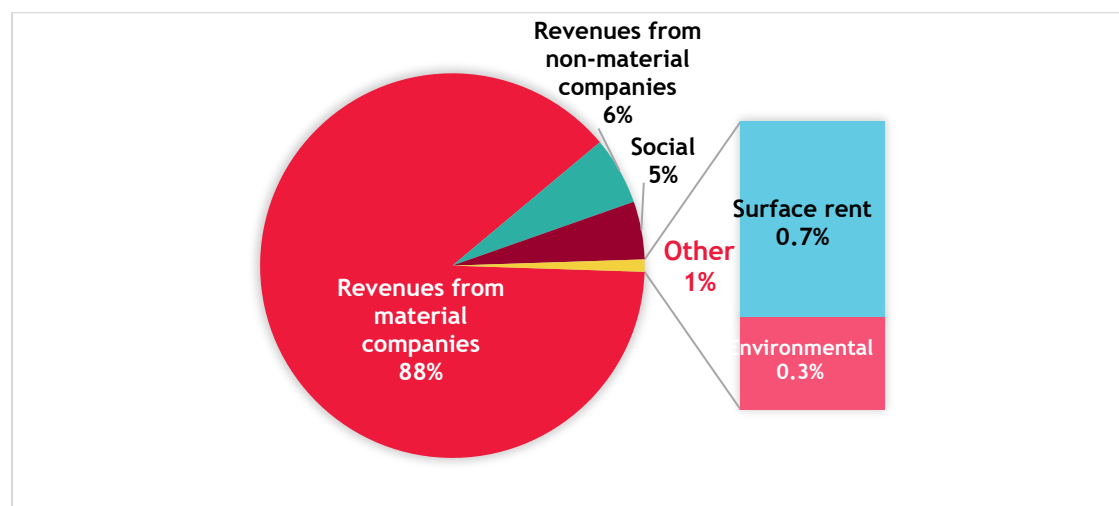


FIGURE 6: BREAKDOWN OF EXTRACTIVE REVENUES BY TYPE OF PAYMENT (2021)



### e. Analysis of production data

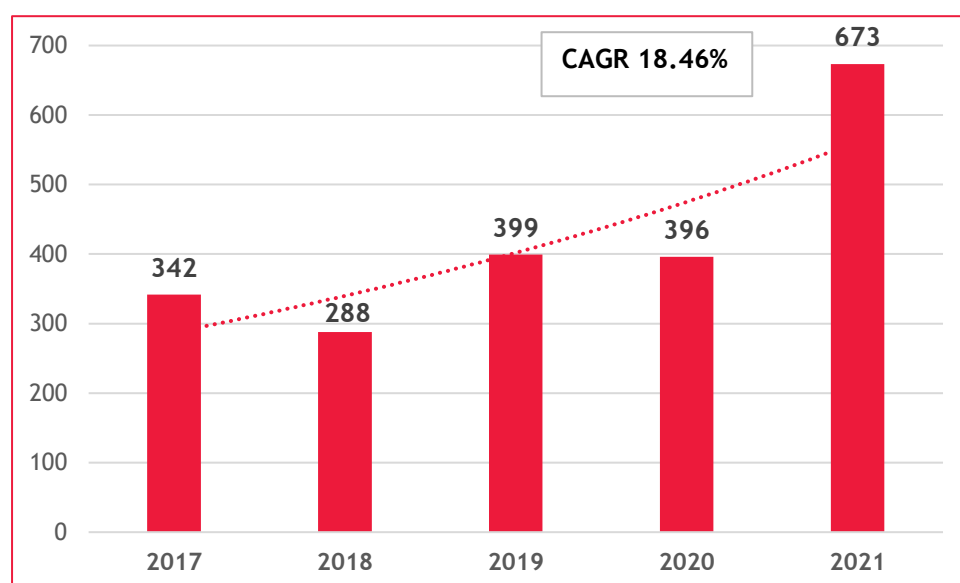
The mining production value has increased by more than 70% between 2020 and 2021 reaching **USD 673 million** in 2021. This was notably through iron ore Marampa Mines Limited produced in 2021 and the price increase of most minerals (for instance, Zircon's average price was USD 507 in 2020 Vs USD 1,486 in 2021). The table below shows the growth in production value by commodity.

TABLE 2: GROWTH OF TOTAL VALUE OF MINING PRODUCTION BETWEEN 2020 AND 2021

In USD Million	2020	2021	Variation	%
Iron Ore	0	154	154	-
Zircon	8	74	65	773%
Titanium Dioxide	9	48	39	430%
Rutile	142	160	17	12%
Gold	1	6	5	425%
Gold Concentrate	3	4	1	34%
Coltan	4	4	1	16%
Ilmenite	8	8	0.4	6%
Garnet	0	0	0	-
Bauxite	48	47	(1)	-2%
Diamond	173	169	(4)	-2%
<b>Total</b>	<b>396</b>	<b>673</b>	<b>277</b>	<b>70%</b>

Source: NMA

FIGURE 7: GROWTH OF TOTAL VALUE OF MINING PRODUCTION BETWEEN 2017 AND 2021 (IN USD MILLION)



Section 4.1 of the report provides detailed information on the production volumes and values NMA provided for 2020 and 2021. Section 5.1 also provides the production data disclosed by in-scope mining companies.

## f. Analysis of exports data

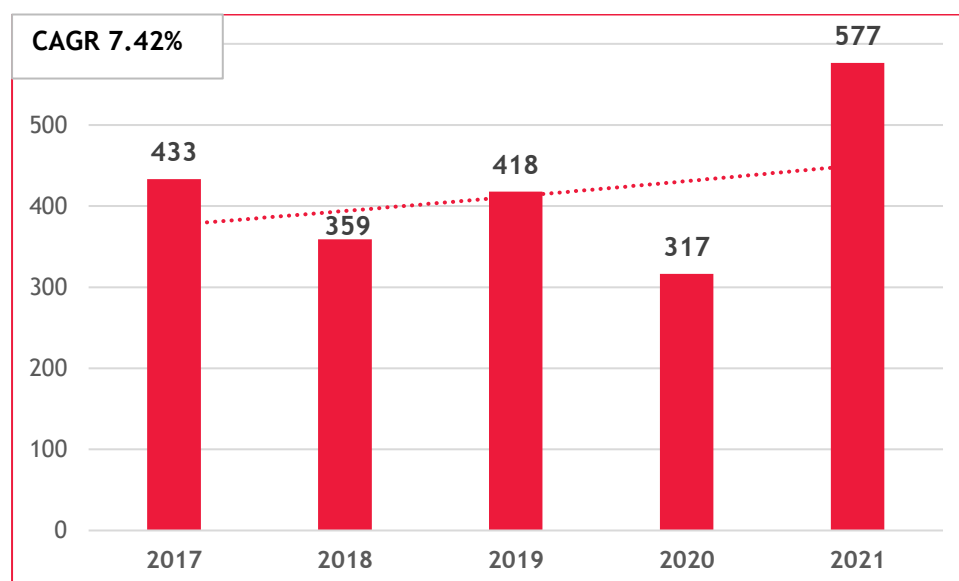
The mining export value has increased by more than 82% between 2021 and 2020 reaching **USD 577 million** in 2021. This was notably through iron ore Marampa Mines Limited exported in 2021 and the increase of diamond and rutile. The table below shows the evolution of the production value by commodity.

TABLE 3: GROWTH OF TOTAL VALUE OF MINING EXPORTS BETWEEN 2020 AND 2021

In USD Million	2020	2021	Variation	%
Iron Ore	0	151	151	-
Diamond	119	164	45	37%
Rutile	120	161	41	34%
Titanium Dioxide	2	17	15	606%
Zircon	11	17	6	49%
Bauxite	44	48	4	9%
Gold	3	5	2	62%
Gold Concentrate	3	4	1	34%
Coltan	4	4	1	16%
Garnet	1	0	(0.4)	-51%
Ilmenite	9	6	(3)	-34%
<b>Total</b>	<b>317</b>	<b>577</b>	<b>260</b>	<b>82%</b>

Source: NMA

FIGURE 8: GROWTH OF TOTAL VALUE OF MINING EXPORTS BETWEEN 2017 AND 2021 (IN USD MILLION)



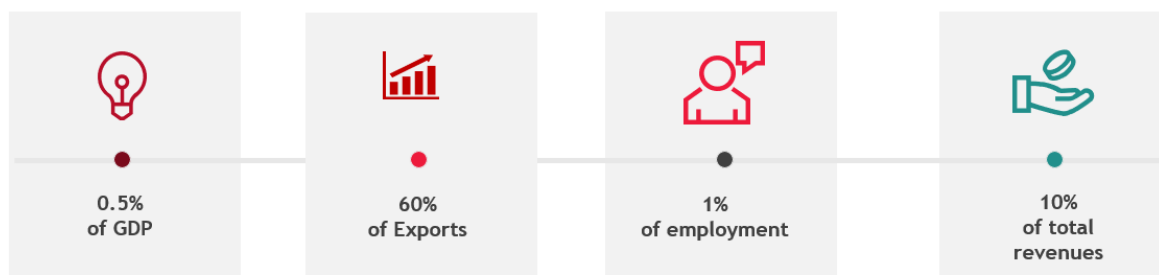
Section 4.1 of the report provides detailed information on the export volumes and values NMA provided for 2020 and 2021. Section 5.1 also provides the export data disclosed by in-scope mining companies.

### g. Contribution of the Extractive Sectors to the Economy in 2020-2021

The figures below show the contribution of the extractive sectors to the economy of Sierra Leone in 2020 and 2021.

#### 2020

FIGURE 9: CONTRIBUTION OF THE EXTRACTIVE SECTORS TO THE ECONOMY IN 2020



#### 2021

FIGURE 10: CONTRIBUTION OF THE EXTRACTIVE SECTORS TO THE ECONOMY IN 2021



Details of these contributions are presented in Section 5.7 of this report.

## h. Data completeness

### Government Agencies

The SLEITI MSG agreed that ten (10) government agencies would be required to disclose the revenues received from extractive companies, contextual data related the exploration, production, exports, state participation, infrastructure provisions and barter agreements, environmental and social expenditure, and employment as required by the EITI Standard. The government agencies selected in the scope are presented in the table below.

TABLE 4: LIST OF IN-SCOPE GOVERNMENT AGENCIES (2020 AND 2021)

N°	Government Agency
1	National Revenue Authority (NRA)
2	National Minerals Agency (NMA) <sup>8</sup>
3	Ministry of Finance (MoF)
4	Ministry of Mines & Mineral Resources (MMMR)
5	Petroleum Directorate (PD)
6	Environmental Protection Agency (EPA)
7	Ministry of Local Government and Community Affairs (MLGCA) <sup>9</sup>
8	District Councils / City Councils
9	Chiefdom Administrations
10	Members of Parliament (MPs)

All in-scope government agencies have submitted their Reporting Templates. Because of lack of time, the templates were not distributed to MPs. The figures provided in this report were then disclosed by companies.

### Extractive companies

The SLEITI MSG agreed that mining companies that paid more than US\$ 450,000 during the years 2020 and 2021 should disclose the following information:

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

<sup>8</sup> Including the Directorate of Precious Minerals Trading.

<sup>9</sup> Formerly Ministry of Local Government and Rural Development (MLGRD).

Based on the above, 11 and 17 mining companies have been selected in the scope respectively for 2020 and 2021 as shown in the following two tables.

## 2020

TABLE 5: LIST OF IN-SCOPE COMPANIES (2020)

N°	Company	N°	Company
1	Cheng Li Trading Mining	7	Sierra Diamond Ltd
2	Dayu Mining Co	8	Sierra Mineral Holdings 1 Limited
3	Kingho Mining Company Limited	9	Sierra Rutile Limited
4	Koidu Limited	10	Tonguma Ltd
5	Meya Mining Limited	11	Wongor Investments and Mining Corporation Limited
6	Northern Mining Company Limited		

## 2021

TABLE 6: LIST OF IN-SCOPE COMPANIES (2021)

N°	Company	N°	Company
1	Cheng Li Trading Mining	10	Seawright Mining Co
2	Dayu Mining Co	11	Sierra Diamond Limited
3	FG Gold Ltd	12	Sierra Mineral Holdings 1 Limited
4	KaSino Mining Company Limited	13	Sierra Rutile Limited
5	Kingho Mining Company Limited	14	Sierramin Bauxite (SL) Limited
6	Koidu Limited	15	Supreme Minerals Corp
7	Marampa Mines Limited	16	Tonguma Limited
8	Meya Mining Limited	17	Wongor Investments and Mining Corporation Limited
9	Pan African Rare Metal Mining Co		

All extractive companies selected in the scope for the 2020 year have submitted their Reporting Templates. However, there were two non-compliant companies for the 2021 year as shown in Table 7 below.

TABLE 7: DETAILS OF NON-COMPLIANT COMPANIES

N°	Non-compliant company	Details	Payments (USD)	% to the total
1	Supreme Minerals Corp	Request made on the 2 <sup>nd</sup> January 2023 along with three chaser emails respectively on the 7 <sup>th</sup> , 23 <sup>rd</sup> of January and 14 <sup>th</sup> March. The Ministry of Mines and Mineral Resources has also sent them a formal chaser letter.	317,042	0.47%
2	Sierramin Bauxite (SL) Limited	The GoSL cancelled its mining license in 2021.	60,605	0.09%
Total			377,647	0.56%

## Assessment of the comprehensiveness

Based on above, we can confirm that both financial and non-financial data included in the SLEITI report for 2020 and 2021 is **comprehensive**.

## i. Data quality and assurance

### Government Agencies

To comply with EITI Requirement 4.9 on Data quality and assurance, the SLEITI MSG agreed that the reporting templates for government agencies should be:

- co-signed by an authorised senior manager and the finance/tax officer; and
- certified by the Auditor General of Sierra Leone who should submit a report confirming that the figures and information reported in the government agencies' Reporting Templates are in accordance with instructions issued by SLEITI MSG, are comprehensive and agree with the government accounts for the FYs 2020 and 2021.

NMA,<sup>10</sup> NRA and EPA have submitted signed and certified reporting templates by ASSL.

### Assessment of the data quality of government agencies

The assessment of the data quality of government agencies depends on the percentage (%) of contribution of the institutions that failed to submit signed and certified reporting templates to the total extractive revenues as indicated in the table below:

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

As all Government agencies have submitted signed and certified reporting templates, we can conclude that the data disclosed by Government agencies was of high quality.

### Extractive companies

To comply with EITI Requirement 4.9 on Data quality and assurance, the SLEITI MSG agreed that reporting templates for the extractive companies should be:

- co-signed by an authorised senior manager and the finance/tax officer;
- certified by an external auditor who should confirm that the figures and information included in the RT are in accordance with instructions issued by SLEITI MSG, comprehensive and agree with the company's accounts for the FY 2020 and 2021; and
- accompanied by the company audited financial statements for the FYs 2020 and 2021 in order to compare the information reported in their reporting templates against those of the audited Financial Statements.

### Assessment of the data quality of extractive companies

The assessment of the data quality of extractive companies depends on the percentage (%) of contribution of the companies that failed to submit signed and certified reporting templates and BO declaration forms to the total extractive revenues as indicated in the table below.

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

<sup>10</sup> Excluding the production and export figures.

The tables below provide the compliance status of each in-scope company for 2020 and 2021.

TABLE 8: DATA COMPLETENESS AND ASSURANCE COMPLIANCE BY MINING COMPANY (2020)

N°	Company	RTs (Excel)	BO declaration form	Legal ownership	RTs (Certified)	Audited Financial Statements	Status
1	Kingho Mining	Yes	Yes	Yes	Yes	No	Mostly compliant
2	Northern Mining	Yes	Yes	Yes	Yes	No	Mostly compliant
3	Wongor Invest. and Mining	Yes	Yes	Yes	Yes	No	Mostly compliant
4	Cheng Li Trading Mining	No	Yes	Yes	No	No	Partly compliant
5	Dayu Mining	Yes	Yes	Yes	Yes	Yes	Compliant
6	Koidu	Yes	Yes	Yes	Yes	Yes	Compliant
7	Meya Mining	Yes	Yes	Yes	Yes	Yes	Compliant
8	Sierra Diamonds (including Tonguma)	Yes	Yes	Yes	Yes	Yes	Compliant
9	Sierra Mineral Holdings 1	Yes	Yes	Yes	Yes	Yes	Compliant
10	Sierra Rutile	Yes	Yes	Yes	Yes	Yes	Compliant

TABLE 9: DATA COMPLETENESS AND ASSURANCE COMPLIANCE BY MINING COMPANY (2021)

N°	Company	RTs (Excel)	BO declaration form	Legal ownership	RTs (Certified)	Audited Financial Statements	Status
1	Sierramin Bauxite (SL)	No	No	No	No	No	Non-compliant
2	Supreme Minerals	No	No	No	No	No	Non-compliant
3	Seawright Mining	Yes	No	Yes	Yes	Yes	Mostly compliant
4	FG Gold	Yes	No	Yes	Yes	Yes	Mostly compliant
5	FG Gold	Yes	No	Yes	Yes	Yes	Mostly compliant
6	KaSino Mining Company	Yes	No	Yes	No	Yes	Mostly compliant
7	Kingho Mining Company	Yes	Yes	Yes	Yes	No	Mostly compliant
8	Pan African Rare Metal Mining	Yes	Yes	Yes	Yes	No	Mostly compliant
9	Wongor Invest. and Mining	Yes	Yes	Yes	Yes	No	Mostly compliant
10	Cheng Li Trading	Yes	Yes	Yes	Yes	Yes	Compliant
11	Dayu Mining	Yes	Yes	Yes	Yes	Yes	Compliant
12	Koidu	Yes	Yes	Yes	Yes	Yes	Compliant
13	Marampa Mines	Yes	Yes	Yes	Yes	Yes	Compliant
14	Meya Mining	Yes	Yes	Yes	Yes	Yes	Compliant
15	Sierra Diamonds (including Tonguma)	Yes	Yes	Yes	Yes	Yes	Compliant
16	Sierra Mineral Holdings 1	Yes	Yes	Yes	Yes	Yes	Compliant
17	Sierra Rutile	Yes	Yes	Yes	Yes	Yes	Compliant

The contribution of the two non-compliant mining companies contributed 0.56% to the total Government extractive revenues, we can conclude the high quality of data reported by extractive companies.

### Assessment of the overall data quality and assurance

The assessment the overall data quality and assurance of the SLEITI report for the years 2020 and 2021 is based on a combination between the assessment of data quality for both Government agencies and extractive companies as set out in the table below.



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

Given the high quality of data reported by Government agencies and high quality of data reported by extractive companies, we can conclude the high quality of the overall data included in the SLEITI report for the years 2020 and 2021.

## 1.4. Findings and Recommendations

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

These recommendations are summarised in the following table:

TABLE 10: LIST OF RECOMMENDATIONS

Title	Responsible	Recommendation
Future EITI scope	SLEITI MSG	Discuss the possibility of extending the EITI scope by including all revenues collected from the forestry sector as well as any other relevant sector.
EITI Systematic disclosure	SLEITI MSG	Implement the recommendations suggested by the Feasibility Study, so that the concept of mainstreaming can gradually be embedded in the Sierra Leone context.
Production and export data	NMA and BSL	Harmonise their data on their sources of information to ensure data accuracy. This can only be achieved by setting up periodic task force meetings and agree on the data to be published. Any discrepancies should be fully investigated before the data is published by each government agency. Such exercise would also assist in the mainstreaming process.

These recommendations are detailed in Section 6.1 of the report.

Sections 6.2 and 6.3 of this report show the progress the SLEITI MSG made towards the implementation of the previous IA recommendations and the latest corrective actions respectively.

Mark Henderson

Partner

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30 March 2023

## 2. APPROACH AND METHODOLOGY

The EITI reporting process consisted of the following steps:

- 1) perform a study to determine the scope of the EITI report and to update the reporting templates;
- 2) collection of payment data from government agencies and extractive companies, which provide the basis for the data collection; and
- 3) contact with government agencies and extractive companies for additional information and explanations.

### 2.1. Scoping Study

In accordance with our terms of reference, we carried out a scoping study and reported to SLEITI on matters which should be considered in determining the scope of the 2020-2021 report, including:

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

During the data collection phase, we were able to obtain an understanding of the regulatory and fiscal frameworks of the extractive sector, the revenue collection process and key events that may have occurred in 2020-2021.

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

To be effective and compliant, the EITI Report should be timely, reliable, comprehensive and comprehensible. Scoping decisions are critical in ensuring that EITI reports meet these requirements. The Scoping Study involves:

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

- identifying additional benefit streams from the extractive sectors that should be disclosed (EITI Requirements 4.2, 4.3, 4.4, 4.5 and 4.6);
- identify revenue streams that are not recorded in the national budget and explain the allocation of such off-budget revenues as well as track implementation of the International Monetary Fund's Government Finance Statistics (GFS) classifications for extractive revenues;
- consider revenue allocations and expenditure that should be disclosed under EITI Requirements 5 and 6, and to the extent possible, assess the possibility for unilateral or where possible reconciliation of social expenditure as per EITI Requirements 6.1 a) and b) and other contributions;
- assessing the reliability of available data, including reviewing current auditing practices and the assurances to be provided by the reporting entities (EITI Requirement 4.9);
- identifying any barriers to disclosure of the information requested and propose solutions for addressing them; and
- investigate any other issues as mandated by the MSG.

To conduct the preliminary analysis, we performed the following:

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

## 2.2. Data Collection

We developed instructions, including reporting templates and reporting guidelines, requesting extractive companies and government agencies to report all required data. The

reporting package, including Reporting Template and the Instructions for its completion, was sent electronically to the stakeholders on the 2<sup>nd</sup> of January 2023, who were given two weeks to fill in the reporting template.

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

The data collection process took more time than it was expected. Further to the IA's chaser emails and call, the Ministry of Mines and Mineral Resources has also written a formal chaser letter to non-compliant companies.

In carrying out the data collection, we performed the following procedures:

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

## 2.3. Reliability and Certification of Data Reported

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

### Extractive companies

The Reporting Templates should be:

- co-signed by an authorised senior manager and the finance/tax officer.
- certified by an external auditor who should confirm that the figures and information included in the RT are in accordance with instructions issued by SLEITI MSG, comprehensive and agree with the company's accounts for the FY 2020 and 2021; and
- accompanied by the company audited financial statements for the FY 2020 and 2021 in order to compare information reported in their reporting templates against those of the audited Financial Statements.

### Government Agencies

The Reporting templates should be:

- co-signed by an authorised senior manager and the finance/tax officer; and
- certified by the Auditor General of Sierra Leone who should submit a report confirming that the figures and information reported in the Government Agencies' Reporting Templates are in accordance with instructions issued by SLEITI MSG, are comprehensive and agree with the Government accounts for the FY 2020 and 2021.

## **2.4. Accounting Records**

The data collection has been carried out on a cash basis. Accordingly, any payment made prior to 1 January 2020 has been excluded. The same applies to any payments made after 31 December 2021.

## **2.5. Government Agencies**

In respect of government agencies, care has been taken to ensure that amounts shown on the “Payment/Receipt Report” include all receipts collected in 2020-2021 irrespective of whether the receipt was allocated in the government agencies’ records against amounts due in a previous or subsequent financial year.

## 3. SCOPE OF THE SLEITI REPORT

For more information on the scope, please read the inception report for the 2020 and 2021 years that is available on SLEITI's website.

### 3.1. Reporting Periods

The SLEITI process covers two extractive sectors in Sierra Leone: mining and oil & gas. To date ten (10) EITI Reports have been published covering the period from 1 January 2006 until 31 December 2019.

This eleventh EITI Report for the years 2020 and 2021 cover the periods:

- from 1 January 2020 to 31 December 2020; and
- from 1 January 2021 to 31 December 2021.

### 3.2. Level of Disaggregation

Requirement 4.7 of the 2019 EITI Standard states that: 'It is required that EITI data is disaggregated by individual project, by company, by government agency and by revenue stream.

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

The specific revenue streams to the extractive sector (mining and oil & gas) should be levied and/or imposed based on mining agreements and petroleum licenses and should therefore be disaggregated as such. The table below presents the list of these specific revenue streams.

TABLE 11: LIST OF SPECIFIC REVENUE STREAMS

Revenue Stream	Government agencies
Mineral Resources Royalty	NRA
Mining license	NRA
Corporate Tax	NRA
Diamond & Gold Export duties	NMA
License Fee	EPA
Exploration license	NRA
Monitoring fee	NMA

### 3.3. Government Agencies

The SLEITI MSG agreed that ten (10) Government agencies would be required to disclose the revenues received from extractive companies, contextual data related the exploration, production, exports, state participation, infrastructure provisions and barter agreements, environmental and social expenditure, and employment as required by the 2019 EITI Standard.

The Government agencies selected in the scope are presented in the table below.

TABLE 12 : LIST OF IN-SCOPE GOVERNMENT AGENCIES

N°	Government Agency	N°	Government Agency
1	National Revenue Authority (NRA)	7	Ministry of Local Government and Community Affairs (MLGCA)
2	National Minerals Agency (NMA) <sup>11</sup>	8	District Councils / City Councils
3	Ministry of Finance (MoF)	9	Chieftdom Administrations
4	Ministry of Mines & Mineral Resources (MMMR)	10	Members of Parliament (MPs)
5	Petroleum Directorate (PD)		
6	Environmental Protection Agency (EPA)		

The SLEITI MSG agreed that these eleven Government agencies were required to submit individual reporting templates for each mining company which contributed 0.17% and more to the total Government revenues generated from the extractive sector. Accordingly, government agencies were invited to submit separate reporting templates for 21 and 20 companies respectively for the years 2020 and 2021 as presented in the tables below.

TABLE 13: LIST OF IN-SCOPE COMPANIES FOR UNILATERAL FULL DISCLOSURE IN 2020

N°	Company	N°	Company
1	Afro-Asia Mining Co	12	Metal & Minerals
2	B.M.E	13	Meya Mining Limited
3	Cheng Li Trading Mining	14	Northern mining company Limited
4	Dawnus	15	Seawright Mining Co Limited
5	Dayu Mining Co	16	Sierra Diamond Limited
6	H M Diamond Limited	17	Sierra Mineral Holdings 1 Limited
7	Kanu Equipment	18	Sierra Rutile Limited
8	Kasino Mining Co. Limited	19	Sierra-min Bauxite SL Limited
9	Kingho Mining Company Limited	20	Tonguma Limited
10	Koidu Limited	21	Wongor Investments and Mining Corporation Limited
11	Mantac		

TABLE 14: LIST OF IN-SCOPE COMPANIES FOR UNILATERAL FULL DISCLOSURE IN 2021

N°	Company	N°	Company
1	Afro-Asia Mining Co	11	Pan African Rare Metal Mining Co
2	Cheng Li Trading Mining	12	Seawright Mining Company
3	Dayu Mining Co	13	Sierra Diamonds Limited
4	FG Gold Limited	14	Sierra Mineral Holdings 1 Limited
5	Gerald Metals Srl	15	Sierra Rutile Limited
6	Hancock Africa Co	16	Sierra-min Bauxite SL Limited
7	KaSino Mining Co Limited	17	Supreme Minerals Corp
8	Kingho Mining Company Limited	18	Tandem Liber Holdings Limited
9	Koidu Limited	19	Tonguma Limited
10	Meya Mining Limited	20	Wongor Investments and Mining Corporation Limited

<sup>11</sup> Including the Directorate of Precious Minerals Trading (PMT).

For the remaining mining companies those which contributed below the materiality threshold (i.e. which contributed less than 0.17% to the total government revenues generated from the extractive sector), the government agencies were required to submit one reporting template including all revenues received from those companies.

### 3.4. Extractive Companies

#### a. Mining sector

The SLEITI MSG agreed that the mining companies which paid more than USD 450,000<sup>12</sup> during the years 2020 and 2021 should disclose the following information:

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

Accordingly, 11 and 17 mining companies were invited to submit their reporting templates respectively for the years 2020 and 2021 as presented in the tables below.

TABLE 15: LIST OF IN-SCOPE COMPANIES FOR LIMITED DISCLOSURE IN 2020

N°	Company	N°	Company
1	Cheng Li Trading Mining	7	Sierra Diamond Limited
2	Dayu Mining Co	8	Sierra Mineral Holdings 1 Limited
3	Kingho Mining Company Limited	9	Sierra Rutile Limited
4	Koidu Limited	10	Tonguma Limited
5	Meya Mining Limited	11	Wongor Investments and Mining Corporation Limited
6	Northern Mining Company Limited		

TABLE 16: LIST OF IN-SCOPE COMPANIES FOR LIMITED DISCLOSURE IN 2021

N°	Company	N°	Company
1	Cheng Li Trading Mining	10	Seawright Mining Co
2	Dayu Mining Co	11	Sierra Diamond Limited
3	FG Gold Ltd	12	Sierra Mineral Holdings 1 Limited
4	KaSino Mining Company Limited	13	Sierra Rutile Limited
5	Kingho Mining Company Limited	14	Sierramin Bauxite (SL) Limited
6	Koidu Limited	15	Supreme Minerals Corp
7	Marampa Mines Limited	16	Tonguma Limited
8	Meya Mining Limited	17	Wongor Investments and Mining Corporation Limited
9	Pan African Rare Metal Mining Co		

<sup>12</sup> During the scoping phase, it was noted that companies that made payments over USD 450,000 contributed 93% and 95% to the total Government extractive revenues in 2020 and 2021 respectively.



## b. Oil and gas sector

The government agencies did not receive any revenues from oil and gas companies during the FYs 2020 and 2021 and there was only one active oil and gas license during that period.

### 3.5. Revenue Streams

In order to ensure consistent and comprehensive disclosures, the SLEITI MSG agreed to keep the list of revenue streams included in the 2019 EITI Report for the 2020 and 2021 Report.

Based on the above, twelve (12) revenue streams were selected as detailed in the table below.

TABLE 17: IN-SCOPE REVENUE STREAMS FOR THE 2020 AND 2021 SLEITI REPORT

N°	Revenue stream	Government Agency
1	PAYE	NRA
2	W/H 5% Contract	NRA
3	Royalty	NRA
4	Mining license	NRA
5	Corporate Tax	NRA
6	Import and Export duties	NRA
7	Exploration license	NRA
8	Diamond & Gold Exporters licence	NRA
9	Diamond & Gold Export duties	NMA
10	Environmental Licence Fee	EPA
11	Environmental Monitoring fee	EPA
12	Surface Rent	District Councils Chiefdom Councils Members of Parliament (MPs) MLGCA

### 3.6. Other Information in line with the EITI Standard

The SLEITI MSG agreed that the following information should be included in the scope of the 2020-2021 SLEITI report as required by the EITI Standard:

- Legal framework and fiscal regime (EITI requirement 2.1);
- Contract and license allocations (requirement 2.2);
- Register of licenses (EITI requirement 2.3);
- Government's policy on disclosure of contracts and licenses (EITI requirement 2.4);
- Beneficial ownership (EITI requirement 2.5);
- State participation in the extractive industries (EITI requirement 2.6);
- An overview of the extractive industries, including any significant exploration activities (EITI requirement 3.1);
- Production data (EITI requirement 3.2);
- Export data (EITI requirement 3.3);
- Infrastructure provisions and Barter arrangements (EITI requirement 4.3)
- Transportation revenues (requirement 4.4);
- Environmental expenditure by extractive companies (EITI requirement 6.1);

- Subnational payments (EITI requirement 4.6);
- Sub-national Transfers (EITI requirement 5.2);
- Social expenditure by extractive companies (EITI requirement 6.1);
- Quasi-fiscal expenditure (EITI requirement 6.2);
- Distribution of revenues from the extractive industries (EITI requirement 5.1); and
- Contribution of the extractive industries to the economy (EITI requirement 6.3).

### 3.7. Additional Disclosure in line with the Flexible Reporting Requirements

The SLEITI MSG agreed that the following information should be included in the scope of the 2020-2021 SLEITI report as required by the EITI Standard, the EITI flexible reporting requirements and the Terms of Reference:

TABLE 18: ADDITIONAL DISCLOSURE (EITI FLEXIBLE REPORTING REQUIREMENTS)

EITI requirement	Additional disclosure (EITI flexible reporting requirements)
Requirement 2.1: Legal framework and fiscal regime	<ul style="list-style-type: none"> <li>- Legal or regulatory changes, including moratoriums, in response to Covid-19.</li> <li>- Adjustments to the fiscal regime, incentives or relief requested by or given to companies (e.g., force majeure, modified consultation).</li> </ul>
Requirement 2.2: Contract and license allocations.	<ul style="list-style-type: none"> <li>- Any new license/contract awarded or transferred in 2020, 2021 and early 2022.</li> <li>- Delays or postponements of license or contracts awards.</li> <li>- Alternative approaches to licensing considering social distancing requirements.</li> </ul>
Requirement 2.3: Register of licenses	Suspended licenses or operations in view of Covid-19.
Requirement 2.4: Contracts	Changes in licensing and contract negotiations or amendments to contracts, revisions on work schedules if they are annexed to the contract.
Requirement 2.6: State participation	<ul style="list-style-type: none"> <li>- Changes in state participation and policies for state-owned enterprises.</li> <li>- Ad-hoc SOE payments and transfers related to the Covid-19 crisis.</li> <li>- Amendments to the rules and practices related to SOE's operating and capital expenditures, procurement, subcontracting and corporate governance in light of the Covid-19 crisis.</li> <li>- Additional SOE quasi-fiscal expenditures agreed in response to the impact of the Covid-19 crisis.</li> </ul>
Requirement 3.1: Exploration	<ul style="list-style-type: none"> <li>- A narrative overview of sector developments and industry outlook considering Covid-19 and the commodity price downturn.</li> <li>- Effects of Covid-19 and the decline in prices on exploration or development plans.</li> </ul>
Requirement 3.2 and 3.3: Production and Exports	<ul style="list-style-type: none"> <li>- Effects of Covid-19 on projected and actual production and export, disaggregated by commodity, company and project.</li> <li>- Production volumes and values disaggregated by company and project for 2020 and to the extent possible for 2021 and early 2022.</li> </ul>
Requirement 4.1 and 4.7: Comprehensive disclosure of taxes and revenues and Level of disaggregation	<ul style="list-style-type: none"> <li>- Effects of Covid-19 on projected and actual revenues and taxes from the extractive industries for 2020 and to the extent possible for 2021 and early 2022.</li> <li>- Analysis of potentially foregone revenues where fiscal relief has been provided or is being considered to the industry.</li> </ul>

EITI requirement	Additional disclosure (EITI flexible reporting requirements)
Requirement 4.2. State's share of production or other revenues collected in-kind	Effects of Covid-19 and the declining commodity prices on expected revenues from the sale of the state's share of production and other revenues collected in-kind. This could include analysis of the potentially foregone revenues from commodity sales because of the declining prices.
Requirement 4.3: Infrastructure provisions and barter arrangements	<ul style="list-style-type: none"> <li>- New or renegotiated infrastructure agreements related to Covid-19 relief operations.</li> <li>- New or renegotiated resource-backed loans.</li> </ul>
Requirement 4.4: Transportation revenues	<ul style="list-style-type: none"> <li>- Changes to extractive commodities transportation arrangements considering the Covid-19 crisis.</li> <li>- Outlook for transportation arrangements, revenues and any relevant extractive industries supply chain disruptions in light of Covid-19 related movement restrictions.</li> </ul>
Requirement 4.6: Sub-national payments	Projected and actual subnational direct payments and possible implications for local government budgets.
Requirement 5.1: Distribution of the extractive industries revenues	Budget re-alignments for extractive industry revenues earmarked for Covid-19 relief.
Requirement 5.2: Sub-national transfers	<ul style="list-style-type: none"> <li>- Projected and actual subnational transfers and possible implications for local government budgets and local communities.</li> <li>- The management of subnational transfers by local governments and any changes in response to the Covid-19 crisis.</li> </ul>
Requirement 5.3: Revenue management and expenditures	<ul style="list-style-type: none"> <li>- Revisions to revenue and budget projections (including breakeven commodity price assumptions).</li> <li>- Rescue funding, stimulus packages, or subsidies related to the sector or its state-owned enterprises).</li> <li>- Shifts in sector-specific borrowing.</li> <li>- Exceptional uses of sovereign wealth funds.</li> </ul>
Requirement 6.1: Social and environmental expenditures	<ul style="list-style-type: none"> <li>- Reforms in legal and contractual social expenditure requirements considering the Covid-19 crisis.</li> <li>- Social expenditures allocated by companies to support Covid-19 measures in areas of operation.</li> <li>- Changes to companies' social expenditure plans and possible impacts on local governments and local communities.</li> </ul>
Requirement 6.3: The contribution of the extractive industries to the economy	<ul style="list-style-type: none"> <li>- Impact of Covid-19 and declining commodity prices on exports and employment (including resulting from movement restrictions and cross-border quarantines).</li> <li>- Impact of the commodity price downturn on the extractive sector and general economic outlook.</li> <li>- Geographic information on the impact of the Covid-19 crisis on the location of extractive activities.</li> </ul>
Requirement 6.4: Environmental impact of extractive activities	Shifts in regulatory rules or enforcement related to environmental protection, climate mitigation, Free, Prior and Informed Consent and other consultations

## 4. CONTEXTUAL INFORMATION ON THE EXTRACTIVE SECTORS

### 4.1. Mining Sector

#### a. General context of the mining sector

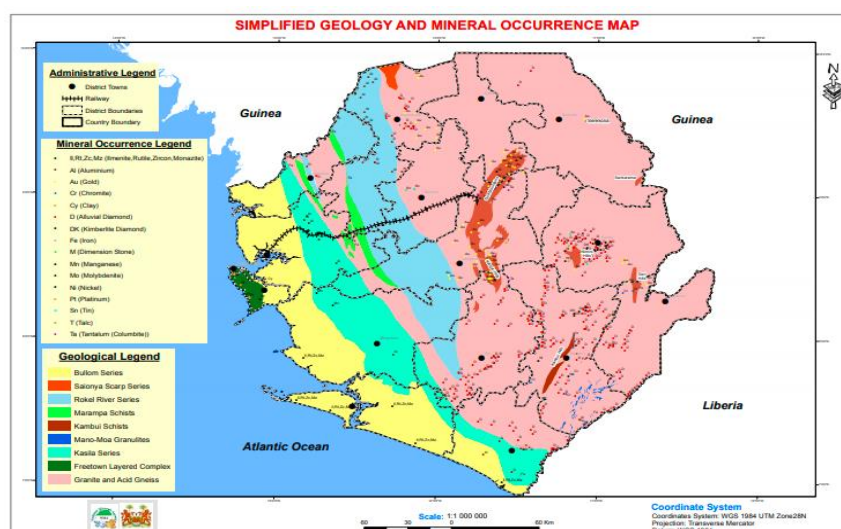
Sierra Leone is rich in natural resources and is well known for its vast endowment in minerals which include diamonds, rutile, bauxite, gold, iron ore, limonite, platinum, chromite, coltan, tantalite, columbite and zircon. In the 1990s, the 11-year civil war funded with revenues from the minerals sector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

The GoSL set up the National Minerals Agency under the Ministry of Mines and Mineral Resources in 2012 with a mandate to implement clear policies and regulations, enhance transparency and accountability and ensure mineral resources support economic and social development. Sierra Leone became a member of the Kimberley Process in 2003 to protect the legitimate trade in rough diamonds, and in 2007 enacted the Diamond Cutting and Polishing Act to issue licenses entitling the holder to buy, deal in, export, import as well as cut, polish, crush and set diamonds for the purposes of trade.<sup>13</sup>

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

Apart from iron ore, the country has proven deposits of bauxite, chromite, diamonds, gold, platinum and rutile with several foreign operators already involved in most of these sub-sectors. All operators are being challenged by current adverse world supply and demand conditions, and it is highly likely that these conditions will persist for the foreseeable future.<sup>14</sup>

FIGURE 11: GEOLOGY AND MINERAL OCCURRENCE MAP<sup>15</sup>



<sup>13</sup> <https://www.trade.gov/country-commercial-guides/sierra-leone-mining-and-mineral-resources>

<sup>14</sup> <http://documents1.worldbank.org/curated/zh/272761511578835426/pdf/SIERRA-LEONE-PAD-11032017.pdf>

<sup>15</sup> Source: National Minerals Agency (NMA)

## Diamond

The Sierra Leone Selection Trust (SLST) began mining diamonds in Kono in 1930 and by 1951 cumulative production annual production averaged 750,000. In 1970, the government acquired a 51% interest and after 1975, exports declined to less than 0.3 Mct/yr and official exports dwindled to less than 10,000 ct during the civil war years (1991 to 2002). The reserves are estimated at 6.3 million carats at Koidu and 3.2 million carats at Tongo both to a depth of 600m. Fig 3 The Geological Map of Sierra Leone and its associated stratigraphy (Based on Dixey, F, 1925) Abu Bakarr Jalloh et al. / Procedia Earth and Planetary Science 6 (2013) 131 - 138 135 Mining leases were granted to Rex mining Company and Branch Energy to exploit the kimberlite deposits. Branch Energy has transferred its lease to Koidu Holdings S.A. which is currently producing 120,000 carats per year and they have plans to increase production because they have identified reserves to permit ongoing mining for at least another 15 years. They have finished exploring the Tongo dykes and they are now developing it into another producing mine. The search for other kimberlitic source rocks continues because not all alluvial diamond occurrences in the country could be linked with the known sources through alluvial dispersion.<sup>16</sup>

## Gold

Gold was first discovered in the northern part of the country in 1926 and the prospecting activities by the country's Geological Survey concluded the existence of gold in many other localities within the granite-greenstone terrain. Following the discovery of gold, several mining companies were involved in alluvial gold production. There was continuous but low mining from 1930 but mining activities stopped in 1956 due to the advent of the Alluvial Mining Scheme. However, mining resumed later, with production increasing in response to favourable market conditions reaching a peak annual production of 30,000 ounces in 1984. Exploration activities resumed in 2003, after the civil conflict and over 20 prospecting licenses were issued by the government. In 2008, Cluff Gold Limited submitted proposals for a mining lease in Baomahun. Recent results from Baomahun have already identified a mineral resource of over 1.1 million ounces of gold and a scoping study confirmed that an open pit mine could produce between 140,000 to 200,000 ounces annually. Another company, Mano River Resources has three gold exploration concessions, which coincides with the richest areas for artisanal gold in the country. All three deposits are considered to have potential gold deposits that are significantly larger than the deposits at Baomahun and Komahun which are the largest currently.<sup>17</sup>

## Iron Ore

Iron Ore was discovered in the Marampa area in 1926. In 1933, Sierra Leone Development Company (DELCO) started producing iron from Marampa until 1975, when it went into liquidation. In 2005, the London Mining Company (LMC) took over the Marampa concession

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<sup>16</sup> The Geology, Mineral Resources of Sierra Leone and how the Resources can be Used to Develop the Nation (core.ac.uk)

<sup>17</sup> The Geology, Mineral Resources of Sierra Leone and how the Resources can be Used to Develop the Nation (core.ac.uk)

and has developed it to a mining project. The tailings left by DELCO was reported at 45 million tons from 40 million at an average grade of 27.7% Fe and the primary ore was reported at 1 billion from 92 million at an average grade of 37.7% Fe. LMC started producing tailings and weathered ore to a consistent high quality in November 2011, and has produced as of May 2012, 300,000 dry metric tons of ore and shipped about 230,000 to Europe and China. This result has put the company in position to achieve their 2012 production target of 1.5Mt. The other deposits investigated were the Tonkolili and Bagla Hill deposits. The Tonkolili iron deposit occurs in the Archaean Sula Mountain-Kangari Hills greenstone belt, close to Ferengbeya in the northern part of the country. The iron occurs as residual or secondary ore caps resting on Precambrian banded iron formation. The caps are because of tropical weathering and leaching of underlying quartz-magnetite rocks and the iron rich amphibolites. Estimates for the caps and primary ore are at least 720 million tons at an average grade of 56.3% Fe. African Mineral Limited (AML) have done an extensive drilling for resource modeling and has come up with an estimated reserve of 5 billion tons at an average grade 56.3% Fe and in late 2011 started exporting the cap to China. Annual export figures are not available yet at the Ministry. The Bagla Hill iron ore deposit occurs in the south eastern part of the country and it is a metamorphosed banded magnetite silicate rock made up of alternating layers of magnetite and quartzite. Preliminary evaluation done by Bethlehem Steel Company gave an ore reserve estimate of 384 million tons of primary ore (magnetite) at average grade of 18.1% Fe and about 90 million tons of haematite ore at 34.3% iron. Other minor occurrences are the Krim-Kpaka deposit in the south with 9 million tons at 40% iron and the Kukuna deposit in the north-west which is been currently developed by Cape Lambert Iron Ore Company with 15 million tons at 39% iron.<sup>18</sup>

## Bauxite

Bauxite occurrence in Sierra Leone was first recorded in 1920 and 1921 at Falaba and Waia respectively, located in the northern part of the country. Other bauxite occurrences included those between Moyamba and Mano which are weathered dolerite sills of the Rockel River Group, the Krim-Kpaka deposits in Pujehun District in the South; the Kamakwie and Makumre bauxite deposits in the North. The most important bauxite deposit finds were made by the Geological Survey in the Mokanji and Gbonge hills in 1960 and by SierraOre and Metal Company (SIEROMCO) in Port Loko in 1972. The Mokanji and Gbonge deposits in Moyamba district were mined by SIEROMCO from 1963 to 1995. The company was able to attain a maximum annual production of about 1.5 million tons. Feasibility studies carried out by SIEROMCO on the Port Loko deposit indicated a mineable deposit with reserves of over 100 million tons out of which 77.3 million tons have been proved. The lease to explore, develop and possibly mine this deposit has been allocated to Gondwana Investments S.A. The former bauxite mine owned by SIEROMCO has now been taken over by a new company; Sierra Minerals Holding and they commenced mining operations in March 2006 and have reported monthly production and export of up to June 2007. In 2006, they produced 1,071,059 mt. and in half a year in 2007, they produced 623,343 mt.

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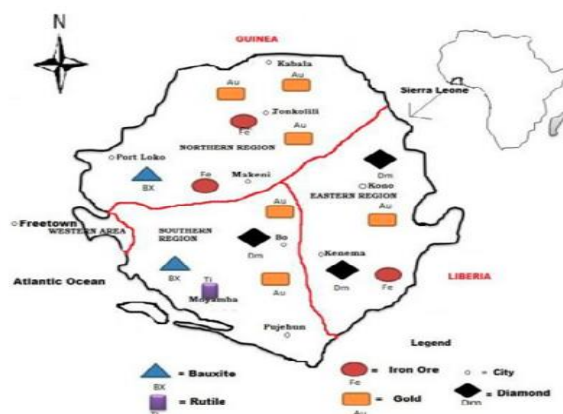
<sup>18</sup> The Geology, Mineral Resources of Sierra Leone and how the Resources can be Used to Develop the Nation (core.ac.uk)



## Rutile

Rutile was discovered in Sierra Leone in 1954 in the gravels of the Lanti River south of the Gbangbama region in the southern province. Four groups of deposits are known to be distributed around the country: the Gbangbama, Sembehun, Rotifunk and the Kambia deposit. Sierra Leone has the largest natural rutile reserve in the world. The Gbangbama deposit consists of six major deposits: Mogbemo, Bamba-Pelebu, Pujubu, Lanti, Gbeni and Gangama. The first three deposits of the Gbangbama group have been almost completely exhausted. The Lanti deposit is currently being mined. At the end of 1994 the Gbangbama group had an estimated 150 million tons of rutile at grade of 1.5 to 2% and large reserves of ilmenite and zircon. The Sembehun deposit is also made up of six deposits: Kibi, Dodo, Benduma, Komende, Mokamatipa and Matehun. Here exploration results in 1990, revealed the presence of over 180 million tons of rutile with grades ranging from 1.2 to 1.6% rutile. The indicated resource estimate for the Rotifunk deposit in 1990 was 235 million tons at 0.62% rutile. The deposit consists of 6-7m thick horizon of sandy clay within the Bullom Group of sediments. Sierra Rutile Limited (SRL), a subsidiary of Titanium Resources Group (TRG) is now the sole operating company in the country and was the largest producer of natural rutile, accounting for about one quarter of global output before its rutile mine was shut down in 1995. The company began to rehabilitate in 2005 and after a ten-year gap due to the rebel war, began production and exporting in 2006. Rutile production in 2006 and 2007 were as follows: in 2006, 73,803 million tons were produced and in a half year in 2007, 42,005 tons were produced.<sup>19</sup>

FIGURE 12: PETROLEUM DIRECTORATE



## b. Exploration activities

### Overview

In 2018, GoSL launched a countrywide airborne geophysical survey to provide a wealth of geophysical data and information that will illuminate geological thinking for decades to come. This survey forms a vital component of the NMA's strategy to encourage investment in the minerals sector was completed in December 2021.

<sup>19</sup> The Geology, Mineral Resources of Sierra Leone and how the Resources can be Used to Develop the Nation (core.ac.uk)

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

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

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

During the geochemical mapping orientation survey, 57 stream sediments, 63 pan (heavy mineral concentrate) and 34 bulk samples collected from 58 sampling sites across the various lithological units. Sediments and bulk samples were sun-dried at the NMA Laboratory, and all pan concentrates were oven-dried. Sample preparation was undertaken by the BGS and NMA Geologists and Technicians at the NMA Laboratory in June 2019. All samples were dispatched to ALS Laboratories in South Africa in November 2019 for multi-elemental analysis.<sup>20</sup>

### Main ongoing mining projects

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

TABLE 19: MAIN ONGOING MINING PROJECTS

Project	Commodity	Location	Company	Description
Lanti and Gangama Rutile mine Project	Rutile	Bonthe and Moyamba Districts	Sierra Rutile Ltd	<p>The company has the world's largest natural rutile deposit and encompasses two operations at Lanti and Gangama; a mineral separation plant; and a dedicated port facility.</p> <p>Sierra Rutile's main product stream is natural rutile and the operation also produces smaller quantities of ilmenite and zircon (in concentrate).</p> <p>Sierra Rutile has an established operating history of more than 50 years and further mine life of at least 20 years, depending on future development options. The Lanti Dry expansion and the Gangama expansion increased the capacity of each mine from 500-600 tonnes per hour of ore to 1,000-1,200 tonnes per hour.<sup>21</sup></p>
Koidu Kimberlite Project	Diamond	Kono District	Koidu Ltd	<p>The Koidu Kimberlite Project is situated in the Kono District of Sierra Leone, approximately 330 km east of the capital city, Freetown. The mining lease area is 4km<sup>2</sup> and comprises two kimberlite pipes, four dyke zones and a number of blows off the dykes. In 2003, Koidu Holdings set up operations on the property and began dewatering and removing silt from the existing 30m excavation of the No.1 Pipe. While the original planning for the pipes included conventional open pit</p>

<sup>20</sup> Source: National Minerals Agency.

<sup>21</sup> <https://iluka.com/operations-resource-development/operations/sierra-leone>



Project	Commodity	Location	Company	Description
				operations, mitigating factors such as the proximity of the town, the presence of houses close to the perimeter of the pit, the size of the kimberlite pipe and the planned open pit depth, combined with relevant stripping ratios and uncertainties on the grades concerning an underground operation, lent themselves to the vertical pit concept. <sup>22</sup>
Guinea Bauxite Deposits project	Bauxite	Moyamba, Bo and Bothe Districts	Sierra Minerals Holdings No.1 Ltd	The company is one of the largest aluminium producers in the world. Its mining lease of 321.7 km <sup>2</sup> lies along the same belt with the world known Guinea bauxite deposit. <sup>23</sup>
Marampa iron ore mine project	Iron Ore	Port Loko District	SL Mining Ltd	The Marampa iron ore deposits have been traced as far as Kukuna near the Guinea border and to the south at Toma and Makalawa. Located in the Port Loko District, in the country's north, SL Mining is engaged in the exploration, development and production of a high-grade iron ore concentrate with >65% Fe content. The company estimates that Marampa holds about 1 billion tonnes of iron ore with a potential lifespan of 30 years.
Masumbiri Gold project	Gold	Tonkolili District	Dayu Mining Company	Dayu Mining, which operates the country's largest gold mine, has started mining gold concentrate in Masumbiri, Simiria chiefdom. <sup>24</sup>

## c. Legal Framework

### Current legal framework

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

- The Mineral and Mines Act (MMA, 2009 Act): which provides details on how mining is to be conducted in Sierra Leone. It advocates the setting up of a modern cadastral system for issuing, registering and surveying mining operations. The Act provides that all rights of ownership and control of minerals in Sierra Leone including its continental shelf are vested in the State notwithstanding any other ownership rights.
- The National Minerals Agency Act, 2012;
- The Extractive Industry Revenue Act 2018;
- The Mines and Minerals Operational Regulations of July 2013;
- The Diamond Cutting and Polishing Act;
- The Diamond Trading Act;
- The Environment Protection (Mines and Minerals) Regulations of July 2013;
- The Income Tax Act, 2000 as amended by the Finance Acts;
- The Customs Act 2011;
- The Sierra Leone Local Content Agency Act, 2016 [No. 3 of 2016];
- The Public Financial Management Act; and
- The Local Content Act.

<sup>22</sup> <https://www.srk.com/en/publications/koidu-vertical-pit-sierra-leone>

<sup>23</sup> <https://vimetcobauxite.com/>

<sup>24</sup> <http://www.mercuryconvention.org/Portals/11/documents/NAP/Sierra-Leone-ASGM-NAP-2020.pdf>

## Legal reforms in mining sector

### The Mines and Minerals Development Act (MMDA) 2022

Following several consultations with other associated Ministries, Departments and Agencies as well as bilateral, multilateral, and broad nationwide stakeholder consultations including mining companies, civil society groups and local communities, the Parliament of Sierra Leone enacted in 2022 the new Mines and Minerals Development Act (MMDA) 2022. The key changes are:

- Clarifying institutional roles and responsibilities taking into consideration the establishment of the National Minerals Agency (NMA) by an Act of Parliament, the National Minerals Agency Act 2012. The institutional changes are geared towards clarifying policy formulation and oversight functions of the Ministry and regulatory functions performed by the NMA.
- Streamlining the role of the Minerals Advisory Board (MAB) as it relates to the award, suspension, transfer, or cancelation of mineral rights. Primarily, the MAB's role is to conduct due diligence on applications for mineral rights, other than Artisanal Mining licence, submitted to it by the NMA and to make recommendations to the Minister accordingly. The MAB also makes recommendation to the Minister on matters related to the suspension, transfer, and cancelation of mineral rights other than artisanal mining licence.
- Beneficial ownership disclosure for companies operating in the mining sector. It is required that the identities of natural person/s or beneficial owner/s with 5% or more shares in any company operating in the mining sector in Sierra Leone should be disclosed. The Act further requires mandatory disclosure of Politically Exposed Persons. This further strengthens and demonstrates GoSL's commitment to implementing the 2019 EITI Standard.
- Transparency assurance provision was introduced.
- Gender and social protection provisions were introduced.
- GoSL to acquire 10% free carried interest in new companies registered to operate in the mining sector.
- Sub-national transfers to finance development projects in mining communities was introduced or enhanced.

### Engagement with the World Bank

The World Bank mining and legal team were asked to provide reviews of the draft Bill. A series of review notes were submitted along with proposed amendments and a comparison of core policy issues included in the Minerals Policy of Sierra Leone. Considerations of good industry practice have also been given.

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

## d. Institutional Framework

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

TABLE 20: INSTITUTIONAL FRAMEWORK

Entity	Functions
MMMR	<p>MMMR is responsible for policy making in the extractive sector. It oversees the issuance of all mineral rights and the administration and supervision of all activities under these rights and administers regulations on mining and marketing of precious minerals through the Precious Mineral Trading. Further information is available on their website on: <a href="https://www.slminerals.org/">https://www.slminerals.org/</a></p>
NMA	<p>NMA was set up in 2012 by the National Minerals Agency Act 2012. Its mandate is the administration and regulation of the minerals sector. It is responsible for the day-to-day implementation of the Mines and Minerals Act (2009) and other mining acts and other relevant regulations. This includes responsibility for mineral rights management, collecting and disseminating geological information and regulating the trading of precious minerals. It provides fairer and more predictable implementation of laws and regulations, which will encourage investment in the minerals sector. NMA also works closely with other Government Agencies with responsibilities in the sector (such as the NRA and the EPA to support them in implementing those policy areas for which they are responsible and impact upon the minerals sector. Further information is available on their website on: <a href="https://www.nma.gov.sl/">https://www.nma.gov.sl/</a></p>
Mining Cadastre Office (MCO)	<p>MCO is responsible for the management of the Mining Cadastre Administration System (MCAS) including:</p> <ul style="list-style-type: none"> <li>the processing of mineral rights applications, the issuance and administration of licenses and permits;</li> <li>the maintenance of cadastral records, registers, and maps; and</li> <li>the receipt and safe keeping of reports in a non-discretionary and transparent manner in accordance with the laws of Sierra Leone.</li> </ul> <p>All applications, requests, and communications regarding a mining license and documents required to maintain and manage a license should be addressed to MCO directly. This Unit sits within the Directorate of Mines at NMA's Headquarters. Further information is available on their website on: <a href="https://www.nma.gov.sl/mining-cadastre-office/">https://www.nma.gov.sl/mining-cadastre-office/</a></p>
Environmental Protection Agency (EPA)	<p>EPA was created following the Environmental Protection Agency Act (2008) as amended in 2022. Its objective is to create and enforce strict regulatory framework for environmental regulation in Sierra Leone. Its mandate is to coordinate, monitor and evaluate the implementation of national environmental policies, programmes, and projects, including issuing Environmental Impact Assessment (EIA) licenses. It also effectively protects and manages the environment by monitoring and regulation of companies with EIA licenses. Additionally, EPA investigates illegal operations that have an impact on the environment and advises the Minister of Environment and Climate Change on all environmental matters. Further information is available on their website on: <a href="https://epa.gov.sl/">https://epa.gov.sl/</a></p>
National Revenue Authority (NRA)	<p>NRA was set up by the National Revenue Act 2002 (Act No-11) in September 2002. It is responsible for assessing and collecting domestic taxes, customs duties and other revenues specified by law, as well as administering and enforcing laws related to these revenues. Further information is available on their website on: <a href="http://nra.gov.sl">nra.gov.sl</a></p>

Entity	Functions
<b>Ministry of Local Government and Community Affairs (MLGCA)</b>	<p>The Ministry of Local Government and Community Affairs is responsible for local government, which comprises six urban councils (Freetown, Bo, Kenema, Makeni, Koidu and Bonthe) and 16 district councils under the Local Government Act 2004. In the third sphere of Government, there are chiefdom councils. Local authorities and chiefdom councils have revenue-raising powers, and they impose levy property taxes and license fees for mining activities in host communities.</p> <p>Further information is available on their website on: <a href="https://mlgrd.gov.sl/">https://mlgrd.gov.sl/</a></p>
<b>Chiefdoms and District Councils</b>	<p>The paramount chiefs and ruling families in the chiefdoms have been recognised and empowered by Sierra Leone's British Colonial Administration. All Chiefdoms have been constituted into district councils. These sub-national Government Agencies receive surface rentals from mining companies.</p>
<b>Members of Parliament</b>	<p>Parliament oversees the activities of the extractive Sector in Sierra Leone. Members of Parliament who receive 10% surface rent from mining companies or more must disclose payments received from mining companies to the IA during data collection phase.</p>
<b>Minerals Advisory Board</b>	<p>The Minerals Advisory Board advises the Minister in the discharge of his statutory responsibilities under the Mines and Minerals Act. In fact, the act restricts the wide range of discretionary powers the minister had under the previous legislation which the average investor was hardly ever comfortable with. The Board is made up of fourteen (14) members including the Director of Mines as Secretary and the Director of Geological Survey as member. The local Chamber of Mines is well represented on the Board with others from the industry and together, presents an informed voice of the industry in its deliberation. The Secretary to the Board is a senior member of the Ministry of Mineral Resources.</p> <p>Composition of the Minerals Advisory Board:</p> <ul style="list-style-type: none"> <li>• Chairman;</li> <li>• Director of Mines (Secretary of the Minerals Advisory Board);</li> <li>• Director of Geological Survey;</li> <li>• Commissioner-General of National Revenue Authority;</li> <li>• Representative of Attorney-General and Minister of Justice;</li> <li>• Representative of the Ministry responsible for local government;</li> <li>• Representatives of the Ministry of Environment and Climate Change;</li> <li>• The Permanent Secretary of the Ministry of Mineral Resources; and</li> <li>• Two persons with considerable qualifications and experience in the mining industry.<sup>25</sup></li> </ul>

## e. Tax regime

The tax regime in the mining sector is governed by:

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

The main revenue streams paid by mining companies are: Corporate Income taxes, Royalties, Surface rentals and Mining license fees:

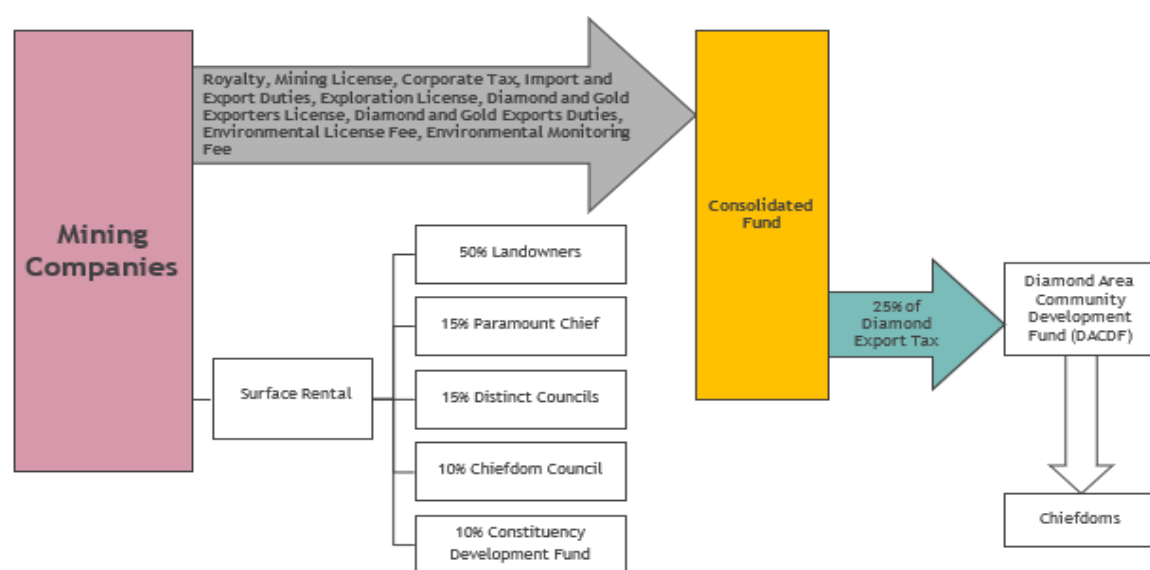
Tax	Description
<b>Royalty</b>	<p>The EIRA 2018 sets out the rates of royalty as follows:</p> <p>For minerals other than by artisanal mining licenses:</p> <ul style="list-style-type: none"> <li>▪ 8% for special stones;</li> <li>▪ 6.5% for precious stones other than special stones;</li> <li>▪ 5% for precious metals; and</li> <li>▪ 3% in other cases, including bulk minerals.</li> </ul>

<sup>25</sup> <https://www.slminerals.org/structure-of-the-ministry/>

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

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

FIGURE 13: MINING REVENUE COLLECTIONS FRAMEWORK



## f. Types of licenses

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

TABLE 21: TYPES OF LICENSES

Type	Duration	Rights conferred
<b>Reconnaissance License</b>	One year renewable once*	A reconnaissance license is the first stage in the mining enterprise entitles the holder to search for all minerals by geological, geophysical, and geochemical means. In general, reconnaissance licenses do not allow drilling, excavation, or other physical activities on the land, except where such activity is specifically mentioned by the license. A reconnaissance area shall not exceed 10,000 square kilometres.
<b>Exploration License</b>	Four years, renewable twice (first for three years then for two years)*	Exploration licenses which cover the second stage of mining operations entitle the holder to search for the stipulated minerals and to determine their extent and economic value. The size of the concession granted for the first 4 years is a maximum of 250 km <sup>2</sup> . This size is halved (i.e. 125 km <sup>2</sup> ) from the 4 <sup>th</sup> year onwards. If one holds more than 125 km <sup>2</sup> then the license fees is increased.
<b>Small Scale Mining License</b>	Limited to three years, renewable.	Between one and one hundred hectares. The holder of a small-scale-mining license shall have the exclusive right to carry on exploration and mining operations in the licensed area.
<b>Large Scale Mining License</b>	Limited to 25 years or the estimated life of the ore body proposed to be mined, whichever is shorter. Renewable for a period limited to fifteen years.**	The holder of a large-scale mining license shall have the exclusive right to carry on exploration and mining operations in the large-scale mining license area.

Type	Duration	Rights conferred
Artisanal mining License	One year, renewable for up to three further periods not exceeding one year at a time.	An artisanal mining license area shall not be more than one half hectare. The holder of an artisanal license shall have the exclusive right to carry on exploration and mining operations in the licensed area.

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

\* Renewal should be applied for no later than 90 days before the expiry of the license

\*\* Renewal should be applied for no later than 1 year before expiry of the license

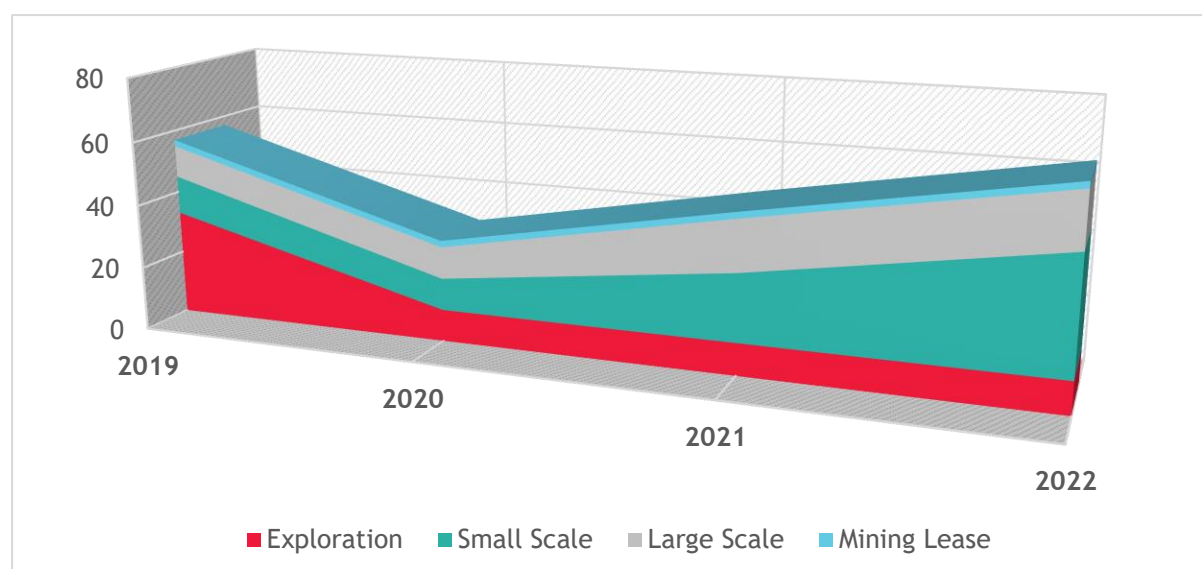
### Active mining licenses on 31 December 2020-2021

The table and Figure below show the evolution of active mining licenses at the end of years 2019-2022.

TABLE 22: EVOLUTION OF ACTIVE MINING LICENSES BETWEEN 2019 AND 2022

Type of License \ number	31/12/2019	31/12/2020	31/12/2021	31/12/2022
Exploration License	33	10	10	10
Small Scale Mining License	12	10	20	36
Large Scale Mining License	10	10	16	17
Mining Lease	2	2	2	2
<b>Total</b>	<b>57</b>	<b>32</b>	<b>48</b>	<b>65</b>

FIGURE 14: EVOLUTION OF ACTIVE MINING LICENSES BETWEEN 2019 AND 2022



### Other types of licenses

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

Further information on mining licenses is available on NMA's online repository [here](#) including artisanal mining licenses.



### g. Mining Cadastre Office (MCO)

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

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

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

This Unit sits within the Directorate of Mines at NMA. The Cadastre is guided by the principle of transparency in handling applications for mining and mineral-related rights on a first-in first-assessed (FIFA) basis.<sup>26</sup>

### h. Register of mining licenses

According to section 39 of the 2009 MMA, the Director of Mines shall establish and maintain an MCO which shall be accessible to the Public.

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

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

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

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

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

Sierra Leone has an Online (an updated) cadastre system, the Mining Cadastre Administration System (MCAS)<sup>27</sup> which provides information on the following with the view

<sup>26</sup> <https://www.nma.gov.sl/mining-cadastre-office/>

<sup>27</sup> <https://sierraleone.revenuedev.org/dashboard>



to ensuring transparency in the management of minerals rights. This Online Repository of mining licenses contains data on all issued mineral rights, exploration, mining, as well as dealers and export licenses, related payments (type of license, license holder, license code, status active/non active, coordinates, start date, expiry date, application date, the commodity being produced, etc.).

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

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

Annex 1 to this report presents the list of active mining licenses active as of 31 December 2021 along with the ones awarded during 2022. The list contains the following information:

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

Coordinates are provided in online Mining Cadastre Administration System (MCAS).<sup>28</sup>

### **i. Mining lease agreements**

The mining lease agreements (MLA) are legally binding agreements between mining companies and the GoSL.

They set out the main following rules:

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

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<sup>28</sup> <https://sierraleone.revenue.gov.org/dashboard>

## Local content

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

## Public disclosure mining contracts

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

The GoSL does not have a contract disclosure policy. However, the draft SLEITI Bill has provisions and objectives which are intended to promote contract disclosure. The draft SLEITI bill has not been passed into legislation at the time of finalising this report. It was reviewed by the EITI International Secretariat and other stakeholders, including the SLEITI MSG. Their comments/input have been updated accordingly. The Bill is currently out to Civil society constituencies and Chamber of Mines for a wider consultation with Stakeholders.

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

However, there are ten (10) MLAs publicly available on NMA and Resource Contracts’ websites:

TABLE 23: LIST OF PUBLICLY AVAILABLE MINING AGREEMENTS

N°	Mining Company	Year	Commodity	Link to the MLA
1	Kingho Mining	2022	Iron Ore	<a href="#">link</a>
2	Marampa Mines Limited	2021	Iron Ore	<a href="#">link</a>
3	SL Mining Limited	2017	Iron Ore	<a href="#">link</a>
4	London Mining Company Limited	2012	Iron Ore	<a href="#">link</a>
5	Tonguma Limited	2012	Diamonds Gold	<a href="#">link</a>
6	Sierra Minerals Holdings 1	2012	Bauxite	<a href="#">link</a>
7	African Minerals Limited	2010	Iron Ore	<a href="#">link</a>
8	Koidu Holdings SA	2010	Diamonds	<a href="#">link</a>
9	Sierra Rutile Limited	2004	Rutile	<a href="#">link</a>
10	Sierra Rutile Limited	2002	Rutile	<a href="#">link</a>

## j. Licences allocation

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

TABLE 24: LICENCE ALLOCATION PROCESS

N°	Type	Granted by	Granting process
1	Reconnaissance License	Minister of Mines upon advice of the Minerals Advisory Board.	An application shall be submitted to the Mining Cadastre Office in the prescribed form and content.
2	Exploration License	Same as above	Same as above

N°	Type	Granted by	Granting process
3	Small Scale Mining License	Same as above	Same as above
4	Large Scale Mining License	Same as above	Same as above
5	Artisanal mining License	Director of Mines.	An application shall be made to the Director of Mines in such form as may be prescribed.

### Licensing method

The 2009 MMA stipulates that mining licences are awarded on a first-in first-assessed (FIFA) basis.

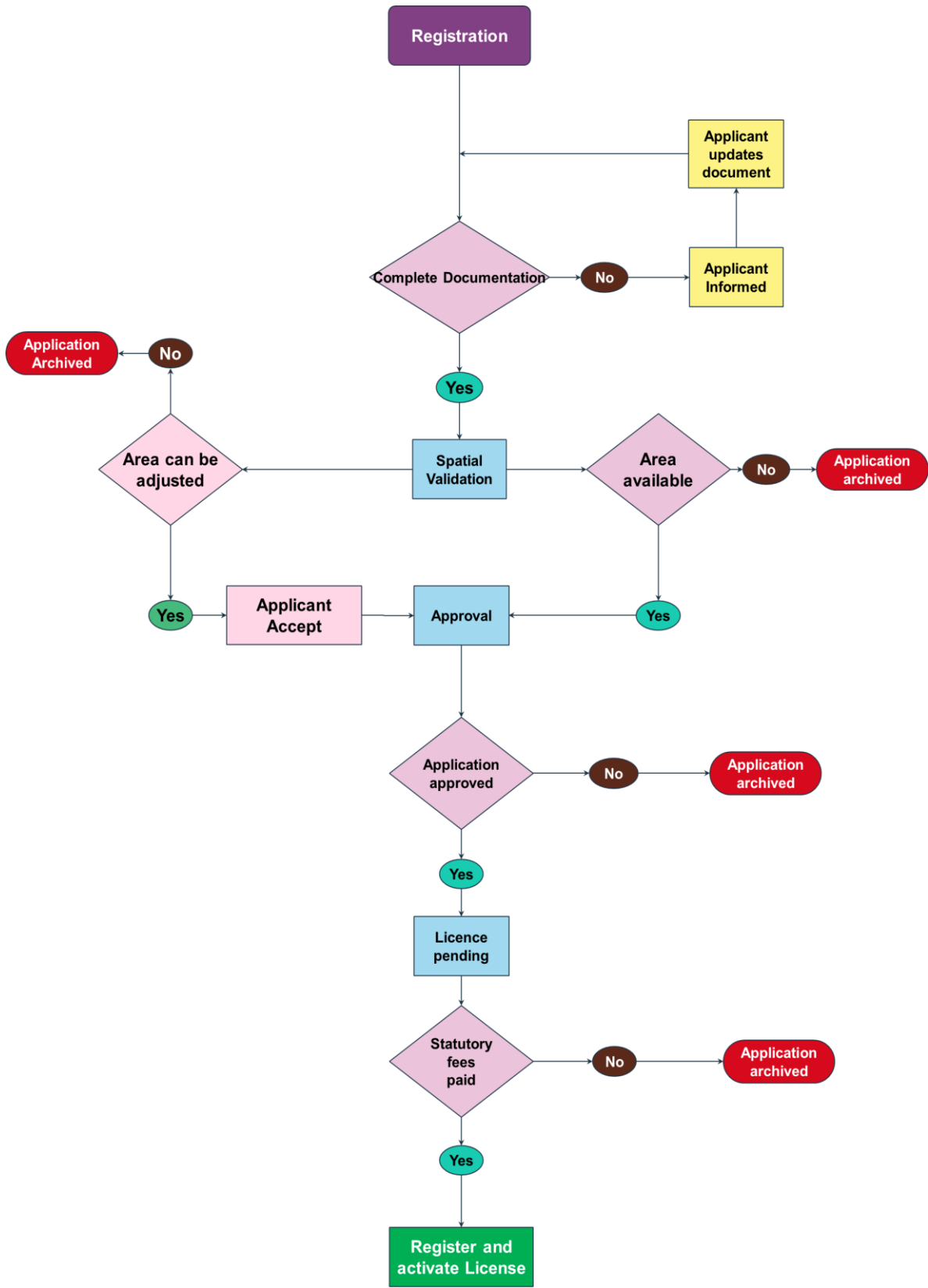
### Licensing process

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

- 1 Step 1: Submission of licence application;
- 2 Step 2: Registration of licence application;
- 3 Step 3: Validation of application by MCO if complete documentation
- 4 Step 4: Technical and financial assessment by NMA;
- 5 Step 5: Submission by MCO to Minerals Advisory Board for recommendation or advise;
- 6 Step 6: Recommendation received from Minerals Advisory Board;
- 7 Step 7: Application approved (If recommended by Minerals Advisory Board);
- 8 Step 8: Licence pending until fees payment;
- 9 Step 9: Licence granted by the Minister of Mines; and
- 10 Step 10: Register and activate licence.

Figure below describes the licencing process:

FIGURE 15: LICENSING PROCESS



## Mining licenses awarded during FY 2020-2021

The table below shows the mining licenses awarded during FY 2020 and 2021.

TABLE 25: MINING LICENCES AWARDED DURING 2020 AND 2021

Type of Licence	Number in 2020	Number in 2021
Small Scale Mining License	3	11
Large Scale Mining License	2	5
<b>Total</b>	<b>5</b>	<b>16</b>

The five new licences awarded in 2020 are listed below:

TABLE 26: MINING LICENCES AWARDED IN 2020

N°	Licence type	Licence holder	Commodity	Start Date
1	Large Scale	Cheng Li Trading Mining Company Limited	Associated Minerals, Gold	16/03/2020
2	Large Scale	Kingho Mining Company Limited	Iron Ore	07/01/2020
3	Small Scale	Millennium Ventures LLC	Diamonds	11/11/2020
4	Small Scale	Sierra Minerals Invest Limited (SL)	All Minerals, Gold	26/10/2020
5	Small Scale	Act Trading Company Limited	Gold	12/11/2020

The eleven new licences awarded in 2021 are listed below:

TABLE 27: MINING LICENCES AWARDED IN 2021

N°	Licence type	Licence holder	Commodity	Start Date
1	Large Scale	Seawright Mining Company Limited	Diamonds	21/04/2021
2	Large Scale	Pan-African Rare Metal Mining Co	Columbite, Tantalite	01/11/2021
3	Large Scale	FG Gold Limited	Associated Minerals, Iron Ore	06/05/2021
4	Large Scale	MARAMPA MINES LIMITED	Iron Ore, Associated Minerals	06/08/2021
5	Large Scale	Supreme Minerals Corporation	Bauxite	28/05/2021
6	Small Scale	Tandem Liber Holdings Limited	Gold	14/05/2021
7	Small Scale	Hancock Mining Company	Gold	24/08/2021
8	Small Scale	Metals and Minerals Trading (SL) Limited	Gold	22/06/2021
9	Small Scale	Xin Yin Company Limited	Gold	22/10/2021
10	Small Scale	Consultancy Finance and Infrastructure (SL) Limited (CFI)	Gold	21/09/2021
11	Small Scale	CFS Construction and General Supplies (SL) Limited	Ilmenite, Rutile, Zircon	20/01/2021
12	Small Scale	AY & KUN (SL) LIMITED	Gold	19/01/2021
13	Small Scale	Nanxin Mining Company Limited	Gold	21/04/2021
14	Small Scale	Hancock Mining Company	Gold	24/08/2021
15	Small Scale	Serrarus Mining and Exploration Limited	Gold	01/04/2021
16	Small Scale	Thazin Mining (SL) Company Limited	Gold	27/01/2021

## Technical and financial criteria

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

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

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

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

## Transfer of Mineral Rights

The table below shows the transfer process for mineral rights.

TABLE 28: TRANSFER PROCESS FOR MINERAL RIGHTS

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

Source: 2009 MMA

According to NMA, no transfers of mining licence was made between 2020 and 2021.

## Review of awarding process during FY 2020-2021

The MSG agreed to select two companies of each type of licence to be verified for material deviations from the applicable legal and regulatory framework governing licence transfers and awards. The table below presents a sample selected based on randomly generated options from the list of licences provided by NMA. The MSG members are invited to select other licenses should the need arise.

TABLE 29: LIST OF LICENSES PROPOSED FOR REVIEW

Licence code	Licence Type	Licence Holder	Application Date	Start Date	Commodity
ML 2/2020	Large Scale	Cheng Li Trading Mining Company Ltd	31/10/2019	16/03/2020	Gold
ML 1/2021	Large Scale	Seawright Mining Co Ltd	26/02/2021	21/04/2021	Diamond
SML 7/2021	Small Scale	Tandem Liber Holdings Ltd	11/02/2021	14/05/2021	Gold
SML 8/2021	Small Scale	Metals and Minerals Trading Ltd	04/03/2021	22/06/2021	Gold

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

TABLE 30: LIST OF DOCUMENTS CHECKED

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

The IA review was performed on Tuesday 28 March 2023 at NMA premises. The required documents for the selected sample are checked and no deviation from the applicable legal and regulatory framework was raised.

## Technical and financial criteria

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

### Technical criteria

- Proposed Work plan
- Proposed mining equipment
- Experience of affiliated companies
- CV of proposed Experts

## Financial criteria

- Commitment of affiliated companies to support project investment.
- Bank Statements.
- Credibility Letter from the bank for supporting project.

## Scoring scheme/weighting framework

We noted that there is no scoring scheme/weighting framework applied, as similar to the Oil and gas sector. This is because the license allocation in the mining sector is based on a first-come, first-served basis.

## k. State participation in the mining sector

Section 162 (1) of the MMA (2009) makes it optional for the government to acquire shareholding interests in any large-scale mining operations.

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

To ensure maximum benefits for the government and people of Sierra Leone, provision has been made in the MMDA 2022 for the Government to acquire a **10-15%** shareholding in any of the Large-Scale Mining companies, free of charge. Additionally, the Government may acquire further shares up to **35%** on terms that will be negotiated and agreed by parties. This legislation will not be applied retroactively.

The SLEITI MSG agreed that there was no State participation (interests) in the mining contracts in Sierra Leone between 2020 and 2021.

## l. In-kind payments

The SLEITI MSG agreed that there were no in-Kind revenues from mining sector in Sierra Leone between 2020 and 2021.

## m. Infrastructure provisions and barter arrangements

African Minerals Ltd (later Shandong Steel) has developed significant port and rail infrastructural support through its subsidiary African Rail and Port Services (SL) Limited in which the Government of Sierra Leone holds a 10% share capital. However, in 2019, the Government of Sierra Leone withdrew the license and took over the port and rail infrastructure in 2020 which is now leased annually.

In 2013, a Memorandum of Understanding (MoU) was signed between China Kingho Energy Group and the Government of Sierra Leone. The investment projects include mainly railway construction from Magburaka to Sulima and the construction of related ports, highway, parks and supporting power facilities.

Government Agencies and mining companies were required to report information on the active infrastructure provisions and barter agreements during 2020 and 2021 including the



parties involved, the resources which have been pledged by the state and the value of the balancing benefit stream (e.g., infrastructure works).

#### **n. Transportation revenues**

The SLEITI MSG agreed that there were no transportation revenues received by GoSL from mining sector between 2020 and 2021.

#### **o. Artisanal Mining**

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

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

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

A baseline study on artisanal mining was published in May 2020 with the overall objective of having quantitative and qualitative data on the current status of artisanal mining in Sierra Leone. The study estimated that artisanal miners represent up to 1% of the national population (18% are women), while around 900,000 people, or nearly 15% of the population, rely directly or indirectly on artisanal mining for a living.

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

For further information, please see the study [here](#).

The GoSL also published a report on the National Action Plan for Reducing Mercury Use in the Artisanal and Small-scale Gold Mining (ASGM) Sectors in April 2020.

For further information, please see the study [here](#).

This EITI Report includes revenues collected from artisanal mining by including revenues collected from licensed dealers and exporters of Gold and diamond:

- Diamond & Gold Export duties;
- Diamond & Gold Exporters licence.

#### **p. Subnational payments**

There is direct payment from mining companies to subnational Government Agencies in accordance with EITI Requirement 4.6. Section 34 (A) of the MMA (2009) stipulates that **Surface Rent** is a sub-national payment made by companies or holders of mining licenses and which should be shared amongst five categories of recipients as follows:

- 50%-Landowners;
- 15%-Paramount chief;

- 15%-District councils;
- 10%-Chiefdom Council; and
- 10%-Constituency development fund.

The SLEITI MSG agreed to include the Ministry of Local Government and Community Affairs, the District Councils, the Chiefdom Councils and the Constituency development fund in SLEITI 2020-2021 scope in order to report revenues received directly from the mining companies. The SLEITI MSG also agreed that mining companies should provide information of payments made to Paramount Chiefs and Landowners unilaterally.

The Districts Councils and Chiefdom Councils have submitted reporting templates indicating Surface Rental revenues from mining companies.

The Mining companies have also reported Surface Rental payments to Landowners and Paramount chief.

Annex 5 to this report presents surface rent revenues detailed by recipient and by mining company.

#### q. Sub-national transfers

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

The SLEITI MSG agreed that the DACDF is a sub-national transfer in Sierra Leone. DACDF was formally approved by Sierra Leone's Ministry of Mineral Resources in December 2001, as part of a broader reform programme for the diamond sector initiated after the end of the civil war. DACDF is funded by a 25% of the government's 3% diamond export tax.

The main reasons for setting up DACDF were:

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

The SLEITI MSG agreed that Government agencies should report transfers made to DACDF in 2020-2021 and disbursements made to Chiefdoms in 2020-2021.

For more information on DACDF, please see its Operational Procedures and Guidelines issued in November 2008, [here](#).

The World Bank Justice for the Poor (J4P) in partnership with Network Movement for Justice and Development (NMJD) has also issued a simplified handbook on the GoSL's new operational procedures and guidelines for the DACDF, available [here](#).

##### ▪ Transfers made to DACDF during 2020 and 2021

NMA confirmed that no transfer was made into the DACDF account between 2020 and 2021. They have stated that the deductions were made accordingly and set into a suspense account, waiting for certain administrative issues to be resolved before the transfers can be made into the DACDF account.

There are administrative issues between NMA & MMMR which are being addressed before transfers will be made.

The table below shows the amount due of transfers to DACFD (i.e., 25% of the total Diamond Export duties) between 2020 and 2021.

TABLE 31: AMOUNT DUE OF THE TRANSFERS TO DACDF

In Leones	2020	2021
Amount due of the transfers to DACFD	1,883,825,375	4,245,396,461

#### ▪ Disbursements made from DACDF to Chiefdoms during 2020 and 2021

As a result of no transfers being made into the account, the MMMR has also confirmed there was no disbursement to chiefdoms in the periods under review.

### r. Environmental impact of extractive activities

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

The MMA (2009) requires mining companies to acquire Environmental Impact Assessment (EIA) licences before they can be granted mining licences. It requires every mineral right holder to protect the environment and carry out operations in a way that will minimise and manage negative environmental impact. In doing this, the EPA should ensure that environmental impact assessments are conducted to ascertain the impact that mining operations will cause.

For more information on the EPA Act, please see [here](#).

### s. Social and Environmental Expenditure

#### Mandatory Social expenditure

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

#### Community Development Fund (CDF)

Section 139 stipulates that the holder of a small or large-scale mining licences is required to implement a Community development agreement (CDA) with the primary host community.

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

Holders of small or large-scale mining licences should use at least 1% of the gross revenue amount earned by the mining operations in the previous year to implement the agreement, and such amount and breakdown of expenditure shall be reported to the Minister annually as may be prescribed (Section 139(4); MMA, 2009). Community Development Committees comprising the representatives from the company and the community are responsible for managing the CDF.

The SLEITI MSG agreed that social expenditure (Mandatory and Voluntary) made by mining companies should be included in the EITI Report based on unilateral disclosure from mining companies.

The mandatory and voluntary social expenditures companies made between 2020 and 2021 are presented in Annex 9 to this report.

### Environmental expenditure

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

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

## t. Local content

### Local content of mining Law

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

### Local content of the MDAs

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

## u. Production and exports

The table below shows the significant increase in both mining production and exports.<sup>29</sup>

TABLE 32: PRODUCTION AND EXPORTS DATA (2020 AND 2021)

In USD million	2020	2021	Increase	%
Mining production	396	673	277	70%
Mining exports	317	577	260	82%

<sup>29</sup> NMA.

The increase of production can be explained by:

- the value of iron ore Marampa Mines Limited produced in 2021; and
- the noticeable rises of average prices for most minerals (For instance, Zircon's average price was USD 507 in 2020 Vs USD 1,486 in 2021).

The increase of exports can be attributed to:

- the value iron ore Marampa Mines Limited exported in 2021 (USD 151 million); and
- the increase in diamond and Rutile respectively for USD 45 and 41 million.

The tables below provide the production and exports data detailed by volume and value between 2020 and 2021:

**TABLE 33: DETAILED PRODUCTION AND EXPORTS DATA (2020)**

Minerals / Category	Production			Export			Average Price (USD)	Unit
	Volume	Unit	Value (USD)	Volume	Unit	Value (USD)		
Iron Ore	0	WMT	0	0	DMT	0	0	USD/DMT
Diamond	686,032	Carats	172,774,358	641,469	Carats	119,434,480	258	USD/Carats
Large Scale	602,993	Carats	102,379,953	558,331	Carats	93,671,581	170	USD/Carats
Artisanal	83,039	Carats	70,394,405	83,138	Carats	25,762,899	848	USD/Carats
Gold	24	Kg	1,189,732	56	Kg	3,011,928	48,768	USD/Kg
Large Scale	0	Kg	0	0	Kg	0	0	USD/Kg
Artisanal	24	Kg	1,189,732	56	Kg	3,011,928	48,768	USD/Kg
Gold Concentrate	783	WMT	3,037,916	75	Kg	3,037,916	40,593	USD/Kg
Coltan	396	DMT	3,619,686	396	DMT	3,619,686	136	USD/DMT
Artisanal	277	DMT	2,388,401	277	DMT	2,388,401	137	USD/DMT
Small Scale	119	DMT	1,231,285	119	DMT	1,231,285	132	USD/DMT
Bauxite	1,441,982	WMT	47,881,015	1,308,951	DMT	43,778,222	33	USD/DMT
Rutile	116,564	DMT	142,356,347	107,829	DMT	119,752,845	1,221	USD/DMT
Ilmenite	45,822	DMT	7,555,075	58,468	DMT	9,451,140	165	USD/DMT
Garnet	0	DMT	0	6,126	DMT	863,484	141	USD/DMT
Zircon	6,564	DMT	8,446,422	37,205	DMT	11,122,445	507	USD/DMT
Artisanal	3,064	DMT	3,925,052	3,064	DMT	378,296	1,281	USD/DMT
Small Scale	3,500	DMT	4,521,370	3,500	DMT	310,957	1,292	USD/DMT
Large Scale	0	DMT	0	30,641	DMT	10,433,192	341	USD/DMT
Titanium Dioxide	6,831	DMT	9,053,838	6,831	DMT	2,437,499	1,326	USD/DMT
Artisanal	3,245	DMT	4,233,282	3,245	DMT	692,062	1,305	USD/DMT
Small Scale	3,586	DMT	4,820,555	3,586	DMT	1,745,436	1,344	USD/DMT
<b>Total</b>			<b>395,914,389</b>			<b>316,509,645</b>		

TABLE 34: DETAILED PRODUCTION AND EXPORTS DATA (2021)

Minerals / Category	Production			Export			Average Price (USD)	Unit
	Volume	Unit	Value (USD)	Volume	Unit	Value (USD)		
Iron Ore	1,583,828	WMT	153,597,628	1,732,081	DMT	150,587,414	97	USD/DMT
Diamond	841,832	Carats	168,874,728	838,384	Carats	163,994,352	201	USD/Carats
Large Scale	653,584	Carats	109,927,775	650,135	Carats	109,548,975	168	USD/Carats
Artisanal	188,248	Carats	58,946,953	188,249	Carats	54,445,377	313	USD/Carats
Gold	117	Kg	6,242,410	94	Kg	4,887,739	53,178	USD/Kg
Large Scale	77	Kg	4,129,823	54	Kg	2,841,648	53,765	USD/Kg
Artisanal	40	Kg	2,112,587	40	Kg	2,046,091	52,505	USD/Kg
Gold Concentrate	453	WMT	4,067,905	775	Kg	4,067,905	52,511	USD/Kg
Coltan	353	DMT	4,183,904	353	DMT	4,183,904	168	USD/DMT
Artisanal	218	DMT	2,459,486	218	DMT	2,459,486	170	USD/DMT
Small Scale	135	DMT	1,724,418	135	DMT	1,724,418	165	USD/DMT
Bauxite	1,443,691	WMT	47,029,355	1,462,650	DMT	47,613,667	33	USD/DMT
Rutile	127,053	DMT	159,519,706	129,359	DMT	160,818,838	1,256	USD/DMT
Ilmenite	52,142	DMT	7,991,712	39,915	DMT	6,208,471	153	USD/DMT
Garnet	2,219	DMT	122,018	7,711	DMT	424,673	55	USD/DMT
Zircon	39,352	DMT	73,697,019	55,680	DMT	16,625,352	1,486	USD/DMT
Artisanal	9,555	DMT	19,506,841	9,555	DMT	1,627,030	2,042	USD/DMT
Small Scale	25,725	DMT	51,938,025	25,725	DMT	3,717,123	2,019	USD/DMT
Large Scale	4,073	DMT	2,252,153	20,400	DMT	11,281,200	553	USD/DMT
Titanium Dioxide	25,208	DMT	47,958,210	25,208	DMT	17,204,266	1,902	USD/DMT
Artisanal	9,859	DMT	18,781,142	9,859	DMT	4,254,600	1,905	USD/DMT
Small Scale	15,349	DMT	29,177,068	15,349	DMT	12,949,666	1,901	USD/DMT
<b>Total</b>			<b>673,284,593</b>			<b>576,616,581</b>		

The following tables and figures show that Diamond, Rutile, Iron Ore, Zircon and Titanium are the main minerals produced and exported from Sierra Leone.

## 2020

TABLE 35: TOP MINERALS (2020)

In USD Million	Production	%	Export	%
Diamond	173	44%	119	38%
Rutile	142	36%	120	38%
Bauxite	48	12%	44	14%
<b>Top 3</b>	<b>363</b>	<b>92%</b>	<b>283</b>	<b>90%</b>
Titanium Dioxide	9	2%	2	1%
Zircon	8	2%	11	4%
Ilmenite	8	2%	9	3%
Coltan	4	1%	4	1.1%
Gold Concentrate	3	1%	3	1.0%
Gold	1	0.3%	3	1.0%
Garnet	0	0%	0.9	0.3%
<b>Total</b>	<b>396</b>	<b>100%</b>	<b>317</b>	<b>100%</b>

FIGURE 16: MAIN PRODUCTION (2020)

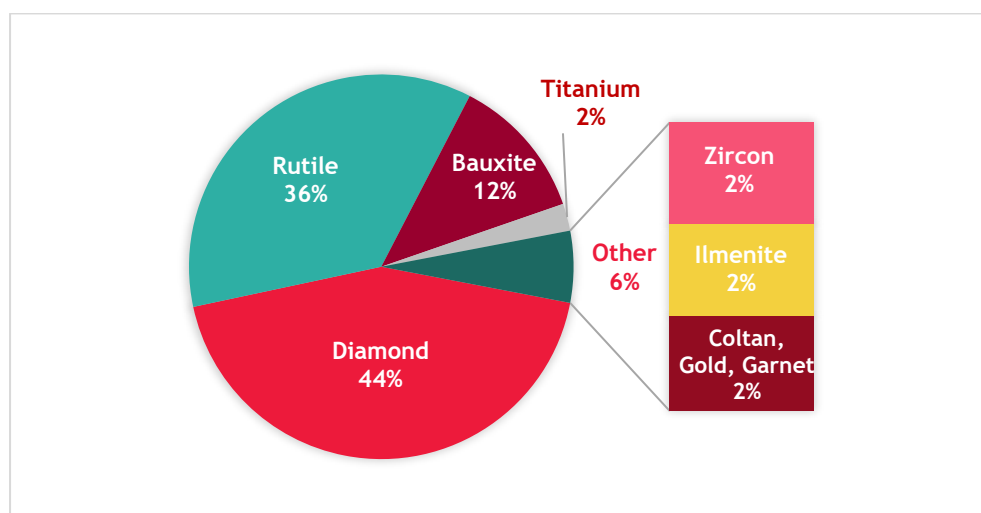
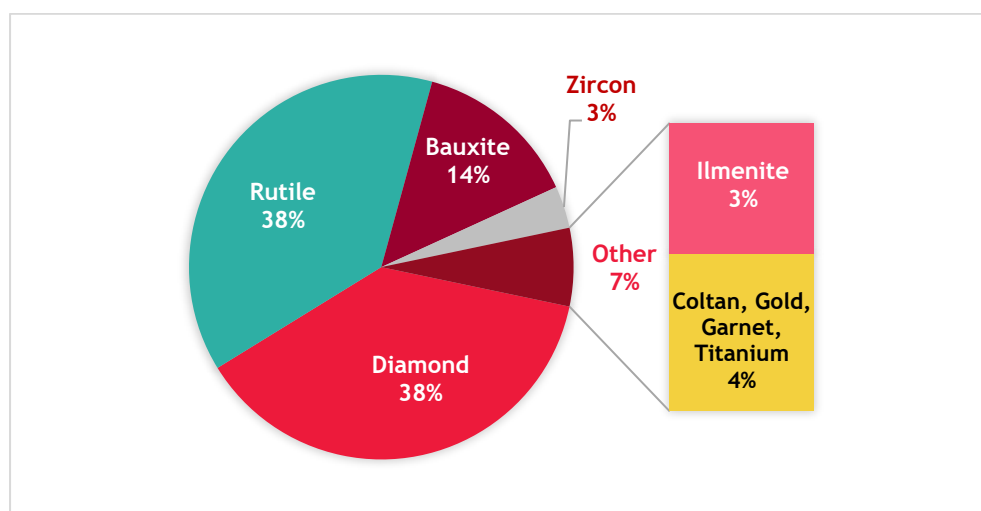


FIGURE 17: MAIN EXPORTS (2020)



## 2021

TABLE 36: TOP MINERALS (2021)

In USD Million	Production	%	Export	%
Diamond	169	25%	164	28%
Rutile	160	24%	161	28%
Iron Ore	154	23%	151	26%
Zircon	74	11%	17	3%
Titanium Dioxide	48	7%	17	3%
<b>Top 5</b>	<b>604</b>	<b>90%</b>	<b>509</b>	<b>88%</b>
Bauxite	47	7%	48	8%
Ilmenite	8	1.2%	6	1.1%
Gold	6	0.9%	5	0.8%
Coltan	4	0.6%	4	0.7%
Gold Concentrate	4	0.6%	4	0.7%
Garnet	0.1	0.02%	0.4	0.1%
<b>Total</b>	<b>673</b>	<b>100%</b>	<b>577</b>	<b>100%</b>

FIGURE 18: MAIN PRODUCTION (2021)

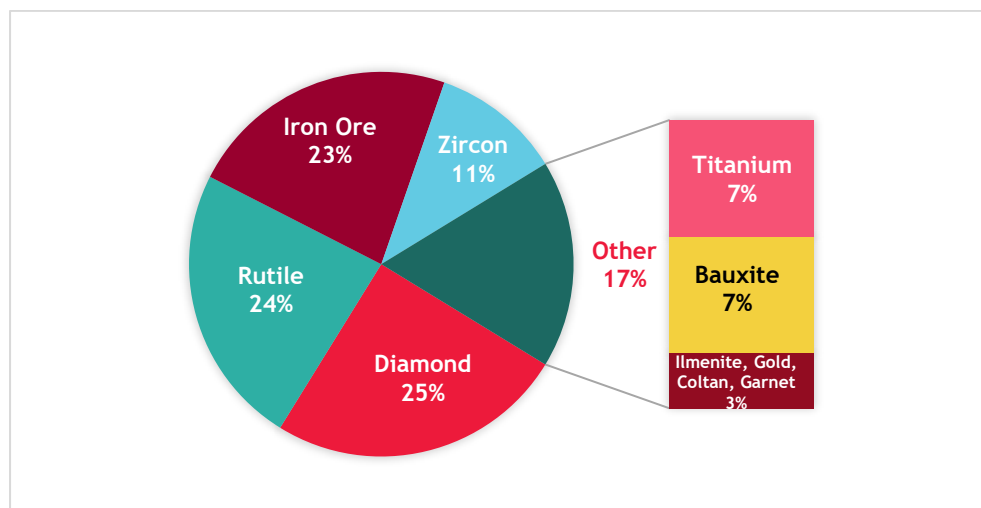
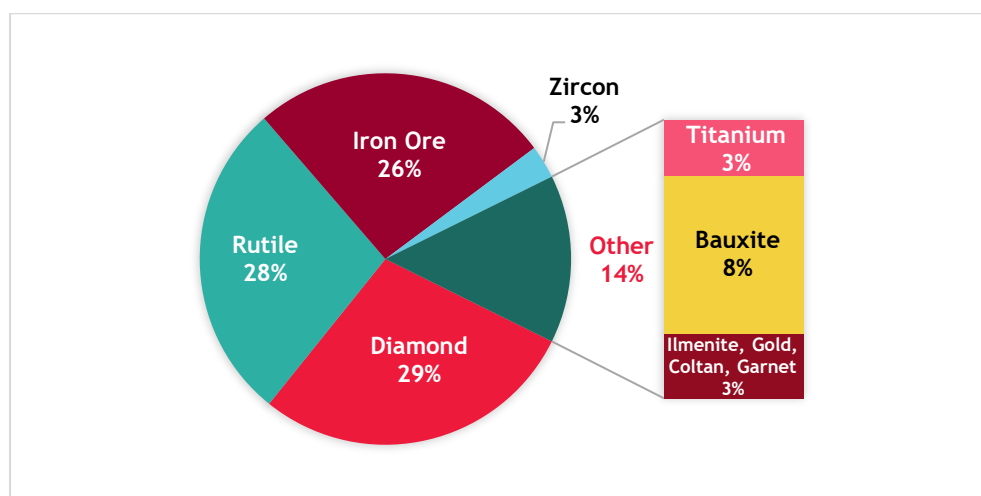


FIGURE 19: MAIN EXPORTS (2021)





## Other sources of production

The Bank of Sierra Leone (BSL) [data portal](#) includes timely systematic disclosures of production volumes by commodity. This aims to ensure comprehensive systematic disclosures of production data. However, three observations should be made:

- BSL did not disclose the production values.
- NMA data (detailed above) seem to be more comprehensive. For instance, BSL did not provide the production data for titanium, coltan and garnet.
- apart from rutile, diamond, bauxite and iron ore, the rest of minerals showed material differences with NMA data as set out in the table below.

TABLE 37: COMPARISON OF PRODUCTION VOLUMES BETWEEN NMA AND BSL

Mineral	Unit	2020				2021			
		NMA	BSL	Discrepancy	%	NMA	BSL	Discrepancy	%
Gem diamonds	Carat	0	602,970	(602,970)	-100%	0	653,600	(653,600)	-100%
Industrial diamonds	Carat	0	83,050	(83,050)	-100%	0	175,760	(175,760)	-100%
Zircon	Metric tons	6,564	0	6,564	-	39,352	27,075	12,278	45%
Gold	Kg	24	13	11	87%	117	107	10	10%
Ilmenite	Metric tons	45,822	50,963	(5,141)	-10%	52,142	53,802	(1,660)	-3%
Rutile	Metric tons	116,564	116,569	(5)	0%	127,053	131,311	(4,258)	-3%
Diamond	Carat	686,032	686,020	12	0%	841,832	829,330	12,502	2%
Bauxite	Metric tons	1,441,982	1,441,987	(5)	0%	1,443,691	1,455,554	(11,863)	-1%
Iron Ore	Metric tons	0	0	0	-	1,583,828	1,584,115	-287	0%

## Other sources of exports

The same BSL [data portal](#) includes timely systematic disclosures of exports values by commodity. However, three observations should be made:

- BSL did not disclose the exports volumes.
- NMA data (detailed above) seem to be more comprehensive. For instance, BSL did not provide the exports data for titanium, coltan and garnet.
- Apart from rutile, bauxite and diamond, the rest of minerals were showing material differences with NMA data as detailed below:

TABLE 38: COMPARISON OF EXPORTS VALUES BETWEEN NMA AND BSL

Mineral	2020				2021			
	NMA	BSL	Discrepancy	%	NMA	BSL	Discrepancy	%
Gem Diamond	0.00	117.35	(117.35)	-100%	0.00	151.66	-151.66	-100%
Industrial Diamond	0.00	2.11	(2.11)	-100%	0.00	9.43	-9.43	-100%
Gold	3.01	4.34	(1.33)	-31%	4.89	7.24	-2.35	-32%
Ilmenite	9.45	11.45	(2.00)	-17%	6.21	7.26	-1.05	-14%
Zircon	11.12	10.70	0.43	4%	16.63	34.87	-18.24	-52%
Iron Ore	0.00	0.00	0.00	-	150.59	124.38	26.20	21%
Diamond	119.43	119.45	(0.02)	0%	163.99	161.09	2.91	2%
Bauxite	43.78	43.78	0.00	0%	47.61	47.61	0.00	0%
Rutile	119.75	119.75	0.00	0%	160.82	160.82	0.00	0%

*In USD million*

The SLEITI MSG confirmed that BSL get their data from NMA who the primary source of all production and export data is. Therefore, the NMA figures are regarded as the most accurate.

## 4.2. Oil & Gas Sector

### a. Context of the Oil & Gas sector in Sierra Leone

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

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

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

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

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

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

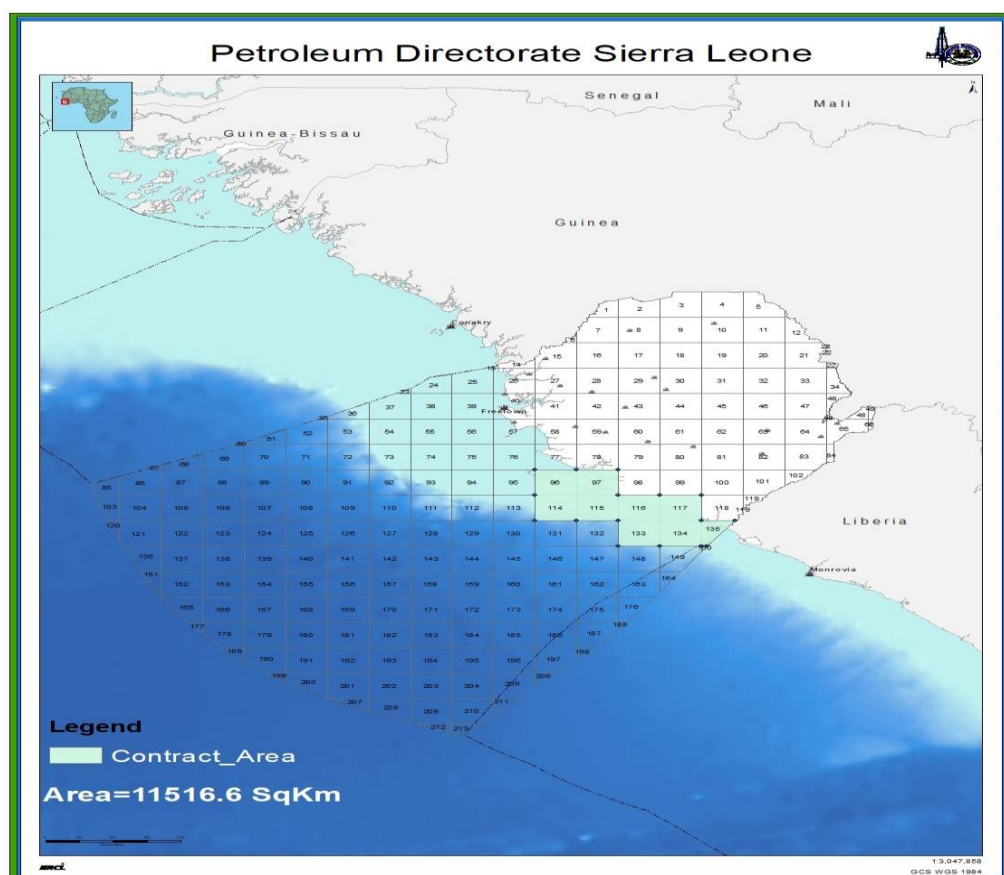
With the gradual recovery of the global price of oil, coupled with progress so far in managing the COVID-19 pandemic, the prospect for oil and gas exploration seems promising. It is hoped

that the transformative potential of this sector will translate into concrete outcomes in the immediate-medium term.<sup>30</sup>

The oil and gas sector in Sierra Leone was in exploration phase during 2020-2021.

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

FIGURE 20: MAP OF ONSHORE AND OFFSHORE BLOCKS IN SIERRA LEONE



A fifth round started on 19 May 2022 and concluded on 30 September 2022. The evaluation results are yet to be published. For more information on this 5<sup>th</sup> licensing round EPA Act, please visit the Petroleum Directorate website [here](#).

The table below provides links to the documentation for that fifth licensing round.

TABLE 39: DOCUMENTATION ABOUT THE FIFTH LICENSING ROUND

Item	Link
Bid Documents	
1 Pre-qualification guidelines for investors	<a href="#">Link</a>
2 Application guidelines for investors	<a href="#">Link</a>
3 Application process - Petroleum rights	<a href="#">Link</a>
4 Section A - Applicant details and financial information	<a href="#">Link</a>
5 Section B - Technical summary	<a href="#">Link</a>
6 Section C - Commercial proposal	<a href="#">Link</a>

<sup>30</sup> Petroleum Directorate.

Item	Link
7 Section D - HSE Summary	<a href="#">Link</a>
8 Negotiation termsheet	<a href="#">Link</a>
9 Bid evaluation scorecard	<a href="#">Link</a>
10 Reconnaissance permit fees	<a href="#">Link</a>
11 Data room rules	<a href="#">Link</a>
Legal Documents	
1 Petroleum Policy 2010	<a href="#">Link</a>
2 PEPA 2011	<a href="#">Link</a>
3 PEPA 2014 - amendment	<a href="#">Link</a>
4 EIRA 2018	<a href="#">Link</a>
5 EPA 2008	<a href="#">Link</a>
6 EPA (EIA licensing regulation) 2010	<a href="#">Link</a>
7 Finance act 2020	<a href="#">Link</a>
8 Public Finance Management Act 2016	<a href="#">Link</a>
9 Consolidated Income Tax Act 2000	<a href="#">Link</a>
10 Income Tax Act 2000	<a href="#">Link</a>
11 Goods and Services Tax Act 2009	<a href="#">Link</a>
12 Local content Act 2016	<a href="#">Link</a>
13 Companies Act 2009	<a href="#">Link</a>
14 Companies Act Amendment 2014	<a href="#">Link</a>
Other Documents	
1 Advert for fifth licensing round	<a href="#">Link</a>
2 Concession map and coordinates	<a href="#">Link</a>
3 Fifth licensing round brochure	<a href="#">Link</a>
4 Model petroleum agreement	<a href="#">Link</a>
5 PDSL bank account details	<a href="#">Link</a>
6 Presentation - Fifth licensing round launch	<a href="#">Link</a>
7 Model Reconnaissance agreement	<a href="#">Link</a>
8 Acreage release announcement - Gazette	<a href="#">Link</a>

## b. Legal Framework

### Legal framework

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

- the petroleum policy 2010
- the Petroleum Exploration and Production Act (PEPA) 2011;
- the Petroleum Exploration and Production Amendment Act 2014;
- the Extractive Industries Revenue Act (EIRA) 2018;
- the Income Tax Act 2000 as amended by subsequent Finance Acts;
- the Companies Act 2009;
- the Environment Protection Act 2008; and
- the Local Contents Act 2016.

The table above provided links to these legislations.

## Legal framework reforms

It has been observed recently that the main statute covering petroleum exploration contains omissions or provisions that need to be amended to reflect best practice and recent developments. One key proposal for reform is providing for onshore exploration activities which is absent in the current PEPA 2011. Recently, lots of interests have been expressed by Oil companies for undertaking exploration activities onshore. It is the view of the PD that if the four successive discoveries that were made between 2009 and 2013 where onshore discoveries, it is highly likely that the Nation may have graduated to a producing Nation given that commercial discovery is not only a function of the size of the reservoir, but also of cost of development which has been estimated to be between three and five-fold less costly in onshore environments.

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

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

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

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

## c. Institutional Framework

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

- coordinating the award of licences;
- negotiating the terms of licences;
- monitoring, regulating, and facilitating upstream activities on behalf of the state; and
- developing regulations from the beginning of exploration to decommissioning.

## d. Tax regime

### Oil and Gas tax regime

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

- the Income Tax Act, 2000 as amended by subsequent Finance Laws;
- the PEPA 2011; and

- the EIRA, 2018.

The table below shows the main revenue streams payable by oil and gas companies.

TABLE 40: TAXES PAYABLE BY OIL AND GAS COMPANIES

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

The EIRA (2018) aims to streamline taxes and levies on extractive industries, including new regulations on fiscal aspects of agreements with extractive companies. It provides for various taxes and charges on extractive companies, the regulation of fiscal aspects of extractive industry agreements and for other related matters. It aims also to support revenue mobilisation efforts through harmonisation and consolidation of the extractive sector fiscal regime.

### e. Types of licenses

According to the PEPA (2011), there are two types of oil and gas licences: Reconnaissance permits and Petroleum licences.

TABLE 41: OIL AND GAS LICENCES

Type	Duration	Rights conferred
<b>Reconnaissance permit</b>	Specified in the reconnaissance permit	A reconnaissance permit shall confer to the holder a non-exclusive right to undertake reconnaissance operations in the permit area.
<b>Petroleum license</b>	30 years from the effective date, unless sooner cancelled or terminated	A petroleum license shall confer on the licensee an exclusive right to undertake exploration and production within a license area.

Source: PEPA (2011)

According to PD there is only one active oil and gas license with Innoson Oil and Gas (IOG) Ltd during 2020 and 2021.

## f. Licenses allocation

The table below shows the award process of each type of Oil & Gas licence:

TABLE 42: OIL AND GAS AWARD PROCESS

Type	Awarded by	Award process
Reconnaissance permit	The Minister on the advice of the Directorate	A company or group of companies may, upon payment of the prescribed non-refundable application fee, apply to the Minister for a reconnaissance permit.
Petroleum License	The Minister	The Minister may prescribe a petroleum license shall be acquired through: <ul style="list-style-type: none"> <li>• a call for tenders; or</li> <li>• direct negotiations.</li> </ul>

Source: PEPA (2011)

The table below details the licensing process:

TABLE 43: OIL AND GAS AWARD PROCESS (DETAILED)

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

### Sierra Leone fourth offshore licensing Round 2018

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

### Results of the fourth round

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



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

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

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

FIGURE 21: RESULTS OF THE FOURTH LICENSING ROUND (1/2)

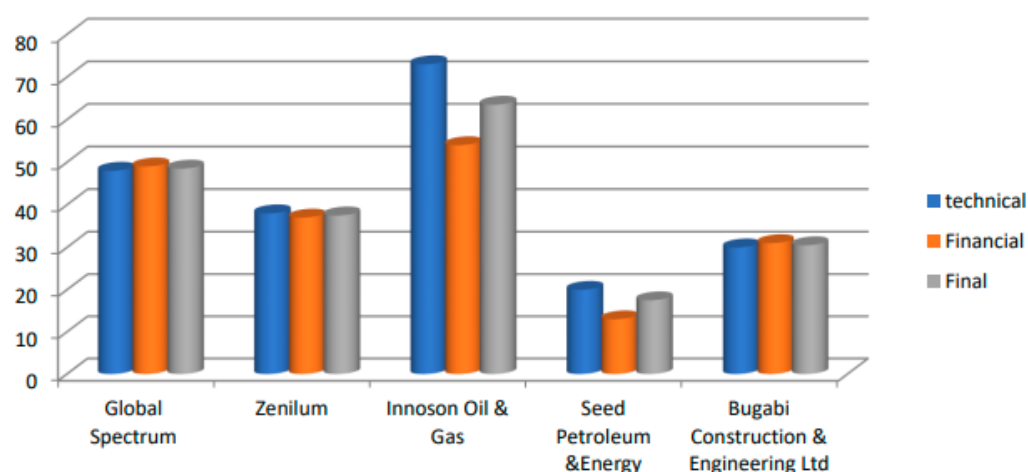
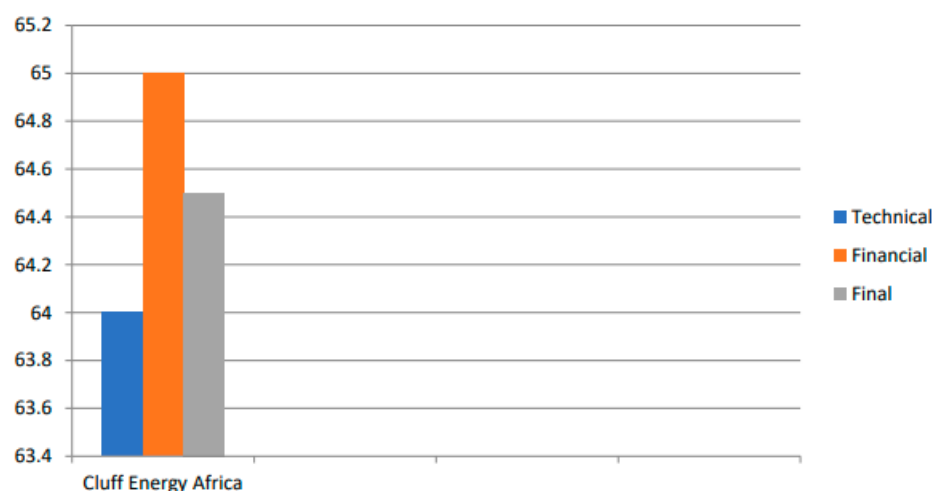


FIGURE 22: RESULTS OF THE FOURTH LICENSING ROUND (2/2)

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



Two out of the six pre-qualified companies were successful and thereby granted provisional licenses to Cluff Energy Africa and Innoson Oil and Gas. Following intensive negotiations,



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

IOG stated that it was on the verge of discovering a huge deposit of 8.2 trillion cubic feet (TCF) gas and 234 MMbbl of condensate in the Sierra Leonean basin in May 2022.<sup>31</sup>

### Technical and financial criteria

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

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

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

### Evaluation Template Benchmarking

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

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

- Applicants’ (technical) assessment of the petroleum potential of the area.
- A primary work program consisting of field work activities such as the type, quantity and duration of seismic acquisition.
- A secondary work program containing field work activities such as the timing and drilling of wells, recognizing the essential role of wells in the discovery of petroleum.
- Applicant’s Health, Safety and Environmental (HSE) policy and practices.
- Evidence of the Applicant’s technical, financial, and managerial capacity to undertake the proposed work programme.

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<sup>31</sup> <https://eurafrika.info/2022/05/16/west-africa-innoson-says-close-to-huge-gas-find-in-sierra-leone/>

- Commercial proposal including bonuses and commitment to community development and local capability empowerment initiatives.

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

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

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

### Bid Evaluation Criteria

#### Technical capability

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

- Technical Understanding of the Block/Basin- Maximum of 20 points
- Applicant's Exploration Expertise- Maximum of 30 points
- Applicant's operational Experience- Maximum of 20 points
- Work Programme (including timing as a function of months/years from award)- Maximum of 54 Marks.
- Applicant's HSE Policy and Management-Maximum of 10 Marks.

#### Financial Capability

- A given applicant's financial capability was assessed based on the following among others:
- Company Value/Net Worth; Maximum of 20 marks ii.
- Audited Financial Statement or Financial Guarantee of company and parent company; Maximum of 10 marks
- Applicant's financing plan to support the proposed work programme; Maximum of 10 marks

#### Commercial Proposal (including Applicant's management structure and experience).

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

- Proposed commitment to Extension and other forms of bonus payments 10 points
- Size and timing of Social Program Offered-Maximum of 10 points
- Commitment to fulfilment of local content and local capability empowerment- 10 points
- Applicant's Management Structure and Experience-Maximum of 10 marks.

**Rating Modality:** Each Committee member independently assessed the various proposals submitted using the assessment framework or standard provided in the evaluation template. Individual marks were allocated for each applicant considering the weights assigned.

Individual marks were then aggregated, and the mean scores derived as the final score for each applicant.

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

Because of the rigorous screening involved particularly in due diligence and procedural compliance, the Team settled on 50% as the eligibility threshold. Applicants were rated based on the extent to which their various proposals met the prescribed standard of expectations. Further, some Applicants scored extremely high marks on all the bidding factors whilst some performed highly on a few of them. The final scores reflected these variable performances.

### **Oil & Gas licences awarded during FY 2020-2021**

According to PD, the only oil and gas licence awarded during 2020 and 2021 was to Innoson Oil & Gas (IOG) Ltd, a Nigerian company.

Further information is available on the company website: <https://innosonoil.com/>.

### **Transfer of Oil & Gas licenses**

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

According to the Petroleum Directorate, there was not transfer of oil & gas licence between 2020 and 2021.

### **g. Oil and gas licences register**

Section 117 of PEPA (2011) prescribes that, the Minister should maintain a register of permits and licenses granted under PEPA (2011). A person may upon the payment of the prescribed fee, inspect the register or take copies of an entry in the register.

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

Section 36 (2) provides that each application for a petroleum license shall, upon receipt by the Minister, be filed at the register of petroleum rights applications.

There is currently no publicly available register or cadastre in oil & gas sector as required by EITI requirement 2.3 (b).

## **h. Oil and gas agreements**

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

Section 150 states that, payments made to the State shall be disclosed according to the terms and procedures of the SLEITI.

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

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

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

## **i. State participation in the Oil & Gas sector**

### **State-Owned Enterprise in the Oil and Gas sector**

SLEITI MSG agreed that there no State-Owned Enterprise in the Oil and Gas sector in Sierra Leone.

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

Sections 84, 85 and 86 of PEPA (2011) state:

- the State may participate as a licensee with a specific participating interest in a petroleum license under the auspices of the National Company;
- the National Company shall have all the rights and obligations of a licensee under PEPA (2011) and the joint operating agreements to which it is a party;
- the revenue resulting from the management of the participating interests shall belong to the State;
- the National Company shall retain an amount not exceeding **25%** of total revenues received in any financial year to meet its operational, administrative and investment requirements for that year, subject to submission of an annual cost plan to the Minister and to Parliament; (retention of a higher amount of revenues shall be subject to the prior written approval by the Minister of finance);
- the National Company shall keep and maintain separate accounts in respect of revenues and expenses relating to the participating interests of the State in each petroleum license;
- where the State elects to participate in a petroleum license, it shall have an initial carried interest of at least **10%** and may acquire an additional paying interest up to a declared maximum within a specified period from the date a discovery is declared to be commercial discovery; and

- a petroleum licence shall provide that a licensee wishing to assign, or transfer its interest whether in part or in whole shall give the right of first refusal to the State to acquire the interest at the same price as agreed with a potential purchaser.

The SLEITI MSG agreed that there was no State participation in oil and gas licenses or agreements between 2020 and 2021.

#### **j. Sub-national payments in oil & gas sector**

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

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

#### **k. Subnational transfer in oil & gas sector**

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

#### **l. Infrastructure provisions and barter arrangements**

The SLEITI MSG agreed that there were not active infrastructure provisions and barter arrangements in oil & gas sector in Sierra Leone between 2020 and 2021 as defined by Requirement 4.3 of the EITI Standard.

#### **m. Transportation revenues**

The SLEITI MSG agreed that there were not transportation revenues from oil & gas sector in Sierra Leone in 2020-2021 as defined by Requirement 4.4 of the EITI Standard.

#### **n. Social and Environmental expenditure**

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

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

There were no social and environmental expenditure made by oil & gas companies in 2020 and 2021.

### 4.3. Beneficial Ownership

As of 1 January 2020, the EITI Standard prescribes “that implementing countries request, and companies disclose, beneficial ownership (BO) information for inclusion in the EITI Report. This applies to corporate entity(ies) that apply for or hold a participating interest in an exploration or production oil, gas or mining license or contract and should include the identity(ies) of their beneficial owner(s), the level of ownership and details about how ownership or control is exerted. (Requirement 2.5 (c).”

#### a. Beneficial Ownership disclosure requirements in the extractive sector

##### Mining Sector

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

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

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

- the registered name and place of incorporation of the company, its certificate of incorporation and a certified copy of its memorandum and articles of association, the names and nationalities of its directors and the name of every shareholder who is the beneficial owner of **5% or more** of the capital share.

##### Oil and gas

Section 21 of PEPA (2011) states that an application for a reconnaissance permit should include:

- the name of each person who is the beneficial owner of **5% or more** of the capital share

The same requirement applies for applications for a petroleum licence according to Section 37.

##### All sectors

For non-extractive activities, the Companies Act (2009), which set up the Corporate Affairs Commission (CAC), and the 2014 Amendments to that Act, give powers to the CAC to request and receive BO information from companies. However, this is limited only to public companies. (i.e., private companies are not then required by law to disclose BO information).

#### b. Beneficial Ownership (BO) road map

According to the EITI Requirement 2.5 (a): It is recommended that implementing countries maintain a publicly available register of the beneficial owners of the corporate entity(ies) that apply for or hold a participating interest in an exploration or production oil, gas or mining license or contract, including the identity(ies) of their beneficial owner(s), the level of ownership and details about how ownership or control is exerted. Where possible, beneficial ownership information should be incorporated in existing filings by companies to corporate regulators, stock exchanges or agencies regulating extractive industry licensing.

Where this information is already publicly available, the EITI Report should include guidance on how to access this information.

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

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

For further information on the BO roadmap, please see [here](#).

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

TABLE 44: DEFINITION OF BO AND PEP

Terms	Definition
BO	BO refers to the natural person(s) who ultimately owns or controls a company and/or the natural person on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement. Reference to "ultimately owned or controlled" and "ultimate effective control" refer to situations in which ownership/control is exercised through a chain of ownership or by means of control other than direct control.
Threshold	Directly or indirectly (e.g., through a chain of entities) 5% or more of the shares or voting rights of an entity.
PEP	The comprehensive PEP definition below as mentioned in the Anti-Money Laundering Act 2012 has been adopted: "Persons holding prominent public positions domestically or in a foreign country such as heads of state or government, senior politicians at national level, senior government, judicial, military or party officials at national level, or senior executives of state-owned enterprises of national importance, or individuals or undertakings identified as having close family ties or personal or business connections to such persons."

### c. Progress made on BO

In order to comply with Requirement 2.5 (a), the SLEITI recruited a Consultant in January 2021 to support the implementation of BO Transparency by developing BO Registry for the mining and oil and gas sectors with a long-term plan for extending the registry to all areas of business. The report was published in August 2021.

The consultant performed the following tasks:

- mapping of existing CAC/NMA/PD processes;
- stakeholder Mapping and Engagement;
- review the findings and recommendations of the 2017 report;
- review and update of template for the collection of Beneficial Ownership (BO) information;
- inter-agency coordination, data collection, and sharing;
- support SLEITI and CAC/NMA in technical capacity building and transfer of expert knowledge in the field;



- undertake an initial paper-based BO disclosure based on reviewed BO declaration forms for the upcoming validation; and
- report and Roadmap for phase two.

The table below summarises the main recommendations of the report.

TABLE 45: MAIN RECOMMENDATIONS OF THE BO REPORT

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

For further information, please see the BO roadmap [here](#).

#### d. Beneficial ownership reporting

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

To comply with Requirement 2.5 (C) for collecting information about the BO of the extractive companies operating in Sierra Leone for the 2020/21 EITI report, the SLEITI MSG agreed to maintain the definition of BO and PEP as adopted by the Beneficial Ownership (BO) working group.

To collect information about the BO of the extractive companies operating in Sierra Leone for the FY 2020-2021, the SLEITI MSG agreed **5% or more** as disclosure threshold according to MMA (2009) and PEPA (2011).

The SLEITI MSG agreed that the information on BO should be included through the reporting process of extractive companies included in the reporting scope (**11 and 14 mining companies respective for the years 2020 and 2021**).



The SLEITI MSG agreed using BO declaration form (high quality data collection) recommended by the EITI International Secretariat.<sup>32</sup>

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

## Results of BO reporting

### 2020

The table below shows that all in-scope companies submitted their completed BO declaration forms.

TABLE 46: RESULTS OF BO REPORTING (2020)

N°	Company	BO information (Yes/No)	Legal ownership (Yes/No)
1	Dayu Mining Co	Yes	Yes
2	Tonguma Limited	Yes	Yes
3	Koidu Limited	Yes	Yes
4	Sierra Mineral Holdings 1 Limited	Yes	Yes
5	Cheng Li Trading Mining	Yes	Yes
6	Kingho Mining Company Limited	Yes	Yes
7	Meya Mining Limited	Yes	Yes
8	Northern Mining Company Limited	Yes	Yes
9	Sierra Diamond Ltd	Yes	Yes
10	Sierra Rutile Limited	Yes	Yes
11	Wongor Investments and Mining Corporation	Yes	Yes

### 2021

The table below shows that five out of 17 in-scope companies did not submit their completed BO declaration forms.

TABLE 47: RESULTS OF BO REPORTING (2021)

N°	Company	BO information (Yes/No)	Legal ownership (Yes/No)
1	Dayu Mining Co	Yes	Yes
2	Tonguma Limited	Yes	Yes
3	Koidu Limited	Yes	Yes
4	Sierra Mineral Holdings 1 Limited	Yes	Yes
5	Sierramin Bauxite (SL) Limited	No	No
6	Supreme Minerals Corp	No	No
7	Cheng Li Trading Mining	Yes	Yes
8	FG Gold Ltd	No	Yes
9	KaSino Mining Company Limited	No	Yes
10	Kingho Mining Company Limited	Yes	Yes
11	Marampa Mines Limited	Yes	Yes
12	Meya Mining Limited	Yes	Yes
13	Pan African Rare Metal Mining Co	Yes	Yes
14	Seawright Mining Co	No	Yes

<sup>32</sup> [https://eiti.org/sites/default/files/2022-02/model\\_eiti\\_beneficial\\_ownership\\_declaration\\_form\\_-\\_high\\_quality\\_data%20%281%29.xlsx](https://eiti.org/sites/default/files/2022-02/model_eiti_beneficial_ownership_declaration_form_-_high_quality_data%20%281%29.xlsx)

N°	Company	BO information (Yes/No)	Legal ownership (Yes/No)
15	Sierra Diamond Limited	Yes	Yes
16	Sierra Rutile Limited	Yes	Yes
17	Wongor Investments and Mining Corporation	Yes	Yes

Annexes 7 and 8 to this Report present the BO and legal ownership information disclosed by mining companies.

The SLEITI MSG agreed that all active licensees that did not participate in the EITI reporting process should complete the BO declaration form in line with EITI Requirement 2.5(a).

Accordingly, a request was made on 28 March 2023 to these companies to complete the BO declaration form and return it to the IA and SLEITI Secretariat team by 27 April 2023.

Both the [BO declaration form](#) and the [completion guide](#) were also added to SLEITI website.

## 4.4. Collection and Distribution of the Extractive Revenues

### a. Budget process

#### Budget preparation

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

The Ministry of Finance and Economic Development (MoF) initiates the budget preparation phase which deals principally with policy. The elements that comprise this phase include:

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

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

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

## Budget Implementation

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

### b. Revenues Collection

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

#### Revenue collection in the mining sector

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

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

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

### c. Budget Audit

The Audit Service of Sierra Leone (ASSL) is a member of the International Organization of Supreme Audit Institutions (INTOSAI) and African Organization of Supreme Audit Institutions (AFROSAI) and applies the International Standards of Supreme Audit Institutions (ISSAI) issued by INTOSAI in its auditing work. The ASSL's Mandate and Framework are available online.

Section 119 of the constitution of Sierra Leone mandates ASSL to audit the Public Accounts of Sierra Leone and all public offices, including courts, the accounts of the Central and Local Government Administration, universities and public institutions of like nature, statutory corporations, companies or other bodies and organisations, set up by an Act of Parliament or statutory instrument or otherwise set up partly or wholly out of public funds shall be audited and reported by or on behalf of the Auditor General.<sup>33</sup>

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<sup>33</sup> <http://www.sierra-leone.org/Laws/constitution1991.pdf>

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

Sierra Leone's Annual Financial Report includes information on revenues and other funds received and spent by the Government during the financial year.

The 2020 Annual Financial Report can be found [here](#).

## 4.5. Extractive Sectors Outlook

### a. Impact of Covid-19 pandemic on domestic revenue

The first confirmed positive case of Covid-19 in Sierra Leone was only reported on the 31<sup>st</sup> March 2020, but the impact of the pandemic, globally, was already manifesting its effect on the economy and by extension, revenue administration. As a result of COVID, the 2020 domestic revenue target of Sierra Leone has been downsized by Le 1.1 trillion (or 17.1%).<sup>34</sup>

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

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

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

With numerous prolonged lockdown and cancellations of major flights throughout Sierra Leone since mid-March 2020 as well as the general fear associated with the virus, tourist flows into the country declined to almost zero, thus affecting GST collection and Foreign Travel Tax. "The World Trade Organisation (WTO) projected that; global merchandise trade could decline by up to 32%" (OECD, 2020: p.5) compared to 2019 as a result of the crises and tourist arrival could fall by 60-80% globally (UNWTO, 2020).

The effect on mining sector revenues has been notable. Whilst mining royalties, and licenses marginally increased by 2% for the first half of 2020 compared to the same period in 2019, yet when the COVID-19 period of Q2 2020 is hived out, the effect is that revenues declined by almost half (49%) in Q2 2020 compared to the same period in 2019.

#### Government's support to the sustainable development goals

Sierra Leone like most countries in sub-Saharan Africa is struggling to support the Sustainable Development Goals (SDGs) prior to COVID 19 because the domestic revenue they were generating was considered insufficient to finance projects that are geared towards the actualization of the SDGs. Thus, the unanticipated COVID-19 pandemic has exacerbated the situation and the likelihood of the actualization of the said SDGs is farfetched in the years to come. However, it has already been established that prior to COVID-19 both domestic and external sources of finance put together were not sufficient to meet the Sustainable Development Goals of lower income countries.<sup>35</sup> Also, it was estimated that the pandemic will exceed the Global Finance Crises of 2008 by 60%.<sup>36</sup>

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<sup>34</sup> NRA, Revenue, and Tax Policy Department.

<sup>35</sup> UN SG, 2019.

<sup>36</sup> OECD, 2020.

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

## b. Impact of COVID-19 on mining sector

The environmental regulations instituted by the GoSL to contain the spread of the COVID-19 ranged from partial to full lock-down including suspension of international flights to Sierra Leone.

NMA recorded hardly any revenue on export duty on gold and diamond since April 2020.

During data collection phase, we required from Government agencies to report information considering COVID-19 pandemic as required by EITI flexible reporting approach.

The table below sets out the impact of COVID-19 on mining sector in Sierra Leone as reported by government agencies:

TABLE 48: IMPACT OF COVID-19 ON MINING SECTOR

EITI requirement \ Additional information	Description
<b>Requirement 2.1: Legal framework and fiscal regime</b>	
Legal or regulatory changes, including moratoriums, in response to Covid-19.	The 2008 Environment Protection Agency Act was repealed and replaced to include local and indigenous communities in the management and protection of the environment, especially during emergency periods such as Covid-19 where officials of the agency may not be able to undertake compliance monitoring because of restriction.
Adjustments to the fiscal regime, incentives or relief requested by or given to companies (e.g. force majeure, modified consultation).	None
<b>Requirement 2.2: Contract and license allocations.</b>	
New license/contract awarded in 2020/2021	21 new mining licences were awarded between 2020 and 2021 (7 large-scale and 14 small scale)
Delays or postponements of license or contracts awards.	Most quarry companies suspended operations and were put on care and maintenance from 2019 to 2020. Few mining companies such as Dayu Mining Limited, Sierra Diamond Limited, Mass Energy, Northern Mining Limited, Tandem Mining Company, Rutile Haul Road were also put on care and maintenance.
Alternative approaches to licensing in light of social distancing requirements.	Online fee negotiations and computation was adopted for companies such as Sierra Rutile Company and Vimetco because of social distancing restrictions. No alternative approach but social distancing during Mineral Advisory Board meetings.
<b>Requirement 2.3: Register of licenses</b>	
Suspended licenses or operations in view of Covid-19.	Some companies suspended operations during Covid-19 such as Sierra Rutile, Marampa Mines, Dojo Mining Company and most quarry companies.
<b>Requirement 2.4: Contracts</b>	
Changes in licensing and contract negotiations or amendments to contracts, revisions on work schedules if they are annexed to the contract.	None
<b>Requirement 2.6: State participation</b>	
Changes in state participation and policies for state-owned enterprises in response to the impact of the Covid-19 crisis.	Not applicable

EITI requirement \ Additional information	Description
Ad-hoc SOE payments and transfers related to the Covid-19 crisis.	Not applicable
Amendments to the rules and practices related to SOEs' operating and capital expenditures, procurement, subcontracting and corporate governance in response to COVID-19 crisis.	Not applicable
Additional SOE quasi-fiscal expenditures agreed in response to the impact of the Covid-19 crisis.	Not applicable
<b>Requirement 3.1: Exploration</b>	
Narrative overview of sector developments and industry outlook in light of Covid-19 and the commodity price downturn.	<p>The GoSL implemented many measures to curtail the spread of the virus and these measures restricted movement of goods and labour and consequently the temporary closure of the mine and subsequent reduction in working days and hours.</p> <p>The Tourism sector regulated by EPA was badly hit by the Covid-19 which constrained several hospitality companies to acquire their EIA licences. A year waiver was therefore given to all hotels from 2019 to 2020. For the extractive industry, some companies suspended their activities such as Dayu Mining limited, Sierra Diamond Limited, Tandem, Northern Mining and Mass Energy.</p>
Effects of Covid-19 and the decline in prices on exploration or development plans.	Effects of Covid-19 led to delay in completion of exploration/development activities and subsequent delay in commencement of mining operations.
<b>Requirement 3.2 and 3.3: Production and Exports</b>	
Effects of Covid-19 on projected and actual production and export, disaggregated by commodity, company and project for 2020/2021.	<p>Lockdown and restriction of movement affected the mining activities of the companies.</p> <p>Delay in getting vessels to load materials because of covid restrictions and quarantine requirement imposed worldwide. Production was adversely affected as a result in adjustment in working condition through the segregation of employees into workable groups. That is blue and white.</p>
Production volumes and values disaggregated by company and project for 2020/2021.	<p>The main negative impacts of Covid-19 on the production stage of mines include the reduction of production. This is mainly due to the reduction in the demand for raw materials resulting from the condition of economies on a global scale and the pandemic limitations on the workforce, the problem with transport, and market sales problems (disturbance of the product supply). Production limitations may also result from disruptions in the supply of materials necessary for mining operations.</p>
<b>Requirement 4.1 and 4.7: Comprehensive disclosure of taxes and revenues and Level of disaggregation</b>	
Effects of Covid-19 on projected and actual revenues and taxes from the extractive industries for 2020/2021.	As we are gradually recovering from the COVID-19, we are anticipating that more revenues and taxes would be generated in 2021
Analysis of potentially foregone revenues where fiscal relief has been provided or is being considered to the extractive industry in 2020/2021.	Not applicable
<b>Requirement 4.2. State's share of production or other revenues collected in-kind</b>	
Effects of Covid-19 and the declining commodity prices on expected revenues from the sale of the state's share of production and other revenues collected in-kind. This could include analysis of the potentially foregone revenues from commodity sales because of the declining prices.	Not applicable
<b>Requirement 4.3: Infrastructure provisions and barter arrangements</b>	
New or renegotiated infrastructure agreements related to Covid-19 relief operations.	Not applicable
New or renegotiated resource-backed loans.	Not applicable

EITI requirement \ Additional information	Description
<b>Requirement 4.4: Transportation revenues</b>	
Changes to extractive commodities transportation arrangements in light of the Covid-19 crisis.	Not applicable
Outlook for transportation arrangements, revenues and any relevant extractive industries supply chain disruptions in light of Covid-19 related movement restrictions.	Movements of staff of the Agency were restricted as a result of national covid-19 measures including regulations curtailing the movements of persons within and across districts. Compliance and enforcement monitoring exercises were therefore limited during this period.
<b>Requirement 4.6: Sub-national payments</b>	
Projected and actual subnational direct payments and possible implications for local government budgets.	Reduction in revenues of companies could lead to less support to the local governments. Less ore mined due to reduction in working days and hours led to shortage of ore available for production and commodities available for sale.
<b>Requirement 5.1: Distribution of the extractive industries revenues</b>	
Budget re-alignments for extractive industry revenues earmarked for Covid-19 relief.	None
<b>Requirement 5.2: Sub-national transfers</b>	
Projected and actual subnational transfers and possible implications for local government budgets and local communities.	Reduction in revenues of companies could lead to less support to the local governments and communities.
The management of subnational transfers by local governments and any changes in response to the Covid-19 crisis.	None
<b>Requirement 5.3: Revenue management and expenditures</b>	
Revisions to revenue and budget projections in response to Covid-19 crisis (including breakeven commodity price assumptions).	The original target set for total domestic revenue in 2020 was Le6.470 trillion. However, following the declaration of COVID-19 Pandemic in March 2020, the original revenue target was revised downward to Le5.363 trillion for 2020. It was later increase to Le5.399 trillion consistent with the IMF's approved Rapid Credit Facility (RCF). The review of the RCF in September-October, the 2020 Revenue target was slightly revised downward to Le5.366 trillion, which has become the final reference target upon which 2020 revenue performance is assessed. For the Fiscal Year 2020, actual domestic revenue collection amounted to Le5.501 trillion, which was more than the IMF-revised target of Le5.366 trillion by Le134.0 billion.
Rescue funding, stimulus packages, or subsidies related to the sector or its state-owned enterprises in response to Covid-19 crisis.	None
Shifts in sector-specific borrowing in response to Covid-19 crisis.	None
Exceptional uses of sovereign wealth funds in response to Covid-19 crisis.	None
<b>Requirement 6.1: Social and environmental expenditures</b>	
Reforms in legal and contractual social expenditure requirements in light of the Covid-19 crisis.	Exemptions were provided to certain sector which does not affect the mining sector.
Social expenditures allocated by companies to support Covid-19 measures in areas of operation.	Voluntary social expenditures by companies moved up in order to support local health authorities to curtail the spread of the virus in areas of operation.
Changes to companies' social expenditure plans and possible impacts on local governments and local communities.	None
<b>Requirement 6.3: The contribution of the extractive industries to the economy</b>	
Impact of Covid-19 and declining commodity prices on exports and employment (including resulting	Declining commodity prices led to less than expected royalties' payment to the government and lockdown locally and internationally means unavailability of



EITI requirement \ Additional information	Description
from movement restrictions and cross-border quarantines).	required skilled labour and increased cost relating to expatriates' travel.
Impact of the commodity price downturn on the extractive sector and general economic outlook.	According to KOIDU Limited, diamond industry has moved from a relatively stable to a highly uncertain environment over the last couple of years, and especially with Covid-19 restrictions profoundly affecting the whole value chain. Rough-diamond prices fell close to 13% (Koidu Ltd) year to date as the Covid-19 crisis continues. Analysts predict that markets will start to recover gradually from the 30-40 per cent fall in global revenue from rough diamond sales this year, in the last quarter 2020 into the first half of 2021 as jewellers and polishers resume operations.
Geographic information on the impact of the Covid-19 crisis on the location of extractive activities.	None
<b>Requirement 6.4: Environmental impact of extractive activities</b>	
Shifts in regulatory rules or enforcement related to environmental protection, climate mitigation, Free, Prior and Informed Consent and other consultations	None

### c. Impact of COVID-19 on oil & gas sector

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

On 29<sup>th</sup> April 2020, the GoSL announced that the Open Offshore Petroleum acreages covering several blocks have been provisionally awarded to Cluff Energy Africa and Innoson Oil & Gas Companies as an initial option following the Nation's Fourth Offshore Petroleum License Round. Under normal circumstances, the winning bidders are expected to accept the provisional offer and express interest to negotiate with the Government within one month.

## 4.6. Assessment of Subnational Revenues

### a. EITI Requirement

Pursuant to the EITI Requirement 4.6 Subnational payments, the MSG is **required** to establish whether direct payments, within the scope of the agreed benefit streams, from companies to subnational government entities are material. Where material, the MSG is



**required** to ensure that company payments to subnational government entities and the receipt of these payments are disclosed.

The MSG is **required** to agree a procedure to address data quality and assurance of information on subnational payments, in accordance with Requirement 4.9.

Some extractive companies make direct payments to subnational government entities, such as regional governments, municipalities and chiefdoms. Other extractive companies make payments directly to the central government which devices a revenue sharing mechanisms that stipulate that a share of revenues collected by the central government is transferred to subnational government entities. While these payments may represent only a portion of revenues at the national level, they are often an important source of income for local governments. Transparency regarding these payments and transfers can be useful in holding local authorities to account.

FIGURE 23: SUBNATIONAL PAYMENTS



EITI implementation has shown strong demand from local communities to increase transparency around the allocation of such revenues, to ensure that revenues contribute to sustainable local development. In several countries, EITI reporting has led to changes in the applicable regulatory framework and helped local communities demand the share of revenues they are entitled to. EITI implementation can also help local governments track, manage and disclose revenues more efficiently.

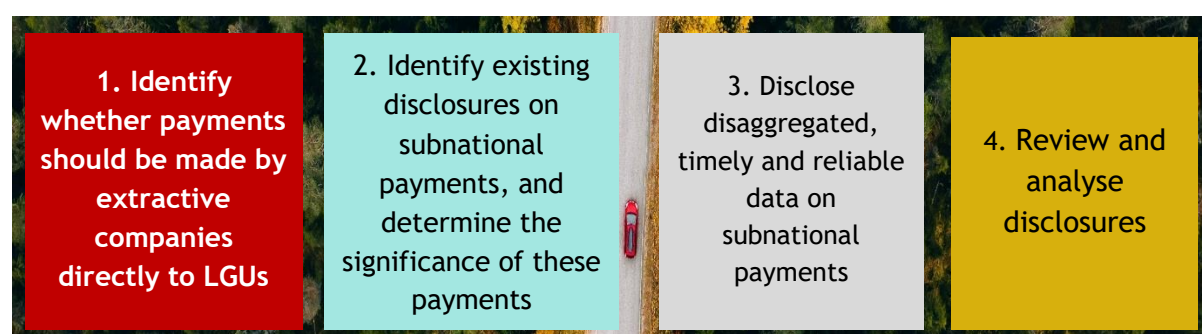
## b. Local government units

According to the International Monetary Fund, subnational governments, also known as local government units (LGUs), are “institutional units whose fiscal, legislative, and executive authority extends over the smallest geographical areas distinguished for administrative and political purposes. The scope of their authority is generally much less than that of central government or state governments, and they may, or may not, be entitled to levy taxes on institutional units resident in their areas. They are often heavily dependent on grants (transfers) from higher levels of government, and they may also act, to some extent, as agents of central or regional governments.”<sup>37</sup>

## c. Implementation process

The implementation of EITI Requirement 4.6 go through the following four phases:

FIGURE 24: IMPLEMENTATION OF EITI REQUIREMENT 4.6



For further information, please refer to the Guidance Note on Subnational payments available [here](#).

## d. Subnational payments in Sierra Leone

Subnational Revenues remain an important source of developmental revenue to several communities in Sierra Leone. As a result, stakeholders remain committed to expanding transparency of subnational revenues and broadening accountability of the impact of such revenues to communities. A recent report commissioned by the SLEITI MSG in 2021 - Assessment of the Impact of EITI and Socioeconomic Benefits Derived from Subnational Extractive Revenues by Mining Communities - found that while subnational payments (in the form of surface rent, CDA, DACDF, crop compensation and other fees) are being made by

<sup>37</sup> Source: IMF (2014), Government Finance Statistics Manual 2014, Paragraph 2.95, available [here](#).

large-scale and small-scale mining companies to host communities and landowning families, the positive social impacts of these payments are limited. The MSG seeks to make progress in addressing the challenges and identifying opportunities to improve oversight and impact of subnational revenues.

Surface rent is paid in accordance with Part 5, Section 34 of the Mining and Mineral Act 2009. This is paid only by entities with mining licence. Surface rents are negotiated between the companies and the communities. There are basically three means of payment namely:

- Companies pay the total amount to the District Council, which in turn give a portion to the relevant Chiefdom Councils
- The Company pays surface rent to the Chiefdom Administration, which pays part to the District Council
- The Company pays directly to the district councils, chiefdom councils and landowners according to the formulae prescribed by part 5 section 34 of the MMA, 2009. The basis of the payment may either be on per km<sup>2</sup> basis or lump sum per annum.

#### **e. Formulae for distribution**

Surface rent is allocated as follows:

- 50% - Land Owners
- 15% - Paramount Chief
- 15% - District Council
- 10% - Chiefdom Council
- 10% - Constituency Development

### **4.7. Analysis of the Impact of External Shocks on Government Extractive Revenues**

#### **a. Background**

External shocks - changes outside a particular economy which have great impact on a country's economy - are often associated with weakening economic growth, higher unemployment, falling real incomes and rising poverty. Hit by a triple whammy of Ebola, falling commodity prices and weak currency, the 2014 SLEITI report revealed a 22% decline in government revenue from the extractive sector compared to the previous year. As countries seek to recover from the COVID-19 pandemic, a solid understanding of its impact on the extractive sector value chain, and in particular, government's domestic resource mobilisation capacity is necessary. Metal- rich countries are considering pivoting their recovery towards critical minerals in the light of the global just energy transition to net-zero and the increased demand for strategic minerals such as bauxite and iron ore. The MSG seeks to ascertain the impact of external shocks on government's revenues, and how that could be mitigated in the future.

## **b. Global Effects of COVID on Extractives**

The outbreak of SARS-CoV-2 virus (COVID-19) has had far reaching consequences on various aspects of life. Globally, it has affected health care delivery, restricted mobility of persons, capital and businesses, worsened poverty, and effected extreme economic hardship on countries, particularly least developed countries. Since the outbreak of the COVID 19 pandemic, WHO estimates that 543,352,927 cases have been confirmed, out of which 6,331,059 deaths have been reported as of 30 June 2022. At the same time, 11,981,689,168 doses have been administered.

The effects of COVID 19 on economies has been multidimensional. To control the virus, many countries introduced lockdown and movement restrictions, some of which were sustained for months. These affected livelihoods, agricultural production, extractives, global manufacturing, supply chain and haulage systems, which in turn created shortage of goods and services and thereby inflation. The economic difficulties effected by the pandemic has eroded decades of economic gains in the fight against poverty. According to the World Bank extreme poverty has risen in nearly 3 decades, while the IMF estimates that between 65 to 75 million people have been put into extreme poverty, reversing decade long trends. Many are even predicting an increase in these numbers, especially on marginalized groups, due to the impact of the current Russian-Ukraine War.

COVID -19 has also led to increased job losses against reduced earnings and incomes due to ever rising prices for goods and services.

The pandemic has affected every sector and every industry globally, but the extent of the impacts is at varying levels. The extractive industry, in the early days of the pandemic was hit with a double whammy. The oil and gas sector for instance faced crude oil price plunged to 20-year lows in April 2020, with WTI prices even briefly turning negative for the first time ever. Collapsing oil and gas demand due to lockdowns collided with strong global supply, resulting in a glut in the market. The nature of the extractive sector, being capital intensive and reliant on global supply chain for its processing and sales, made the sector more vulnerable to the impacts of the pandemic. It presented uncertain further for the industry and companies to adjust to a new normal. Several of the world's biggest mining multinationals and oil and gas majors announced major cuts (of about 25%) to their exploration and development investments, while other projects in the Africa region postponed or cancelled their projects that had not commenced production. At the same time, companies experienced reduction in production due to restrictions on labour movements. Despite the lifting of stringent COVID restrictions and promising signs of global economic recovery, global exploration and regulatory developments in the sector continue to face a downward trend.

## **c. Summary of Global Trends in 2020 and 2021**

- Global energy demand declined by over 6% in 2020 compared to 2019, equivalent to the combined energy demand of France, Germany, Italy, and the UK in 2019. This was the largest relative decline since the Second World War.

- Global oil consumption declined on the average of over 8% across the year with the highest decline happening in April by as much as 25%. In essence, global oil supply declined by an unprecedented 8.8 million barrels of oil per day
- Natural gas demand also fell on average by 4% - the first decline since 2009 and the largest on record. This was equivalent to 6.6 million bpd
- Crude oil prices plummeted to record low, plunging 20-year low in April 2020 due to disruption in activities and further reduction in demand, however gold, Rubber, palm oil and iron ore experienced significant increases because of disruption in more commodity producing countries and for gold due to the volatility in other financial assets because of economic uncertainties effected by COVID 19
- Crude oil prices declined by 32.7%
- Iron ore price increased by 16.1%
- Rubber price rose by 5.5%
- Palm oil price increased by 20%
- Despite the increases in the process of base metals and gold, investments and exploration and development activities in the mining sector slowed. Similarly, major cuts were made to crude oil projects, especially those that were in exploration and development phases.

#### d. Sierra Leone

Sierra Leone has since the pandemic recorded 7,760 confirmed cases with 125 recorded deaths. The country has administered 6,158,679 vaccines as of 18<sup>th</sup> December 2022. Since the pandemic, the country has undergone significant economic challenges linked to the global economic downturn. Inflation is on the rise, some businesses are yet to resume from COVID 19 induced closures or suspension, among other macro fiscal challenges.

Furthermore, the recent war in Ukraine by Russia has had a significant impact on the extractive industry with rising inflation rates, increased exchange rate and general deterioration in the cost of living of average Sierra Leoneans.

### 4.8. Cost and Benefit Analysis of a State Participation in the Mining Sector

#### a. Background

State participation in oil, gas and mining is often exercised through state-owned enterprises (SOEs) whereby government takes a direct ownership stake in oil, mineral or gas ventures, either as the sole commercial entity or in partnership with private companies. State participation offers opportunities for strategic control of national resources and revenues to achieve developmental goals. At the same time, without strong mechanisms for oversight and accountability, state participation can exacerbate governance problems and lead to sizable losses of revenues for the state; extra-budgetary spending and patronage.<sup>38</sup> In Sierra Leone, the Mines and Minerals Act (MMA) of 2009 makes no provision for Government

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<sup>38</sup> <https://resourcegovernance.org/analysis-tools/publications/state-participation-oil-gas-and-mining>

to acquire shares in any of the Large-Scale Mining Companies. However, Section 162 (1) of the MMA 2009 makes it optional for the government to acquire shareholding interests in any large-scale mining operations.

To ensure maximum benefits for the government and people of Sierra Leone, provision has been made in the MMDA 2022 for the Government to acquire a 10-15% shareholding in any of the Large-Scale Mining companies, free of charge. Additionally, the Government may acquire further shares up to 35% on terms that will be negotiated and agreed by parties.

The 2019 SLEITI report noted that there was no State participation (interests) in the mining contracts in Sierra Leone in FY 2019. In the light of the government's decision to own a 10% stake in Marampa Mine, the MSG seeks to ascertain the risks and opportunities associated with state participation in the extractives sector.

## **b. Current Status**

Except for artisanal mining, there are currently no restrictions for foreign entry and investments in Sierra Leone's minerals sector.

In the past, large-scale mineral investors have been able to directly negotiate with Government the different terms and conditions for their operations through mineral development agreements. This approach has created an uneven playing field and rendered the monitoring of obligations and the collection of revenues difficult. Also, inadequate due diligence checks resulted in situations where, following the award of a mineral right, an investor subsequently demanded financial and performance concessions claiming its inability to mobilize the funds required for mine development under the existing fiscal regime and applicable laws.

There is presently no state participation in the sector either in the form of state shares or a state mining company.

## **c. Benefit Analysis of a State Participation in the Mining Sector**

State participation in the mining sector whether through state owned enterprises or ownership stake via ministries or other government institutions purports three principal benefits:

### **Capacity building**

If a government holds equity through a national company, that company can become a domestic expert in commercial management of oil, gas or mining. Over time, this can promote broader industrial development and reduce dependence on foreign partners, as has been the case with Sierra Leone. However, state ownership alone does not ensure this kind of capacity building; many state-owned companies have failed to develop.

### **Improved monitoring**

By having a seat at the table as a shareholder in an oil, gas or mining venture, officials in many governments expect to enhance their ability to monitor the activities of private

partners. Experience here has been mixed. While countries like Trinidad and Tobago have used equity as a tool for stronger enforcement, many government shareholders remain excluded from major decisions. In these nations, the arrangement provides scarcely more authority than the government's basic regulatory powers. Governments should negotiate shareholder agreements carefully, to ensure an active role and full information-sharing.

**Direct financial benefits**

In some countries, an equity ownership stake entitles the state to a share of the resource produced, which the state or a state-owned company might sell itself, or which might be monetized via cash payments from the private company to the state. In other cases, equity participation entitles the state to some form of dividend payment if a project is profitable, much like payments to shareholders in a publicly traded company. With this sort of arrangement, however, private companies often control the accounting procedures that lead to the declaration of dividends. As a result, dividends are paid only after a project has recovered all upfront costs, meaning that they are often awarded years after the project's start, leading to disappointing dividends for states.

## 5. ANALYSIS OF EITI DATA

### 5.1. Production

According to NMA, the calculation of production values is based on production costs (direct and indirect costs) as reported by mining companies. Production volumes are based on mining companies monthly reporting. The full production data NMA provided was presented in Section 4.1 above.

This Section summarises the same data disclosed by in-scope companies only detailed by volume, by value, by commodity and by region, mining company and project.

#### 2020

TABLE 49: DETAILS OF PRODUCTION DISCLOSED BY IN-SCOPE COMPANIES (2020)

N°	Company	Commodity	Region	Licence	Unit	Volume	Value USD
1	Sierra Rutile	Rutile	Southern	ML-2134	MT	116,564	141,113,689
2	Koidu	Diamond	Eastern	ML-06/95	Carat	603,042	102,390,489
3	Sierra Mineral Holdings 1	Bauxite	Southern	ML01/05	MT	1,342,139	43,874,524
4	Sierra Rutile	Ilmenite	Southern	ML-2134	MT	45,822	7,407,015
5	Sierra Rutile	Zircon	Southern	ML-2134	MT	6,616	5,506,909
6	Meya Mining	Diamond	Eastern	ML 2/2019	Carat	12,531	3,384,832
7	Sierra Rutile	Garnet	Southern	ML-2134	MT	3,629	2,062,739
8	Dayu Mining	Gold	Northern	ML-1/2018	WMT	919	1,951,956
Total							307,692,153

The total production value NMA provided amounted to USD 396 million. The difference could be due to the lack of data provided by these companies:

- Cheng Li Trading Mining
- Kingho Mining Company Limited
- Northern Mining Company Limited
- Sierra Diamond Ltd
- Wongor Investments and Mining Corporation Limited

However, it is worth highlighting some discrepancies between the company data and NMA. For instance, Sierra Rutile disclosed a production of 3,629 metric tons of garnet while NMA stated only 2,219.



## 2021

TABLE 50: DETAILS OF PRODUCTION DISCLOSED BY IN-SCOPE COMPANIES (2021)

N°	Company	Commodity	Region	Licence	Unit	Volume	Value USD
1	Sierra Rutile	Rutile	Southern	ML-2134	MT	127,054	154,370,610
2	Koidu	Diamond	Eastern	ML06/95	Carats	649,795	110,803,207
3	Sierra Mineral Holdings 1	Bauxite	Southern	ML01/05	MT	1,396,678	42,919,915
4	Marampa Mines	IRON ORE	Northern	ML 4/2021	WMT	254,837	10,703,154
5	Sierra Rutile	Ilmenite	Southern	ML-2134	MT	52,142	8,134,152
6	Sierra Rutile	Zircon	Southern	ML-2134	MT	4,500	5,616,000
7	KaSino Mining	Zircon	Southern	SML 10/2019	MT	15,200	4,560,000
8	Wongor	GOLD	Eastern	ML01/2019	Kg	71	3,654,793
9	Dayu Mining	Gold	Northern	ML-1/2018	WMT	1,045	2,788,060
10	Sierra Rutile	Garnet	Southern	ML-2134	MT	2,500	2,057,500
11	Meya Mining	Diamond	Eastern	ML 2/2019	Carats	4,343	1,172,991
12	Sierra Diamond	Diamond	Eastern	Tonguma	Carats	343	45,041
13	Kingho Mining Company	Iron ore	Northern	ML 1/2020	WMT	NP	NP
<b>Total</b>							<b>346,825,423</b>

The total production value NMA provided amounted to USD 673 million. The difference could be due to the lack of data provided by these companies:

- Cheng Li Trading Mining
- FG Gold Ltd
- Pan African Rare Metal Mining Co
- Sierramin Bauxite (SL) Limited
- Supreme Minerals Corp
- Seawright Mining Co

## 5.2. Exports

The full production data NMA provided is presented in Section 4.1 above. This Section summarises the same data as disclosed by in-scope companies only detailed by volume, value, commodity and region, mining company and project.

2020

TABLE 51: DETAILS OF EXPORTS DISCLOSED BY IN-SCOPE COMPANIES (2020)

N°	Company	Commodity	License	Volume	Unit	Unit Price (USD)	Total value (USD)
1	Sierra Rutile Limited	Standard Grade Rutile	ML-2134	99,121	MT	1,225	121,458,707
2	Sierra Mineral Holdings 1	Bauxite	ML01/05	1,321,685	MT	33	43,905,012
3	Koidu	Diamond	ML06/95	124,060	Carat	155	19,258,404
4	Sierra Rutile Limited	Industrial Grade Rutile	ML-2134	13,020	MT	1,389	18,078,519
5	Koidu	Diamond	ML06/95	98,970	Carat	176	17,412,753
6	Koidu	Diamond	ML06/95	96,256	Carat	161	15,541,387
7	Koidu	Diamond	ML06/95	63,981	Carat	174	11,104,846
8	Koidu	Diamond	ML06/95	57,107	Carat	175	10,021,049
9	Sierra Rutile Limited	Zircon (concentrate)	ML-2134	30,641	MT	312	9,557,396
10	Sierra Rutile Limited	Ilmenite	ML-2134	58,468	MT	162	9,451,139
11	Koidu	Diamond	ML06/95	43,039	Carat	175	7,525,532
12	Koidu	Diamond	ML06/95	41,474	Carat	172	7,113,697
13	Koidu	Diamond	ML06/95	33,445	Carat	170	5,693,912
14	Dayu Mining	Gold (concentrate)	ML 1/2018	414	WMT	3,075	1,272,948
15	Sierra Rutile Limited	Garnet (concentrate)	ML-2134	6,126	MT	141	863,484
16	Dayu Mining	Gold (concentrate)	ML 1/2018	232	WMT	3,017	699,925
17	Dayu Mining	Gold (concentrate)	ML 1/2018	218	WMT	3,058	666,648
18	Sierra Diamond Limited	Diamond	ML 2/2018	343	Carats	131	45,041
<b>Total</b>							<b>299,670,398</b>

The total exports value NMA provided amounted to USD 317 million. The difference could be due to the lack of data provided by these companies:

- Kingho Mining Company Limited
- Meya Mining Co. Ltd
- Cheng Li Trading Mining
- Northern Mining Company Limited
- Wongor Investments and Mining Corporation Limited

2021

TABLE 52: DETAILS OF EXPORTS DISCLOSED BY IN-SCOPE COMPANIES (2021)

N°	Company	Commodity	Licence	Volume	Unit	Unit Price (USD)	Total value (USD)
1	Sierra Rutile	Standard Grade Rutile	ML-2134	115,672	MT	1,231	142,349,728
2	Kingho Mining	IRON ORE	ML 1/2020	2,032,015	MT	57	116,090,101
3	Sierra Mineral Holdings	Bauxite	ML01/05	1,478,700	MT	32	47,613,347
4	Sierra Rutile	Industrial Grade Rutile	ML-2134	14,081	MT	1,535	21,617,867
5	Koidu	Diamond	ML06/95	116,818	Carats	166	19,366,576
6	Koidu	Diamond	ML06/95	92,492	Carats	165	15,300,254
7	Koidu	Diamond	ML06/95	72,548	Carats	181	13,156,216
8	Koidu	Diamond	ML06/95	81,165	Carats	161	13,043,543
9	Koidu	Diamond	ML06/95	51,396	Carats	231	11,881,797
10	Koidu	Diamond	ML06/95	70,209	Carats	151	10,583,201
11	Sierra Rutile	Zircon in concentrate	ML-2134	20,400	MT	500	10,194,000
12	Koidu	Diamond	ML06/95	52,612	Carats	173	9,108,579
13	Koidu	Diamond	ML06/95	68,221	Carats	129	8,800,567
14	Koidu	Diamond	ML06/95	39,801	Carats	177	7,059,828
15	Sierra Rutile	Ilmenite	ML-2134	39,915	MT	156	6,208,471
16	Kasino Mining	Heavy Minerals Concentrate	SML 10/2019	15,200		300	4,560,000
17	Wongor	Gold	ML01/2019	70,756	GRAMS	N/A	3,654,793
18	Dayu Mining	Gold (concentrate)	ML 1/2018	866	WMT	3,036	2,628,917
19	Sierra Rutile	Garnet in concentrate	ML-2134	7,711	MT	235	1,811,740
20	Meya Mining	Diamonds	ML 2/2019	2,622	Carats	327	857,849
21	Dayu Mining	Gold (concentrate)	ML 1/2018	146	WMT	2,922	426,554
22	Meya Mining	Diamonds	ML 2/2019	1,762	Carats	185	326,218
23	Sierra Diamond	Diamond	ML 2/2018	343	Carats	131	45,041
<b>Total</b>							<b>466,685,189</b>

The total exports value NMA provided amounted to USD 577 million. The difference could be due to the lack of data provided by these companies:

- FG Gold Ltd
- Marampa Mines Limited
- Pan African Rare Metal Mining Co
- Seawright Mining Co

### 5.3. Analysis of Government revenues from Extractive Sector

In Sierra Leone extractive revenues are derived entirely from the mining sector. The petroleum sector has yet to contribute to the Government revenues for the years 2020 and 2021.

This section shows the details of Government tax revenues by

- company;
- revenue stream;
- government agency;
- commodity;
- region; and
- project (mining agreement).

Annexes 2-4 to this report provide the full list of payments made by all mining companies and individuals.

### Analysis by extractive company

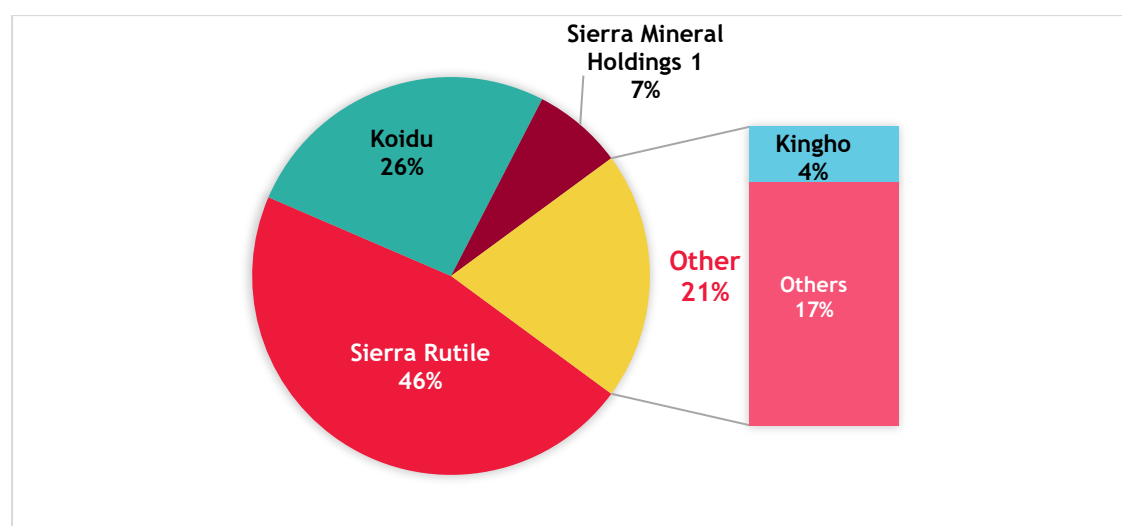
#### 2020

The analysis of tax revenues from the extractive industries shows that top 10 companies contributed almost **92%** of the total revenues. Both Sierra Rutile and Koidu accounted for **72%**. The table and Figure below set out the breakdown of extractive revenues by mining company.

TABLE 53: BREAKDOWN OF EXTRACTIVE REVENUES BY COMPANY (2020)

N°	Company	Commodity	Contribution to tax revenues (USD million)	Weight (%)	Cumulative weight (%)
1	Sierra Rutile Limited	Rutile	23.99	46.39%	46.39%
2	Koidu Limited	Diamond	13.50	26.10%	72.49%
3	Sierra Mineral Holdings 1 Limited	Bauxite	3.79	7.33%	79.82%
4	Kingho mining company Limited	Iron Ore	1.93	3.73%	83.55%
5	Sierra Diamonds Limited	Diamond	1.11	2.14%	85.69%
6	Dayu Mining Company	Gold	0.79	1.52%	87.21%
7	Wongor Invest. and Mining Corporation Ltd	Gold	0.58	1.12%	88.33%
8	Meya Mining Limited	Diamond	0.57	1.09%	89.43%
9	H M Diamond Limited	Diamond	0.56	1.07%	90.50%
10	Cheng Li Trading Mining Comp. (SL) Ltd	Gold	0.54	1.04%	91.54%
Top 10			47.33	91.54%	
Other companies and individuals			4.38	8.46%	100.00%
Total			51.71	100.00%	

FIGURE 25: BREAKDOWN OF EXTRACTIVE REVENUES BY COMPANY (2020)



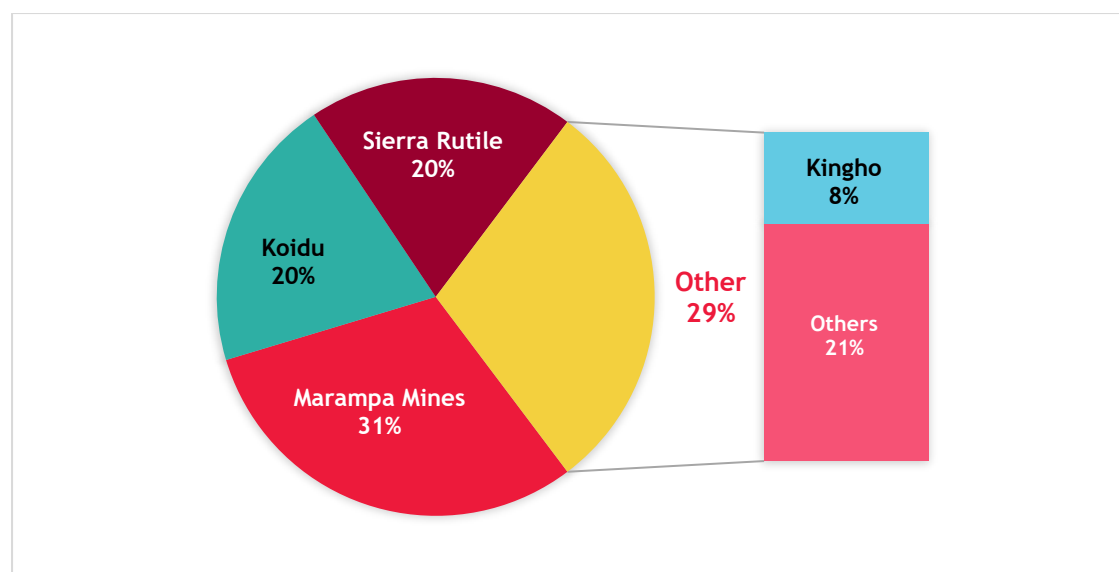
## 2021

The analysis of tax revenues from the extractive industries shows that top 10 companies contributed for 91% of the total revenues. Marampa Mines, Koidu and Sierra Rutile accounted for 71%. The table and Figure below set out the breakdown of extractive revenues by mining company.

TABLE 54: BREAKDOWN OF EXTRACTIVE REVENUES BY COMPANY (2021)

N°	Company	Commodity	Contribution to tax revenues (USD million)	Weight (%)	Cumulative weight (%)
1	Marampa Mines Limited	Iron ore	20.73	30.62%	30.62%
2	Koidu Limited	Diamond	13.73	20.27%	50.89%
3	Sierra Rutile Limited	Rutile	13.31	19.66%	70.54%
4	Kingho Mining Company Limited	Iron Ore	5.59	8.25%	78.80%
5	Sierra Mineral Holdings 1 Limited	Bauxite	3.87	5.72%	84.52%
6	Seawright Mining Company	Diamond	1.20	1.77%	86.29%
7	Sierra Diamonds Limited	Diamond	1.16	1.71%	88.00%
8	Wongor Invest. and Mining Corporation Ltd	Gold	0.74	1.10%	89.10%
9	Dayu Mining Co	Gold	0.73	1.08%	90.18%
10	Meya Mining Limited	Diamond	0.65	0.96%	91.14%
<b>Top 10</b>			<b>61.71</b>	<b>91.14%</b>	
-	Other companies and individuals		6.00	8.86%	100.00%
<b>Total</b>			<b>67.71</b>	<b>100.00%</b>	

FIGURE 26: BREAKDOWN OF EXTRACTIVE REVENUES BY COMPANY (2021)



## Analysis by Government Agency and sub-national entity

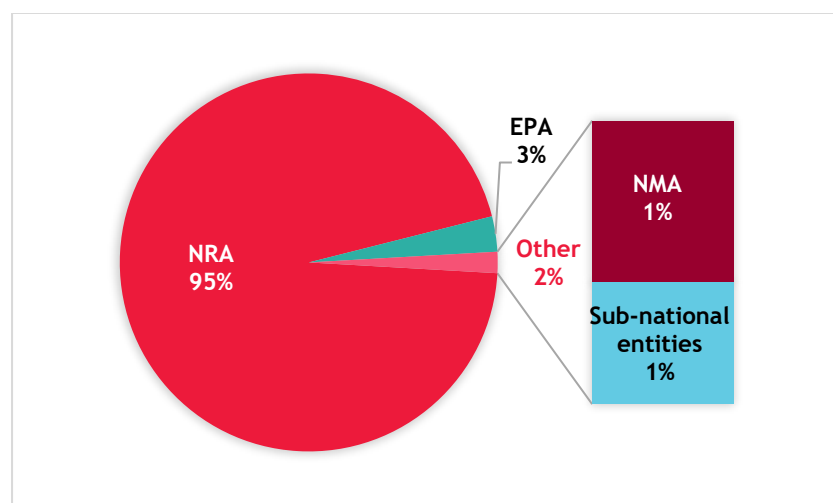
### 2020

The analysis of tax revenues from the extractive industries shows that NRA contributed **95%** of the total revenues. The table and Figure below set out the breakdown of extractive revenues by government agency.

TABLE 55: BREAKDOWN OF EXTRACTIVE REVENUES BY AGENCY (2020)

N°	Agency	Contribution to tax revenues (USD million)	Weight (%)	Cumulative weight (%)
1	NRA	49.22	95.19%	95.19%
2	EPA	1.56	3.02%	98.22%
3	NMA	0.54	1.04%	99.25%
4	Sub-national entities	0.39	0.75%	100.00%
<b>Total</b>		<b>51.71</b>	<b>100.00%</b>	

FIGURE 27: BREAKDOWN OF EXTRACTIVE REVENUES BY AGENCY (2020)



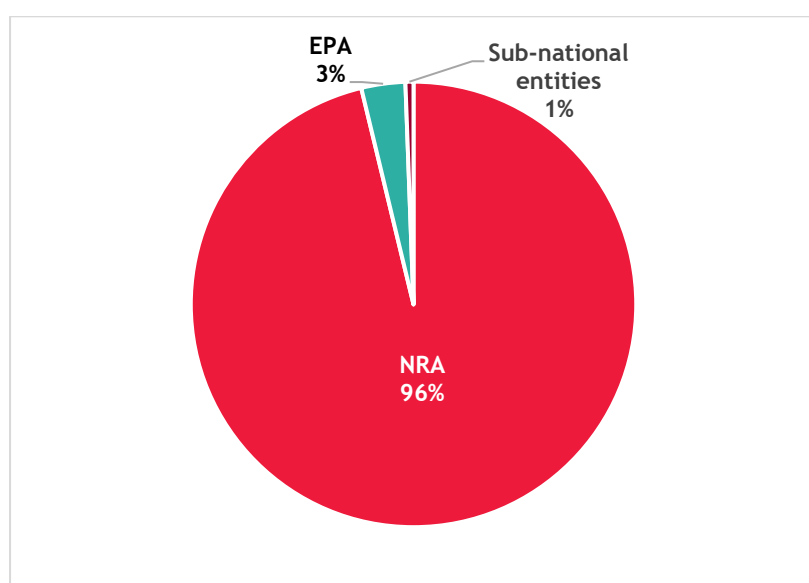
## 2021

The analysis of tax revenues from the extractive industries shows that NRA contributed **96%** of the total revenues. The table and Figure below set out the breakdown of extractive revenues by government agency.

TABLE 56: BREAKDOWN OF EXTRACTIVE REVENUES BY AGENCY (2021)

N°	Agency	Contribution to tax revenues (USD million)	Weight (%)	Cumulative weight (%)
1	NRA	65.05	96.07%	96.07%
2	EPA	2.16	3.19%	99.26%
3	Sub-national entities	0.50	0.74%	100.00%
Total		67.71	100.00%	

FIGURE 28: BREAKDOWN OF EXTRACTIVE REVENUES BY AGENCY (2021)



## Analysis by revenue stream

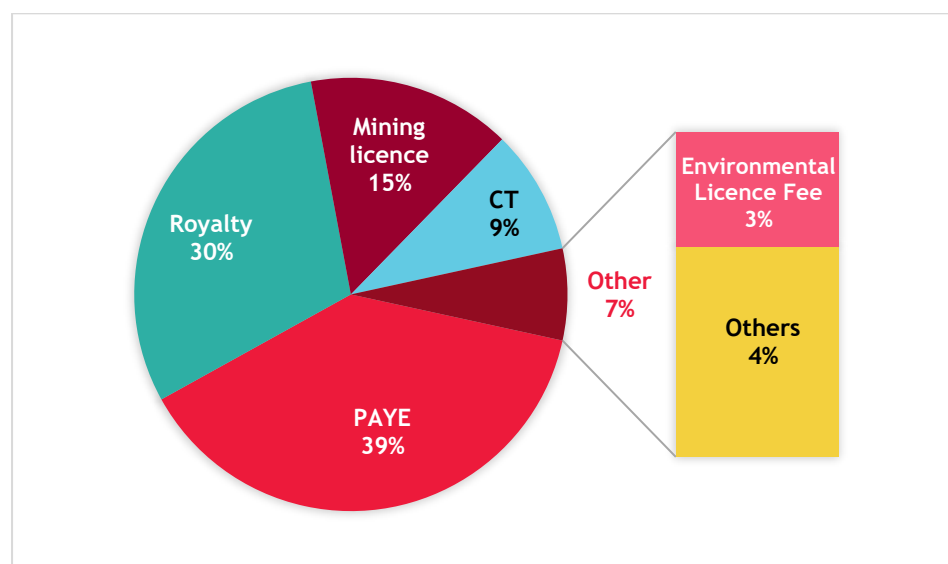
### 2020

The analysis of tax revenues from the extractive industries shows that top 5 revenue streams contributed almost for **96%** of the total revenues. The table and Figure below set out the breakdown of extractive revenues by revenue stream.

TABLE 57: BREAKDOWN OF EXTRACTIVE REVENUES BY REVENUE STREAM (2020)

N°	Revenue stream	Contribution to tax revenues (USD million)	Weight (%)	Cumulative weight (%)
1	PAYE	19.93	38.54%	38.54%
2	Royalty	15.56	30.10%	68.64%
3	Mining licence	7.90	15.27%	83.91%
4	Corporate Tax	4.80	9.28%	93.19%
5	Environmental Licence Fee	1.25	2.42%	95.61%
	<b>Top 5</b>	<b>49.44</b>	<b>95.61%</b>	
	<b>Other revenue streams</b>	<b>2.27</b>	<b>4.39%</b>	<b>100.00%</b>
	<b>Total</b>	<b>51.71</b>	<b>100.00%</b>	

FIGURE 29: BREAKDOWN OF EXTRACTIVE REVENUES BY REVENUE STREAM (2020)





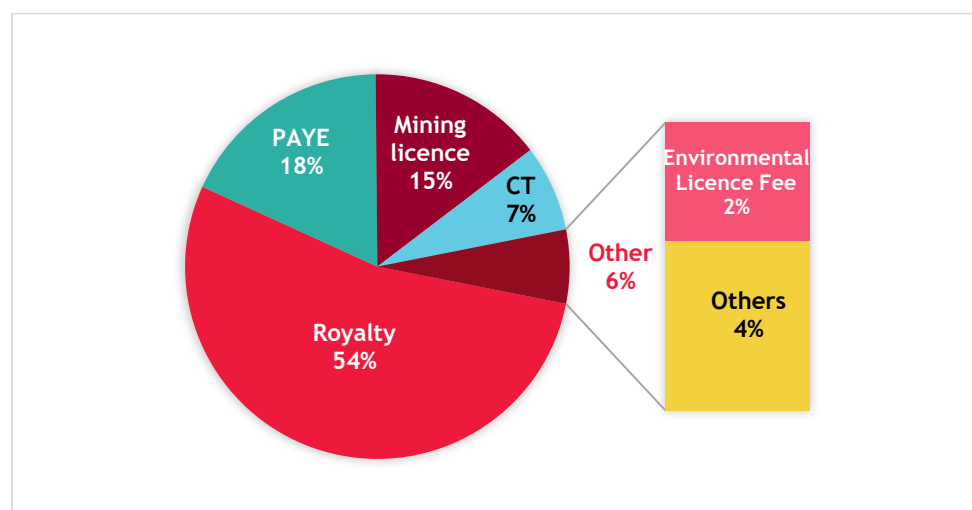
## 2021

The analysis of tax revenues from the extractive industries shows that top 5 revenue streams contributed almost for **96%** of the total revenues. The table and Figure below set out the breakdown of extractive revenues by revenue stream.

TABLE 58: BREAKDOWN OF EXTRACTIVE REVENUES BY REVENUE STREAM (2021)

N°	Revenue stream	Contribution to tax revenues (USD million)	Weight (%)	Cumulative weight (%)
1	Royalty	36.31	53.62%	53.62%
2	PAYE	12.20	18.01%	71.63%
3	Mining licence	10.00	14.76%	86.40%
4	Corporate Tax	4.90	7.24%	93.64%
5	Environmental Licence Fee	1.73	2.55%	96.19%
	<b>Top 5</b>	<b>65.13</b>	<b>96.19%</b>	
	<b>Other 6 revenue streams</b>	<b>2.58</b>	<b>3.81%</b>	<b>100.00%</b>
	<b>Total</b>	<b>67.71</b>	<b>100.00%</b>	

FIGURE 30: BREAKDOWN OF EXTRACTIVE REVENUES BY REVENUE STREAM (2021)



## Analysis by commodity

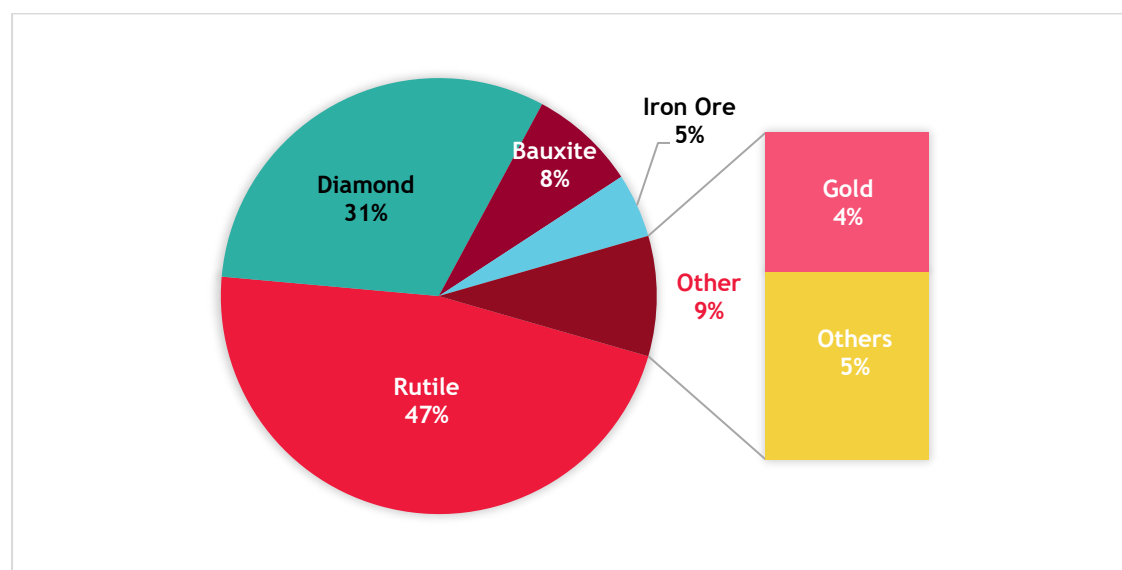
### 2020

The analysis of tax revenues from the extractive industries shows that **rutile** accounted for approximately **half** the total revenues. Top 5 commodities accounted for almost **95%**. The table and Figure below set out the breakdown of extractive revenues by commodity.

TABLE 59: BREAKDOWN OF EXTRACTIVE REVENUES BY COMMODITY (2020)

N°	Commodity	Contribution to tax revenues (USD million)	Weight (%)	Cumulative weight (%)
1	Rutile	24.29	46.97%	46.97%
2	Diamond	16.26	31.44%	78.41%
3	Bauxite	4.10	7.93%	86.33%
4	Iron Ore	2.46	4.76%	91.09%
5	Gold	1.96	3.79%	94.88%
	<b>Top 5</b>	<b>49.06</b>	<b>94.88%</b>	
	<b>Other commodities</b>	<b>2.65</b>	<b>5.12%</b>	<b>100.00%</b>
	<b>Total</b>	<b>51.71</b>	<b>100.00%</b>	

FIGURE 31: BREAKDOWN OF EXTRACTIVE REVENUES BY COMMODITY (2020)



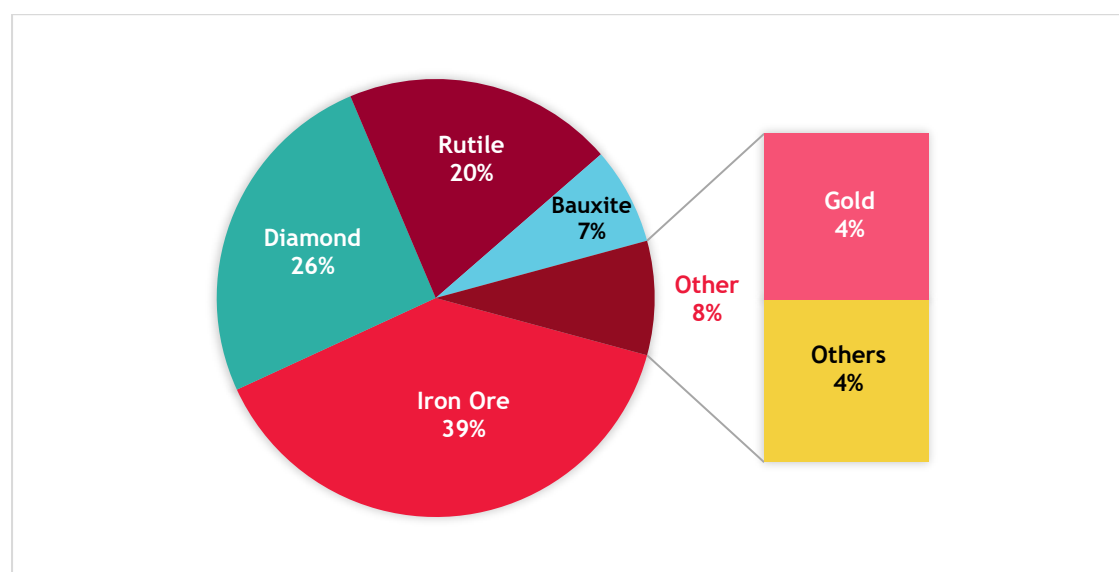
## 2021

The analysis of tax revenues from the extractive industries shows that **iron ore** accounted for approximately **39%** the total revenues. Top 5 commodities accounted for **96%**. The table and Figure below set out the breakdown of extractive revenues by commodity.

**TABLE 60: BREAKDOWN OF EXTRACTIVE REVENUES BY COMMODITY (2021)**

N°	Commodity	Contribution to tax revenues (USD million)	Weight (%)	Cumulative weight (%)
1	Iron Ore	26.35	38.91%	38.91%
2	Diamond	17.27	25.51%	64.42%
3	Rutile	13.53	19.98%	84.40%
4	Bauxite	4.86	7.18%	91.58%
5	Gold	2.89	4.27%	95.85%
	<b>Top 5</b>	<b>64.90</b>	<b>95.85%</b>	
	<b>Other commodities</b>	<b>2.81</b>	<b>4.15%</b>	<b>100.00%</b>
	<b>Total</b>	<b>67.71</b>	<b>100.00%</b>	

**FIGURE 32: BREAKDOWN OF EXTRACTIVE REVENUES BY COMMODITY (2021)**



## Analysis by District

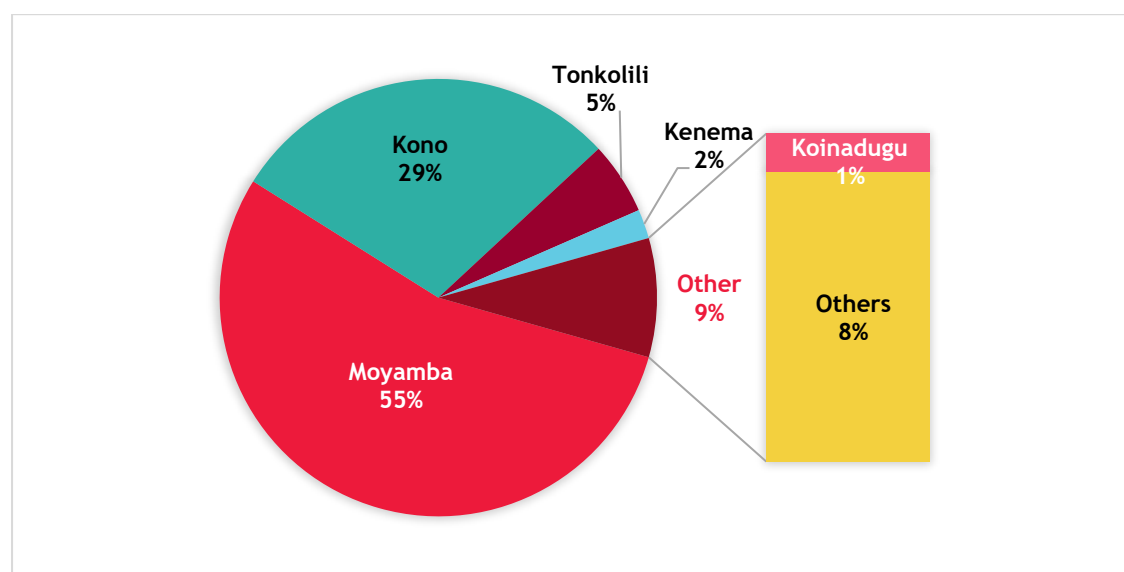
### 2020

The analysis of tax revenues from the extractive industries shows that **Moyamba** and **Kono** districts accounted for approximately **84%** the total revenues. The table and Figure below set out the breakdown of extractive revenues by district.

TABLE 61: BREAKDOWN OF EXTRACTIVE REVENUES BY DISTRICT (2020)

N°	District	Contribution to tax revenues (USD million)	Weight (%)	Cumulative weight (%)
1	Moyamba	28.20	54.53%	54.53%
2	Kono	15.08	29.16%	83.69%
3	Tonkolili	2.77	5.36%	89.06%
4	Kenema	1.12	2.16%	91.21%
5	Koinadugu	0.54	1.04%	92.25%
	<b>Top 5</b>	<b>47.70</b>	<b>92.25%</b>	
	Other Districts	4.01	7.75%	100.00%
	<b>Total</b>	<b>51.71</b>	<b>100.00%</b>	

FIGURE 33: BREAKDOWN OF EXTRACTIVE REVENUES BY DISTRICT (2020)



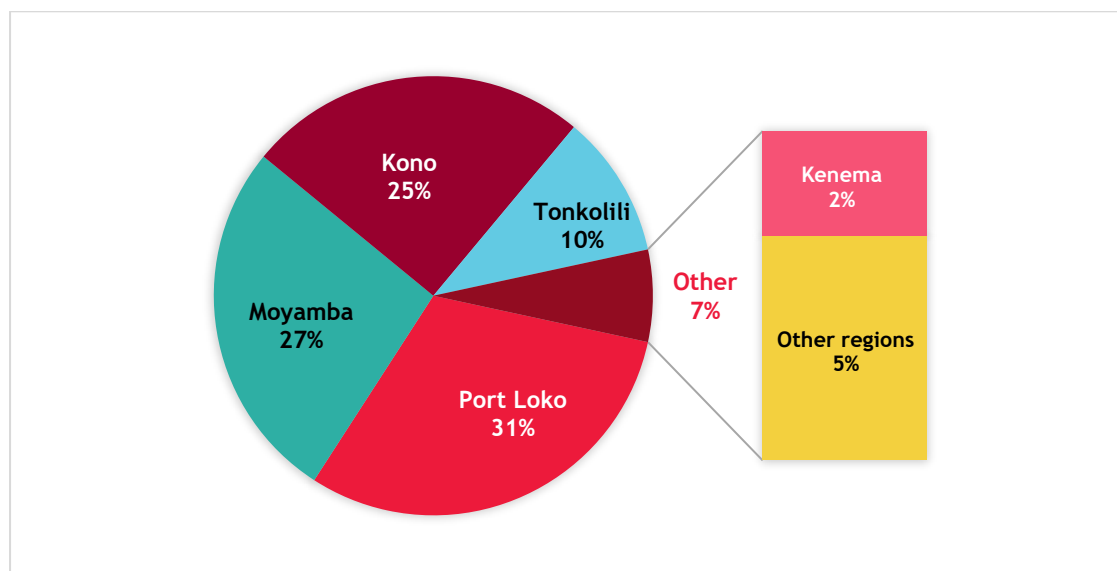
## 2021

The analysis of tax revenues from the extractive industries shows that **Port Loko**, **Moyamba** and **Kono** districts accounted for approximately **83%** the total revenues. The table and Figure below set out the breakdown of extractive revenues by region.

TABLE 62: BREAKDOWN OF EXTRACTIVE REVENUES BY DISTRICT (2021)

N°	District	Contribution to tax revenues (USD million)	Weight (%)	Cumulative weight (%)
1	Port Loko	20.82	30.74%	30.74%
2	Moyamba	18.15	26.80%	57.54%
3	Kono	17.02	25.13%	82.68%
4	Tonkolili	7.14	10.55%	93.23%
5	Kenema	1.47	2.17%	95.40%
	<b>Top 5</b>	<b>64.60</b>	<b>95.40%</b>	
	Other Districts	3.12	4.60%	100.00%
	<b>Total</b>	<b>67.71</b>	<b>100.00%</b>	

FIGURE 34: BREAKDOWN OF EXTRACTIVE REVENUES BY DISTRICT (2021)



## Analysis by project (mining agreement)

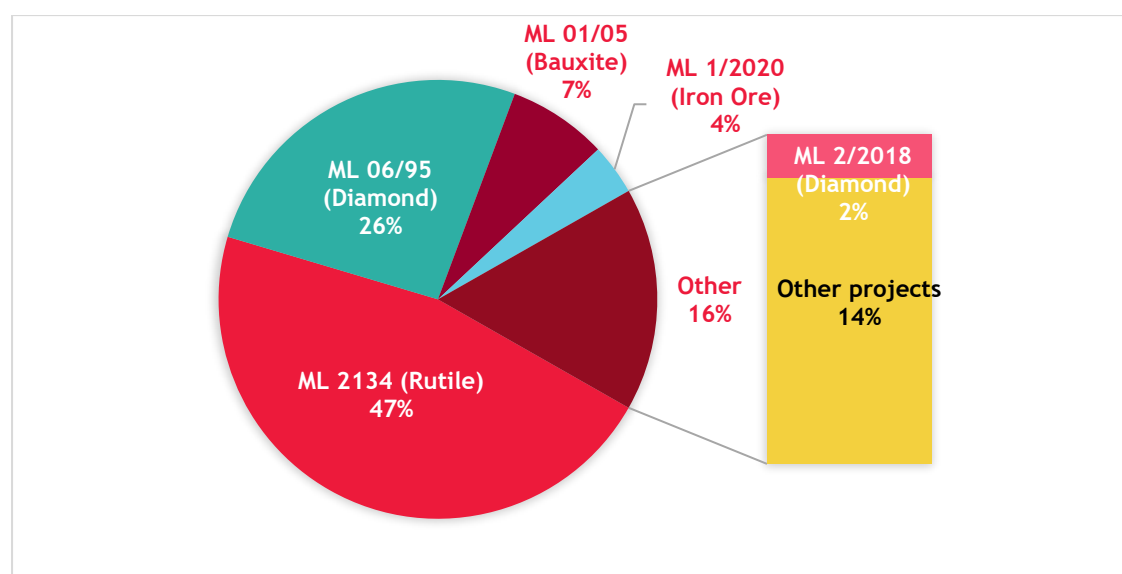
### 2020

The analysis of tax revenues from the extractive industries shows that project **ML 2134** operated by **Sierra Rutile** accounted for **46%** the total revenues. The table and Figure below set out the breakdown of extractive revenues by project.

TABLE 63: BREAKDOWN OF EXTRACTIVE REVENUES BY PROJECT (2020)

N°	Project reference	Start date	Owner	Commodity	Contribution to tax revenues (USD million)	Weight (%)	Cumulative weight (%)
1	ML 2134	09/09/2010	Sierra Rutile Limited	Rutile	23.99	46.39%	46.39%
2	ML 06/95	22/07/1995	Koidu Limited	Diamond	13.57	26.25%	72.64%
3	ML 01/05	17/01/2005	Sierra Mineral Holdings 1	Bauxite	3.79	7.33%	79.97%
4	ML 1/2020	07/01/2020	Kingho Mining Company	Iron Ore	1.94	3.74%	83.72%
5	ML 2/2018	16/05/2018	Sierra Diamonds Limited	Diamond	1.11	2.14%	85.86%
Top 5					44.39	85.86%	
Other projects					7.31	14.14%	100.00%
Total					51.71	100.00%	

FIGURE 35: BREAKDOWN OF EXTRACTIVE REVENUES BY PROJECT (2020)



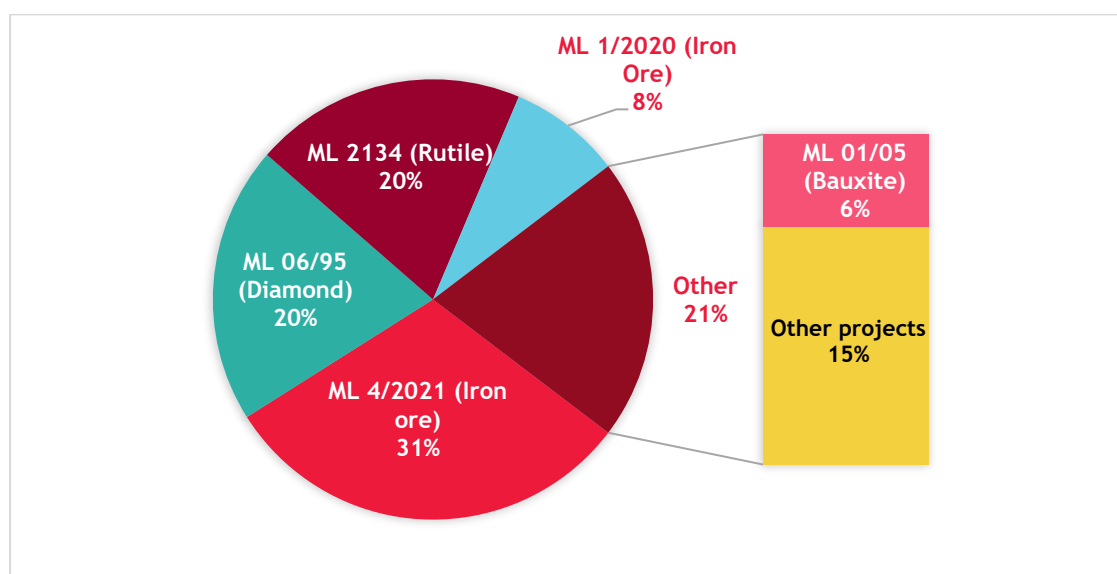
## 2021

The analysis of tax revenues from the extractive industries shows that project **ML 4/2021** operated by **Marampa Mines** accounted for **31%** the total revenues. The table and Figure below set out the breakdown of extractive revenues by project.

TABLE 64: BREAKDOWN OF EXTRACTIVE REVENUES BY PROJECT (2021)

N°	Project reference	Start date	Owner	Commodity	Contribution to tax revenues (USD million)	Weight (%)	Cumulative weight (%)
1	ML 4/2021	06/08/2021	Marampa Mines Ltd	Iron ore	20.76	30.65%	30.65%
2	ML 06/95	22/07/1995	Koidu Ltd	Diamond	13.80	20.38%	51.04%
3	ML 2134	09/09/2010	Sierra Rutile Ltd	Rutile	13.45	19.87%	70.90%
4	ML 1/2020	07/01/2020	Kingho Mining Company	Iron Ore	5.59	8.26%	79.16%
5	ML 01/05	17/01/2005	Sierra Mineral Holdings 1	Bauxite	3.98	5.87%	85.04%
Top 5					57.58	85.04%	
Other projects					10.13	14.96%	100.00%
Total					67.71	100.00%	

FIGURE 36: BREAKDOWN OF EXTRACTIVE REVENUES BY PROJECT (2021)



## 5.4. Analysis of Sub-national Payments

Surface rent collected by District / Chiefdom councils and Paramount chiefs from mining companies amounted to **USD 386,665** and **USD 500,752** respectively in 2020 and 2021.

The tables below present surface rent by district and mining company.

**TABLE 65: BREAKDOWN OF SURFACE RENT BY REGION (2020 AND 2021)**

District (In USD)	2020	%	2021	%
Moyamba	240,206	62.12%	242,856	48.50%
Kono	125,103	32.35%	202,100	40.36%
Kenema	8,625	2.23%	8,480	1.69%
Tonkolili	7,402	1.91%	22,118	4.42%
Port Loko	5,329	1.38%	25,198	5.03%
<b>Total</b>	<b>386,665</b>	<b>100.00%</b>	<b>500,752</b>	<b>100.00%</b>

**TABLE 66: BREAKDOWN OF SURFACE RENT BY COMPANY (2020 AND 2021)**

Company (In USD)	2020	%	2021	%
Sierra Rutile Limited	141,615	36.62%	140,647	28.09%
Sierra Mineral Holdings 1 Limited	98,591	25.50%	102,209	20.41%
Koidu mining limited	76,956	19.90%	77,456	15.47%
Meya Mining Limited	48,147	12.45%	80,034	15.98%
Sierra Diamonds Limited	8,625	2.23%	8,480	1.69%
Kingho mining company Limited	6,908	1.79%	6,481	1.29%
Sierra-min Bauxite SL Limited	5,329	1.38%		
Dayu Mining Company	493	0.13%	1,296	0.26%
Seawright Mining Company			40,000	7.99%
Marampa Mines Limited			25,198	5.03%
FG Gold Limited			12,500	2.50%
Wongor Investments and Mining Corporation Limited			3,684	0.74%
Chilting mining company			1,840	0.37%
Pan African Rare Metal Mining Co			926	0.18%
<b>Total</b>	<b>386,665</b>	<b>100.00%</b>	<b>500,752</b>	<b>100.00%</b>

Further details of surface rental revenues are presented in Annex 5 to this report.



## 5.5. Analysis of Social Payments

The extractive companies selected to submit reporting templates have reported mandatory and voluntary social payments amounting to **USD 1.3 million** and **USD 3.5 million** during the years 2020 and 2021 respectively. The tables below summarise these social payments by company and type of payment.

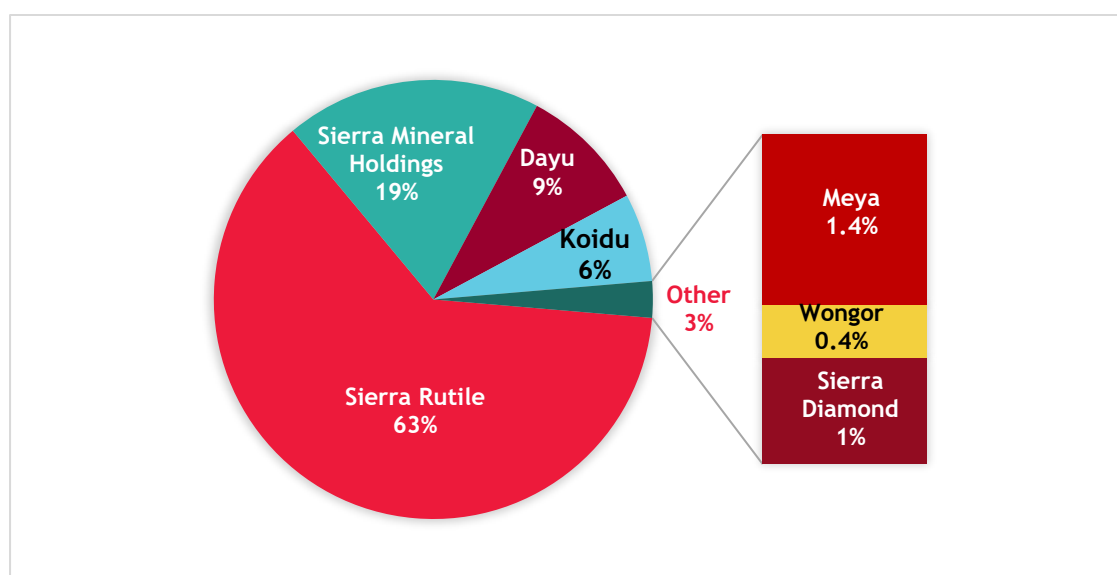
### 2020

TABLE 67: BREAKDOWN OF SOCIAL PAYMENTS BY COMPANY AND TYPE OF PAYMENT (2020)

*In USD*

Company	Mandatory social payments		Voluntary social payments		Total	%
	Cash	In Kind	Cash	In Kind		
Sierra Rutile Limited	825,919	0	0	709	826,628	62.61%
Sierra Mineral Holdings 1 Limited	0	0	249,168	0	249,168	18.87%
Dayu Mining Company Limited	122,372	0	1,026	0	123,399	9.35%
Koidu Limited	14,828	0	70,879	0	85,707	6.49%
Meya Mining Limited	0	0	18,321	0	18,321	1.39%
Wongor Invest. and Mining Corporation	0	0	5,744	0	5,744	0.44%
Sierra Diamond Ltd	0	0	0	11,398	11,398	0.86%
<b>Total</b>	<b>963,119</b>	<b>0</b>	<b>345,138</b>	<b>12,107</b>	<b>1,320,365</b>	<b>100.00%</b>

FIGURE 37: BREAKDOWN OF SOCIAL PAYMENTS BY COMPANY AND TYPE OF PAYMENT (2020)



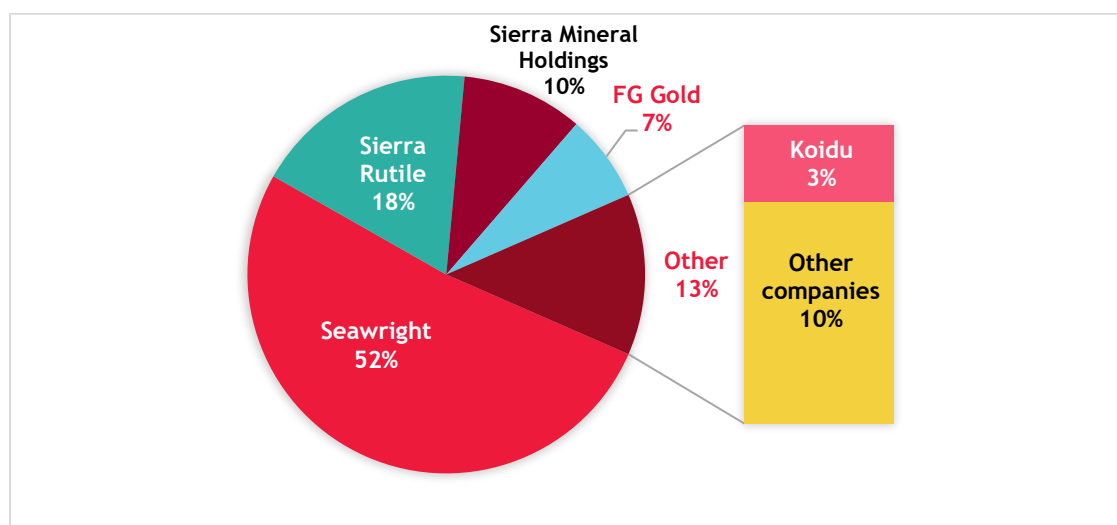
## 2021

TABLE 68: BREAKDOWN OF SOCIAL PAYMENTS BY COMPANY AND TYPE OF PAYMENT (2021)

*In USD*

Company	Mandatory social payments		Voluntary social payments		Total	%
	Cash	In Kind	Cash	In Kind		
Seawright Mining Co	0	0	1,821,802	0	1,821,802	51.66%
Sierra Rutile Limited	462,994	0	180,532	0	643,526	18.25%
Sierra Mineral Holdings 1 Limited	348,398	0	0	0	348,398	9.88%
FG Gold Ltd	0	0	0	250,000	250,000	7.09%
Koidu Limited	45,465	0	72,870	0	118,335	3.36%
Cheng Li Trading Mining	74,074	0	0	20,000	94,074	2.67%
Meya Mining Limited	18,611	0	62,599	0	81,210	2.30%
Wongor Invest. and Mining Corporation	53,941	0	10,445	0	64,386	1.83%
Dayu Mining Company Limited	48,148	0	1,019	0	49,167	1.39%
Kingho Mining Company Limited	0	0	0	23,926	23,926	0.68%
KaSino Mining Company Limited	0	0	13,000	0	13,000	0.37%
Sierra Diamond Limited	0	0	12,963	0	12,963	0.37%
Marampa Mines Limited	0	0	5,515	0	5,515	0.16%
<b>Total</b>	<b>1,051,631</b>	<b>0</b>	<b>2,180,745</b>	<b>293,926</b>	<b>3,526,302</b>	<b>100.00%</b>

FIGURE 38: BREAKDOWN OF SOCIAL PAYMENTS BY COMPANY AND TYPE OF PAYMENT (2021)



The full details of social payments reported by each company are presented in Annex 9 to this report.

## 5.6. Analysis of Environmental Payments

The extractive companies selected to submit reporting templates have reported environmental payments amounted for **USD 200,152** and **USD 592,522** during 2020 and 2021 respectively. The tables below summarise these environmental payments by company and type of payment.

### 2020

TABLE 69: BREAKDOWN OF ENVIRONMENTAL PAYMENTS BY COMPANY AND TYPE OF PAYMENT (2020)

*In USD*

Company	Paid to private entities	Paid to public agencies	Total	%
Wongor Invest. And Mining Co Ltd	112,978		112,978	56.45%
Sierra Mineral Holdings 1 Ltd		82,162	82,162	41.05%
Meyra Mining Co. Ltd	5,012		5,012	2.50%
<b>Total</b>	<b>117,990</b>	<b>82,162</b>	<b>200,152</b>	<b>100.00%</b>

### 2021

TABLE 70: BREAKDOWN OF ENVIRONMENTAL PAYMENTS BY COMPANY AND TYPE OF PAYMENT (2021)

*In USD*

Company	Paid to private entities	Paid to public agencies	Total	%
Wongor Invest. And Mining Co Ltd	299,066	0	299,066	50.47%
Kingho Mining Company Limited	0	180,206	180,206	30.41%
Sierra Mineral Holdings 1 Ltd	0	56,190	56,190	9.48%
Marampa Mines Limited	49,060	0	49,060	8.28%
Meyra Mining Co. Ltd	8,000	0	8,000	1.35%
<b>Total</b>	<b>356,126</b>	<b>236,396</b>	<b>592,522</b>	<b>100.00%</b>

Details environmental payments reported by each company are presented in Annex 10 to this report.

## 5.7. Contribution of the Extractive Sectors to the Economy

### a. Contribution to the Government revenues

The table below shows the contribution of the extractive sector to the Government revenues.

TABLE 71: CONTRIBUTION TO THE GOVERNMENT REVENUES (2020 AND 2021)

USD million	2020	2021
Extractive revenues <sup>39</sup>	52.99	71.43
Total domestic revenues	543.44 <sup>40</sup>	640.47 <sup>41</sup>
<b>Contribution</b>	<b>9.75%</b>	<b>11.15%</b>

### b. Contribution to Gross Domestic Product

The table below shows the contribution of the extractive sector to Gross Domestic Product (GDP).

TABLE 72: CONTRIBUTION TO THE GDP (2020 AND 2021)

Contribution to GDP	2020	2021
Contribution domestic revenues to GDP	13.30%	15.70%
<b>Contribution Mining revenues (excluding CT, GST and Customs and Excise)</b>	<b>0.50%</b>	<b>1.20%</b>

Source: Ministry of Finance (Government budget and Statement of economic and financial policies for 2022)

### c. Contribution to total exports

The table below shows the contribution of the extractive sector to the total exports.

USD million	2020	2021
Total mining exports	316.51	576.62
Total Sierra Leone exports	532.00 <sup>42</sup>	948.30 <sup>43</sup>
<b>Contribution %</b>	<b>59.49%</b>	<b>60.81%</b>

<sup>39</sup> Source: EITI data.

<sup>40</sup> Source: Ministry of Finance (Government budget and Statement of economic and financial policies for 2022)

<sup>41</sup> <https://mofsl.gov.sl/wp-content/uploads/2022/11/Fiscal-Year-2023-Budget-for-Sierra-Leone..pdf>

<sup>42</sup> <https://oec.world/en/profile/country/sle/>

<sup>43</sup> <https://www.worldstopexports.com/sierra-leones-top-10-exports/>

#### d. Contribution to employment

The table below shows that almost 58% of the population works in the agricultural sector while the extractive sector contributed to 1.33% of total labour force in 2020.

TABLE 73: EMPLOYMENT SECTOR DISTRIBUTION IN SIERRA LEONE, 2020

N°	Sector	Total sector employment	Sector employment share, %	Ratio of women in sector employment, %
1	Agriculture	1,520,619	57.84%	49.00%
2	Trade, restaurants & hotels <sup>(a)</sup>	713,583	27.14%	70.00%
3	Community, social and personal services <sup>(b)</sup>	96,586	3.67%	32.00%
4	Manufacturing	72,577	2.76%	8.50%
5	Transport, storage & communication	51,564	1.96%	4.20%
6	Finance, real estate & business services <sup>l</sup>	40,311	1.53%	43.00%
7	<b>Mining &amp; quarrying</b>	<b>35,037</b>	<b>1.33%</b>	<b>4.10%</b>
8	Construction	33,826	1.29%	29.00%
9	Electricity, gas & water	16,224	0.62%	12.00%
10	Other services	48,673	1.85%	45.00%
<b>Total</b>		<b>2,629,000</b>	<b>100.00%</b>	<b>51.00%</b>

(a) This sector includes Wholesale and retail trade, repair of vehicles and motorcycles and Accommodation and food service activities.

(b) This sector includes Financial and insurance activities and Real estate, business and administrative activities.

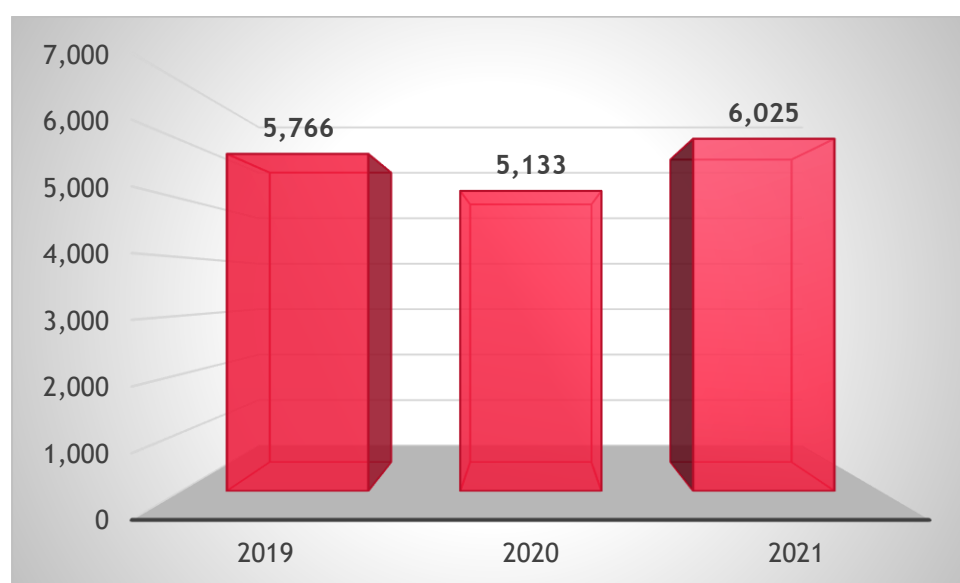
<sup>l</sup> This sector includes public administration and Defence, compulsory social security, Education, and Human health and social work activities.

Source: International Labour Organization (ILO), website, [link](#), Labour Market Profile Sierra Leone - 2020, Danish Trade Union Development Agency, Analytical Unit, [link](#).

Annex 6 to this report presents the 2020 and 2021 employment data reported by in-scope mining companies disaggregated by company and by gender.

The Figure below shows that total employment of in-scope companies has resumed growth in 2021 as Marampa Mines Limited commenced operations in June 2021.

FIGURE 39: EVOLUTION OF TOTAL EMPLOYMENT OF IN-SCOPE COMPANIES



## 6. RECOMMENDATIONS

### 6.1. Findings and recommendations raised during FY 2020-2021

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

These recommendations are described as follows:

<b>Recommendation n° 1:</b>	<b>Title: Future EITI scope</b>
<b>Type of finding:</b> Requirement 4	
<b>Relevant entity :</b> SLEITI MSG	
<b>Description:</b> <p>EITI Requirement 4 warrants the comprehensive disclosure of company payments and government revenues from the extractive industries. Although most of the EITI member countries include only the oil and gas and mining sectors in their EITI Reports, others have extended their EITI scope to include agriculture (rubber), forestry (timber), fisheries, water extraction from boreholes, as well as the hydropower sector, etc.</p> <p>We note that Sierra Leone is among the 100 major exporters of sawn wood.<sup>44</sup> However, the MSG has not considered including the forestry sector in its scope to date.</p>	
<b>Recommendation:</b> <p>The SLEITI MSG is encouraged to discuss the possibility of extending the EITI scope by including all revenues collected from the forestry sector as well as any other relevant sector.</p> <p>This would help inter alia touch on the debate and planning around the issue of deforestation and illegal logging. Such measures have already been undertaken by several other EITI implementing countries, including countries from the African continent such as Liberia, the Republic of Congo and the Democratic Republic of Congo which have included the forestry sector in their EITI reporting.</p>	

<sup>44</sup> <https://www.worldstopexports.com/sawn-wood-exports-country/>

<b>Recommendation n° 2:</b>	<b>Title: EITI Systematic disclosure</b>
<b>Type of finding:</b> Requirement 4	
<b>Relevant entity :</b> SLEITI MSG	
<p><b>Description:</b></p> <p>EITI Implementing countries are encouraged to systematically publish open data by embedding open data policies and strategies in reporting entities involved in EITI reporting to ensure timely and quality of data, accessibility and cost effectiveness of data delivery.</p> <p>The systematic disclosure or mainstreaming refers to the desired end-state, where the EITI's disclosure requirements are met through routine and publicly available company and government reporting. This could include public financial reporting, annual reports, information portals and other open data initiatives. Systematic disclosure is the expectation, with EITI Reports used to provide additional context, collate the sources where systematic disclosures can be found, and address any gaps and concerns about data quality. EITI disclosure requirements can be met by referencing publicly available information and/or data collected as part of EITI implementation.</p> <p>According to EITI Requirement 1.5.c, the work plan must address the scope of EITI implementation, including plans for strengthening systematic disclosures.</p> <p>We note that Sierra Leone published a Feasibility Study for Mainstreaming EITI Reporting in December 2021.<sup>45</sup> However, there has not been much progress made since the publication of that feasibility study.</p>	
<p><b>Recommendation:</b></p> <p>The SLEITI MSG is encouraged to implement the recommendations suggested by the Feasibility Study, so that the concept of mainstreaming can gradually be embedded in the Sierra Leone context.</p>	

<sup>45</sup> <http://www.sleiti.gov.sl/index.php/documents/feasibility-study-for-mainstreaming-eiti-reporting-in-sierra-leone-2>

Recommendation n° 3:	Title: Production and export data
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Type of finding: Requirements 3.2 and 3.3

Relevant entity : BSL & NMA

#### Description:

According to EITI Requirements 3.2 and 3.3 EITI Implementing countries must disclose timely production and export data.

We note that the BSL [data portal](#) includes monthly production and export data while NMA, despite being in possession of more comprehensive data, does not publish any data outside the EITI Reporting exercise.

The following observations were made when we compared the production between these two sources:

- BSL only disclose production volume but did not disclose the values.
- NMA data (detailed above) which is the primary source, seem to be more comprehensive but not regularly published. For instance, BSL did not provide the production data for titanium, coltan and garnet.
- apart from rutile, diamond, bauxite and iron ore, the remaining minerals showed material differences between BSL and NMA data.

Similar findings were raised when we compared the export data between these two sources:

- BSL did not disclose the exports volumes.
- NMA data (detailed above) seem to be more comprehensive. For instance, BSL did not provide the exports data for titanium, coltan and garnet.
- Apart from rutile, bauxite and diamond, the rest of minerals showed material differences with NMA data.

#### Recommendation:

NMA and BSL are encouraged to harmonise their data on their sources of information to ensure data accuracy. This can only be achieved by setting up periodic task force meetings and agree on the data to be published. Any discrepancies should be fully investigated before the data is published by each government agency. Such exercise would also assist in the mainstreaming process.



## 6.2. Follow up of the Previous IA Recommendations

The table below shows the progress the SLEITI MSG made towards the implementation of the previous recommendations from the 2019 SLEITI report are yet to be implemented.

TABLE 74: FOLLOW-UP OF THE PREVIOUS IA RECOMMENDATIONS

No.	Title	EITI Req.	Responsible entity	Description	Recommendation	Addressed (Yes / No / Partly)	IA comments	MSG comments
1	Contract Transparency	2.4	SLEITI MSG	<p>Requirement 2.4 (b) stipulates that implementing countries are required to disclose any contracts and licenses that have been granted, entered into or amended from 1 January 2021. It is a requirement to document the government's policy on disclosure of contracts and licenses that govern the exploration and exploitation of oil, gas and minerals.</p> <p>Although all active mining agreements are publicly available on NMA's as well as Resource Contracts websites, we note that the SLEITI MSG did not:</p> <ul style="list-style-type: none"> <li>document the government's policy on contract disclosure and licenses that govern the exploration and exploitation of oil, gas and minerals;</li> <li>outline any barriers or gaps in timely, comprehensive and reliable disclosures face to implement contract transparency fully, as well as technical or financial support needs;</li> <li>document all the obstacles and challenges of adopting full contract transparency as required by the EITI Standard;</li> <li>identify whether there are any legal reforms underway or under discussion that could strengthen or threaten the availability of contract information; and</li> <li>propose and develop a roadmap for strengthening the disclosures of extractive contracts which include actions, responsible parties, timelines, resource and technical assistance needs.</li> </ul>	<p>The SLEITI MSG should document its discussion on what constitutes government policy on contract disclosures by identifying ongoing reforms or new measures under discussion that could strengthen or threaten the availability of contract information.</p> <p>The SLEITI MSG should then address "any obstacles and challenges in adopting full contract transparency. Finally, the SLEITI MSG should develop a roadmap for strengthening the disclosures of extractive contracts, which include actions, responsible parties, timelines, resource and technical assistance needs.</p>	Partly	<p>Most of the contracts are publicly available. The SLEITI Secretariat has a hard copy of the Innoson oil &amp; gas contract. It is recommended to upload a soft copy on the <a href="#">SLEITI Website</a>.</p>	<p>The SLEITI MSG has discussed this at a meeting and has approached the necessary Line Ministries including the Ministry of Mines and Mineral Resources (including the newly created Policy Department at the Ministry of Mines and Mineral Resources to develop the policy.</p>

No.	Title	EITI Req.	Responsible entity	Description	Recommendation	Addressed (Yes / No / Partly)	IA comments	MSG comments
2	Implementation of register of licences in oil and gas sector	2.3	Petroleum Directorate	In accordance with Requirement 2.3 (b) of the EITI Standard, implementing countries are required to maintain a publicly available register or cadastre system(s) with timely and comprehensive information. We noted that Sierra Leone does not maintain a publicly available register for oil and gas licences.	In order to comply with Requirement 2.3 (b), the GoSL should implement a publicly available register for oil & gas licenses including the following information: <ul style="list-style-type: none"> <li>• licence holder(s);</li> <li>• coordinates of the licensed area;</li> <li>• dates of application, dates of award and duration of the licences; and</li> <li>• In the case of production licences, the commodity being produced.</li> </ul>	No		The SLEITI MSG is working closely with the PD to establish a public register.
3	Contribution of the extractive sector to the economy	6.3	Ministry of Finance, BSL and Ministry of Labour	In accordance with EITI Requirement 6.3, implementing countries must disclose, when available, information about the contribution of the extractive sector to the economy for the fiscal year covered by EITI implementation, especially contribution to GDP, to Government revenues, to Exports and to employment. We note that this information was not disclosed by relevant government agencies. For instance, the Ministry of Finance did not disclose the contribution of the extractive sector to GDP, or to government revenues. BSL was unable to disclose the contribution of the EITI sector to exports, while the Ministry of Labour could not provide statistics on employment in the extractive sector.	In order to comply with requirement 6.3, we recommend the Government agencies to disclose contribution of the extractive sector to the economy on annual basis. It is required that this information includes: <ol style="list-style-type: none"> <li>1. The size of the extractive industries in absolute terms and as a percentage of GDP as well as an estimate of informal sector activity, including but not necessarily limited to artisanal and small-scale mining;</li> <li>2. Total government revenues generated by the extractive industries (including taxes, royalties, bonuses, fees, and other payments) in absolute terms and as a percentage of total government revenues;</li> <li>3. Exports from the extractive industries in absolute terms and as a percentage of total exports.</li> <li>4. Employment in the extractive industries in absolute terms and as a percentage of the total employment.</li> </ol> The information should be disaggregated by gender and, when available, further disaggregated by company and occupational level.	Yes		The MSG has confirmed with the Ministry of Finance that this information is provided in the Annual Budget speech read in Parliament by the Minister of Finance and it is available on the MoF website.

No.	Title	EITI Req.	Responsible entity	Description	Recommendation	Addressed (Yes / No / Partly)	IA comments	MSG comments
4	Non-compliance with EITI reporting templates deadlines	4.1	Reporting entities	We note that Government agencies as well as extractive companies did not honour the deadline set by the SLEITI MSG for the submission of reporting templates. Additionally, there was a complete lack of response to our queries, despite several chasers sent to these stakeholders. As result, the preparation of the Report took longer than anticipated and was significantly delayed.	We recommend for future exercises that the MSG engages with the reporting entities so they adhere to the agreed deadlines. These could be in the form of training workshops and emphasis should be laid upon the fact that late reporting could lead to SLEITI's suspension from the EITI Programme. Additionally, they should also be encouraged to reply promptly to the IA's queries so the report can be finalised on time.	Yes	Although most of the reporting entities did not meet the agreed deadline, we can confirm their full cooperation. The SLEITI Secretariat team's support was also appreciated.	There has been some improvement from the last reporting round. The SLEITI MSG will continue to engage the relevant entities to adhere to reporting deadline.
5	Lack of financial support to SLEITI Secretariat	7	SLEITI MSG	We note that the SLEITI Secretariat does not have sufficient financial support to carry out the following tasks: <ul style="list-style-type: none"> <li>• promotion of the EITI values across the country;</li> <li>• awareness workshops to improve the participation of SLEITI Stakeholders in EITI reporting process; and</li> <li>• capacity building of government agencies and extractive companies EITI focal points.</li> </ul>	We recommend to the SLEITI MSG to seek a financial support to the SLEITI Secretariat from government or funding international institution in order to: <ol style="list-style-type: none"> <li>1. promote EITI values in Sierra Leone;</li> <li>2. perform awareness workshops to improve the involvement of SLEITI Stakeholders in EITI reporting process; and</li> <li>3. capacity building of government agencies and extractive companies EITI focal points.</li> </ol>	Partly	Although GoSL supported with validation activities, we understand that the SLEITI Secretariat does not have adequate financial support to improve its operations.	

### 6.3. Follow up of the Corrective Actions from the Latest Validation Report

The table below summarises the overall assessment the EITI International Secretariat made in October 2022 for each EITI Requirements.

TABLE 75: CORRECTIVE ACTIONS FROM THE LATEST VALIDATION REPORT

Status	Number	EITI Requirements
Fully met	13	#7.1 Public debate #7.2 Data accessibility and open data #7.3 Recommendations from EITI implementation #7.4 Review the outcomes and impact of EITI implementation #1.2 Industry engagement #1.3 Civil society engagement #6.3 Contribution of the extractive sector to the economy #2.3 Register of licenses #4.1 Comprehensive disclosure of taxes and revenues #4.8 Data timeliness #4.9 Data quality and assurance #4.6 Subnational payments (two points)
Mostly met	6	#2.4 Contracts (two points) #3.2 Production #3.3 Exports #4.7 Level of disaggregation #5.1 Distribution of extractive industry revenues
Not applicable	3	#2.6 State participation #4.3 Infrastructure provisions and barter arrangements #4.4 Transportation revenues
Exceeded	1	#3.1 Exploration
Partly met	1	#2.5 Beneficial Ownership
Not assessed	1	#5.3 Revenue management and expenditures
<b>Total</b>	<b>25</b>	

The table below shows the progress made towards implementing the corrective actions (i.e., EITI Requirements mostly and partly met) between October 2022 and March 2023. The progress in addressing these corrective actions will be assessed in the next validation commencing on 1 January 2025:

TABLE 76: PROGRESS MADE TOWARDS IMPLEMENTING THE CORRECTIVE ACTIONS

N°	EITI Requirement	Status (October 2022)	Corrective action	IA comments (March 2023)	MSG Comments (March 2023)
1	#2.2 Contract and license allocations	Mostly met	Sierra Leone should comprehensively disclose information on non-trivial deviations from the statutory framework for all contract and license awards and transfers in the period under review. The Government should continue to prioritise efforts to strengthen institutional collaboration, in particularly between the EPA and NMA, with regards to license allocation. The MSG is encouraged to adopt a robust approach, such as a risk-based methodology, that builds on existing disclosures in evaluating and documenting incidences of material deviation. The MSG is expected to review annually if there have been awards and/or transfers of oil, gas and mining licenses and ensure disclosure of information in accordance with Requirement 2.2.	In progress	
2	#2.4 Contracts	Mostly met	Sierra Leone should clarify its policy on the disclosure of contracts and licenses that govern the exploration and exploitation of minerals. Sierra Leone should maintain a list of all active oil, gas and mining contracts and licenses, indicating which ones are publicly available and which are not. Once the policy on the disclosure of contracts and licenses has been clarified, Sierra Leone should publish an explanation for any deviations between disclosure practices and legislative or government policy on contract and license disclosure. Regarding mining licenses, the template for different license types should be disclosed, accompanied by a clarification of which licenses are pro forma and which are not. These could be integrated into the MCAS portal.	In progress	
3	#2.5 Beneficial Ownership	Partly met	Sierra Leone is required to disclose the beneficial owners of all companies holding or applying for extractive licenses. To ensure disclosure of this information going forward, Sierra Leone should undertake the following measures: Request all companies holding oil, gas and mining licenses to disclose beneficial ownership information and provide adequate assurances for data reliability. The government is encouraged to establish a public register of beneficial owners. Ensure that all applicants for oil, gas and mining licenses to disclose their beneficial owners. Undertake an assessment of the comprehensiveness and reliability of beneficial ownership disclosures by all extractive companies to date. Ensure comprehensive disclosure of legal owners of oil, gas and mining companies.	Progress made so far: The IA sent a request to all licensees to complete the BO declaration form. The SLEITI Secretariat also invited companies to do so through a post on their <a href="#">website</a> .	

N°	EITI Requirement	Status (October 2022)	Corrective action	IA comments (March 2023)	MSG Comments (March 2023)
4	#3.2 Production	Mostly met	Sierra Leone is required to disclose comprehensive data on production volumes and values, including for companies that fall below the materiality threshold. The MSG is encouraged to review data available from different sources to establish whether comprehensive systematic disclosures are currently available. Sierra Leone is encouraged to consider covering estimates of ASM production in EITI reporting, drawing on available data collated by the Kimberley process and government agencies. NMA is encouraged to consider systematically disclosing the production data it collects from companies to improve the timeliness of disclosures. The MSG may wish to consider alternative methods for calculating production values, in addition to disclosing production cost data, to ensure that the full value of production is captured in disclosures.	Almost met	
5	#3.3 Exports	Mostly met	Sierra Leone is required to disclose comprehensive data on export volumes and values, including for companies that fall below the materiality threshold. Government agencies are encouraged to disclose this data continually systematically in open format, including both export volumes and values disaggregated by commodity.	Almost met	
6	#4.7 Level of disaggregation	Mostly met	Sierra Leone is required to clarify whether revenues and payments are disclosed at project level, in accordance with the agreed definition of project. If any material companies hold several licenses, their payments to government should be disaggregated by project, if the revenue stream is levied at project level. If certain payments are levied at the level of multiple agreements that are substantially interconnected, Sierra Leone is encouraged to clearly identify and document which instances are considered to be a single project for the purposes of levying revenues.	Met	
7	#5.1 Distribution of extractive industry revenues	Mostly met	Sierra Leone should document the availability of public information on the management of subnational extractive revenues not recorded in the national budget, with links provided to relevant financial reports as applicable. Sierra Leone may wish to use its EITI reporting to document the national revenue classification system, with reference to international revenue classification systems. If implementation of provisions related to the Transformational Development Stabilization Fund and/or the Intergenerational Savings Fund commences, allocation of revenues to and from these funds should be disclosed with links to relevant financial reports.	In progress	

## ANNEXES

## Annex 1: Register of Small & Large-Scale Mining Licences

As of 31 December 2021

Licence code	Licence type	Licence holder	Commodity	Application Date	Start Date	Expiry Date	Duration
EL 2/2017	Exploration	Serrarus Mining and Exploration Limited	Gold	26/07/2016	24/01/2017	23/01/2024	7
EL 24/2017	Exploration	J.M. Mining Kenema (SL) Limited	Associated Minerals, Columbite, Gold, Tantalite	19/05/2017	27/07/2017	07/07/2024	7
EL 25/2017	Exploration	Aberdeen Gold and Diamond Center Limited	Associated Minerals, Bauxite, Gold	19/05/2017	04/08/2017	04/08/2026	9
EL 35/2017	Exploration	Afro-Asia Mining Corporation Limited	Associated Minerals, Rutile	10/08/2017	18/09/2017	18/09/2026	9
EL 3/2018	Exploration	African Gold Stream Mining (AGSM) (SL) Limited	Gold	13/11/2017	19/01/2018	19/01/2027	9
EL 4/2018	Exploration	Solid Rock Mining and Exploration (SL) Limited	All Minerals	15/02/2018	02/03/2018	02/03/2027	9
EL 6/2018	Exploration	Metals and Minerals Trading (SL) Limited	All Minerals	15/02/2018	02/03/2018	02/03/2027	9
EL 19/2018	Exploration	Kasila Mining and Engineering Services	Ilmenite, Rutile, Zircon	23/03/2018	24/09/2018	24/09/2027	9
EL 16/2018	Exploration	Gold Generous Industrial Company Limited	All Minerals	13/06/2018	31/07/2018	31/07/2027	9
EL 17/2018	Exploration	Guang Yuan (SL) Limited	Associated Minerals, Diamonds, Gold	13/07/2018	02/08/2018	02/08/2027	9
ML 1/2021	Large Scale	Seawright Mining Company Limited	Diamonds	26/02/2021	21/04/2021	20/04/2091	70
ML 5/2021	Large Scale	Pan-African Rare Metal Mining Co	Columbite, Tantalite	09/03/2021	01/11/2021	31/10/2091	70
ML 2/2021	Large Scale	FG Gold Limited	Associated Minerals, Iron Ore	23/03/2021	06/05/2021	05/05/2091	70
ML 4/2021	Large Scale	Marampa Mines Limited	Iron Ore, Associated Minerals	06/07/2021	06/08/2021	05/08/2091	70
ML 06/95	Large Scale	KOIDU Limited	Diamonds	01/02/1995	22/07/1995	21/07/2070	75
ML 1/2014	Large Scale	Northern Mining Company Limited	Associated Minerals, Iron Ore	16/12/2013	28/01/2014	28/01/2084	70
ML 3/2014	Large Scale	Mass Energy Mining Company Limited	Associated Minerals, Iron Ore	16/12/2013	28/01/2014	28/01/2084	70
ML 4/2014	Large Scale	CKH Mining Company Limited	Associated Minerals, Iron Ore	16/12/2013	28/01/2014	28/01/2084	70
ML 02/2012	Large Scale	Tonguma Limited	Diamonds	02/07/2012	11/07/2012	11/07/2037	25
ML 1/2018	Large Scale	Dayu Mining Company Limited	Gold	21/12/2017	04/01/2018	04/01/2088	70



Licence code	Licence type	Licence holder	Commodity	Application Date	Start Date	Expiry Date	Duration
ML 1/2019	Large Scale	Wongor Investment and Mining Corporation Ltd	Associated Minerals, Gold	04/10/2018	23/05/2019	22/05/2089	70
ML 2/2019	Large Scale	Meya Mining	Associated Minerals, Diamonds, Gold	20/05/2019	26/07/2019	25/07/2089	70
ML 2/2020	Large Scale	Cheng Li Trading Mining Company Limited	Associated Minerals, Gold	31/10/2019	16/03/2020	15/03/2090	70
ML 1/2020	Large Scale	Kingho Mining Company Limited	Iron Ore	20/11/2019	07/01/2020	06/01/2090	70
ML 3/2021	Large Scale	Supreme Minerals Corporation	Bauxite	19/11/2020	28/05/2021	27/05/2091	70
ML 01/05	Mining Lease	Sierra Minerals Holdings No.1 Limited	Bauxite	01/01/2001	17/01/2005	16/01/2075	70
ML 2134	Mining Lease	Sierra Rutile Limited	Columbite, Graphite, Ilmenite, Monazite, Rutile, Titanium, Zircon	01/01/2001	09/09/2010	09/09/2080	70
SML 7/2021	Small Scale	Tandem Liber Holdings Limited	Gold	11/02/2021	14/05/2021	13/05/2033	12
SML 9/2021	Small Scale	Hancock Mining Company	Gold	03/03/2021	24/08/2021	23/08/2033	12
SML 8/2021	Small Scale	Metals and Minerals Trading (SL) Limited	Gold	04/03/2021	22/06/2021	21/06/2033	12
SML 11/2021	Small Scale	XIN YIN COMPANY LIMITED	Gold	16/03/2021	22/10/2021	21/10/2033	12
SML 10/2021	Small Scale	Consultancy Finance and Infrastructure (SL) Limited (CFI)	Gold	27/05/2021	21/09/2021	20/09/2033	12
SML 1/2018	Small Scale	Dojo Resources (SL) Limited	Associated Minerals, Gold	13/12/2017	19/01/2018	19/01/2030	12
SML 1/2019	Small Scale	Afro-Asia Mining Corporation Limited	Ilmenite, Rutile, Zircon	21/05/2018	13/08/2019	12/08/2031	12
SML 2/2019	Small Scale	Metals and Minerals Trading (SL) Limited	Columbite, Tantalite	08/01/2019	14/08/2019	13/08/2031	12
SML 6/2019	Small Scale	Hong Peng Resources (SL) Mining Investment Co. Limited	All Minerals	10/05/2019	14/10/2019	13/10/2031	12
na	Small Scale	Xin Yin Company Limited	Gold	09/07/2019	30/08/2019	29/08/2031	12
SML 8/2019	Small Scale	Jingxiang Mining Company Limited	Gold	24/09/2019	18/10/2019	17/10/2031	12
SML 10/2019	Small Scale	Kasino Mining Company Limited	Ilmenite, Rutile, Zircon	10/10/2019	28/11/2019	27/11/2031	12
SML 4/2021	Small Scale	CFS Construction and General Supplies (SL) Limited	Ilmenite, Rutile, Zircon	02/06/2020	20/01/2021	19/01/2033	12
na	Small Scale	Millennium Ventures LLC	Diamonds	na	11/11/2020	10/11/2032	12

Licence code	Licence type	Licence holder	Commodity	Application Date	Start Date	Expiry Date	Duration
na	Small Scale	Sierra Minerals Invest Limited (SL)	All Minerals, Gold	na	26/10/2020	25/10/2032	12
na	Small Scale	Act Trading Company Limited	Gold	na	12/11/2020	11/11/2032	12
na	Small Scale	Ay & Kun (SL) Limited	Gold	na	19/01/2021	18/01/2033	12
SML 6/2021	Small Scale	Nanxin Mining Company Limited	Gold	08/09/2020	21/04/2021	20/04/2033	12
SML 9/2021	Small Scale	Hancock Mining Company	Gold	03/03/2021	24/08/2021	23/08/2033	12
SML 5/2021	Small Scale	Serrarus Mining and Exploration Limited	Gold	17/11/2020	01/04/2021	31/03/2033	12
SML 3/2021	Small Scale	Thazin Mining (SL) Company Limited	Gold	26/11/2020	27/01/2021	26/01/2033	12

### Awarded in 2022

License code	License Type	License Holder	Commodity	Application Date	Start Date	Expiry Date	Duration
SML 8/2022	Small Scale	Bravura (SL) Limited	Gold	24/11/2021	23/06/2022	22/06/2034	12
SML 15/2022	Small Scale	Bright Continent Minerals Limited	Gold, Associated Minerals	15/06/2022	14/10/2022	13/10/2034	12
SML 10/2022	Small Scale	Dde F-Tech Africa (SL) Limited	Gold	26/08/2021	19/07/2022	18/07/2034	12
SML 16/2022	Small Scale	Delcore SL Limited	Gold	13/01/2022	19/10/2022	18/10/2034	12
SML 9/2022	Small Scale	DZT Resources Limited	Associated Minerals, Zircon	06/04/2022	18/07/2022	17/07/2034	12
SML 1/2022	Small Scale	General Minerals and Articles of Association of World Minerals Company (SL) Limited	Gold, Associated Minerals	08/09/2021	01/02/2022	31/01/2034	12
SML 2/2022	Small Scale	Jingxiang Mining Company Limited	Titanium	27/05/2021	16/02/2022	15/02/2034	12
SML 5/2022	Small Scale	Jong Minerals Company Limited	Ilmenite, Zircon, Rutile, Associated Minerals	08/12/2021	05/05/2022	04/05/2034	12
SML 11/2022	Small Scale	Jong Minerals Company Limited	Ilmenite, Zircon, Rutile, Associated Minerals	29/04/2022	18/08/2022	17/08/2034	12
SML 12/2022	Small Scale	Leone Minerals Limited	Ilmenite, Zircon, Rutile, Associated Minerals	04/05/2022	18/08/2022	17/08/2034	12
ML 1/2022	Large Scale	Millennium Panorama (SL) Limited	Iron Ore	29/10/2021	07/02/2022	06/02/2092	70
SML 4/2022	Small Scale	Sahanik Resources (SL) Limited	Diamonds	10/12/2021	04/05/2022	03/05/2034	12

License code	License Type	License Holder	Commodity	Application Date	Start Date	Expiry Date	Duration
SML 7/2022	Small Scale	Simira Chiefdom Gold Mining Company Limited	Gold	15/11/2021	01/06/2022	31/05/2034	12
SML 6/2022	Small Scale	Tejan Jalloh Brothers Investment Limited	Gold	17/11/2021	30/05/2022	29/05/2034	12
SML 3/2022	Small Scale	Universal Mining Company	Gold	18/10/2021	03/05/2022	02/05/2034	12
SML 14/2022	Small Scale	Yidesheng Mining (SL) Company Limited	Associated Minerals, Zircon	27/06/2022	28/09/2022	27/09/2034	12

## Annex 2: Details of Extractive Revenues by company, Government agency and revenue stream

### 2020

In USD

Company / Revenue stream	NRA	EPA	NMA	Sub-national entities	Total
<b>Sierra Rutile Limited</b>	<b>23,768,466</b>	<b>218,208</b>		<b>141,615</b>	<b>24,128,289</b>
Corporate Tax	4,531,977				4,531,977
Environmental Licence fee		174,567			174,567
Environmental Monitoring fee		43,642			43,642
Mining licence	377,516				377,516
PAYE	12,158,009				12,158,009
Royalty	6,516,306				6,516,306
Surface rent				141,615	141,615
W/H 5% Contract	184,658				184,658
<b>Koidu mining limited</b>	<b>13,404,044</b>	<b>91,904</b>		<b>76,956</b>	<b>13,572,904</b>
Environmental Licence fee		73,523			73,523
Environmental Monitoring fee		18,381			18,381
Mining licence	259,800				259,800
PAYE	5,364,185				5,364,185
Royalty	7,400,104				7,400,104
Surface rent				76,956	76,956
W/H 5% Contract	379,954				379,954
<b>Sierra Mineral Holdings 1 Limited</b>	<b>3,677,811</b>	<b>113,993</b>		<b>98,591</b>	<b>3,890,396</b>
Corporate Tax	228,574				228,574
Environmental Licence fee		91,195			91,195
Environmental Monitoring fee		22,799			22,799
Mining licence	475,773				475,773
PAYE	1,666,677				1,666,677
Royalty	1,306,787				1,306,787
Surface rent				98,591	98,591

In USD

Company / Revenue stream	NRA	EPA	NMA	Sub-national entities	Total
<b>Kingho mining company Limited</b>	<b>1,929,094</b>			<b>6,908</b>	<b>1,936,002</b>
Mining licence	1,927,883				1,927,883
PAYE	1,211				1,211
Surface rent				6,908	6,908
<b>Sierra Diamonds Limited</b>	<b>1,106,519</b>			<b>8,625</b>	<b>1,115,144</b>
Mining licence	1,106,519				1,106,519
Surface rent				8,625	8,625
<b>Dayu Mining Company</b>	<b>691,708</b>	<b>93,575</b>		<b>493</b>	<b>785,776</b>
Environmental Licence fee		74,860			74,860
Environmental Monitoring fee		18,715			18,715
Mining licence	474,367				474,367
PAYE	50,590				50,590
Royalty	145,325				145,325
Surface rent				493	493
W/H 5% Contract	21,425				21,425
<b>Meya Mining Limited</b>	<b>486,656</b>	<b>78,985</b>		<b>48,147</b>	<b>613,789</b>
Environmental Licence fee		63,188			63,188
Environmental Monitoring fee		15,797			15,797
Mining licence	486,656				486,656
Surface rent				48,147	48,147
<b>Wongor Investments and Mining Corporation Limited</b>	<b>485,351</b>	<b>93,344</b>			<b>578,695</b>
Environmental Licence fee		74,675			74,675
Environmental Monitoring fee		18,669			18,669
Mining licence	475,773				475,773
PAYE	7,597				7,597
W/H 5% Contract	1,982				1,982
<b>H M Diamond Limited</b>	<b>37,205</b>		<b>517,850</b>		<b>555,055</b>
Diamond & Gold Export duties			517,850		517,850
Diamond & Gold Exporters licence	33,380				33,380

In USD

Company / Revenue stream	NRA	EPA	NMA	Sub-national entities	Total
PAYE	3,825				3,825
<b>Cheng Li Trading Mining Comp. (SL) Ltd</b>	<b>475,596</b>	<b>60,797</b>			<b>536,393</b>
Environmental Licence fee		48,638			48,638
Environmental Monitoring fee		12,159			12,159
Mining licence	475,596				475,596
<b>Northern mining company Limited</b>	<b>491,127</b>	<b>16,829</b>			<b>507,956</b>
Environmental Licence fee		13,464			13,464
Environmental Monitoring fee		3,366			3,366
Mining licence	491,127				491,127
<b>Seawright Mining Co Limited</b>	<b>183,691</b>	<b>128,888</b>			<b>312,578</b>
Environmental Licence fee		103,110			103,110
Environmental Monitoring fee		25,778			25,778
Exploration license	18,799				18,799
PAYE	152,095				152,095
W/H 5% Contract	12,797				12,797
<b>B.M.E</b>	<b>229,689</b>	<b>18,389</b>			<b>248,079</b>
Environmental Licence fee		14,711			14,711
Environmental Monitoring fee		3,678			3,678
GST	38,167				38,167
PAYE	163,227				163,227
Payroll tax	1,924				1,924
W/H 5% Contract	26,371				26,371
<b>Metals &amp; Minerals Trading (SL) LTD</b>	<b>160,044</b>	<b>27,429</b>	<b>18,183</b>		<b>205,656</b>
Diamond & Gold Export duties			18,183		18,183
Diamond & Gold Exporters licence	54,520				54,520
Environmental Licence fee		21,943			21,943
Environmental Monitoring fee		5,486			5,486
Mining licence	105,524				105,524
<b>Afro-Asia Mining Corporation Ltd</b>	<b>94,775</b>	<b>83,683</b>			<b>178,458</b>

In USD

Company / Revenue stream	NRA	EPA	NMA	Sub-national entities	Total
Environmental Licence fee		66,946			66,946
Environmental Monitoring fee		16,737			16,737
Exploration license	13,347				13,347
Mining licence	76,643				76,643
PAYE	4,786				4,786
<b>KaSino Mining Company Limited</b>	<b>125,294</b>	<b>32,326</b>			<b>157,619</b>
Diamond & Gold Exporters licence	78,914				78,914
Environmental Licence fee		25,860			25,860
Environmental Monitoring fee		6,465			6,465
Royalty	46,379				46,379
<b>Mantac</b>	<b>150,142</b>				<b>150,142</b>
PAYE	110,996				110,996
Payroll tax	148				148
W/H 5% Contract	38,998				38,998
<b>Sierra-min Bauxite SL Limited</b>	<b>67,322</b>	<b>59,649</b>		<b>5,329</b>	<b>132,300</b>
Environmental Licence fee		47,719			47,719
Environmental Monitoring fee		11,930			11,930
PAYE	67,322				67,322
Surface rent				5,329	5,329
<b>Dawnus</b>	<b>120,014</b>				<b>120,014</b>
Corporate Tax	5,921				5,921
PAYE	86,638				86,638
W/H 5% Contract	27,455				27,455
<b>Kanu Equipment</b>	<b>100,259</b>				<b>100,259</b>
PAYE	42,979				42,979
W/H 5% Contract	57,280				57,280
<b>Tonguma Mining Limited</b>	<b>691</b>	<b>86,284</b>			<b>86,975</b>
Environmental Licence fee		69,027			69,027
Environmental Monitoring fee		17,257			17,257

*In USD*

Company / Revenue stream	NRA	EPA	NMA	Sub-national entities	Total
PAYE	691				691
<b>Other Mining companies and Dimond and Gold exports</b>	<b>1,436,118</b>	<b>358,589</b>			<b>1,794,707</b>
Corporate Tax	32,036				32,036
Environmental Licence fee		286,871			286,871
Environmental Monitoring fee		71,718			71,718
GST	4,030				4,030
Import duties	10,491				10,491
Mining licence	1,162,607				1,162,607
PAYE	48,906				48,906
Royalty	149,411				149,411
W/H 5% Contract	28,637				28,637
<b>Total</b>	<b>49,221,615</b>	<b>1,562,872</b>	<b>536,033</b>	<b>386,665</b>	<b>51,707,186</b>



2021

In USD

Company / Revenue stream	NRA	EPA	Sub-national entities	Total
<b>Marampa Mines Limited</b>	<b>20,731,542</b>		<b>25,198</b>	<b>20,756,740</b>
Mining licence	470,819			470,819
Royalty	20,260,722			20,260,722
Surface rent			25,198	25,198
<b>Koidu mining limited</b>	<b>13,633,842</b>	<b>91,504</b>	<b>77,456</b>	<b>13,802,802</b>
Environmental Licence fee		73,203		73,203
Environmental Monitoring fee		18,301		18,301
Mining licence	261,600			261,600
PAYE	5,571,644			5,571,644
Royalty	6,802,327			6,802,327
Surface rent			77,456	77,456
W/H 5% Contract	998,271			998,271
<b>Sierra Rutile Limited</b>	<b>12,910,706</b>	<b>400,460</b>	<b>140,647</b>	<b>13,451,813</b>
Corporate Tax	3,388,630			3,388,630
Environmental Licence fee		320,368		320,368
Environmental Monitoring fee		80,092		80,092
PAYE	5,226,720			5,226,720
Royalty	3,964,047			3,964,047
Surface rent			140,647	140,647
W/H 5% Contract	331,309			331,309
<b>Kingho mining company</b>	<b>5,423,749</b>	<b>163,425</b>	<b>6,481</b>	<b>5,593,655</b>
Environmental Licence fee		130,740		130,740
Environmental Monitoring fee		32,685		32,685
Mining licence	1,876,611			1,876,611
PAYE	76,086			76,086
Royalty	3,453,553			3,453,553
Surface rent			6,481	6,481

In USD

Company / Revenue stream	NRA	EPA	Sub-national entities	Total
W/H 5% Contract	17,499			17,499
<b>Sierra Mineral Holdings 1 Limited</b>	<b>3,775,695</b>	<b>98,542</b>	<b>102,209</b>	<b>3,976,446</b>
Corporate Tax	1,437,506			1,437,506
Environmental Licence fee		78,834		78,834
Environmental Monitoring fee		19,708		19,708
Mining licence	468,613			468,613
PAYE	851,719			851,719
Royalty	1,017,857			1,017,857
Surface rent			102,209	102,209
<b>Seawright Mining Company</b>	<b>1,071,445</b>	<b>125,882</b>	<b>40,000</b>	<b>1,237,327</b>
Environmental Licence fee		100,706		100,706
Environmental Monitoring fee		25,176		25,176
Mining licence	936,454			936,454
PAYE	134,991			134,991
Surface rent			40,000	40,000
<b>Sierra Diamonds Limited</b>	<b>1,145,351</b>	<b>12,759</b>	<b>8,480</b>	<b>1,166,590</b>
Environmental Licence fee		10,207		10,207
Environmental Monitoring fee		2,552		2,552
Mining licence	1,145,351			1,145,351
Surface rent			8,480	8,480
<b>Wongor Investments and Mining Corporation Limited</b>	<b>652,293</b>	<b>92,420</b>	<b>3,684</b>	<b>748,397</b>
Environmental Licence fee		73,936		73,936
Environmental Monitoring fee		18,484		18,484
Mining licence	469,000			469,000
PAYE	49,674			49,674
Royalty	133,592			133,592
Surface rent			3,684	3,684
W/H 5% Contract	27			27
<b>Dayu mining company</b>	<b>645,342</b>	<b>88,461</b>	<b>1,296</b>	<b>735,100</b>

In USD

Company / Revenue stream	NRA	EPA	Sub-national entities	Total
Environmental Licence fee		70,769		70,769
Environmental Monitoring fee		17,692		17,692
Mining licence	469,332			469,332
PAYE	15,523			15,523
Royalty	160,487			160,487
Surface rent			1,296	1,296
<b>Meya Mining Limited</b>	<b>574,925</b>	<b>75,907</b>	<b>80,034</b>	<b>730,866</b>
Environmental Licence fee		60,725		60,725
Environmental Monitoring fee		15,181		15,181
Mining licence	500,516			500,516
Royalty	74,409			74,409
Surface rent			80,034	80,034
<b>FG Gold Limited</b>	<b>470,104</b>	<b>170,121</b>	<b>12,500</b>	<b>652,725</b>
Environmental Licence fee		136,097		136,097
Environmental Monitoring fee		34,024		34,024
Mining licence	470,104			470,104
Surface rent			12,500	12,500
<b>KaSino Mining Company Limited</b>	<b>441,099</b>	<b>66,629</b>		<b>507,727</b>
Environmental Licence fee		53,303		53,303
Environmental Monitoring fee		13,326		13,326
Exploration license	6,769			6,769
Mining licence	137,055			137,055
Royalty	297,275			297,275
<b>Pan African Rare Metal Mining Co</b>	<b>499,015</b>		<b>926</b>	<b>499,941</b>
Mining licence	499,015			499,015
Surface rent			926	926
<b>Cheng Li Trading Mining</b>	<b>492,405</b>			<b>492,405</b>
Mining licence	469,360			469,360
PAYE	23,044			23,044

In USD

Company / Revenue stream	NRA	EPA	Sub-national entities	Total
<b>Supreme Mineral Cooperation</b>	<b>235,038</b>	<b>82,004</b>		<b>317,042</b>
Environmental Licence fee		65,603		65,603
Environmental Monitoring fee		16,401		16,401
Mining licence	235,038			235,038
<b>Tonguma Mining Limited</b>	<b>173,077</b>	<b>84,307</b>		<b>257,384</b>
Environmental Licence fee		67,446		67,446
Environmental Monitoring fee		16,861		16,861
Royalty	4,068			4,068
W/H 5% Contract	169,009			169,009
<b>Afro-Asia Mining Corporation Ltd</b>	<b>131,528</b>	<b>79,883</b>		<b>211,411</b>
Environmental Licence fee		63,907		63,907
Environmental Monitoring fee		15,977		15,977
Mining licence	75,727			75,727
PAYE	1,517			1,517
Royalty	54,284			54,284
<b>Hancock Africa Co</b>	<b>73,339</b>			<b>73,339</b>
Mining licence	73,339			73,339
<b>Sierramin Bauxite SL Ltd.</b>		<b>60,604</b>		<b>60,604</b>
Environmental Licence fee		48,483		48,483
Environmental Monitoring fee		12,121		12,121
<b>Tandem Liber Holdings Ltd</b>	<b>55,344</b>			<b>55,344</b>
Mining licence	55,344			55,344
<b>Chilting mining company</b>			<b>1,840</b>	<b>1,840</b>
Surface rent			1,840	1,840
<b>Other Mining companies and Dimond and Gold exports</b>	<b>1,919,021</b>	<b>465,166</b>		<b>2,384,187</b>
Audit liability	2,926			2,926
Corporate Tax	77,941			77,941
Domestic GST	61,922			61,922
Environmental Licence fee		372,133		372,133

*In USD*

Company / Revenue stream	NRA	EPA	Sub-national entities	Total
Environmental Monitoring fee		93,033		93,033
Mining licence	1,383,231			1,383,231
PAYE	246,805			246,805
Royalty	86,058			86,058
W/H 5% Contract	60,138			60,138
<b>Total</b>	<b>65,054,858</b>	<b>2,158,076</b>	<b>500,752</b>	<b>67,713,686</b>

## Annex 3: Details of Extractive Revenues by revenue stream and Government agency

2020

*In USD*

Revenue stream	NRA	EPA	NMA	Sub-national entities	Total
PAYE	19,929,734				19,929,734
Royalty	15,564,313				15,564,313
Mining licence	7,895,783				7,895,783
Corporate Tax	4,798,508				4,798,508
Environmental Licence fee		1,250,298			1,250,298
W/H 5% Contract	779,556				779,556
Diamond & Gold Export duties			536,033		536,033
Surface rent				386,665	386,665
Environmental Monitoring fee		312,574			312,574
Diamond & Gold Exporters licence	166,815				166,815
GST	42,197				42,197
Exploration license	32,146				32,146
Import duties	10,491				10,491
Payroll tax	2,072				2,072
<b>Total</b>	<b>49,221,615</b>	<b>1,562,872</b>	<b>536,033</b>	<b>386,665</b>	<b>51,707,186</b>

2021

*In USD*

Revenue stream	NRA	EPA	Sub-national entities	Total
Royalty	36,308,679			36,308,679
PAYE	12,197,723			12,197,723
Mining licence	9,996,510			9,996,510
Corporate Tax	4,904,076			4,904,076
Environmental Licence fee		1,726,461		1,726,461
W/H 5% Contract	1,576,252			1,576,252
Surface rent			500,752	500,752
Environmental Monitoring fee		431,615		431,615
Domestic GST	61,922			61,922
Exploration license	6,769			6,769
Audit liability	2,926			2,926
<b>Total</b>	<b>65,054,858</b>	<b>2,158,076</b>	<b>500,752</b>	<b>67,713,686</b>

## Annex 4: Details of Extractive Revenues by project and Government agency

2020

In USD

Project / Revenue stream	NRA	EPA	NMA	Sub-national entities	Total
<b>ML 2134 (Rutile)</b>	<b>23,768,466</b>	<b>218,208</b>		<b>141,615</b>	<b>24,128,289</b>
PAYE	12,158,009				12,158,009
Royalty	6,516,306				6,516,306
Corporate Tax	4,531,977				4,531,977
Mining licence	377,516				377,516
W/H 5% Contract	184,658				184,658
Environmental Licence fee		174,567			174,567
Surface rent				141,615	141,615
Environmental Monitoring fee		43,642			43,642
<b>ML 06/95 (Diamond)</b>	<b>13,404,044</b>	<b>91,904</b>		<b>76,956</b>	<b>13,572,904</b>
Royalty	7,400,104				7,400,104
PAYE	5,364,185				5,364,185
W/H 5% Contract	379,954				379,954
Mining licence	259,800				259,800
Surface rent				76,956	76,956
Environmental Licence fee		73,523			73,523
Environmental Monitoring fee		18,381			18,381
<b>ML 01/05 (Bauxite)</b>	<b>3,677,811</b>	<b>113,993</b>		<b>98,591</b>	<b>3,890,396</b>
PAYE	1,666,677				1,666,677
Royalty	1,306,787				1,306,787
Mining licence	475,773				475,773
Corporate Tax	228,574				228,574
Surface rent				98,591	98,591
Environmental Licence fee		91,195			91,195
Environmental Monitoring fee		22,799			22,799
<b>ML 1/2020 (Iron Ore)</b>	<b>1,929,094</b>			<b>6,908</b>	<b>1,936,002</b>

In USD

Project / Revenue stream	NRA	EPA	NMA	Sub-national entities	Total
Mining licence	1,927,883				1,927,883
Surface rent				6,908	6,908
PAYE	1,211				1,211
<b>ML 2/2018 (Diamond)</b>	<b>1,106,519</b>			<b>8,625</b>	<b>1,115,144</b>
Mining licence	1,106,519				1,106,519
Surface rent				8,625	8,625
<b>ML 1/2018 (Gold)</b>	<b>691,708</b>	<b>93,575</b>		<b>493</b>	<b>785,776</b>
Mining licence	474,367				474,367
Royalty	145,325				145,325
Environmental Licence fee		74,860			74,860
PAYE	50,590				50,590
W/H 5% Contract	21,425				21,425
Environmental Monitoring fee		18,715			18,715
Surface rent				493	493
<b>ML 2/2019 (Diamond)</b>	<b>486,656</b>	<b>78,985</b>		<b>48,147</b>	<b>613,789</b>
Mining licence	486,656				486,656
Environmental Licence fee		63,188			63,188
Surface rent				48,147	48,147
Environmental Monitoring fee		15,797			15,797
<b>ML 1/2019 (Gold)</b>	<b>485,351</b>	<b>93,344</b>			<b>578,695</b>
Mining licence	475,773				475,773
Environmental Licence fee		74,675			74,675
Environmental Monitoring fee		18,669			18,669
PAYE	7,597				7,597
W/H 5% Contract	1,982				1,982
<b>ML 2/2020 (Gold)</b>	<b>475,596</b>	<b>60,797</b>			<b>536,393</b>
Mining licence	475,596				475,596
Environmental Licence fee		48,638			48,638
Environmental Monitoring fee		12,159			12,159



In USD

Project / Revenue stream	NRA	EPA	NMA	Sub-national entities	Total
<b>ML 1/2021 (Diamond)</b>	<b>183,691</b>	<b>128,888</b>			<b>312,578</b>
PAYE	152,095				152,095
Environmental Licence fee		103,110			103,110
Environmental Monitoring fee		25,778			25,778
Exploration license	18,799				18,799
W/H 5% Contract	12,797				12,797
<b>SML 1/2019 (Ilmenite, Zircon, Rutile)</b>	<b>94,775</b>	<b>83,683</b>			<b>178,458</b>
Mining licence	76,643				76,643
Environmental Licence fee		66,946			66,946
Environmental Monitoring fee		16,737			16,737
Exploration license	13,347				13,347
PAYE	4,786				4,786
<b>SML 10/2019 (Ilmenite, Zircon, Rutile)</b>	<b>125,294</b>	<b>32,326</b>			<b>157,619</b>
Diamond & Gold Exporters licence	78,914				78,914
Royalty	46,379				46,379
Environmental Licence fee		25,860			25,860
Environmental Monitoring fee		6,465			6,465
<b>Other projects</b>	<b>2,792,611</b>	<b>567,169</b>	<b>536,033</b>	<b>5,329</b>	<b>3,901,143</b>
Mining licence	1,759,258				1,759,258
Diamond & Gold Export duties			536,033		536,033
PAYE	524,584				524,584
Environmental Licence fee		453,735			453,735
W/H 5% Contract	178,740				178,740
Royalty	149,411				149,411
Environmental Monitoring fee		113,434			113,434
Diamond & Gold Exporters licence	87,900				87,900
GST	42,197				42,197
Corporate Tax	37,957				37,957
Import duties	10,491				10,491

*In USD*

Project / Revenue stream	NRA	EPA	NMA	Sub-national entities	Total
Surface rent				5,329	5,329
Payroll tax	2,072				2,072
<b>Total</b>	<b>49,221,615</b>	<b>1,562,872</b>	<b>536,033</b>	<b>386,665</b>	<b>51,707,186</b>

## 2021

*In USD*

Project / Revenue stream	NRA	EPA	Sub-national entities	Total
<b>ML 4/2021 (Iron Ore)</b>	<b>20,731,542</b>		<b>25,198</b>	<b>20,756,740</b>
Royalty	20,260,722			20,260,722
Mining licence	470,819			470,819
Surface rent			25,198	25,198
<b>ML 06/95 (Diamond)</b>	<b>13,633,842</b>	<b>91,504</b>	<b>77,456</b>	<b>13,802,802</b>
Royalty	6,802,327			6,802,327
PAYE	5,571,644			5,571,644
W/H 5% Contract	998,271			998,271
Mining licence	261,600			261,600
Surface rent			77,456	77,456
Environmental Licence fee		73,203		73,203
Environmental Monitoring fee		18,301		18,301
<b>ML 2134 (Rutile)</b>	<b>12,910,706</b>	<b>400,460</b>	<b>140,647</b>	<b>13,451,813</b>
PAYE	5,226,720			5,226,720
Royalty	3,964,047			3,964,047
Corporate Tax	3,388,630			3,388,630
W/H 5% Contract	331,309			331,309
Environmental Licence fee		320,368		320,368
Surface rent			140,647	140,647
Environmental Monitoring fee		80,092		80,092
<b>ML 1/2020 (Iron Ore)</b>	<b>5,423,749</b>	<b>163,425</b>	<b>6,481</b>	<b>5,593,655</b>
Royalty	3,453,553			3,453,553
Mining licence	1,876,611			1,876,611
Environmental Licence fee		130,740		130,740
PAYE	76,086			76,086
Environmental Monitoring fee		32,685		32,685
W/H 5% Contract	17,499			17,499
Surface rent			6,481	6,481

In USD

Project / Revenue stream	NRA	EPA	Sub-national entities	Total
<b>ML 01/05 (Bauxite)</b>	<b>3,775,695</b>	<b>98,542</b>	<b>102,209</b>	<b>3,976,446</b>
Corporate Tax	1,437,506			1,437,506
Royalty	1,017,857			1,017,857
PAYE	851,719			851,719
Mining licence	468,613			468,613
Surface rent			102,209	102,209
Environmental Licence fee		78,834		78,834
Environmental Monitoring fee		19,708		19,708
<b>ML 1/2021 (Diamond)</b>	<b>1,071,445</b>	<b>125,882</b>	<b>40,000</b>	<b>1,237,327</b>
Mining licence	936,454			936,454
PAYE	134,991			134,991
Environmental Licence fee		100,706		100,706
Surface rent			40,000	40,000
Environmental Monitoring fee		25,176		25,176
<b>ML 2/2018 (Diamond)</b>	<b>1,145,351</b>	<b>12,759</b>	<b>8,480</b>	<b>1,166,590</b>
Mining licence	1,145,351			1,145,351
Environmental Licence fee		10,207		10,207
Surface rent			8,480	8,480
Environmental Monitoring fee		2,552		2,552
<b>ML 1/2019 (Gold)</b>	<b>652,293</b>	<b>92,420</b>	<b>3,684</b>	<b>748,397</b>
Mining licence	469,000			469,000
Royalty	133,592			133,592
Environmental Licence fee		73,936		73,936
PAYE	49,674			49,674
Environmental Monitoring fee		18,484		18,484
Surface rent			3,684	3,684
W/H 5% Contract	27			27
<b>ML 1/2018 (Gold)</b>	<b>645,342</b>	<b>88,461</b>	<b>1,296</b>	<b>735,100</b>
Mining licence	469,332			469,332
Royalty	160,487			160,487

				<i>In USD</i>
Project / Revenue stream	NRA	EPA	Sub-national entities	Total
Environmental Licence fee		70,769		70,769
Environmental Monitoring fee		17,692		17,692
PAYE	15,523			15,523
Surface rent			1,296	1,296
<b>ML 2/2019 (Diamond)</b>	<b>574,925</b>	<b>75,907</b>	<b>80,034</b>	<b>730,866</b>
Mining licence	500,516			500,516
Surface rent			80,034	80,034
Royalty	74,409			74,409
Environmental Licence fee		60,725		60,725
Environmental Monitoring fee		15,181		15,181
<b>ML 2/2021 (Gold)</b>	<b>470,104</b>	<b>170,121</b>	<b>12,500</b>	<b>652,725</b>
Mining licence	470,104			470,104
Environmental Licence fee		136,097		136,097
Environmental Monitoring fee		34,024		34,024
Surface rent			12,500	12,500
<b>SML 10/2019 (Ilmenite, Zircon, Rutile)</b>	<b>441,099</b>	<b>66,629</b>		<b>507,727</b>
Royalty	297,275			297,275
Mining licence	137,055			137,055
Environmental Licence fee		53,303		53,303
Environmental Monitoring fee		13,326		13,326
Exploration license	6,769			6,769
<b>ML 5/2021</b>	<b>499,015</b>		<b>926</b>	<b>499,941</b>
Mining licence	499,015			499,015
Surface rent			926	926
<b>ML 2/2020 (Gold)</b>	<b>492,405</b>			<b>492,405</b>
Mining licence	469,360			469,360
PAYE	23,044			23,044
<b>ML 3/2021 (Bauxite)</b>	<b>235,038</b>	<b>82,004</b>		<b>317,042</b>
Mining licence	235,038			235,038
Environmental Licence fee		65,603		65,603

				<i>In USD</i>
Project / Revenue stream	NRA	EPA	Sub-national entities	Total
Environmental Monitoring fee		16,401		16,401
<b>ML 02/2012</b>	<b>173,077</b>	<b>84,307</b>		<b>257,384</b>
W/H 5% Contract	169,009			169,009
Environmental Licence fee		67,446		67,446
Environmental Monitoring fee		16,861		16,861
Royalty	4,068			4,068
<b>SML 1/2019 (Ilmenite, Zircon, Rutile)</b>	<b>131,528</b>	<b>79,883</b>		<b>211,411</b>
Mining licence	75,727			75,727
Environmental Licence fee		63,907		63,907
Royalty	54,284			54,284
Environmental Monitoring fee		15,977		15,977
PAYE	1,517			1,517
<b>SML 7/2021</b>	<b>55,344</b>			<b>55,344</b>
Mining licence	55,344			55,344
<b>Other projects</b>	<b>1,992,360</b>	<b>525,771</b>	<b>1,840</b>	<b>2,519,970</b>
Mining licence	1,456,569			1,456,569
Environmental Licence fee		420,616		420,616
PAYE	246,805			246,805
Environmental Monitoring fee		105,154		105,154
Royalty	86,058			86,058
Corporate Tax	77,941			77,941
Domestic GST	61,922			61,922
W/H 5% Contract	60,138			60,138
Audit liability	2,926			2,926
Surface rent			1,840	1,840
<b>Total</b>	<b>65,054,858</b>	<b>2,158,076</b>	<b>500,752</b>	<b>67,713,686</b>

## Annex 5: Details of Surface rent by recipient, mining company and region

2020

Company / recipient	Moyamba	Kono	Kenema	Tonkolili	Port Loko	Total (in USD)
<b>Sierra Rutile Limited</b>	<b>141,615</b>					<b>141,615</b>
Bonth District Council	41,176					41,176
Imperi Chiefdom	26,144					26,144
Jong Chiefdom	1,306					1,306
Moyamba District	64,658					64,658
Upper Banta Chiefdom	8,331					8,331
<b>Sierra Mineral Holdings 1 Limited</b>	<b>98,591</b>					<b>98,591</b>
Bo District Council	6,183					6,183
Bonthe District Council	2,035					2,035
Bumpeh Chiefdom	5,519					5,519
Chiefdom Development Funds	17,265					17,265
Constituency Dev. Funds Total	17,265					17,265
Moyamba District Council	17,679					17,679
Paramount Chiefs	25,897					25,897
Upper Banta Chiefdom	6,748					6,748
<b>Koidu mining limited</b>		<b>76,956</b>				<b>76,956</b>
Constituency Development Fund		7,696				7,696
Kono district council		3,848				3,848
New Sembehun city council		15,388				15,388
PC Paul N Saquee		11,544				11,544
Tonkoro chiefdom		38,480				38,480
<b>Meya Mining Limited</b>		<b>48,147</b>				<b>48,147</b>
Constituency 023 Development Fund (Nimikoro)		6,367				6,367
Constituency 028 Development Fund (Kamara)		970				970
Constituency 029 Development Fund (Tankoro)		1,041				1,041
Constituency 030 Development Fund (Gbense)		1,251				1,251
Gbense Chiefdom Administration		1,251				1,251

Company / recipient	Moyamba	Kono	Kenema	Tonkolili	Port Loko	Total (in USD)
Kamara Chiefdom Administration		970				970
Kono district council		14,444				14,444
Nimikoro Chiefdom Administration		6,367				6,367
Paramount Chief Aiah Denton Bona (Nimikoro)		9,551				9,551
Paramount Chief Aiah Melvin Ngekia 11 (Kamara)		1,455				1,455
Paramount Chief Ngaba Saquee V (Tankoro)		1,562				1,562
Paramount Chief Sahr Fengai Kamachiande 111 (Gbense)		1,876				1,876
Tankoro Chiefdom Administration		1,041				1,041
<b>Sierra Diamonds Limited</b>			<b>8,625</b>			<b>8,625</b>
Kenema District Council			8,625			8,625
<b>Kingho mining company Limited</b>				<b>6,908</b>		<b>6,908</b>
Simiria chiefdom				987		987
Tonkolili district council				5,921		5,921
<b>Sierra-min Bauxite SL Limited</b>					<b>5,329</b>	<b>5,329</b>
Marampa Chiefdom					5,329	5,329
<b>Dayu Mining Company</b>				<b>493</b>		<b>493</b>
Simiria chiefdom				493		493
<b>Total</b>	<b>240,206</b>	<b>125,103</b>	<b>8,625</b>	<b>7,402</b>	<b>5,329</b>	<b>386,665</b>



## 2021

Company / recipient	Moyamba	Kono	Port Loko	Tonkolili	Kenema	Total (in USD)
<b>Sierra Rutile Limited</b>	<b>140,647</b>					<b>140,647</b>
Bagruwa Chiefdom	22,376					22,376
Bonth District Council	43,791					43,791
Imperi Chiefdom	46					46
Jong Chiefdom	1,324					1,324
Moyamba District	65,015					65,015
Upper Banta Chiefdom	8,094					8,094
<b>Sierra Mineral Holdings 1 Limited</b>	<b>102,209</b>					<b>102,209</b>
Bo District Council	8,276					8,276
Bonthe District Council	2,112					2,112
Bumpeh Chiefdom	4,339					4,339
Chiefdom Development Funds	17,842					17,842
Constituency Dev. Funds Total	17,842					17,842
Moyamba District	18,143					18,143
Paramount Chiefs	26,763					26,763
Upper Banta Chiefdom	6,894					6,894
<b>Meya Mining Limited</b>		<b>80,034</b>				<b>80,034</b>
Constituency 023 Development Fund (Nimikoro)		6,275				6,275
Constituency 028 Development Fund (Kamara)		956				956
Constituency 029 Development Fund (Tankoro)		1,026				1,026
Constituency 030 Development Fund (Gbense)		1,233				1,233
Kamara chiefdom		5,878				5,878
Kono District Council		14,583				14,583
New Sembehun City Council		3,704				3,704
Nimikoro chiefdom		32,143				32,143
Paramount Chief Aiah Denton Bona (Nimikoro)		9,413				9,413
Paramount Chief Aiah Melvin Ngekie 11 (Kamara)		1,434				1,434
Paramount Chief Ngaba Saquee V (Tankoro)		1,540				1,540

Company / recipient	Moyamba	Kono	Port Loko	Tonkolili	Kenema	Total (in USD)
Paramount Chief Sahr Fengai Kamachiande 111 (Gbense)		1,849				1,849
<b>Koidu mining limited</b>		<b>77,456</b>				<b>77,456</b>
Constituency Development Fund		7,753				7,753
Kono District Council		3,877				3,877
New Sembehun City Council		7,731				7,731
Paramount Chief Saquee		11,630				11,630
Tankoro Chiefdom		7,753				7,753
Tonkoro chiefdom		38,711				38,711
<b>Seawright Mining Company</b>		<b>40,000</b>				<b>40,000</b>
Constituency Dev. Fund		8,000				8,000
Gbense Chiefdom Administration		6,400				6,400
Kamara Chiefdom Administration		800				800
Koidu New Sembehun City Council		6,000				6,000
Kono District Council		6,000				6,000
Paramount Chief Aiah Melvin Ngekia II		1,200				1,200
Paramount Chief Kaimachiande III Sahr fengai		9,600				9,600
Paramount Chief P.C. Paul Ngaba Saquee V		1,200				1,200
Tankoro Chiefdom		800				800
<b>Marampa Mines Limited</b>			<b>25,198</b>			<b>25,198</b>
Maforki chiefdom			1,890			1,890
Marampa chiefdom			11,654			11,654
Moyamba District			11,654			11,654
<b>FG Gold Limited</b>				<b>12,500</b>		<b>12,500</b>
Tonkolili district council				4,167		4,167
Valunia Chiefdom				8,333		8,333
<b>Sierra Diamonds Limited</b>					<b>8,480</b>	<b>8,480</b>
Kenema District Council					8,480	8,480
<b>Kingho mining company</b>				<b>6,481</b>		<b>6,481</b>
Simiria chiefdom				926		926
Tonkolili district council				5,556		5,556

Company / recipient	Moyamba	Kono	Port Loko	Tonkolili	Kenema	Total (in USD)
Wongor Investments and Mining Corporation Limited		3,684				3,684
Kono District Council		3,684				3,684
Chilting mining company				1,840		1,840
Tonkolili district council				1,840		1,840
Dayu mining company				1,296		1,296
Simiria chiefdom				463		463
Tonkolili district council				833		833
Pan African Rare Metal Mining Co		926				926
Nimikoro chiefdom		926				926
Total	242,856	202,100	25,198	22,118	8,480	500,752

Annex 6: Details of Employment Data by company and gender<sup>46</sup>

2020

Mining company	National employees				Sub-total	Foreign employees				Sub-total	Total		
	Permanent		Non-permanent			Permanent		Non-permanent			Male	Female	Total
	Male	Female	Male	Female		Male	Female	Male	Female				
Sierra Rutile Limited <sup>(a)</sup>	2,638				2,638	65				65	2,702	0	2,702
Koidu Limited	884	19	36	1	940	180	15			195	1,100	35	1,135
Sierra Mineral Holdings 1 Limited	423	32	53	6	514	31	2			33	507	40	547
Meya Mining Limited	240	19	1		260	26	4			29	266	23	289
Sierra Diamonds Ltd <sup>(b)</sup>	51	5	106	10	172			28	1	29	185	16	201
Wongor Invest and Mining Corporation Ltd	27		36	5	68			5	1	6	68	6	74
Kingho Mining Company Limited	23	2			25					0	23	2	25
Dayu Mining Co	122	12			134	25	2			26	146	14	160
Northern Mining Company Limited <sup>(c)</sup>													
Cheng Li Trading Mining <sup>(d)</sup>													
Total	4,407	89	232	22	4,750	326	22	33	2	383	4,998	135	5,133

(a) The company did disaggregate its employment data by gender.

(b) Including Tonguma Ltd

(c) The company submitted its reporting template but did not provide the employment data.

(d) The company did not submit its reporting template.

<sup>46</sup> Average monthly numbers disclosed by in-scope mining companies.

2021

Mining company	National employees				Sub-total	Foreign employees				Sub-total	Total		
	Permanent		Non-permanent			Permanent		Non-permanent			Male	Female	Total
	Male	Female	Male	Female		Male	Female	Male	Female				
Sierra Rutile Limited	2,111	224	143	11	2,490	58	2			60	2,312	238	2,550
Koidu Limited	889	22	64	1	976	183	14			197	1,136	37	1,173
Marampa Mines Limited	522	82			604	45	2			47	567	84	651
Sierra Mineral Holdings 1 Limited	392	30	64	7	492	28	3			31	483	40	523
Meya Mining Limited	244	19			263	25	3			28	269	22	291
Wongor Invest. Mining Corporation	26		104	10	141	12	3	16	1	32	159	14	173
Sierra Diamond Limited <sup>(a)</sup>	80	12	25	4	121			28		28	132	16	149
Cheng Li Trading Mining	25	13	50	15	103	10	3			13	85	31	116
Kingho Mining Company Limited	103	5			108					0	103	5	108
KaSino Mining Company Limited	78	4			82	7	1			8	85	5	89
Pan African Rare Metal Mining Co	13	2			15	5				5	18	2	20
Dayu Mining Co	143	10			153	27	2			29	170	13	183
FG Gold Ltd <sup>(b)</sup>													
Seawright Mining Co <sup>(b)</sup>													
Sierramin Bauxite (SL) Limited <sup>(c)</sup>													
Supreme Minerals Corp <sup>(c)</sup>													
Total	4,627	423	449	48	5,547	399	33	44	1	478	5,519	506	6,025

(a) Including Tonguma Ltd

(b) The company submitted its reporting template but did not provide the employment data.

(c) The company did not submit its reporting template.

## Annex 7: Beneficial Ownership Information

Company	Listed company	Stock exchange	Full legal name of BO	Date of birth	Nationalities	Country of residence	Type of interest or control	Description of interest or control	Percentage interest (exact)	Directly or indirectly held?	If interest is indirectly held, Intermediate legal owner	Is this individual PEP?
Marampa Mines	No	NA	Craig Fuad Dean	05/03/1973	USA Switzerland	Puerto Rico	Shareholding	Indirect shareholding	90.00%	Indirectly	Marampa Mines Holding Limited FZE DMCC (Dubai)	No
Koidu Limited	No	NA	Benjamin Steinmetz	02/04/1956	France / Israel	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Agnes Steinmetz	05/03/1958	France / Israel	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Merav Steinmetz-Schwartz	01/10/1982	France / Israel	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Avner Steinmetz	02/08/1984	France / Israel	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Michal Steinmetz	25/11/1986	France / Israel	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Nadav Steinmetz	22/04/1993	France / Israel	United Kingdom	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
Tonguma Limited	No	NA	Benjamin Steinmetz	02/04/1956	France / Israel	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Agnes Steinmetz	05/03/1958	France / Israel	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Merav Steinmetz-Schwartz	01/10/1982	France / Israel	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Avner Steinmetz	02/08/1984	France / Israel	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Michal Steinmetz	25/11/1986	France / Israel	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Nadav Steinmetz	22/04/1993	France / Israel	United Kingdom	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No

Company	Listed company	Stock exchange	Full legal name of BO	Date of birth	Nationalities	Country of residence	Type of interest or control	Description of interest or control	Percentage interest (exact)	Directly or indirectly held?	If interest is indirectly held, Intermediate legal owner	Is this individual PEP?
Sierra Diamonds Limited	Yes	Australian Securities Exchange Parent company: Newfield Resources Limited URL: <a href="https://www2.asx.com.au/markets/company/nwf">https://www2.asx.com.au/markets/company/nwf</a>										
Wongor Investments and Mining Corporation Limited	No	NA	Shao Guolong	01/10/1986	China	Italy	Shareholding	Direct interest	51.00%	N/A	N/A	No
			Liang Xiaohao	18/02/1973	China	Portugal	Shareholding	Direct interest	49.00%	N/A	N/A	No
Cheng Li Trading Mining	No	NA	Zengcai Li	NP	China	Sierra Leone	Shareholding	Direct interest	40.00%	N/A	N/A	No
			Meng Chengzhou	NP	China	Sierra Leone	Shareholding	Direct interest	40.00%	N/A	N/A	No
			Pan Hongxin	NP	China	Sierra Leone	Shareholding	Direct interest	20.00%	N/A	N/A	No
Pan African Rare Metal Mining	No	NA	Abu Bakarr Jalloh	NP	Sierra Leone	Sierra Leone	Shareholding	Direct interest	0.15	Directly	N/A	No
			Juniang Chen	NP	China	China	Shareholding	Direct interest	0.22	Directly	N/A	No
			Jlahong Chen	NP	China	China	Shareholding	Direct interest	0.12	Directly	N/A	No
			Tingyu Miao	NP	China	China	Shareholding	Direct interest	0.08	Directly	N/A	No
			Xiangoin Han	NP	China	China	Shareholding	Direct interest	0.215	Directly	N/A	No
			Wenting Huang	NP	China	China	Shareholding	Direct interest	0.215	Directly	N/A	No
Sierra Mineral Holdings I Limited	No	NA	Olga Volokhova	11/01/1975	Israel	Israel	Shareholding	Indirect shareholding	25.60%	Indirectly	Global Aluminium Limited	No
Northern Mining	No	NA	Wa Hing Fok	18/06/1961	China	Hong Kong	Shareholding	Direct interest	100.00%	Directly	N/A	No
Kingho Mining Company Limited	No	NA	Wa Hing Fok	18/06/1961	China	Hong Kong	Shareholding	Direct interest	100.00%	N/A	N/A	No

Company	Listed company	Stock exchange	Full legal name of BO	Date of birth	Nationalities	Country of residence	Type of interest or control	Description of interest or control	Percentage interest (exact)	Directly or indirectly held?	If interest is indirectly held, Intermediate legal owner	Is this individual PEP?
Sierra Rutile Limited <sup>47</sup>	No	NA	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP
Dayu Mining Co	No	NA	ZHAO YU	11/09/1970	China	China	Shareholding	Direct interest	100.00%	Directly	N/A	No
Meya Mining Limited	No	NA	Ibrahim Sorie Kamara	02/01/1980	Sierra Leone	Sierra Leone	Shareholding	Indirect interest	49.00%	Indirectly	Germinate (SL) Limited	No

NP: Not provided

NA: Not applicable

<sup>47</sup> The company did not disclose any beneficial owner but mentioned two politically exposed persons (Ishmael Momoh and Orlon Peter P. M. Baker) as GoSL nominee Directors on the company's Board.



## Annex 8: Legal Ownership Information

Company	TIN	Establishment date	Company's Capital (in USD)	Contact address	Legal owner's name	%	Company / individual	Country of registration	Type of company	Company identifier type	Company Identifier	Registration authority
Marampa Mines	1000178031	20/05/2021	50,000,000	26 Main motor road Brookfields, Freetown, SL	Marampa Mines Holding FZE DMCC	90.00%	Company	United Arab Emirates	Private registered company	Company registration number/ID	194668	Dubai Multi Commodities Centre Authority
					GoSL	10.00%	GoSL	NA	NA	NA	NA	NA
Koidu Limited	1001358-5	06/09/2010	52,000,000	84 Wilkinson Road, Freetown, SL	Octea Mining Limited	100.00%	Company	Guernsey	Private registered company	Company registration number/ID	65910	Guernsey Registry
Tonguma Limited	1030730-0	15/03/2012	10,050,000	84 Wellington Street, Freetown, SL	Octea Mining Limited	100.00%	Company	Guernsey	Private registered company	Company registration number/ID	65910	Guernsey Registry Office
Sierra Diamonds Limited	1009710-01	15/04/2004	50,000	3 Cole Street Murray Town, Freetown, SL	Stellar Diamonds Limited	100.00%	Company	Guernsey	Private registered company	Company registration number/ID	46859	Guernsey Registry Office
Wongor Invest. And Mining Corp Ltd	1103502-2	25/07/2018	881,155	190G, Wellington Street, Freetown, SL	Shao Guolong	51.00%	Individual	N/A	N/A	N/A	N/A	N/A
					Liang Xiaohao	49.00%	Individual	N/A	N/A	N/A	N/A	N/A
Cheng Li Trading Mining	1106762-6	16/10/2018	10,000,000	10 Walpole Street, Freetown, SL	Zengcai Li	40.00%	Individual	N/A	N/A	N/A	N/A	N/A
					Meng Chengzhou	40.00%	Individual	N/A	N/A	N/A	N/A	N/A
					Pan Hongxin	20.00%	Individual	N/A	N/A	N/A	N/A	N/A
Pan African Rare Metal Mining	1141159-9	10/12/2020	10,000,000	10 Walpole Street, Freetown, SL	Abu Bakarr Jalloh	15.00%	Individual	NA	NA	NA	NA	NA
					Juniang Chen	22.00%	Individual	NA	NA	NA	NA	NA
					Jlahong Chen	12.00%	Individual	NA	NA	NA	NA	NA
					Tingyu Miao	8.00%	Individual	NA	NA	NA	NA	NA
					Xiangoin Han	21.50%	Individual	NA	NA	NA	NA	NA
					Wenting Huang	21.50%	Individual	NA	NA	NA	NA	NA

Company	TIN	Establishment date	Company's Capital (in USD)	Contact address	Legal owner's name	%	Company / individual	Country of registration	Type of company	Company identifier type	Company Identifier	Registration authority
Sierra Mineral Holdings I Limited	1000001938	30/06/1905	3,400,000	52 Wellington Street, Freetown, SL	GLOBAL ALUMINIUM LIMITED	100.00%	Company	British Virgin Island	Private registered company	Company registration number/ID	544624	SHRM TRUSTEES BVI LIMITED
Northern Mining	1000535266	29/08/2013	NP	20 Signal Hill Road, Wilberforce, Freetown, SL	Wa Hing Fok	100.00%	Individual	NA	NA	NA	NA	NA
Kingho Mining Company Limited	1000001229	01/01/2021	NP	20 Signal Hill Road, Wilberforce, Freetown, SL	Wa Hing Fok	100.00%	Individual	N/A	N/A	N/A	N/A	N/A
Seawright Mining	1000074145	06/01/2013	NP	40 Liverpool Street, Freetown, SL	NP	NP	NP	NP	NP	NP	NP	NP
Meya Mining Limited	1081040-2	26/07/2019	1,000	52 Wellington Street, Freetown, SL	Trustco Resource (Pty) Ltd	51.00%	Company	Namibia	Private registered company	Company registration number/ID	2015/0081	Registrar of Companies-Namibia
					Germinate (SL) Ltd	49.00%	Company	Sierra Leone	Private registered company	Company registration number/ID	SLE180816GERMI1600404	CAC SL
FG Gold	1000109607	19/01/2021	1,010,000	3 Hill Cot Road; Freetown, SL	FG Gold HoldCo DMCC	100.00%	Company	United Arab Emirates	Private registered company	Company registration number/ID	DMCC189878	Dubai Multi Commodities Centre Authority
KaSino Mining Company	1118164-4	NP	NP	35 Liverpool Street Freetown, SL	Kasila Mining & Engineering Services	50.00%	Company	Sierra Leone	Private registered company	Company registration number/ID	SL150318KASIL02785	CAC SL
					Hesino Mineral & Trade Company Limited	50.00%	Company	China	Private registered company	NP	NP	NP
Dayu Mining Co	1000001954	05/07/2017	1,000,000	Six Mile, Waterloo, Freetown	ZHAO YU	100.00%	Individual	NA	NA	NA	NA	NA

Company	TIN	Establishment date	Company's Capital (in USD)	Contact address	Legal owner's name	%	Company / individual	Country of registration	Type of company	Company identifier type	Company Identifier	Registration authority
Sierra Rutile Limited	1000005453	27/06/1975	12,970,000	110 Wilkinson Road, Freetown Sierra Leone	Sierra Rutile Holdings Limited	99.00%	Company	British Virgin Island	Private registered company	Company registration number/ID	99548	Registrar of Company of the British Virgin Island
					SRL Acquisition No.3 Limited	1.00%	Company	British Virgin Island	Private registered company	Company registration number/ID	436691	Registrar of Company of the British Virgin Island

NP: Not provided

NA: Not applicable

## Annex 9: Details of Social Payments

### 2020

N°	Company	Payment type	Beneficiary Name	Beneficiary Location	Description	Payment mode	Amount (SLL)
1	Koidu Limited	Mandatory	College of Theology, Management and Church Training Center - Scholarship funds		Scholarship Awards	Cash	15,400,000
2	Koidu Limited	Mandatory	Freetown Teachers College - Scholarship Funds		Scholarship Awards	Cash	9,000,000
3	Koidu Limited	Mandatory	Fourah Bay College (FBC) - Scholarship Funds		Scholarship Awards	Cash	22,735,402
4	Koidu Limited	Mandatory	College of Medicines and Allied Health Sciences - Scholarship Funds		Scholarship Awards	Cash	24,375,000
5	Koidu Limited	Mandatory	Institute of Public Administration and Management - IPAM		Scholarship Awards	Cash	33,243,594
6	Koidu Limited	Mandatory	Njala University (NU) - Scholarship Funds		Scholarship Awards	Cash	21,296,300
7	Koidu Limited	Mandatory	College of Theology, Management & Church Training Center - Balance Iro Meshack A Alieu		Scholarship Awards	Cash	3,200,000
8	Koidu Limited	Mandatory	Social Services EBKUST - Scholarship Awards for 2019/2020 Academic Year		Scholarship Awards	Cash	6,000,000
9	Koidu Limited	Mandatory	Hanile School of Commerce & Technology - Scholarship Program		Scholarship Awards	Cash	5,000,000
10	Koidu Limited	Mandatory	The Sierra Leone Law School - Scholarship funds for Emmanuel Sahr Musa		Scholarship Awards	Cash	10,000,000
11	Koidu Limited	Voluntary	Village Resettlement Committee (VRC)	Koidu		Cash	176,825,000
12	Koidu Limited	Voluntary	Polio Victims Association	Koidu		Cash	9,680,000
13	Koidu Limited	Voluntary	PC Paul N Saquee V	Koidu	Support to paramount chief	Cash	159,500,000
14	Koidu Limited	Voluntary	Students	Koidu	School bus service	Cash	372,214,555
15	Meya Mining Limited	Voluntary	Local Communities	Kono	Assort Materials	Cash	9,984,300

N°	Company	Payment type	Beneficiary Name	Beneficiary Location	Description	Payment mode	Amount (SLL)
16	Meya Mining Limited	Voluntary	Local Communities	Kono	Assort Materials	Cash	6,256,000
17	Meya Mining Limited	Voluntary	Local Communities	Kono	Hand Washing Project	Cash	13,500,000
18	Meya Mining Limited	Voluntary	Local Communities	Kono	1 Gallon Yellow Paint	Cash	149,500
19	Meya Mining Limited	Voluntary	Local Communities	Kono	Assort Building Materials	Cash	3,047,500
20	Meya Mining Limited	Voluntary	Local Communities	Kono	Hand Washing Drums	Cash	1,000,000
21	Meya Mining Limited	Voluntary	Local Communities	Kono	Assort Paint Hand Wash Drums	Cash	621,000
22	Meya Mining Limited	Voluntary	Local Communities	Kono	Hand Washing Project	Cash	100,000
23	Meya Mining Limited	Voluntary	Local Communities	Kono	Lockdown/ Covid 19 Support	Cash	15,000,000
24	Meya Mining Limited	Voluntary	Local Communities	Kono	Lockdown/ Covid 19 Support	Cash	1,000,000
25	Meya Mining Limited	Voluntary	Local Communities	Kono	Community Boreholes Pump	Cash	690,000
26	Meya Mining Limited	Voluntary	Local Communities	Kono	Community Boreholes Pump	Cash	442,750
27	Meya Mining Limited	Voluntary	Local Communities	Kono	Community Boreholes Pump	Cash	34,500
28	Meya Mining Limited	Voluntary	Local Communities	Kono	Community Boreholes Pump	Cash	69,000
29	Meya Mining Limited	Voluntary	Local Communities	Kono	Community Boreholes Pump	Cash	51,750
30	Meya Mining Limited	Voluntary	Local Communities	Kono	BP6 Deep Well Pump	Cash	6,040,889
31	Meya Mining Limited	Voluntary	Local Communities	Kono	Community borehole and Corona drums	Cash	287,500
32	Meya Mining Limited	Voluntary	Local Communities	Kono	Community borehole and Corona drums	Cash	287,500
33	Meya Mining Limited	Voluntary	Local Communities	Kono	Community borehole and Corona drums	Cash	575,000
34	Meya Mining Limited	Voluntary	Local Communities	Kono	Stakeholders Engagement Meeting - Nimikoro	Cash	2,000,000
35	Meya Mining Limited	Voluntary	Local Communities	Kono	Asst To Cyling Sponsorship	Cash	600,000
36	Meya Mining Limited	Voluntary	Local Communities	Kono	Social / Lockdown	Cash	6,079,800
37	Meya Mining Limited	Voluntary	Local Communities	Kono	Diamond Stars - FC Support	Cash	5,000,000
38	Meya Mining Limited	Voluntary	Local Communities	Kono	Asst To Cyling Assosciation	Cash	500,000
39	Meya Mining Limited	Voluntary	Local Communities	Kono	Social -Support To Cyling Assosciation	Cash	500,000
40	Meya Mining Limited	Voluntary	Local Communities	Kono	Support To Cycling Association	Cash	300,000
41	Meya Mining Limited	Voluntary	Local Communities	Kono	Social/ Lockdown-COVID-19	Cash	3,000,000
42	Meya Mining Limited	Voluntary	Local Communities	Kono	Social/ Lockdown-COVID-19	Cash	1,000,000
43	Meya Mining Limited	Voluntary	Local Communities	Kono	Social/ Lockdown-COVID-19	Cash	30,399,000
44	Meya Mining Limited	Voluntary	Local Communities	Kono	Social/ Lockdown-COVID-19	Cash	1,000,000
45	Meya Mining Limited	Voluntary	Local Communities	Kono	Funeral Assistance	Cash	3,500,000
46	Meya Mining Limited	Voluntary	Local Communities	Kono	Social -Surface Rental Payments Ceremony	Cash	12,640,000

N°	Company	Payment type	Beneficiary Name	Beneficiary Location	Description	Payment mode	Amount (SLL)
47	Meya Mining Limited	Voluntary	Local Communities	Kono	Social -Surface Rental Payment Ceremony	Cash	14,840,000
48	Meya Mining Limited	Voluntary	Local Communities	Kono	Printing of 8 Pcs Stickers for Surface Rent Ceremony.	Cash	1,439,900
49	Meya Mining Limited	Voluntary	Local Communities	Kono	Hard Board to Display Surface Rent Cheque	Cash	50,000
50	Meya Mining Limited	Voluntary	Local Communities	Kono	Social/ Surface Rent	Cash	2,000,000
51	Meya Mining Limited	Voluntary	Local Communities	Kono	Social/ Surface Rent	Cash	1,000,000
52	Meya Mining Limited	Voluntary	Local Communities	Kono	Printing of 2 Stickers (Meya Mining Sunset Picture)	Cash	360,000
53	Meya Mining Limited	Voluntary	Local Communities	Kono	Publication on 2019/2020 Surface Rent Payment	Cash	1,600,000
54	Meya Mining Limited	Voluntary	Local Communities	Kono	Surface Rent Coverage in New National Newspaper	Cash	1,600,000
55	Meya Mining Limited	Voluntary	Local Communities	Kono	Publication on 2019/2020 Surface Rent Payment	Cash	1,600,000
56	Meya Mining Limited	Voluntary	Local Communities	Kono	Publication on 2019/20 Surface Rent Payment.	Cash	1,600,000
57	Meya Mining Limited	Voluntary	Local Communities	Kono	Diamond Stars Support	Cash	20,000,000
58	Meya Mining Limited	Voluntary	Local Communities	Kono	Support to NMA Regional Office (Logistics)	Cash	2,000,000
59	Meya Mining Limited	Voluntary	Local Communities	Kono	Festive Season Programme (4 Host Chiefdoms)	Cash	7,000,000
60	Meya Mining Limited	Voluntary	Local Communities	Kono	Meya Cycling Team Christmas Ride Logistics	Cash	500,000
61	Meya Mining Limited	Voluntary	Local Communities	Kono	Hand Soap for Community	Cash	4,400,000
62	Sierra Diamond Ltd	Voluntary	Lower Bambara Chiefdom	Lower Bambara, Kenema District	Road repair from Mano Junction to Tongo / Labour cost, fuel and use of equipment	In-kind	115,500,000
63	Sierra Mineral Holdings 1 Limited	Voluntary	Various Farmers		Crop Compensation	Cash	2,524,822,026
64	Sierra Rutile Limited	Mandatory	ADF		ADF payment in respect of 2020	Cash	1,759,902,420
65	Sierra Rutile Limited	Mandatory	Various Farmers		Crop Compensation	Cash	6,609,131,750
66	Sierra Rutile Limited	Voluntary			Construction of local bridge within the mining community	In-kind	7,185,000
67	Wongor Investments and Mining Corporation Limited	Voluntary	Nimikoro And Nimiya Chiedrom People	Kono	Donating cash support and veronica bucket to support the host communities to fight again COVID 19	Cash	50,000,000
68	Wongor Investments and Mining Corporation Limited	Voluntary	Kono District Council	Kono	Bidding fee for Kono district council for the Community health clinic sponsored by Wongor	Cash	8,200,000
69	Dayu Mining Company Limited	Mandatory	Maramda Health Center	Maramda	MEDICAL	Cash	420,000,000

N°	Company	Payment type	Beneficiary Name	Beneficiary Location	Description	Payment mode	Amount (SLL)
70	Dayu Mining Company Limited	Mandatory	Gbafaya Communicity School	Gbafaya	EDUCATION	Cash	440,000,000
71	Dayu Mining Company Limited	Mandatory	Masumbirie Road And Bridge	Masumbirie	Communcity Conmute And Material Transport	Cash	380,000,000
72	Dayu Mining Company Limited	Voluntary	Masumbirie Water Pipe Project Assemble	Masumbirie	Communcity Water Distribution	Cash	5,000,000
73	Dayu Mining Company Limited	Voluntary	Compension for the Road to Maranda	Maranda	Communcity Transoprtation	Cash	3,400,000
74	Dayu Mining Company Limited	Voluntary	Masumbirie School Football Match	Masumbirie	Football Match	Cash	2,000,000
					<b>Total</b>		<b>13,379,256,936</b>

2021

N°	Company	Payment type	Beneficiary Name	Beneficiary Location	Description	Payment mode	Amount (SLL)
1	Cheng Li Trading Mining	Mandatory	DIANG CHIEFDOM BARRY	DALAKURU	CONSTRUCTION OF TOWN BARRY	Cash	500,000,000
2	Cheng Li Trading Mining	Mandatory	DIANG CHIEFDOM DAM	DALAKURU	WATER DAM CONSTRUCTION	Cash	150,000,000
3	Cheng Li Trading Mining	Mandatory	DIANG CHIEFDOM	DALAKURU/DIANG	LEARNING MATERIALS & SCHOLARSHIP	Cash	150,000,000
4	Cheng Li Trading Mining	Voluntary	DIANG CHIEFDOM	DIANGE CHIEFDOM	CONSTRUCTION OF FEEDER ROADS	In-Kind	216,000,000
5	FG Gold Ltd	Voluntary	Kundoma, Valunia Chiefdom	Kundoma, Valunia Chiefdom	Building of a primary school (8 classrooms, canteen/store, covered walkway). The construction was completed in April 2022 and the costs were estimated at USD 250,000)	In-Kind	2,700,000,000
6	KaSino Mining Company Limited	Voluntary	Water well project	Canal Mokpandi and Njagbahun		Cash	140,400,000
7	Kingho Mining Company Limited	Voluntary	SIMIRA CHIEFDOM	MABONTOR	CONSTRUCTION OF TURN TABLE	In-Kind	24,323,000
8	Kingho Mining Company Limited	Voluntary	SAMBAIA CHIEFDOM	BENDUGU	WOMEN IN AGRICULTURE & FARMING	In-Kind	10,288,070
9	Kingho Mining Company Limited	Voluntary	SAMBAIA CHIEFDOM	BENDUGU	WATER & SANITATION PROJECT	In-Kind	41,150,000
10	Kingho Mining Company Limited	Voluntary	DANSOGOIA CHIEFDOM	KEMEDUGU	ASSISTANCE TO HEALTH	In-Kind	53,617,000
11	Kingho Mining Company Limited	Voluntary	KAMASONDO CHIEFDOM	PEPEL	SAFE DRINKING WATER FOR PEPEL	In-Kind	54,840,000
12	Kingho Mining Company Limited	Voluntary	SAMBAIA CHIEFDOM	BENDUGU	CONSTRUCTION OF CROSSING SLABS	In-Kind	24,691,368
13	Kingho Mining Company Limited	Voluntary	DANSOGOIA CHIEFDOM	BUMBUNA	WOMEN IN AGRICULTURE & FARMING	In-Kind	13,520,000
14	Kingho Mining Company Limited	Voluntary	SIMIRA CHIEFDOM	MABONTOR	WOMEN IN AGRICULTURE & FARMING	In-Kind	9,850,000
15	Kingho Mining Company Limited	Voluntary	DANSOGOIA CHIEFDOM	KEGBEMA	ASSISTANCE TOWARDS EDUCATION	In-Kind	26,125,000
16	Koidu Limited	Mandatory	Government Technical Institute	Kono	Scholarship Funds for 92 Polytechnic Students	Cash	46,000,000
17	Koidu Limited	Mandatory	Government Technical Institute	Dorma	Scholarship funds 2020/2021 Academic Year	Cash	51,000,000
18	Koidu Limited	Mandatory	College of Theology		Management and Church Training Center:Isata Mabinty Koroma & Aiah J. Mbendakwia	Cash	12,400,000
19	Koidu Limited	Mandatory	University of Makeni		Scholarships-Isata Kai Yusff;Sia Sessie;Aminata Lamin & Ibrahim S.Jalloh	Cash	23,600,000



N°	Company	Payment type	Beneficiary Name	Beneficiary Location	Description	Payment mode	Amount (SLL)
20	Koidu Limited	Mandatory	College of Medicines & Allied Health Sciences-COMAHS		Hamza Mansaray;Sahr Samuel Ngegbai;Philip Alpha	Cash	30,000,000
21	Koidu Limited	Mandatory	Fourah Bay College - FBC		Lucy Bundu;Tamba David Moikoa;Sahr Henry Fomba;Emmerson Tamba Babonjo	Cash	15,827,855
22	Koidu Limited	Mandatory	IAMTECH Project Account		Kumba Isata Sheriff;James Tamba Bundor;Finda Suzan Yongai & Komba E. Soka	Cash	15,464,000
23	Koidu Limited	Mandatory	Government Technical Institute	Kono	Juliet Bondu Amara	Cash	2,000,000
24	Koidu Limited	Mandatory	Njala University		Sahr Melvin Mbayoh;Stven Boima & Tamba Amara	Cash	7,500,000
25	Koidu Limited	Mandatory	Institute of Publice Administration & Management - IPAM		Seven scholarship beneficiaries	Cash	24,729,594
26	Koidu Limited	Mandatory	Government Technical Institute	Kono	Scholarship Fees for 2021	Cash	105,000,000
27	Koidu Limited	Mandatory	Government Technical Institute	Dorma	Scholarship Fees for 2021	Cash	157,500,000
28	Koidu Limited	Voluntary	Polio Victims Association	Koidu	Rice & soup allowance	Cash	19,590,000
29	Koidu Limited	Voluntary	PC Paul N Saquee V	Koidu	Support to paramount chief	Cash	305,000,000
30	Koidu Limited	Voluntary	Village Resettlement Committee (VRC)	Koidu	VRC - funding 2021	Cash	176,825,000
31	Koidu Limited	Voluntary	Community assistance	Koidu	Funeral contribution for Chiefdom Speaker's wife's funeral (Chief T.S Gando)	Cash	11,915,000
32	Koidu Limited	Voluntary	Community assistance	Koidu	Payment for vegetable seeds for community sustainable livelihood - RAP2	Cash	1,020,000
33	Koidu Limited	Voluntary	Community assistance	Koidu	Support cost for field trip and assistance to invited guests in Sowa Chiefdom	Cash	2,700,000
34	Koidu Limited	Voluntary	Community assistance	Koidu	Support to the funeral of Chief Komba Gbondo of Koakoyima	Cash	23,000,000
35	Koidu Limited	Voluntary	Kono University	Koidu	Community Assistance - Water & Lights - Kono University Launch Function	Cash	60,000,000
36	Koidu Limited	Voluntary	NMA	Freetown	National Minerals Agency - NMA/MMMR Sponsorship fees for Exhibition	Cash	151,500,000
37	Koidu Limited	Voluntary	Road Safety	Koidu	Contribution to the commemoration of UN Global Road Safety Week Fund Raising Drive	Cash	10,000,000
38	Koidu Limited	Voluntary	Sierra Leone Postal Services	Freetown	Rent for Sierra Leone Postal Services (SALPOST) for the period(2015 - 2021)	Cash	450,000

N°	Company	Payment type	Beneficiary Name	Beneficiary Location	Description	Payment mode	Amount (SLL)
39	Koidu Limited	Voluntary		Freetown	Sierra Leone EITI/GOVT Account - Support for the Purchase of 9.5KVA Gen	Cash	25,000,000
40	Marampa Mines Limited	Voluntary	Community	Lunsar	UPDATING COMMUNITY DEVELOPMENT AGREEMENT	Cash	25,242,574
41	Marampa Mines Limited	Voluntary	Community	Lunsar	Payment for COMMUNITY VISIT ASSISTANCE	Cash	3,095,000
42	Marampa Mines Limited	Voluntary	Community	Lunsar	Public Community Meeting workshop expense & Meeting arrangement with Community	Cash	16,724,000
43	Marampa Mines Limited	Voluntary	Community	Lunsar	Community assistance to the Paramount Chief Koblo Queen II (funeral assistance for late mother)	Cash	10,000,000
44	Marampa Mines Limited	Voluntary	Community	Lunsar	Funds for Sensitization of Riverine communities along river side	Cash	4,500,000
45	Meya Mining Limited	Mandatory	Community	Kono	Crop Compensation	Cash	200,995,000
46	Meya Mining Limited	Voluntary	Local Communities	Kono	Chlorine for Community Borehole	Cash	3,600,000
47	Meya Mining Limited	Voluntary	Local Communities	Kono	Simbakoro Compensation	Cash	32,000,000
48	Meya Mining Limited	Voluntary	Local Communities	Kono	Simbakoro Compensation	Cash	32,360,000
49	Meya Mining Limited	Voluntary	Local Communities	Kono	Koakoyima Resource Center	Cash	20,000,000
50	Meya Mining Limited	Voluntary	Local Communities	Kono	Koakoyima Resource Center Opening	Cash	7,000,000
51	Meya Mining Limited	Voluntary	Local Communities	Kono	Koakoyima Resource Center Opening	Cash	5,000,000
52	Meya Mining Limited	Voluntary	Local Communities	Kono	Koakoyima Resource Center Opening	Cash	1,000,000
53	Meya Mining Limited	Voluntary	Local Communities	Kono	Koakoyima Resource Center Opening	Cash	7,000,000
54	Meya Mining Limited	Voluntary	Local Communities	Kono	Koidu New Sembahun City Council	Cash	40,000,000
55	Meya Mining Limited	Voluntary	Local Communities	Kono	EPA - Monotoring Visit	Cash	2,500,000
56	Meya Mining Limited	Voluntary	Local Communities	Kono	Simbakoro Blasting Land	Cash	20,000,000
57	Meya Mining Limited	Voluntary	Local Communities	Kono	Materials For Bardu Community Tape	Cash	1,100,000
58	Meya Mining Limited	Voluntary	Local Communities	Kono	Assistance To Simbakoro Community School	Cash	16,650,000
59	Meya Mining Limited	Voluntary	Local Communities	Kono	Simbakoro Blasting Land	Cash	7,500,000
60	Meya Mining Limited	Voluntary	Local Communities	Kono	Materials for Community Bore Holes	Cash	4,703,500
61	Meya Mining Limited	Voluntary	Local Communities	Kono	White Tiles for Community Grave Repairs	Cash	1,006,250
62	Meya Mining Limited	Voluntary	Local Communities	Kono	Cement for Simbakoro Community School	Cash	1,437,500
63	Meya Mining Limited	Voluntary	Local Communities	Kono	Logistics For Parliamentarians	Cash	1,000,000
64	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Expense - Paliamentarians	Cash	10,000,000
65	Meya Mining Limited	Voluntary	Local Communities	Kono	Kamara Chiefdom Expense	Cash	2,000,000
66	Meya Mining Limited	Voluntary	Local Communities	Kono	TransportationFor Stakeholders	Cash	1,000,000
67	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Community Assistance	Cash	1,000,000
68	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Community Assistance	Cash	1,000,000

N°	Company	Payment type	Beneficiary Name	Beneficiary Location	Description	Payment mode	Amount (SLL)
69	Meya Mining Limited	Voluntary	Local Communities	Kono	Meya Mining Cycling Team Logistic	Cash	300,000
70	Meya Mining Limited	Voluntary	Local Communities	Kono	Social-Community assistance	Cash	300,000
71	Meya Mining Limited	Voluntary	Local Communities	Kono	Assistance To Sierra Leone Cycling Association - Kono Branch	Cash	2,000,000
72	Meya Mining Limited	Voluntary	Local Communities	Kono	Social-Community assistance	Cash	20,000,000
73	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Community Assistance	Cash	20,000,000
74	Meya Mining Limited	Voluntary	Local Communities	Kono	Social - Meeting	Cash	1,000,000
75	Meya Mining Limited	Voluntary	Local Communities	Kono	Support To Nimikoro Chiefdom for Presendential Visit	Cash	15,000,000
76	Meya Mining Limited	Voluntary	Local Communities	Kono	40 Litres Fuel for Ambulance And Assistance To Driver - Cycl	Cash	540,000
77	Meya Mining Limited	Voluntary	Local Communities	Kono	Assistance To Cycling	Cash	1,000,000
78	Meya Mining Limited	Voluntary	Local Communities	Kono	Simbakoro Ramada - Eid Mubarak Celebration	Cash	3,000,000
79	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Expense - Logistice for Cycling	Cash	500,000
80	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Community Assistance	Cash	10,800,000
81	Meya Mining Limited	Voluntary	Local Communities	Kono	Meya Mining Cycling Logistics	Cash	500,000
82	Meya Mining Limited	Voluntary	Local Communities	Kono	National Mineral Agency (Geodata Launch And Exhibition)	Cash	75,600,000
83	Meya Mining Limited	Voluntary	Local Communities	Kono	ONS Logistics Support	Cash	2,000,000
84	Meya Mining Limited	Voluntary	Local Communities	Kono	Logistics To EPA	Cash	1,000,000
85	Meya Mining Limited	Voluntary	Local Communities	Kono	Assistance To Koakoyima Youth	Cash	150,000
86	Meya Mining Limited	Voluntary	Local Communities	Kono	9 Batalon Inventation Logistics - 3/07/2021	Cash	1,000,000
87	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Community Assistance	Cash	1,585,980
88	Meya Mining Limited	Voluntary	Local Communities	Kono	Assistance To Kono Cycling Club	Cash	15,000,000
89	Meya Mining Limited	Voluntary	Local Communities	Kono	Assistance To Inspector General of Police	Cash	1,000,000
90	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Services	Cash	50,000,000
91	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Community Assistance	Cash	12,753,936
92	Meya Mining Limited	Voluntary	Local Communities	Kono	Hand Soap for Community	Cash	1,426,000
93	Meya Mining Limited	Voluntary	Local Communities	Kono	Fuel Allowance	Cash	3,000,000
94	Meya Mining Limited	Voluntary	Local Communities	Kono	Social - Expenses	Cash	5,000,000
95	Meya Mining Limited	Voluntary	Local Communities	Kono	Assistance To Kono Cycling Team	Cash	12,560,000
96	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Expense	Cash	2,500,000
97	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Community Assistance	Cash	3,000,000
98	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Community Assistance	Cash	15,000,000
99	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Community Assistance	Cash	80,000,000
100	Meya Mining Limited	Voluntary	Local Communities	Kono	Assistance To Kono Cycling Team	Cash	500,000

N°	Company	Payment type	Beneficiary Name	Beneficiary Location	Description	Payment mode	Amount (SLL)
101	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Expense	Cash	2,500,000
102	Meya Mining Limited	Voluntary	Local Communities	Kono	Logistics For ONS & Support	Cash	1,500,000
103	Meya Mining Limited	Voluntary	Local Communities	Kono	Meya Mining Cycling Team Logistics	Cash	500,000
104	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Community Assistance	Cash	10,000,000
105	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Community Assistance	Cash	4,000,000
106	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Community Assistance	Cash	49,700,000
107	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Community Assistance	Cash	1,000,000
108	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Community Assistance	Cash	20,000,000
109	Meya Mining Limited	Voluntary	Local Communities	Kono	Assistance To Kono Cycling Team	Cash	5,000,000
110	Meya Mining Limited	Voluntary	Local Communities	Kono	Social Community Assistance	Cash	5,000,000
111	Seawright Mining Co	Voluntary	Mondeya Community	Nimiyama Chiefdom	Nimiyama Recirculatory Aquaculture System (RAS)	Cash	2,312,680,092
112	Seawright Mining Co	Voluntary	Tungie Community	Goramba Mende Chiefdom	Secondary School/Tertiary Institution	Cash	10,566,021,858
113	Seawright Mining Co	Voluntary	Mondema Community	Goramba Mende Chiefdom	Modema Recirculatory Aquaculture System (RAS)	Cash	2,307,753,034
114	Seawright Mining Co	Voluntary	Njala University	Moyamba Chiefdom	Njala University Recirculatory Aquaculture System (RAS)	Cash	2,454,838,561
115	Seawright Mining Co	Voluntary	Tungie PC House Construction	Goramba Mende Chiefdom	Tungie PC House Construction	Cash	532,743,031
116	Seawright Mining Co	Voluntary	Gbesne PC Fence Construction	Gbesne Chiefdom	Gbesne PC Fence Construction	Cash	521,500,647
117	Seawright Mining Co	Voluntary	Gbesne Administrative Building Project	Gbesne Chiefdom	Gbesne Administrative Building Project	Cash	521,216,528
118	Seawright Mining Co	Voluntary	Solar Donation	Various Stakeholders	Solar Donation	Cash	458,708,400
119	Sierra Diamond Limited	Voluntary	Lower Bambara Chiefdom	Lower Bambara Chiefdom	Road repair from Mano Junction to Tongo / Labour cost, fuel and use of equipment	Cash	140,000,000
120	Sierra Mineral Holdings 1 Limited	Mandatory	Various Farmers			Cash	3,762,699,213
121	Sierra Rutile Limited	Mandatory	Community		Crop Compensation	Cash	5,000,335,250
122	Sierra Rutile Limited	Voluntary	Payment of various SRL scholarship for 2018 to 2021 academic year- for NPSE		Payment of various SRL scholarship for 2018 to 2021 academic year- for NPSE	Cash	180,000,000
123	Sierra Rutile Limited	Voluntary	Payment of various SRL scholarship for 2018 to 2021 academic year- for BECE		Payment of various SRL scholarship for 2018 to 2021 academic year- for BECE	Cash	27,000,000

N°	Company	Payment type	Beneficiary Name	Beneficiary Location	Description	Payment mode	Amount (SLL)
124	Sierra Rutile Limited	Voluntary	Payment of various SRL scholarship for 2018 to 2021 academic year- for WASSCE		Payment of various SRL scholarship for 2018 to 2021 academic year- for WASSCE	Cash	125,000,000
125	Sierra Rutile Limited	Voluntary	Payment of support to NPSE pupils		Payment of support to NPSE pupils	Cash	29,670,000
126	Sierra Rutile Limited	Voluntary	NPSE Scholarship		NPSE Scholarship	Cash	60,000,000
127	Sierra Rutile Limited	Voluntary	BECE Scholarship		BECE Scholarship	Cash	18,000,000
128	Sierra Rutile Limited	Voluntary	WASSCE Scholarship		WASSCE Scholarship	Cash	50,000,000
129	Sierra Rutile Limited	Voluntary	NPSE-Scholarship-2019-202SLL 10216		NPSE-Scholarship-2019-202SLL 10216	Cash	230,000,000
130	Sierra Rutile Limited	Voluntary	NPSE-NMA of scholarship SLL 10610		NPSE-NMA of scholarship SLL 10610	Cash	180,000,000
131	Sierra Rutile Limited	Voluntary	JSS Scholarships-Union SLL 10920		JSS Scholarships-Union SLL 10920	Cash	395,000,000
132	Sierra Rutile Limited	Voluntary	SSS Scholarships-Union SLL 10920		SSS Scholarships-Union SLL 10920	Cash	85,000,000
133	Sierra Rutile Limited	Voluntary	Jackson and Devon Anderson		Monthly assistance to JADA	Cash	40,238,250
134	Sierra Rutile Limited	Voluntary	Ruby Rose Educational Resource		Ruby Rose Educational Resource	Cash	16,290,000
135	Sierra Rutile Limited	Voluntary	Payment for meal for 200 participants @ community engagement		Payment for meal for 200 participants @ community engagement	Cash	3,000,000
136	Sierra Rutile Limited	Voluntary	Ruby Rose Educational Resource		Ruby Rose Educational Resource	Cash	62,805,000
137	Sierra Rutile Limited	Voluntary	Bainima Cont and General services		Bainima Cont and General services	Cash	57,500,000
138	Sierra Rutile Limited	Voluntary	Payment for meal for 200 participants @ community engagement		Payment for meal for 200 participants @ community engagement	Cash	3,000,000
139	Sierra Rutile Limited	Voluntary	Roman Standard Construction and Engineering Services		Roman Standard Construction and Engineering Services	Cash	45,081,698
140	Sierra Rutile Limited	Voluntary	Beining Constuction and general		construction of coomunity service	Cash	316,707,300
141	Sierra Rutile Limited	Voluntary	PC Madam Hawa Kpanabom		Funeral assistnce for late Chief Simeon Amara	Cash	10,000,000
142	Sierra Rutile Limited	Voluntary	Ruby Rose Educational Resource		Assistance to Rube Rose	Cash	2,428,500

N°	Company	Payment type	Beneficiary Name	Beneficiary Location	Description	Payment mode	Amount (SLL)
143	Sierra Rutile Limited	Voluntary	Ruby Rose Educational Resource		Monthly salary contribution	Cash	13,020,000
144	Wongor Investments and Mining Corporation Limited	Mandatory	NIMIKORO CHIEFDOM	NIMIKORO, KONO	CDAP (BY EPA)	Cash	582,564,000
145	Wongor Investments and Mining Corporation Limited	Voluntary	Diamond Soccer Club	Kono	Sponsorship	Cash	50,000,000
146	Wongor Investments and Mining Corporation Limited	Voluntary	Ministry Of Defence	Freetown HQ	Sponsorship of construction of military hospital	Cash	50,000,000
147	Wongor Investments and Mining Corporation Limited	Voluntary	Mines Union	FREETOWN	Sponsorship for Mining Unions for the purpose of updating Laws of Union,Essays of companies	Cash	4,000,000
148	Wongor Investments and Mining Corporation Limited	Voluntary	Motema Police Devision	KONO	4 tyres for Police Station in Kono	Cash	6,800,000
149	Wongor Investments and Mining Corporation Limited	Voluntary	Nimikoro Community Youth	NIMIKORO, KONO	Vest for the team of vigilantes for football match	Cash	2,010,000
150	Dayu Mining Company Limited	Mandatory	Maramda Health Center	MARAMDA	Medical	Cash	120,000,000
151	Dayu Mining Company Limited	Mandatory	Gbafaya Communcity School	GBAFAYA	Education	Cash	140,000,000
152	Dayu Mining Company Limited	Mandatory	Masumbirie Road and Bridge	MASUMBIRIE	Communcity Conmute and Material Transport	Cash	260,000,000
153	Dayu Mining Company Limited	Voluntary	Masumbirie Water Pipe Project Assemble	MASUMBIRIE	Communcity Water Distribution	Cash	5,000,000
154	Dayu Mining Company Limited	Voluntary	Compension for the Road to Maranda	MARANDA	Communcity Transoprtation	Cash	4,000,000
155	Dayu Mining Company Limited	Voluntary	Masumbirie School Football Match	MASUMBIRIE	Football Match	Cash	2,000,000
					<b>Total</b>		<b>38,084,066,988</b>

## Annex 10: Environmental Expenditures

2020

N°	Company	Beneficiary Name	Beneficiary status	Description	Beneficiary Location	Amount (SLL)	Date
1	Meya Mining Co. Ltd	CEMMATS GROUP -SL LTD	Private	Environmental Monitoring	Kono	38,454,735	08/01/2020
2	Meya Mining Co. Ltd	CEMMATS GROUP -SL LTD	Private	Environmental Monitoring	Kono	10,133,000	08/01/2020
3	Meya Mining Co. Ltd	CEMMATS GROUP -SL LTD	Private	Environmental Monitoring	Kono	1,200,000	04/02/2020
4	Meya Mining Co. Ltd	CEMMATS GROUP -SL LTD	Private	Environmental Monitoring	Kono	1,000,000	26/02/2020
5	Sierra Mineral Holdings 1 Ltd	Water Resource Agency	Public		Freetown	326,688,143	04/08/2020
6	Sierra Mineral Holdings 1 Ltd	Ministry of Energy (Nuclear Safety and Radiation Agency)	Public		Freetown	188,269,462	19/02/2020
7	Sierra Mineral Holdings 1 Ltd	Ministry of Energy (Nuclear Safety and Radiation Agency)	Public		Freetown	42,000,000	01/09/2020
8	Sierra Mineral Holdings 1 Ltd	Ministry of Energy (Nuclear Safety and Radiation Agency)	Public		Freetown	222,592,138	03/11/2020
9	Sierra Mineral Holdings 1 Ltd	Ministry of Energy (Nuclear Safety and Radiation Agency)	Public		Freetown	53,000,000	04/11/2020
10	Wongor Invest. and Mining Co Ltd	INTEGEMS	Private	Environmental Consultancy Service	Freetown	300,227,351	30/04/2020
11	Wongor Invest. and Mining Co Ltd	INTEGEMS	Private	Environmental Consultancy Service	Freetown	295,900,000	30/07/2020
12	Wongor Invest. and Mining Co Ltd	INTEGEMS	Private	Environmental Consultancy Service	Freetown	348,679,804	09/11/2020
13	Wongor Invest. and Mining Co Ltd	INTEGEMS	Private	Environmental Consultancy Service	Freetown	200,000,000	15/12/2020
Total						2,028,144,633	

## 2021

N°	Company	Beneficiary Name	Beneficiary status	Description	Beneficiary Location	Amount (SLL)	Date
1	Kingho Mining Company Limited	EPA	Public	Environmental Impact Assessment & Monitoring fees including fines for 2021	Freetwon	1,946,227,137	13/07/1905
2	Meya Mining Co. Ltd	CEMMATS GROUP -SL LTD	Private	Environmental Consultancy	Kono	86,400,000	17/12/2021
3	Sierra Mineral Holdings 1 Ltd	Water Resource Agency	Public	Water Management	Freetwon	200,000	29/04/2021
4	Sierra Mineral Holdings 1 Ltd	Water Resource Agency	Public	Water Management	Freetwon	4,500,000	12/05/2021
5	Sierra Mineral Holdings 1 Ltd	Water Resource Agency	Public	Water Management	Freetwon	275,134,464	06/07/2021
6	Sierra Mineral Holdings 1 Ltd	Water Resource Agency	Public	Water Management	Freetwon	4,500,000	23/11/2021
7	Sierra Mineral Holdings 1 Ltd	Ministry of Energy (Nuclear Safety and Radiation Agency)	Public	Radiation Assessment	Freetwon	133,839,588	20/04/2021
8	Sierra Mineral Holdings 1 Ltd	Ministry of Energy (Nuclear Safety and Radiation Agency)	Public	Radiation Assessment	Freetwon	31,000,000	20/04/2021
9	Sierra Mineral Holdings 1 Ltd	Ministry of Energy (Nuclear Safety and Radiation Agency)	Public	Radiation Assessment	Freetwon	31,000,000	17/09/2021
10	Sierra Mineral Holdings 1 Ltd	Ministry of Energy (Nuclear Safety and Radiation Agency)	Public	Radiation Assessment	Freetwon	126,676,316	17/09/2021
11	Wongor Invest. and Mining Co Ltd	INTEGEMS	Private	Environmental Consultancy Service	Freetwon	143,730,000	13/01/2021
12	Wongor Invest. and Mining Co Ltd	INTEGEMS	Private	Environmental Consultancy Service	Freetwon	200,000,000	18/01/2021
13	Wongor Invest. and Mining Co Ltd	INTEGEMS	Private	Environmental Consultancy Service	Freetwon	200,000,000	26/02/2021
14	Wongor Invest. and Mining Co Ltd	INTEGEMS	Private	Environmental Consultancy Service	Freetwon	150,000,000	18/03/2021
15	Wongor Invest. and Mining Co Ltd	INTEGEMS	Private	Environmental Consultancy Service	Freetwon	200,000,000	26/03/2021
16	Wongor Invest. and Mining Co Ltd	INTEGEMS	Private	Environmental Consultancy Service	Freetwon	152,793,000	07/04/2021
17	Wongor Invest. and Mining Co Ltd	INTEGEMS	Private	Environmental Consultancy Service	Freetwon	200,000,000	01/06/2021
18	Wongor Invest. and Mining Co Ltd	INTEGEMS	Private	Environmental Consultancy Service	Freetwon	158,000,000	09/06/2021
19	Wongor Invest. and Mining Co Ltd	INTEGEMS	Private	Environmental Consultancy Service	Freetwon	358,260,000	26/07/2021
20	Wongor Invest. and Mining Co Ltd	INTEGEMS	Private	Environmental Consultancy Service	Freetwon	370,719,346	21/10/2021
21	Wongor Invest. and Mining Co Ltd	INTEGEMS	Private	Environmental Consultancy Service	Freetwon	780,410,880	29/12/2021
22	Wongor Invest. and Mining Co Ltd	INTEGEMS	Private	Environmental Consultancy Service	Freetwon	158,000,000	09/06/2021
23	Wongor Invest. and Mining Co Ltd	INTEGEMS	Private	Environmental Consultancy Service	Freetwon	158,000,000	09/06/2021
24	Marampa Mines Limited	CEMMATS GROUP -SL LTD	Private	Services for conducting environmental and social impact assignment	LUNSAR	179,740,329	22/06/2021
25	Marampa Mines Limited	CEMMATS GROUP -SL LTD	Private	Environmental Advisory Services MML-Lease Issues	LUNSAR	71,159,152	05/07/2021
26	Marampa Mines Limited	CEMMATS GROUP -SL LTD	Private	Environmental advisory services MML-lease issues	LUNSAR	278,946,034	14/07/2021
				<b>Total</b>		<b>6,399,236,247</b>	



## Annex 11: Persons involved in the preparation of EITI Report

Independent Administrator (BDO LLP)	
Mark Henderson	Partner
Ben Toorabally	Director
Hedi Zaghouani	Associate Director
Mehdi Mellah	Manager
Helmi Ben Rhouma	Junior Manager
Achraf Kanoun	Junior Manager
Bilel Yahyaoui	Supervisor
Nigel Roach (BDO SL)	Supervisor