

SIERRA LEONE EXTRACTIVE INDUSTRIES TRANSPARENCY INITIATIVE (SLEITI)

RECONCILIATION REPORT FOR THE YEAR 2011

December 2013



Table of Contents

EXEC	UTIVE SUMMARY	4
1. II	NTRODUCTION	7
1.1.	Extractive Industries Transparency Initiative (EITI)	7
1.2.	EITI in Sierra Leone	7
2. C	OVERVIEW OF THE EXTRACTIVE SECTOR IN SIERRA LEONE	8
2.1.	Mining Sector	8
2.2.	Oil and Gas sector	10
3. C	BJECTIVES, APPROACH & METHODOLOGY OF THE ENGAGE	MENT12
3.1.	Objectives of the engagement	12
3.2.	Approach & Methodology	12
4. R	RECONCILIATION SCOPE	15
4.1.	Payment flows included in the EITI reconciliation	15
4.2.	Extractive companies involved in the EITI reconciliation	17
4.3.	Government Agencies involved in the EITI reconciliation	17
5. R	RECONCILIATION RESULTS	18
5.1.	Reconciliation by extractive Company	18
5.2.	Reconciliation by revenue stream	20
5.3.	Adjustments	21
5.4.	Final unreconciled discrepancies	23
5.5.	Contributions to Local Administrations	25
6. A	NALYSIS OF KEY FIGURES IN THE EITI REPORT	29
6.1.	Contributions of extractive companies in the 2011 EITI report	29
6.2.	Contribution of revenue streams in the 2011 EITI report	30
6.3.	Contribution of Government Agencies in the 2011 EITI report	30
6.4.	Extractive revenues declared compared with GDP	31
7. R	RECOMMENDATIONS	32
ANNE	XES	36
Anne	ex 1: Extractive companies' details	37
Anne	ex 2: Map of the active industrial mineral rights	39
Anne	ex 3: Reconciliation sheet by company	40
Anne	ex 4: Persons contacted or involved in the reconciliation work	65

LIST OF ABBREVIATIONS

ADF	Agricultural Developement Fund
CA	Chiefdoms Administration
DC	District Councils
EITI	Extractive Industries Transparency Initiative
EPA	Environmental Protection Agency
GGDO	Government Gold and Diamond Office
GOSL	Government of Sierra Leone
IFAC	International Federation of Accountants
ISA	International Standard on Auditing
LGCD	Local Government and Community Development
MMMR	Ministry of Mines and Minerals Resources
MSG	Multi-Stakeholder Group
NMA	National Minerals Agency
NRA	National Revenue Authority
PD	Petroleum Directorate
SLEITI	Sierra Leone Extractive Industries Transparency Initiative
VAT	Value Added Tax

EXECUTIVE SUMMARY

The reconciliation of cash flows relating to the mineral and oil and gas sectors for the 2011 fiscal year covering the period 1 January to 31 December 2011 was carried out by Moore Stephens between 18 November and 12 December 2013.

Our reconciliation work was carried out in accordance with the Terms of Reference annexed to our contract approved by the Multi-Stakeholder Group. The terms and the proposed reconciliation scope were approved by the Multi-Stakeholder Group in its meeting of 14 November 2013.

The overall objective of the reconciliation exercise was to assist the Government of Sierra Leone and other stakeholders involved to determine the contribution that the extractive sector has made to the country's economy and social development, and to improve transparency and responsibility in the extractive industries' sector.

Principal findings arising from reconciliation work

The main results arising from our work are as follows:

1. All companies included in the reconciliation scope have submitted their reporting templates, except for the following entities, who do not operate anymore in Sierra Leone:

N°	Companies	Sector
1	Lion Stones (SL) Ltd	Mining
2	West Africa Group for Mining Gold and Diamond (SL) Ltd	Mining
3	Diam Investment (SL) Ltd	Mining
4	Danasha Gem (S.L) Ltd	Mining
5	Akar, Hasanein Ibrahim	Mining
6	Shanti Sierra Limited	Mining

2. The receipts reported by Government Agencies in respect of these companies were USD 1,146,579, which represent 4.15% of the total amount declared by the government, and are detailed as follows:

N°	Companies	Total receipts after adjustments (USD)
1	Lion Stones (SL) Ltd	121,263
2	West Africa Group for Mining Gold and Diamond (SL) Ltd	314,284
3	Diam Investment (SL) Ltd	234,115
4	Danasha Gem (S.L) Ltd	144,626
5	Akar, Hasanein Ibrahim	102,835
6	Shanti Sierra Limited	229,456
Tot	al	1,146,579

Several efforts had been made to reach out to the 6 exporters that failed to report as these exporters did not have addresses or any form of contact to locate them. Based on the foregoing, the MSG agreed that the unilateral disclosure by the government is acceptable as the licences of these have expired and they are no longer in operation.

- **3.** All extractive companies' reporting templates were certified by an external auditor in accordance with the procedures adopted by the MSG, except for "Talisman Sierra Leone BV/Prontinal Ltd" company. The MSG accepted this reporting template without certification as the company is no longer in operation in Sierra Leone.
- **4.** All Government Agencies included in the reconciliation scope have submitted certified reporting templates.
- **5.** At the <u>beginning</u> of the reconciliation, the total amount reported by the Government of Sierra Leone amounted to USD 28,329,658 while the total amount reported by extractive companies amounted to USD 26,973,783.

As a result the total net difference before adjustment amounted to **USD 1,355,875** (4.79%), as summarised in the table below:

Payments declared initially	Companies	Government Agencies	Difference	%
Mining Sector	11,779,444	12,953,203	(1,173,759)	(9,06)%
Oil & Gas Sector	15,194,339	15,376,455	(182,116)	(1,18)%
Total	26,973,783	28,329,658	(1,355,875)	(4,79)%

At <u>the end</u> of the reconciliation exercise, a net difference of **USD 1,328,265** (4.81%) remained unreconciled, as summarised in the table below:

Payments after adjustment	Companies	Government Agencies	Difference	%
Mining Sector	11,098,803	12,244,951	(1,146,149)	(9.36)%
Oil & Gas Sector	15,194,339	15,376,455	(182,116)	(1.18)%
Total	26,293,142	27,621,406	(1,328,265)	(4,81)%

The differences and operating adjustments are further analysed in Section 5 of this report.

6. The final net difference of **USD 1,328,265** relating to the 2011 reconciliation exercise is summarised in the tables below:

Description	Net Difference (USD)	%
Templates not submitted by extractive companies	1,146,579	86.32%
Discrepancies in Templates submitted	181,686	13.68%
Total differences	1,328,265	

Unreconciled differences by Company

Company	Net Difference (USD)	%
West Africa Group for Mining Gold and Diamond (SL) Ltd	(314,284)	23.66%
Diam Investment (SL) Ltd	(234,115)	17.63%
Shanti Sierra Limited	(229,456)	17.27%
Danasha Gem (S.L) Ltd	(144,626)	10.89%
Lion Stones (SL) Ltd	(121,263)	9.13%
Akar, Hasanein Ibrahim	(102,835)	7.74%
Other (immaterial)	430	-0.03%
Total Mining Companies	(1,146,149)	86.29%
Talisman Sierra Leone BV/Prontinal Ltd	(182,226)	13.72%
Other (immaterial)	110	(0.01)%
Total Oil and Gas Company	(182,116)	13.71%
Total USD	(1,328,265)	

Unreconciled differences by tax

Тах	Net Difference (USD)	%
Export Duties	(835,303)	62.89%
Diamond Exporter' Licence	(215,000)	16.19%
Corporate Tax	(69,924)	5.26%
Exploration Licence	(26,356)	1.98%
Other (immaterial)	434	(0.03)%
Total Mining Companies	(1,146,149)	86.29%
Surface Rent (Oil & Gas)	(109,231)	8.22%
Training Fund for Oil	(72,905)	5.49%
Other (immaterial)	20	0.00%
Total Oil and Gas Company	(182,116)	13.71%
Total USD	(1,328,265)	

Tim Woodward Partner Moore Stephens LLP

150 Aldersgate Street London EC1A 4AB s LLP

23 December 2013

1. INTRODUCTION

1.1. Extractive Industries Transparency Initiative (EITI)

The Extractive Industries Transparency Initiative (EITI) was first announced at the World Summit for Sustainable Development in Johannesburg in 2002 (the 'Earth Summit 2002'), and officially launched in London in 2003. It was founded on the recognition that, while oil, gas and minerals can help to raise living standards across the world, in countries where these resources are not managed appropriately, this may often lead to corruption and conflict and, for many people, a lower quality of life.

The initiative aims for improved transparency through companies in the mining sector publishing their tax payments and government organizations disclosing amounts received from those companies. EITI therefore promotes better governance in countries rich in oil, gas and mineral resources, and seeks to reduce the risk of diversion or misappropriation of funds generated by the development of a country's extractive industries. It works through the joint cooperation of governments, private sector companies, civil society groups, investors and international organizations.

EITI has a robust yet flexible methodology that ensures a global standard is maintained throughout the different implementing countries. The EITI Board and the International Secretariat are the guarantors of this methodology. Implementation itself, however, is the responsibility of each individual country. The EITI, in a nutshell, is a globally developed standard that promotes revenue transparency at the local level.

1.2. EITI in Sierra Leone

Sierra Leone endorsed the EITI in 2006 and two years later became a candidate country. Sierra Leone published its first EITI Report (2006-2007) in 2010 on minerals only. In the same year, a Validation Report was published and the assessment of the EITI Board was that Sierra Leone only made a "meaningful progress" but did not achieve compliance.

In 2012, another validation report was published but, requirements 11, 13, 14 and 15 were not considered met by the EITI Board. As a result of not meeting these requirements, the Board suspended Sierra Leone on 26 February 2013. The Board also recognised the significant process achieved and asked Sierra Leone to complete four remedial actions. The suspension will be lifted if the Board is satisfied that the remedial actions have been satisfactorily completed. If suspension is in effect beyond 27 February 2014, the Board will consider delisting Sierra Leone as a candidate country.

Since 2006, Sierra Leone has produced 2 EITI reports (2006 to 2010). The first EITI Report covered the period 2006-2007 and the second EITI Report covered the period 2008-2010. The number of Government Entities and extractive companies involved in the EITI reports increased from 9 in the first EITI report to 19 in the second EITI report. The table below shows the progress made in each report:

Period Covered	Publication Date	Sectors Covered	Government Revenues (USD)	Company Payments (USD)	Number of Companies Reporting
2006	February 2010	Mining	7,200,000	7,700,000	9
2007	February 2010	Mining	10,200,000	10,600,000	9
2008	September 2012	Oil & Gas, Mining	5,027,565	7,476,297	19
2009	September 2012	Oil & Gas, Mining	5,875,779	6,091,294	19
2010	September 2012	Oil & Gas, Mining	7,586,793	8,273,470	19

2. OVERVIEW OF THE EXTRACTIVE SECTOR IN SIERRA LEONE

2.1. Mining Sector

2.1.1. Background and profile of the mining sector

Sierra Leone's mineral resources include diamonds, rutile, bauxite, iron ore and gold. The mining sector importance to Sierra Leone is understated in national accounts however, as mining accounts for over 90% of export revenues. It is also the second largest employer providing employment to more than 300,000 people.

Diamonds were first discovered in Sierra Leone in 1930 and kimberlites, a type of igneous rock that can contain diamonds, in 1948. The country has significant deposits of diamonds, bauxite, rutile and gold, with potential for additional discoveries. The established diamond fields cover an area of almost 20,000 km² in the Eastern and South Eastern parts of the country, concentrated mainly in the Kono, Kenema and Bo districts. In 2010, the country was the world's 10th largest producer of diamonds. In the same year, Sierra Leone exported more than 550.000 carats, worth approximately 130 MUSD. Semi-industrial production of kimberlite diamonds began in 2003 but production was halted throughout 2008 following violent protests against the main producer. Before then, diamond production was largely undertaken on an artisanal basis with its environmental and physical risks.

Although best-known for diamonds, Sierra Leone also possesses one of the largest natural rutile reserves in the world as well as significant bauxite reserves, and prior to the war these represented the largest contributors to tax revenue (40% and 20%, respectively). Having been suspended in 1995, rutile and bauxite mining operations resumed in 2006 although the production of rutile was scaled down in 2008 following the collapse of one of the two dredges used to mine the mineral.

Other identified minerals in Sierra Leone include platinum, chromite, lignite, clay, copper, nickel, molybdenum, lead and zinc.

The map of the active industrial mineral rights is presented in Annex 2 of the present report.

2.1.2. Legal context

The management of Sierra Leone's mineral resources rests with the Ministry of Mines and Mineral Resources (MMMR). MMMR's mission is to develop policies and programmes for the systematic and economic exploitation of mineral resources as well as formulating appropriate regulations for the mining industry and related activities to ensure that the nation derives maximum benefit from the mineral resources."

The Ministry of Mines and Mineral Resources (MMMR) administers the provisions of the Mines and Minerals Act, 2009. The Act governs the mining industry in Sierra Leone and covers the following areas:

- ownership of minerals;
- administration;
- acquisition of mineral rights;
- mineral rights and surface rights;
- · registration, records and cadastre;
- surrender, suspension and cancellation of mineral rights;
- reconnaissance licences;
- exploration licences;

- artisanal mining licences;
- small-scale mining licences;
- large-scale mining licences;
- radioactive minerals;
- dredging for minerals;
- protection of the environment;
- community development;
- health and safety;
- financial;
- miscellaneous;
- regulations; and
- · repeal and savings.

a. Licensing

Five types of licences are available to the large-scale operators:

- Reconnaissance Licence: this confers non-exclusive rights to carry on reconnaissance operations in reconnaissance areas not exceeding 10,000 km² for a period of one year and is renewable:
- Exploration Licence: this confers exclusive rights to carry out exploration operations in exploration areas that do not exceed 250 km². The period of the Exploration Licence shall not exceed 4 years and is renewable;
- <u>Artisanal Mining Licence:</u> this confers exclusive rights to carry out exploration and mining operations in licensed areas that do not exceed half an hectare. The period of the Artisanal Mining Licence shall not exceed one year and may be renewed for up to three further periods;
- <u>Small-Scale Mining Licence:</u> this confers exclusive rights to carry out exploration and mining operations in licensed areas that are not less than one hectare and not more than 100 hectares. The period of the Small-Scale Mining Licence does not exceed 3 years and may be renewed for further periods not exceeding 3 years at a time;
- <u>Large-Scale Mining Licence:</u> this confers exclusive rights to carry out exploration and mining operations in Large-Scale Mining licence areas. The period for which a large-scale mining licence is granted shall be stated in the licence and shall not exceed 25 years or the estimated life of the ore body proposed to be mined, whichever is shorter. This period is renewable.

b. Taxation

Sierra Leone's mining taxes are mainly embodied in the Income Tax Act 2000 and the Mines and Minerals Act 2009.

The Mines and Minerals Act 2009 sets the royalty rates for special stones at 15%, for precious stones at 6.5%, for precious metals at 5% and for all other minerals at 3%. These royalties are calculated as a percentage of the market value (Section 148). The Act also requires mining lease holders to pay 0.01% of their gross revenue to the Community Development Fund (CDF) to benefit the areas in which the mines are located (Section 139).

Surface rents are defined and set by the Mines and Minerals Act 2009. Surface rents are agreed between the mining licence holder and the communities (Section 34).

Moore Stephens LLP

Mining was formerly subjected to a 37.5% Income Tax, higher than the then-prevailing 35% tax on other companies, but this was reduced to 30% in the most recent amendment to the Income Tax Act, thus bringing it into line with the tax applied to other sectors. Royalties paid are considered as operating costs' of the company and are deductible expenses in the income tax calculation. There are a number of capital allowances for mining set out in the Income Tax Act, the depletion, depreciation and amortization rate in the first year of expenditure is 40% and 20% in the three subsequent years. Exploration costs are fully deductible and losses may be carried forward indefinitely.

Mining companies are also subjected to the payment of Environmental Impact Assessment Licence and Environmental Impact Assessment Monitoring Fee under the Environmental Protection Agency Act 2008.

2.2. Oil and Gas sector

2.2.1. Background and legal context

Sierra Leone does not currently produce any oil, but there are offshore prospects. In September 2009, Anadarko Petroleum Corporation announced an offshore deep-water discovery at the Venus exploration well. This is the first deep-water test in the Sierra Leone-Liberian Basin.

The Government of Sierra Leone recently had a successful third petroleum bid round for the award of nine open offshore petroleum exploration block permits. With such continued investment, there is prospect for Sierra Leone to become an oil producing country.

The current legislative framework is set by the Petroleum Exploration and Production Act 2011 to provide for the management of petroleum operations, to regulate and promote petroleum exploration, development and production; to regulate the licensing and participation of commercial entities in petroleum operations; to provide for proper supervision of petroleum operations, to promote the participation of Sierra Leoneans in the petroleum industry; to provide for efficient and safe petroleum operations; to provide for an open, transparent and competitive process of licensing and for other related matters.

The Petroleum Exploration and Production Act 2011 governs the oil and gas sector in Sierra Leone and covers the following areas:

- · Ownership of petroleum;
- Administration;
- Acquisition of petroleum rights;
- Reconnaissance permit;
- Petroleum licences;
- Development and production;
- Decommissioning;
- State participation;
- Employment and local content;
- Environment, health and safety;
- Financial provisions;
- Arbitration;
- Transfer, revocation and suspension of petroleum rights;
- General provisions relating to petroleum rights;
- Offences: and
- Miscellaneous.

2.2.2. Taxation

The Petroleum Exploration and Production Act 2011 provides for the payment of royalties unless otherwise agreed in the Petroleum Agreement. The Model Petroleum Agreement states that royalties have to be delivered in kind, but upon request of the state it may also be received in cash. The Act also requires companies to pay for training Sierra Leoneans in Petroleum Sector, at a rate of USD 125,000 per year. Surface rentals are defined and stand at USD 30 per km² during the initial period of production, USD 50 during the first extension, USD 75 for the second production period and USD 100 for the third. Currently these, as well as revenue from application fee, sale of data and the training fund make up the only petroleum sector related revenue stream.

Income tax regulations are set out in the Income Tax Act 2000. A rate of 30% applies to resident companies and contractors.

Fees and rentals for the oil and gas sector are collected centrally through the Petroleum Directorate and include:

- Training Fund for Oil and Gas;
- · Signature Bonus for Oil and Gas; and
- Surface Rent.

Oil and Gas companies are also subjected to the payment of Environmental Impact Assessment Licence and Environmental Impact Assessment Monitoring Fee under the Environmental Protection Agency Act 2008.

3. OBJECTIVES, APPROACH & METHODOLOGY OF THE ENGAGEMENT

The third Sierra Leone Extractive Industries Transparency Initiative (EITI) reconciliation covers the period 1 January to 31 December 2011.

The report is intended for the use of the Multi-Stakeholder Group (MSG) for the purpose of the initiative set out in our Terms of Reference.

3.1. Objectives of the engagement

The purpose of the third EITI Report for Sierra Leone is to:

- verify financial data relating to payments from extractive companies (large-scale, small-scale, exploration, dealers and exporters) with data declared by the Ministry of Mines and Mineral Resources (National Minerals Agency & Government Gold and Diamond Office), National Revenue Authority, the Petroleum Directorate, Environment and Protection Agency, District Councils and Chiefdom Administration for the 2011 fiscal year; and
- to produce a comprehensible and a comprehensive EITI Report that is based on international standards.

3.2. Approach & Methodology

3.2.1. Data collection and analysis

The first stage of our work consisted of an analysis of the reports received from extractive companies and Government Entities and the detection of any potential errors.

Extractive companies

The reporting templates from extractive companies were provided by the EITI Secretariat to the Reconciler. These reports disclosed total payments by tax for 2011. However, there were no detailed schedules for each type of payment. The reporting templates also included a section where the companies were requested to provide contact details, information on licences, type of products and TPIN. However, not all companies had filled in that part of the report.

Government Agencies

The reporting templates from Government Agencies were provided by the EITI Secretariat to the Reconciler. These reports disclose total payments for 2011 by tax. However, there were no detailed schedules for each type of payment.

We contacted relevant Government Agencies such as NRA, MMMR, PD and EPA in order to obtain detailed information on amounts declared.

3.2.2. Materiality thresholds

MSG decided during the meeting held on 14 November 2013 that the materiality threshold was to be set at USD 99,360. This threshold meant that the reconciliation exercise would cover data from 21 mining companies.

MSG decided that the materiality threshold should be set at a level that would ensure the efficiency of the reconciliation exercise without jeopardizing its comprehensiveness with regards to the proportion of revenue accounted for. On this basis, MSG indicated that the threshold should ensure that over 85% of EITI-relevant revenues should be accounted for in the reconciliation exercise. The threshold was arrived at by analysing data from GoSL Online Repository on May 2013.

GoSL Online Repository reports on all taxes and non-tax revenues from the mining sector which are paid to the central government. Tax data is provided by NRA, whilst non-tax data is provided by the Mining Cadastre Administration System (MCAS). To be included in the Repository, a payment must be supported by relevant documentation. Given that all revenues disclosed in the Repository had been checked individually to their supporting documents, MSG agreed that this was the most reliable dataset for the scoping study. It should be noted, however, that payments not supported by a receipt were excluded from the Repository.

The dataset was adjusted so that only the revenue streams that were actually paid by the companies to central government (i.e. not indirect taxes, employee taxes and fees levied on agents) were included.

Only four petroleum exploration companies were considered to be operational in 2011. Therefore MSG decided that all of these companies were to be included in the reconciliation.

As a result, the total of companies within the reconciliation scope was 25 comprising 21 mining companies and 4 oil companies.

3.2.3. Selection of Revenue Streams

The selection of the revenue streams was carried out in two stages. At the beginning of the process, MSG agreed that only direct taxes should be included in the reconciliation, i.e. only taxes that are actually paid by the companies should be considered relevant for the purpose of the reconciliation. All indirect taxes were excluded from the scoping study and the reconciliation. This includes the following:

- PAYE:
- Payroll Tax;
- Withholding Tax on Contractors;
- Withholding Tax on Rent;
- GST:
- Import Duty:
- Customs Processing Fee;
- ECOWAS Levy;
- Diamond Dealer's Agent's Certificate;
- Diamond Exporter's Agent's Certificate;
- Gold Exporter's Agent's Certificate; and
- Foreign Travel Tax.

The second stage involved determining which of the direct taxes were material. MSG decided that only those revenue streams that the Repository indicated were relevant to the companies above the materiality threshold would be classed as material and therefore to be included in the reconciliation. A revenue stream was viewed as relevant if a company had paid USD 3,000 and above in 2011.

On this basis, the following were determined to be immaterial and therefore not to be included in the reconciliation:

- Diamond Dealer's License:
- Gold Dealer's License;
- Gold Exporter's License;
- Reconnaissance License; and
- Small Scale License.

3.2.4. Reconciliation work carried out

We carried out the reconciliation company by company and flow by flow on the basis of detailed information made available by the stakeholders in their supporting documents annexed to the reporting templates.

All discrepancies were reported to the companies and Government Entities in order to obtain further supporting documents and explanations in order to proceed with the necessary adjustments. The discrepancies for which the supporting documents or explanations were not provided are presented as unreconciled discrepancies in this report.

The differences are detailed as:

- positive differences: when the total amount declared by an extractive company for a payment flow exceeds the total of the amount declared by the Government Entity for the same payment flow:
- negative differences: when the total amount declared by an extractive company for a payment flow is less the total amount declared by the Government Entity for the same payment flow; and
- net difference: it is the total of the negative and positive differences.

In order to facilitate data compilation and reporting on discrepancies identified, we developed a database in Microsoft Excel for each extractive company that sets out all payment streams declared on the reporting templates and the corresponding Government receipts.

Using the reconciliation database above, we identified the necessary information required to reconcile discrepancies on an item by item basis for each extractive company.

Where the reporting from Government Entities agreed with the taxpayers' reporting templates, the government figures were considered to be confirmed by the company's reporting. If not, the initial findings were classified by origin of discrepancy for better assessment of the necessary actions required to resolve them (request for clarification, request for additional supporting documentation, etc.).

Once the initial findings were identified, we contacted those reporting entities whose reports were inconsistent or incomplete. Inconsistency may occur within reports of a single entity, or between a private sector company and the Government. In the first instance, we contacted such entities by telephone and/or email, and requested additional explanations and/or documentation (detailed schedule, evidence, paying entity, etc.) to resolve our queries. We reviewed documentation subsequently supplied, and re-assessed the report for that entity to determine whether the inconsistency or incompleteness is resolved or adjusted.

All adjustments were made on the basis of confirmations from the extractive companies or the Government Entities or supported by documented evidences.

During our reconciliation work we tried to detect and examine all significant weaknesses and deficiencies that should be addressed in future exercises. All these weaknesses and deficiencies are detailed in Section 7 of our report.

4. RECONCILIATION SCOPE

Based on the scoping study, MSG agreed that the reconciliation should cover the areas cited below.

4.1. Payment flows included in the EITI reconciliation

The flows included in the 2011 reconciliation scope may be summarised as follows:

N°	Payment flows	Definition
Paym	ent flows to NRA	
1	Mining Lease	Annual fee paid according to Section 152 of the Mines and Minerals Act 2009, by the holder of any mineral right. This charge is paid upon the granting of a mineral right, which is then paid annually until the termination of the mineral right.
2	Exploration License Fee	Annual fee paid in accordance with Section 152 of the Mines and Minerals Act 2009 by the holder of any exploration licence. Exploration Licence Fee is area based and is US\$100/sq km for the first 4 years, following which, the fee is US\$400/sq km for the first 125 sq km of area and US\$800/sq km for anything in excess. Other Exploration License Fees are lump sum payments.
3	Royalty Payment	Sales based tax which is levied on the basis of Section 148 of the Mines and Minerals Act 2009. Royalties shall be the following percentages of market value:-15% for special stones defined as those stones whose market value is above five hundred thousand United States dollars; - 6.5% for precious stones; - 5% for precious metals; and - 3% for all other minerals.
4	Corporate tax	Tax on profit paid by companies in the extractive industry which is levied on the basis of Section 21 of the Income Tax Act 2000. It is payable at the rate of 30% of the profit made by a company over the fiscal year.
5	Diamond Exporter's Licence Payment	Tax paid by Diamond Exporters who do not hold a Mining Licence. The amount payable is US\$ 35,000 per annum.
Paym	ent flows to EPA	
6	Environmental Impact Assessment Licence	This amount is levied on the basis of the Environmental Protection Agency Act 2008. It is pre-condition for a company to be granted a small or large-scale mining licence.
7	Environmental Impact Assessment Monitoring Fee	This amount is levied on the basis of the Environmental Protection Agency Act 2008. It is a pre-condition for a company to be granted a small or large-scale mining licence.
Paym	ent flows to MMMR	
8	Export Duty for Diamonds	Tax paid on the export of Diamonds when the exporter does not hold a Mining Licence. The payable amount is 6.5% of the market value of the diamonds up to March 2011. Since March 2011, the rate has been reduced to 3%.
9	Agricultral Development Fund	This tax is now referred to as the Community Development Fund and it is used to assist in the development of mining communities affected by mining operations to promote sustainable development, enhance the general welfare and the quality of life of the inhabitants. It is levied in accordance with Section 139 of the Mines and Minerals Act 2009 at the rate of 0.01% of gross revenue.

- Chiefdom Administration 1 - Paramount Chief 1 - Constituency Development Fund 1 - Land owners 5	
paid by companies holding a Mining Licence. Surface rents are negotiate the companies and the communities. The Surface Rent is shared among 5 parties in the following proportion: 10 Surface Rent - District Council - Chiefdom Administration - Paramount Chief - Constituency Development Fund - Land owners 5	ed between
- District Council 1 - Chiefdom Administration 1 - Paramount Chief 1 - Constituency Development Fund 1 - Land owners 5	5%
	0% 5% 0% 60%
Petroleum Directorate	
Training Fund for Oil/Gas Annual fees paid towards training, research and development in the Cindustry. It is levied in accordance with Section 89 of the Petroleum A amount payable is negotiated between the Government and the compan	ct 2011.The
Sale of Amount paid by companies for Geophysical Data provided by the Directorate. The amount payable is negotiated between the Governm company.	
Signature Bonus for Oil/Gas Amount paid for the award of a licence or the achievement of a specific target. It is levied in accordance with Section 110 of the Petroleum A amount payable is negotiated between the Government and the compan	ct 2011.The
This amount is paid for the use of the licenced area which is levied in with Section 109 of the Petroleum Act 2011. The amount payable is between the Government and the company.	

4.2. Extractive companies involved in the EITI reconciliation

According to the materiality threshold proposed in the section above, twenty-five (25) companies were selected for the 2011 reconciliation exercise. These companies are listed below:

N°	Extractive company
Mining Comp	panies
1	London Mining Company
2	Koidu Holdings
3	H.M. Diamonds
4	African Minerals Ltd (Consolidated)
5	Sierra Minerals Holdings No.1 Ltd
6	Kassim M. Basma
7	Sierra Rutile Ltd
8	Shawke B. Shour
9	Cluff Gold (SL) Ltd
10	Metal Exploration (SL) Ltd
11	Murray Investment Company Ltd
12	Marampa Iron Ore (SL) Ltd
13	Kingho Investment Company Ltd
14	AMR Gold (SL) Ltd
15	West Africa Zircon Mining (SL) Ltd
16	Lion Stones (SL) Ltd
17	West Africa Group for Mining Gold and Diamond (SL) Ltd
18	Diam Investment (SL) Ltd
19	Danasha Gem (S.L) Ltd
20	Akar, Hasanein Ibrahim
21	Shanti Sierra Ltd
Oil and Gas (Companies
22	Lukoil Oversas Sierra Leone
23	Anadarko (SL) Company
24	European Hydrocarbon Ltd. UK
25	Talisman Sierra Leone BV/Prontinal Ltd

4.3. Government Agencies involved in the EITI reconciliation

Based on the scope detailed above, the Government Agencies that were required to report for the 2011 EITI Report were:

N°	Government Agency
1	National Revenue Authority (NRA)
2	Ministry of Mines and Minerals Resources (MMMR)
3	Environmental Protection Agency (EPA)
4	Petroleum Directorate (PD)
5	District Councils (DC)
6	Chiefdoms Administration (CA)
7	Local Government and Community Development (LGCD)

Moore Stephens LLP 17 I

5. RECONCILIATION RESULTS

We present below detailed results of our reconciliation exercise, as well as differences noted between amounts paid by extractive companies and amounts received by Government Agencies. We have highlighted the amounts initially reported and the adjustments made following our reconciliation work, as well as the final amounts and unreconciled differences.

5.1. Reconciliation by extractive company

The tables include consolidated figures based on the reporting templates made by every extractive company and Government entity, the adjustments made by us following our reconciliation work, and the residual, unreconciled differences. In order to keep the report size reasonable, detailed reconciliation reports for each company are included in a separate document in Annex 2 for analysis purpose.

Amounts in USD

			Templates originally reported		Adjustments			Final amounts		
No.	Company	Extractive company	Government Agency	Difference	Extractive company	Government Agency	Difference	Extractive company	Government Agency	Difference
1	London Mining Company	696,346	668,676	27,670	-27,670	-	-27,670	668,676	668,676	-
2	Koidu Holdings S.A	2,028,429	2,028,359	70	-	-	0	2,028,429	2,028,359	70
3	H.M. Diamonds	1,708,283	1,693,388	14,895	-14,895	-	-14,895	1,693,388	1,693,388	-1
4	African Minerals Itd (Consolidated)	2,358,983	2,466,395	-107,412	-166,279	-273,933	107,654	2,192,704	2,192,462	242
5	Sierra Minerals Holdings No.1 Limited	1,354,620	1,339,466	15,154	-68,544	-53,398	-15,146	1,286,077	1,286,069	8
6	Kassim M. Basma	412,736	436,570	-23,834	-6,337	-30,168	23,831	406,399	406,402	-3
7	Sierra Rutile Ltd	1,398,972	1,350,856	48,116	-402,691	-354,689	-48,002	996,281	996,167	114
8	Shawke B. Shour	412,600	439,027	-26,427	-	-26,427	26,427	412,600	412,600	-
9	Cluff Gold (SL) LTD	314,578	267,853	46,725	-	46,725	-46,725	314,578	314,578	-
10	Metal Exploration (SL) Limited	287,484	294,259	-6,775	6,775	-	6,775	294,259	294,259	-
11	Murray Investment Company Limited	158,191	168,130	-9,939	-	-9,939	9,939	158,191	158,191	-
12	Marampa Iron Ore (SL) Limited	194,200	194,200	-	-	-	-	194,200	194,200	-
13	Kingho Investment Company Limited	179,782	179,782	-	-	-	-	179,782	179,782	-
14	AMR Gold (SL) Limited	99,360	98,360	1,000	-1,000	-	-1,000	98,360	98,360	-
15	West Africa Zircon ining (SL) Limited	174,880	174,880	-	-	-	-	174,880	174,880	-
16	Lion Stones (SL) Ltd	-	127,683	-127,683	-	-6,421	6,421	-	121,262	-121,262

		Template	es originally re	ported		Adjustments		F	inal amounts	
No.	Company	Extractive company	Government Agency	Difference	Extractive company	Government Agency	Difference	Extractive company	Government Agency	Difference
17	West Africa Group for Mining Gold and Diamond (SL) Ltd	-	314,284	-314,284	-	-	-	-	314,284	-314,284
18	Diam Investment (SL) Ltd	-	234,115	-234,115	-	-	-	-	234,115	-234,115
19	Danasha Gem (S.L) Ltd	-	144,626	-144,626	-	-	-	-	144,626	-144,626
20	Akar, Hasanein Ibrahim	-	102,835	-102,835	-	-	-	-	102,835	-102,835
21	Shanti Sierra Limited	-	229,456	-229,456	-	-	-	-	229,456	-229,456
Tota	al Mining Companies	11,779,444	12,953,202	-1,173,759	-680,641	-708,251	27,610	11,098,802	12,244,951	-1,146,149
22	Lukoil Overseas Sierra Leone	5,165,770	5,165,740	30	-	-	-	5,165,770	5,165,740	30
23	Anadarko (SL) Company	648,895	648,815	80	-	-	-	648,895	648,815	80
24	European Hydrocarbon Ltd. UK	327,650	327,650	-	-	-	-	327,650	327,650	-
25	Talisman Sierra Leone BV/Prontinal Ltd	9,052,024	9,234,250	-182,226	-	-	-	9,052,024	9,234,250	-182,226
	Total Oil and Gas Company	15,194,339	15,376,455	-182,116	-	-	-	15,194,339	15,376,455	-182,116
	Total USD	26,973,783	28,329,658	-1,355,875	-680,641	-708,251	27,610	26,293,142	27,621,406	-1,328,265

Moore Stephens LLP

5.2. Reconciliation by revenue stream

The table below shows the detail by tax of the total payments reported by extractive companies and government entities, taking into account all adjustments.

Amounts in USD

		Templat	es originally rep	oorted		Adjustments		F	inal amounts	nounts in USD
No.	Company	Extractive company	Government Agency	Difference	Extractive company	Government Agency	Difference	Extractive company	Government Agency	Difference
1	Mining Lease	2,162,663	2,412,662	-249,999	-	-250,000	250,000	2,162,663	2,162,662	1
2	Exploration Licence	1,637,635	1,670,766	-33,131	6,775	-	6,775	1,644,410	1,670,766	-26,356
3	Royalty	3,075,705	3,075,705	-	-	-	-	3,075,705	3,075,705	-
4	Corporate Tax	503,702	646,582	-142,880	-	-72,956	72,956	503,702	573,626	-69,924
5	Environmental impact Assessment Licence	585,355	585,063	292	-	-	-	585,355	585,063	292
6	Environmental impact Assessment Monitoring Fee	37,070	37,036	34	-	-	-	37,070	37,036	34
7	Diamond Exporter's Licence	159,733	355,000	-195,267	-19,733	-	-19,733	140,000	355,000	-215,000
8	Export Duties	2,328,266	3,162,568	-834,302	-1,000	-	-1,000	2,327,265	3,162,568	-835,303
9	Surface Rent (Mining)	1,184,043	902,548	281,495	-666,683	-385,295	-281,388	517,359	517,252	107
10	Agricultural Developement Fund	105,273	105,273	-	-	-	-	105,273	105,273	-
Tota	al Mining Companies	11,779,444	12,953,202	-1,173,759	-680,641	-708,251	27,610	11,098,802	12,244,951	-1,146,149
11	Training Fund for Oil	552,024	624,929	-72,905	-	-	-	552,024	624,929	-72,905
12	Sale of Geophysical Data	-	-	-	-	-	-	0	0	-
13	Surface Rent (Oil & Gas)	681,770	791,001	-109,231	-	-	-	681,770	791,001	-109,231
14	Signature Bonus Payment	13,900,000	13,900,000	-	-	-	-	13,900,000	13,900,000	-
15	Environmental impact Assessment Licence	53,580	53,570	10	-	-	-	53,580	53,570	10
16	Environmental impact Assessment Monitoring Fee	6,965	6,955	10	-	-	-	6,965	6,955	10
1	Total Oil and Gas Company	15,194,339	15,376,455	-182,116	-	-	-	15,194,339	15,376,455	-182,116
	Total USD	26,973,783	28,329,658	-1,355,875	-680,641	-708,251	27,610	26,293,142	27,621,406	-1,328,265

The final net difference represents only 4.8% of the total receipts reported by Government Agencies. This difference of USD 1,328,265 is detailed in Section 5.4 of this report.

5.3. Adjustments

5.3.1. Extractive Companies adjustments

The adjustments were carried out on the basis of a confirmation from extractive companies and Government Agencies or supported by sufficient evidence wherever deemed appropriate. These adjustments are detailed as follows:

Adjustments to extractive company payments	Amount (USD)
Tax paid to Government Agencies hors scope (1)	-501,537
Tax out of the reconciliation scope (2)	-272,233
Tax paid not reported (3)	102,049
Tax erroneously reported (4)	-8,920
Total added to amounts initially reported	-680,641

(1) Surface rents are paid by companies and are shared among 5 parties (District Council, Chiefdom Administration, Paramount Chief, Constituency Development Fund and Land owners). Only payments to District Councils and Chiefdom Administrations have been considered in the reconciliation exercise. These adjustments reflect the deduction of surface rents reported by extractive companies which are paid to entities outside of the reconciliation scope (Paramount Chief, Constituency Development Fund and Land owners):

Company	Tax	Amount (USD)
Sierra Rutile Ltd	Surface rent	-402,691
Sierra Minerals Holdings No.1 Limited	Surface rent	-80,096
London Mining Company	Surface rent	-18,750
Total		-501,537

(2) These adjustments reflect the taxes reported by extractive companies which were outside the reconciliation scope. The detail by company and by tax of these adjustments is presented in the following table:

Company	Taxes not reported by company	Amount (USD
Africa Mineral Itd (Consolidated)	Port rent	-250,000
H.M. Diamonds	Diamond Exporter's Agent fee	-13,395
T.IVI. Diamonds	Certificate of origin	-1,500
Kassim M. Basma	Diamond Exporter's Agent fee	-4,837
Rassiiii Wi. Dasiiia	Certficate of origin	-1,500
AMR Gold (SL) Limited	Primary application fee	-1,000
	Fotal	-272,233

(3) These payment flows were paid by extractive companies but were not included in their reporting templates. We set out in the table below the detail by company and by tax of these adjustments made to companies' payments:

Company	Taxes not reported by company	Amount (USD
Africa Mineral Itd (Consolidated)	Surface Rent (Mining) to CA/DC	83,721
Sierra Minerals Holdings No.1 Limited	Surface Rent (Mining) to CA/DC	11,553
Metal Exploration (SL) Limited	Exploration Licence	6,775
Tot	al	102,049

(4) This adjustment concerns a difference between the total surface rent reported by London Mining Company and the relevant receipts.

5.3.2. Government Agencies adjustments

The adjustments were carried out on the basis of confirmations received from extractive companies or from Government entities supported by original payment receipts wherever deemed appropriate. These adjustments are detailed as follows:

Adjustments to Government Agencies receipts	Amount (USD
Tax paid to Government Agencies hors scope (1)	-461,510
Tax out of the reconciliation scope (2)	-250,000
Tax paid not reported (3)	76,215
Tax double counted (4)	-72,956
Total added to amounts originally reported	-708,251

(1) Surface rents are paid by companies and are shared among 5 parties (District Council, Chiefdom Administration, Paramount Chief, Constituency Development Fund and Land owners). As decided by the MSG, only payments to District Councils and Chiefdom Administrations have been considered for reconciliation. These adjustments reflect the deduction of surface rents reported by Government Agencies which are paid to entities outside the reconciliation scope (Paramount Chief, Constituency Development Fund and Land owners):

Company	Тах	Amount (USD)
Sierra Rutile Ltd	Surface rent	-354,689
Sierra Minerals Holdings No.1 Limited	Surface rent	-80,097
African Minerals Itd (Consolidated)	Surface rent	-26,724
Total		-461,510

- (2) These adjustments reflect the Port rent reported by NRA but which falls outside of the EITI reconciliation scope.
- (3) These are receipts collected by Government Agencies that were not included in their reporting templates. The detail by company and by tax of these adjustments is presented in the following table:

Company	Taxes not reported by company	Amount (USD
Cluff Gold (SL) Ltd	Surface Rent (Mining) to CA/DC	46,725
Sierra Minerals Holdings No.1 Limited	Surface Rent (Mining) to CA/DC	26,699
African Minerals Itd (Consolidated)	Surface Rent (Mining) to CA/DC	2,791
	76,215	

(4) These adjustments eliminate the Corporate tax reported twice by GGDO and NRA, the detail by company is presented as follows:

Company	Tax double counted (USD)
Kassim M. Basma	-30,168
Shawke B. Shour	-26,427
Murray Investment Company Limited	-9,939
Lion Stones (SL) Ltd	-6,422
Total	-72,956

5.4. Final unreconciled discrepancies

Following our adjustments, the total unreconciled differences amounted to **USD 1,328,265** and represents **4.8%** of total cash payments reported by Government Agencies. This is the sum of positive differences of **USD 558** and negative differences amounting to **USD 1,328,823** which are detailed as follows:

	Balances after adjustment				
Company	Extractive company	Government Agency	Difference	Negative Difference	Positive Difference
West Africa Group for Mining Gold and Diamond (SL) Ltd	-	314,284	-314,284	-314,284	-
Diam Investment (SL) Ltd	-	234,115	-234,115	-234,115	-
Shanti Sierra Limited	-	229,456	-229,456	-229,456	-
Danasha Gem (S.L) Ltd	-	144,626	-144,626	-144,626	-
Lion Stones (SL) Ltd	-	121,263	-121,263	-121,263	-
Akar, Hasanein Ibrahim	-	102,835	-102,835	-102,835	-
Kassim M. Basma	406,399	406,402	-3	-3	-
H.M. Diamonds	1,693,388	1,693,388	-1	-1	-
London Mining Company	668,676	668,676	-	-	-
Shawke B. Shour	412,600	412,600	-	-	-
Cluff Gold (SL) LTD	314,578	314,578	-	-	-
Metal Exploration (SL) Limited	294,259	294,259	-	-	-
Marampa Iron Ore (SL) Limited	194,200	194,200	-	-	-
Kingho Investment Company Limited	179,782	179,782	-	-	-
AMR Gold (SL) Limited	98,360	98,360	-	-	-
West Africa Zircon ining (SL) Limited	174,880	174,880	-	-	-
Murray Investment Company Limited	158,191	158,191	-	-	-
Sierra Minerals Holdings No.1 Limited	1,286,077	1,286,069	8	-	8
Koidu Holdings S.A	2,028,429	2,028,359	70	-	70
Sierra Rutile Ltd	996,281	996,167	114	-	114
African Minerals Itd (Consolidated)	2,192,704	2,192,462	242	-14	256
Total Mining Companies	11,098,802	12,244,951	-1,146,149	-1,146,596	448
Talisman Sierra Leone BV/Prontinal Ltd	9,052,024	9,234,250	-182,226	-182,226	-
Lukoil Oversas Sierra Leone	5,165,770	5,165,740	30	-	30
Anadarko (SL) Company	648,895	648,815	80	-	80
European Hydrocarbon Ltd. UK	327,650	327,650			
Total Oil and Gas Company	15,194,339	15,376,455	-182,116	-182,226	110
Total USD	26,293,142	27,621,406	-1,328,265	-1,328,823	558

The unreconciled differences can be analysed as follows:

Company	RT not submitted by the extractive company (1)	Tax not reported by the extractive company (2)	Not Material	Total
West Africa Group for Mining Gold and Diamond (SL) Ltd	-314,284	-	-	-314,284
Diam Investment (SL) Ltd	-234,115	-	-	-234,115
Shanti Sierra Limited	-229,456	-	-	-229,456
Talisman Sierra Leone BV/Prontinal Ltd	-	-182,226	-	-182,226
Danasha Gem (S.L) Ltd	-144,626	-	-	-144,626
Lion Stones (SL) Ltd	-121,263	-	-	-121,263
Akar, Hasanein Ibrahim	-102,835	-	-	-102,835
Kassim M. Basma	-	-	-3	-3
H.M. Diamonds	-	-	-1	-1
Murray Investment Company Limited	-	-	0	0
Sierra Minerals Holdings No.1 Limited	-	-	8	8
Lukoil Oversas Sierra Leone	-	-	30	30
Koidu Holdings S.A	-	-	70	70
Anadarko (SL) Company	-	-	80	80
African Minerals Itd (Consolidated)	-	-	242	242
Sierra Rutile Ltd	-	-	113	113
Total	-1,146,579	-182,226	539	-1,328,265

(1) As shown above, the majority of discrepancies (86%) are the result of the lack of reporting templates not submitted by six (6) mining companies, who do not operate anymore in Sierra Leone.

The MSG acknowledged that several efforts had been made to reach out to the 6 exporters that failed to report as these exporters did not have addresses or any form of contact to locate them. Based on the foregoing, the MSG agreed that the unilateral disclosure by the government is acceptable as the licences of these have expired and they are no longer in operation. These companies are:

N°	Companies	Amount (USD)
1	Lion Stones (SL) Ltd	121,263
2	West Africa Group for Mining Gold and Diamond (SL) Ltd	314,284
3	Diam Investment (SL) Ltd	234,115
4	Danasha Gem (S.L) Ltd	144,626
5	Akar, Hasanein Ibrahim	102,835
6	Shanti Sierra Limited	229,456
	Total	1,146,579

(2) These discrepancies relate to the taxes reported by Government Agencies and not confirmed by the companies. We set out below the detail of these discrepancies by tax:

Government Agency	Taxes not reported by company	Amount (USD
PD	Training Fund for Oil	72,905
PD	Surface Rent (Oil & Gas)	109,321
Total not reporte	d by Talisman Sierra Leone BV/Prontinal Ltd	182,226

5.5. Contributions to Local Administrations

All District Councils and Chiefdoms that received revenues (in the form of surface rent payments and agricultural development fund) from the companies within the reconciliation scope were asked to report on the amounts received.

We present in this section the detail of the surface rent and the Agricultural Developement Fund (ADF) reported by companies and local administrations.

5.5.1 Surface Rent

We set out below surface rents paid and received detailed by company:

Company	Amounts paid by companies (USD)	Amounts received by Local Administrations (USD)	Amounts outside scope
Sierra Rutile Ltd	538,623	135,932	402,691
Africa Mineral Itd (Consolidated)	255,681	255,681	-
Sierra Minerals Holdings No.1 Limited	118,357	38,260	80,097
Cluff Gold (SL) Ltd	46,725	46,725	-
Koidu Holdings S.A	34,512	34,512	-
London Mining Company	25,000	6,250	18,750
Total	1,018,897	517,359	501,538

Surface Rents received by local administrations are detailed as follows for each company:

London Mining

Government agencies and land owners	Amounts paid by companies (USD)	Amounts received by Local Administrations (USD)	Amounts outside scope
Land owners	12,500	-	12,500
Paramount Chief	3,750	-	3,750
Port Loko District Council	3,750	3,750	-
Marampa Chiefdom Administration	2,500	2,500	-
Marampa Constitutency Development Fund	2,500	-	2,500
Total	25,000	6,250	18,750

African Minerals

Government agencies and land owners	Amounts paid by companies (USD)	Amounts received by Local Administrations (USD)	Amounts outside scope
Samaia Bendugu chiefdom	63,195	63,195	-
Kalansogoia chiefdom	46,008	46,008	-
Kaffu Bullum chiefdom	41,859	41,859	-
Lokomasama chiefdom	41,859	41,859	-
Kafe Simira chiefdom	20,062	20,062	-
Maforki chiefdom	10,324	10,324	-
Diang chiefdom	9,954	9,954	-
Makari Gbanti chiefdom	8,401	8,401	-
Buya Ronende chiefdom	6,469	6,469	-
Safroko chiefdom	4,761	4,761	-
Marampa chiefdom	2,789	2,789	-
Total	255,681	255,681	-

Koidu Holdings S.A

Government agencies and land owners	Amounts paid by companies (USD)	Amounts received by Local Administrations (USD)	Amounts outside scope
Tankoro Chiefdom Administration	34,512	34,512	-
Total	34,512	34,512	-

Sierra Rutile

Government agencies and land owners	Amounts paid by companies (USD)	Amounts received by Local Administrations (USD)	Amounts outside scope
Land Owners	272,944	-	272,944
Paramount Chief	94,053	-	94,053
Constituency Development Fund	35,694	-	35,694
Imperri Chiefdom Administration	19,636	19,636	-
Bagruwa Chiefdom Administration	18,679	18,679	-
Lower Banta Chiefdom Administration	8,514	8,514	-
Upper Banta Chiefdom Administration	6,525	6,525	-
Jong Chiefdom Administration	1,020	1,020	-
Moyamba district council	50,575	50,575	-
Bonthe district council	30,984	30,984	-
Total	538,623	135,932	402,691

Sierra Minerals Holdings No.1 Limited

Government agencies and land owners	Amounts paid by companies (USD)	Amounts received by Local Administrations (USD)	Amounts outside scope
Kpanda Kemoh chiefdom	997	997	-
Upper Banta chiefdom	6,192	6,192	-
Lower Banta chiefdom	1,060	1,060	-
Dasse chiefdom	449	449	-
Bumbe-Ngao chiefdom	1,981	1,981	-
District councils	16,019	16,019	-
Land owners	53,398	-	53,398
Paramount chief	16,019	-	16,019
Chiefdom development fund	10,680	-	10,680
Moyamba District Council	11,561	11,561	-
Total	118,357	38,260	80,097

Cluff Gold

Government agencies and land owners	Amounts paid by companies (USD)	Amounts received by Local Administrations (USD)	Amounts outside scope
BO District Council	46,725	46,725	-
Total	46,725	46,725	-

5.5.2 Agricultural Developement Fund

We set out below Agricultural Developement Fund payments detailed by company:

Company	Amounts paid by companies (USD)
Sierra Rutile Ltd	75,000
Sierra Minerals Holdings No.1 Limited	30,273
Total	105,273

Agricultural Developement Fund received by local administrations are detailed as follows for each of the above companies:

Sierra Rutile Ltd

Government agencies and land owners	Amounts paid by companies (USD)
Imperri chiefdom	13,953
Upper Banta chiefdom	12,558
Upper Banta chiefdom	13,953
Bagruwa chiefdom	13,953
Jong chiefdom	13,953
Others (not provided)	6,628
Total	75,000

Sierra Minerals Holdings No.1 Limited

Government agencies and land owners	Amounts paid by companies (USD)
Lower Banta chiefdom	5,581
Kpanda Kemoh chiefdom	5,581
Dasse chiefdom	5,581
Bumbe-Ngao chiefdom	5,581
Upper Banta chiefdom	6,977
Others (not provided)	971
Total	30,273

6. ANALYSIS OF KEY FIGURES IN THE EITI REPORT

We summarise in the tables below the payments after adjustments by extractive company and by payment flows reported by Government Agencies.

6.1. Contributions of extractive companies in the 2011 EITI report

The table below presents the contribution of each extractive company covered by the reconciliation exercise:

Amounts in USD % of total Government **Companies** Government revenues revenues African Minerals Ltd (Consolidated) 7.94% 2,192,462 Koidu Holdings S.A 2,028,359 7.34% H.M. Diamonds 1,693,388 6.13% Sierra Minerals Holdings No.1 Limited 1,286,069 4.66% Sierra Rutile Ltd 3.61% 996,167 **London Mining Company** 2.42% 668,676 Shawke B. Shour 412,600 1.49% Kassim M. Basma 406,402 1.47% Cluff Gold (SL) LTD 314,578 1.14% West Africa Group for Mining Gold and Diamond (SL) Ltd 314,284 1.14% Metal Exploration (SL) Limited 294,259 1.07% Diam Investment (SL) Ltd 234.115 0.85% Shanti Sierra Limited 229,456 0.83% Marampa Iron Ore (SL) Limited 0.70% 194,200 Kingho Investment Company Limited 179,782 0.65% West Africa Zircon ining (SL) Limited 174.880 0.63% Murray Investment Company Limited 158,191 0.57% 0.52% Danasha Gem (S.L) Ltd 144,626 Lion Stones (SL) Ltd 121,262 0.44% Akar, Hasanein Ibrahim 0.37% 102,835 AMR Gold (SL) Limited 98,360 0.36% **Total Mining Companies** 12,244,951 44.33% Talisman Sierra Leone BV/Prontinal Ltd 9,234,250 33.43% Lukoil Oversas Sierra Leone 5,165,740 18.70% Anadarko (SL) Company 2.35% 648,815 European Hydrocarbon Ltd. UK 327,650 1.19% **Total Oil and Gas Company** 15,376,455 55.67% **Total USD** 27,621,406

6.2. Contribution of revenue streams in the 2011 EITI report

The table below presents the contribution of each revenue flow covered by the reconciliation exercise:

Amounts in USD % of total Government **Payment stream** Government revenues revenues **Export Duties** 3,162,568 11.45% Royalty 3,075,705 11.14% Mining Lease 2,162,662 7.83% **Exploration Licence** 1,670,766 6.05% Corporate Tax 573,626 2.08% **Environmental impact Assessment Licence** 585,063 2.12% Surface Rent (Mining) 517,252 1.87% Diamond Exporter' Licence 355.000 1.29% Agricultural Developement Fund 105,273 0.38% **Environmental impact Assessment Monitoring Fee** 0.13% 37,036 **Total Mining Companies** 12,244,951 44.33% Signature Bonus Payement 13,900,000 50.32% Surface Rent (Oil & Gas) 791,001 2.86% Training Fund for Oil 624,929 2.26% **Environmental impact Assessment Licence** 0.19% 53,570 Environmental impact Assessment Monitoring Fee 6,955 0.03% **Total Oil and Gas Company** 15,376,455 55.67% **Total USD** 27,621,406

6.3. Contribution of Government Agencies in the 2011 EITI report

The table below shows the contribution of each Government Agency considered for the reconciliation exercise:

Amounts in USD

Government Agency	Government revenues	% of total Government revenues
Petroleum Directorate	15,315,930	55%
National Revenue Authority	7,837,759	28%
Ministry of Mines and Mineral Resources	3,267,841	12%
Environmental Protection Agency	682,624	2%
Chiefdoms Administration District Councils Local Government and Community Development	517,252	2%
Total USD	27,621,406	

6.4. Extractive revenues declared compared with GDP

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

Year	Total revenues reported by Government (USD)	GDP (current US\$)	EITI revenues /GDP
2006	7,200,000	1,887,429,109	0.38%
2007	10,200,000	2,157,944,721	0.47%
2008	5,027,565	2,504,381,637	0.20%
2009	5,875,779	2,454,531,383	0.24%
2010	7,586,793	2,575,466,372	0.29%
2011	27,621,406	2,938,747,215	0.94%

^(*) Source: EITI website: www.eiti.org (**)Source: worldbank website: www.worldbank.org

7. RECOMMENDATIONS

7.1. Lack of EITI Database

It appeared that to date the SLEITI Secretariat still does not have a comprehensive database of all extractive companies operating in the extractive sector. This is due to the lack of a formal procedure of communication between the Secretariat and Government Agencies with regard to active extractive companies.

Accordingly, SLEITI did not have the list of active companies along with their TIN, activity status (exploration or production stage), active licenses and the type of minerals extracted.

Although we obtained most of the information from Government Agencies during our fieldwork, other key information such as activity status and minerals extracted were still missing.

We recommend that, in the first instance, the Secretariat should create and maintain its database following this reconciliation exercise. The Secretariat should then liaise with the Government Agencies to ensure it obtains adequate information in real time and updates the database regularly. To this end, we believe it is vital that any new entrants to the extractive sector are registered with the EITI Secretariat as part of the process before or at the same time as they obtain their operating licence. A quarterly review with the Government Agencies of the list of extractive companies licenced to operate in the sector is also recommended.

7.2. Timing of the reconciliation work

The reconciliation work started in November 2013 and the report has to be prepared by the administrator and approved by MSG in December 2013. The duration between the beginning of the reconciliation works and the submission of the draft report only lasted one (1) month.

Although we noted that EITI stakeholders were committed to meet the deadlines, some information was not prepared in time due to the tight timeframe. Accordingly, some templates remained uncertified and some discrepancies remained unresolved. Had MSG allowed more time for the reconciliation, these discrepancies could have been resolved.

We recommend for the future that the timing of the reconciliation exercise is better planned in the year in order to allow for more time for resolving discrepancies and the preparation of the Reconcilor's report.

7.3. Weaknesses in the scoping study

We noted several weaknesses in the scoping study as follows:

Reporting Entities

The Environment Protection Agency Act (EPA Act) defines the projects requiring environmental impact assessment licences. Section 24 of the EPA Act states that "a licence is required for the projects whose activities involve or include extractive activities such as mining, quarrying, and extraction of sand, gravel, salt, peat, oil and gas."

The granting of an environment license involves the payment of two taxes to the Environmental Protection Agency (EPA). These taxes are the Environmental Impact Assessment Licence and the Environmental Impact Assessment Monitoring Fee.

We noted that while the scoping study included the EPA as a reporting entity for the mining sector, it omitted to consider it for the oil Sector.

As a consequence, neither oil companies nor the EPA were initially required to report on Environmental taxes.

For the current reconciliation, we note that the aforementioned taxes were included in the reconciliation exercise following our recommendation, although not recommended by the scoping study.

As a consequence, we recommend for the future that these taxes are considered in the scoping studies for the oil Sector.

Furthermore, we noted that, with regard to reporting companies, the initial scoping study did not include an oil company which was Talisman Sierra Leone BV/Prontinal, as the latter was no longer active in 2013. This company was subsequently identified and included within the reconciliation scope.

We recommend for the future, that the Petroleum Directorate is consulted when preparing the scoping study in order to ensure the completeness of the list of oil companies which were active during the period covered by the reconciliation.

Revenue streams

The scoping study included a payment relating to the oil sector called "sale of Geophysical data".

The payment mechanism of this income stream is as follows:

TGS, a private company not domiciled in Sierra Leone, and whose activity is the collection and the selling of geophysical data to oil companies wishing to acquire such data, collects fees from oil companies in exchange for the data sold. TGS pays part of the fees to the GOSL (Petroleum Directorate (PD)) according to a pre-defined formula.

As a result, it appears that this income stream is not a tax. Additionally, there is no direct relationship between Oil companies and PD regarding this income stream.

For the year 2011, this income stream was not reported as being paid or received by either the oil company or PD. Had it been reported, this would have led to unreconciled differences.

In view of the above, we recommend, for the future, that this income stream is not reconciled, but rather reported unilaterally by PD and presented in the reconciliation report for information purposes only.

Reporting templates

SLEITI used different reporting templates for the 2011 reconciliation exercise (one for oil companies, one for mining companies and one for each Government Agency). Based on our past experiences, the creation of a separate template for each type of activity is unnecessary (minerals extracting, minerals exploring, petroleum exploring or extracting). Most of the taxes are common for all companies and it would be more appropriate to incorporate all taxes in one reporting template. The companies and Government Agencies will only report on their specific payment/revenues.

The reporting entities did not submit detailed schedules along with their reports as they were not instructed to do so. They only declared annual figures for each tax. Some companies have submitted copies of flag receipts along with their templates.

Details of payments are vital documents for completion of the reconciliation exercise. All companies and Government Agencies should be instructed to send their detailed schedules after the start of the reconciliation exercise. It would have been more efficient and would have saved time if all reporting entities were requested to send details of their payments along with their reporting templates.

In addition, we noted that templates were lacking information necessary for the reconciliation exercise such as production data and the breakdown of surface rentals.

Finally, we note that we, as reconcilers, we did not have the opportunity to examine the templates before they were sent to the reporting entities. As a result, we were unable to address flaws in these templates.

We recommend, for the future, that templates are submitted to the reconcilers before being submitted to reporting entities. All templates should be examined and approved by MSG. In this respect, the decision making process should be documented and substantiated by signed minutes. The approved template should be annexed to the minutes of approval. In addition, detailed schedules should be requested with the templates. Finally, instructions for filling in the templates

should be prepared and sent along with the templates. For a better efficiency of the process, SLEITI could arrange for a workshop where all stakeholders are invited in order that the reconcilers are able to explain the contents of the templates, provide them with the instructions and explain their expectations.

7.4. Weaknesses in the taxation framework

The legal and taxation framework in Sierra Leone suffers from several limitations. We set out below the major weaknesses and limitations that the GOSL should address in order to improve the legal and taxation environment in the country and consequently improve the traceability and transparency of income.

Inconsistent payment system with regard to surface rentals

Payments of Surface rentals are made by mining companies to 5 different entities as follows:

- District Council	15%
- Chiefdom Administration	10%
- Paramount Chief	15%
- Constituency Development Fund	10%
- Land owners	50%

We noted that whilst most of the payments were made to each of the 5 entities mentioned above, payments done by Koidu Holdings S.A were made to the Local Government and Community Development (LGCD).

Decentralised payments and inconsistent payment procedures render the reconciliation of surface rentals difficult and undermine the traceability of the income flows paid by mining companies.

We recommend, wherever possible, to centralise all payments relating to surface rentals with a single Government Agency and that such Government Agency proceeds with the sharing of surface rentals.

Lack of reconciliations between the Consolidated Fund and the Petroleum Directorate

In addition, there was an oil signature bonus declared during 2011 by Lukoil Petroleum which was not declared by the Petroleum Directorate. It appeared that the payment was received directly in the Consolidated Fund (CRF), and this receipt was confirmed by the Accountant General.

We note, however, that no reconciliation had been performed between PD and CRF. As a consequence, the aforementioned payment was not traced in PD's books despite the signature bonus relating to the oil sector.

We recommend that all oil payments are reconciled between CRF and PD and that any future payments made to CRF is accounted for within PD's books.

Weaknesses in the collection of Environment taxes

Finally, in accordance with Section 30 of the EPA Act, an Environmental Impact Assessment Licence issued under this Act shall (a) be in the prescribed form; (b) authorise the licensee to undertake such activity as may be specified in it; (c) be valid for twelve months from the date of issue or such period as the Executive Director may determine; and (d) contain such conditions as may be necessary for the protection of the environment.

Accordingly, it appears that companies could not operate without such a license. However, we found that several companies did not report any payment with regards to this tax, thereby implying that they were not issued with such license.

This situation may cause a shortfall to the State's revenue. Additionally, such infringements can remain undetected by the reconciliation exercise, which by nature, only covers amounts paid.

A review of the tax collection system in Sierra Leone is indispensable in order to improve controls over extractive sector revenues, improve transparency and traceability of income. In addition, taxes due could be included in future reconciliations exercises in order to uncover any tax violations.

7.5. Communication enhancement

We noted that the data and information available on the EITI Sierra Leone website is not systematically updated with laws and regulations, summary of EITI reports.

We recommend that the SLEITI website includes a portal in which all data and documents are published in order to enable better dissemination and to a wider audience.

7.6. Clarification of the SLEITI Legal status

SLEITI was created by a Memorandum of Understanding (MoU) between the Government, Civil Society Organisations, and the Extractive Industries. We note that the MoU did not include any rule of quorum or voting procedures (to approve work plans reports etc.) by MSG.

This situation creates ambiguities as to the legal status of SLEITI and might be open to interpretations by the different stakeholder groups.

We recommend the acceleration of the creation of the SLEITI Act, which would define all basic rules and regulations for the future.

ANNEXES

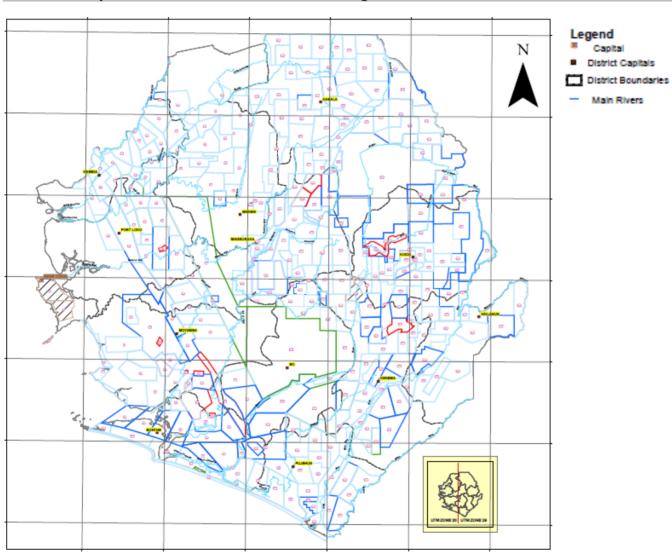
Annex 1: Extractive companies' details

N°	Companies	Sector	TPIN	Licence Number	Activity (Exploration/ Exploitation)	Minerals Extracted/Exported	Production	Equity Ownership
1	London Mining Company	Mining	1001359-0	ML 02/09	NP	Iron-ore	NP	NP
2	Koidu Holdings S.A	Mining	1001358-5	ML 06/95	NP	NP	NP	NP
3	H.M. Diamonds	Mining	1000351-9	DEL 12/2011	Exportation	Diamond	N/A	Hisham Mackie 90% and Oussama Mattar 10%
4	Africa Mineral Itd (Consolidated)	Mining	1001883-8	1AML01A/10 1BML01B/10	Exploitation	Ore	190,932 mtpa	TIO (75% AML Group and 25% SISG) ARPS (65%AML Group, 25% SISG & 10% GoSL)
5	Sierra Minerals Holdings No.1 Limited	Mining	1000672-9	ML 01/05 EL 59/2011 EL 60/2011 EL 01/2012	Exploitation	Bauxite	1,320,751	ALUM SA holds 100% of Global Aluminum Global Aluminum Holds 100% of Sierra Minerals Holdings 1 Limited
6	Kassim M. Basma	Mining	Company: 1025212-6 NRA: 1000351-9	DEL/10/2011	Exportation	Diamond	N/A	Sole Proprietor
7	Sierra Rutile Ltd	Mining	1000306-2	ML 2134	NP	<u>Heavy Minerals</u> <u>Sand</u>	NP	NP
8	Shawke B. Shour	Mining	1020041-5	14/2011	Exportation	Diamond	N/A	Sole Proprietor
9	Cluff Gold (SL) LTD	Mining	1005704-8	ML02/08 Expl 03/04	NP	Gold	NP	NP
10	Metal Exploration (SL) Limited	Mining	1011695-8	NP	NP	NP	NP	NP
11	Murray Investment Company Limited	Mining	1026512-3	DEL 01/2011	Exportation	Diamond	N/A	Sole Proprietor
12	Marampa Iron Ore (SL) Limited	Mining	1001887-0	EL 06/09	NP	NP	NP	NP
13	Kingho Investment Company Limited	Mining	1013683-0	EL 21/2010 EL 22/2010 EL 23/2010 EL 32/2010 EL 33/2010 EL 34/2010 EL 40/2010 EL 41/2010 EL 42/2010 EL 43/2010	Exploration	Iron-ore	<u>N/A</u>	The Chairman (Qinghua Huo) is 100% shares owner

N°	Companies	Sector	TPIN	Licence Number	Activity (Exploration/ Exploitation)	Minerals Extracted/Exported	Production	Equity Ownership
14	AMR Gold (SL) Limited	Mining	1022760-6	EL 47/2011 EL 48/2011 EL 49/2011 EL 50/2011	Exploration	N/A	N/A	AMR Gold is a Joint Venture Company between 1. Bedrock Group Holdings Limited - Messrs Michael Haworth and François J Du Plessis & 2. Israel Holding Group - Messrs Raphael Israel, Shraga Israel and Yehuda Berzon
15	West Africa Zircon ining (SL) Limited	Mining	1016411-2	EL 08/2010 EL 07/2010 EL 06/2010 EL 05/2010 EL 04/2010 EL 03/2010 EL 02/2010 EL 01/2010	Exploration	Zircon	N/A	Mr. Taklam Wong, Mr. Alphonso Yarjah
16	Lion Stones (SL) Ltd	Mining	NP	NP	NP	NP	NP	NP
17	West Africa Group for Mining Gold and Diamond (SL) Ltd	Mining	1022766-9	EL 37/2011	NP	NP	NP	NP
18	Diam Investment (SL) Ltd	Mining	NP	NP	NP	NP	NP	NP
19	Danasha Gem (S.L) Ltd	Mining	NP	NP	NP	NP	NP	NP
20	Akar, Hasanein Ibrahim	Mining	NP	NP	NP	NP	NP	NP
21	Shanti Sierra Limited	Mining	1027764-9	NP	NP	NP	NP	NP
22	Lukoil Oversas Sierra Leone	Oil & Gas	NP	NP	NP	NP	NP	NP
23	Anadarko (SL) Company	Oil & Gas	1105488-2	SL-078-11	NP	NP	NP	NP
24	European Hydrocarbon Ltd. UK	Oil & Gas	NP	SL-03	NP	NP	NP	NP
25	Talisman Sierra Leone BV/Prontinal Ltd	Oil & Gas	NP	NP	NP	NP	NP	NP

NP : Not provided N/A : Not applicable

Annex 2: Map of the active industrial mineral rights



Industrial Mineral Rights

- Mining Licence (ML)
 - Exploration Licence After 2009 Act (EL)
- Exploration Licence Before 2009 Act (EXPL)
- Exclusive Prospecting License (EPL)
- Reconnaissance Licence (RL)
- Identification Number for Mineral Right

Annex 3: Reconciliation sheet by company

TAXPAYER NAME
TAXPAYER IDENTIFICATION NUMBER (TPIN)
LICENCE NO/TYPE

London Mining Company
1001359-0
ML.2/09

MINERAL EXTRACTED	PRODUCTION
Iron Ore	

Tax	Tax name
	Mining Companies
1	Mining Lease
2	Exploration Licence
3	Royalty
4	Corporate Tax
5	Environmental impact Assessment Licence
6	Environmental impact Assessment Monitoring Fee
7	Diamond Exporter' Licence
8	Export Duties
9	Surface Rent (Mining) to CA/DC
10	Agricultural Developement Fund
Oil and Gas Companies	
11	Training Fund for Oil
12	Sale of Geophysical Data
13	Surface Rent (Oil & Gas)
14	Signature Bonus Payement
15	Environmental impact Assessment Licence
16	Environmental impact Assessment Monitoring Fee
	Total payments

Per Company		
Original	Adjust	Final
500,000.00	-	500,000.00
-	-	-
-	-	-
-	-	-
143,740.00	-	143,740.00
18,686.20	-	18,686.20
-	-	-
-	-	-
33,920.00	- 27,670.00	6,250.00
-		-
-		
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
	-	-
696,346.20	- 27,670.00	668,676.20

Per Government			Govt Agency	Fina
Original	Adjust	Final		Diff
500,000.00	-	500,000.00	NRA	
-	1	-	NRA	
-	-	-	NRA	
-	-	-	NRA	
143,740.00	-	143,740.00	EPA	
18,686.20	-	18,686.20	EPA	
-	-	-	NRA	
-	-	-	MMMR	
6,250.00	-	6,250.00	CA/DC/LGCD	
	-	-	MMMR	
-	-	-	PD	
-	-	-	PD	
-	-	-	PD	
-	-	-	PD	
-	-	-	EPA	
-	-	-	EPA	
668,676.20	-	668,676.20		

TAXPAYER NAME
TAXPAYER IDENTIFICATION NUMBER (TPIN)
LICENCE NO/TYPE

Koidu Holdings S.A
ML 06/95

MINERAL EXTRACTED	PRODUCTION

Tax	Tax name		
	Mining Companies		
1	Mining Lease		
2	Exploration Licence		
3	Royalty		
4	Corporate Tax		
5	Environmental impact Assessment Licence		
6	Environmental impact Assessment Monitoring Fee		
7	Diamond Exporter' Licence		
8	Export Duties		
9	Surface Rent (Mining) to CA/DC		
10	Agricultural Developement Fund		
	Oil and Gas Companies		
11	Training Fund for Oil		
12	Sale of Geophysical Data		
13	Surface Rent (Oil & Gas)		
14	Signature Bonus Payement		
15	Environmental impact Assessment Licence		
16	Environmental impact Assessment Monitoring Fee		
Total payments			

Per Company		
Original	Adjust	Final
206,000.00	1	206,000.00
-	-	-
1,706,964.34	-	1,706,964.34
-	ı	ı
71,640.00	ı	71,640.00
9,313.00	1	9,313.00
ı	ı	ı
ı	ı	ı
34,512.00	1	34,512.00
	-	-
1	1	1
1	1	1
1	1	1
-	-	-
-	-	-
-	-	-
2,028,429.34	-	2,028,429.34

Per Government			Govt Agency
Original	Adjust	Final	
206,000.00	-	206,000.00	NRA
-	-	ı	NRA
1,706,964.34	-	1,706,964.34	NRA
-	-	ı	NRA
71,604.00	-	71,604.00	EPA
9,279.00	-	9,279.00	EPA
-	-	-	NRA
-	-	ı	MMMR
34,512.00	-	34,512.00	CA/DC/LGCD
	1	ı	MMMR
-	-	-	PD
-	1	ı	PD
-	1	ı	PD
-	-	-	PD
-	-	-	EPA
-	-	-	EPA
2,028,359.34	-	2,028,359.34	

Final	
Diff.	
_	
-	
-	
-	
36.00	
34.00	
-	
-	
-	
-	
-	
-	
-	
-	
-	
-	
70.00	

TAXPAYER NAME
TAXPAYER IDENTIFICATION NUMBER (TPIN)
LICENCE NO/TYPE

H.M. Diamonds
1000351-9
DEL 12/2011

MINERAL EXTRACTED		PRODUCTION	
Diamonds			

Tax	Tax name		
	Mining Companies		
1	Mining Lease		
2	Exploration Licence		
3	Royalty		
4	Corporate Tax		
5	Environmental impact Assessment Licence		
6	Environmental impact Assessment Monitoring Fee		
7	Diamond Exporter' Licence		
8	Export Duties		
9	Surface Rent (Mining) to CA/DC		
10	Agricultural Developement Fund		
	Oil and Gas Companies		
11	Training Fund for Oil		
12	Sale of Geophysical Data		
13	Surface Rent (Oil & Gas)		
14	Signature Bonus Payement		
15	Environmental impact Assessment Licence		
16	Environmental impact Assessment Monitoring Fee		
	Total payments		

Per Company		
Original	Adjust	Final
-	-	-
-	-	-
-	-	-
136,777.70	-	136,777.70
-	-	-
-	-	-
48,395.35	- 13,395.35	35,000.00
1,521,610.00	1	1,521,610.00
1,500.00	- 1,500.00	-
-	-	-
-	-	-
_	-	-
-	-	-
-	-	-
_	-	-
-	-	-
1,708,283.05	- 14,895.35	1,693,387.70

Per Government			Govt Agency	Final
Original	Adjust	Final		Diff.
-	-	-	NRA	
-	-	-	NRA	
-	-	-	NRA	
136,778.22	-	136,778.22	NRA	- 0.52
-	-	-	EPA	
-	-	-	EPA	
35,000.00	-	35,000.00	NRA	
1,521,610.00	-	1,521,610.00	MMMR	
-	-	-	CA/DC/LGCD	
-	-	-	MMMR	
-	-	-	PD	
-	-	-	PD	
-	-	-	PD	
-	-	-	PD	
-	-	-	EPA	
-	-	-	EPA	
1,693,388.22	-	1,693,388.22		- 0.52

Final Diff.

256.22

- 14.09

242.13

TAXPAYER NAME
TAXPAYER IDENTIFICATION NUMBER (TPIN)
LICENCE NO/TYPE

	African Minerals Itd (Consolidated)
	1001883-8

MINERAL EXTRACTED	PRODUCTION

Tax	Tax name	
	Mining Companies	
1	Mining Lease	
2	Exploration Licence	
3	Royalty	
4	Corporate Tax	
5	Environmental impact Assessment Licence	
6	Environmental impact Assessment Monitoring Fee	
7	Diamond Exporter' Licence	
8	Export Duties	
9	Surface Rent (Mining) to CA/DC	
10	Agricultural Developement Fund	
	Oil and Gas Companies	
11	Training Fund for Oil	
12	Sale of Geophysical Data	
13	Surface Rent (Oil & Gas)	
14	Signature Bonus Payement	
15	Environmental impact Assessment Licence	
16	Environmental impact Assessment Monitoring Fee	
	Total payments	

Per Company		
Original	Adjust	Final
1,000,000.00	1	1,000,000.00
636,828.00	-	636,828.00
-	-	1
-	-	-
300,195.00	-	300,195.00
-	-	-
-	-	1
-	1	
421,959.81	- 166,279.07	255,680.74
-		-
		-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
2,358,982.81	- 166,279.07	2,192,703.74

Per Government			Govt Agency
Original	Adjust	Final	
1,250,000.00	- 250,000.00	1,000,000.00	NRA
636,828.00	-	636,828.00	NRA
-	-	-	NRA
-	-	-	NRA
299,938.78	-	299,938.78	EPA
-	-	-	EPA
-	-	-	NRA
-	-	-	MMMR
279,628.10	- 23,933.27	255,694.84	CA/DC/LGCD
-		-	MMMR
		-	
-	-	-	PD
-	-	-	PD
	-	-	PD
-	-	-	PD
-	-	-	EPA
-	-	-	EPA
2,466,394.88	- 273,933.27	2,192,461.62	

	TAXPAYER NAME
	TAXPAYER IDENTIFICATION NUMBER (TPIN)
	LICENCE NO/TYPE

Sierra Minerals Holdings No.1 Limited
1000672-9
ML 1/05

MINERAL EXTRACTED	PRODUCTION
BAUXITE	

Tax	Tax name	Original USD
Tax	Tax name	
	Mining Companies	
1	Mining Lease	1
2	Exploration Licence	
3	Royalty	
4	Corporate Tax	
5	Environmental impact Assessment Licence	
6	Environmental impact Assessment Monitoring Fee	
7	Diamond Exporter' Licence	
8	Export Duties	
9	Surface Rent (Mining) to CA/DC	
10	Agricultural Developement Fund	
	Oil and Gas Companies	
11	Training Fund for Oil	
12	Sale of Geophysical Data	
13	Surface Rent (Oil & Gas)	
14	Signature Bonus Payement	
15	Environmental impact Assessment Licence	
16	Environmental impact Assessment Monitoring Fee	
	Total payments	

	Per Company		
)	Original	Adjust	Final
	1 Or CO	2 Adj CO	3 Final CO
	68,136,71	1	68,136,71
	29,773,00	-	29,773,00
	1,040,782,83	ı	1,040,782,83
	1	1	1
	69,780,00	-	69,780,00
	9,071,00	-	9,071,00
	-	-	1
	-	-	-
	106,803,49	- 68,543,72	38,259,77
	30,273,19	-	30,273,19
	-	-	-
	-	-	-
	-	-	-
	-	-	-
	-	-	-
	-	-	-
	1,354,620,22	- 68,543,72	1,286,076.50

Per Government			Govt Agency	Final
Original	Adjust	Final		Diff.
4 Or Gov	5 Adj Gov	6 Final Gov	7 Govt Agency	8 Diff.
-				
68,136,00	-	68,136,00	NRA	0,71
29,773,00	-	29,773,00	NRA	-
1,040,782,83	-	1,040,782,83	NRA	-
	-	-	NRA	-
69,780,00	1	69,780,00	EPA	-
9,071,00	-	9,071,00	EPA	-
-	-	-	NRA	-
-	-	-	MMMR	-
91,650,47	- 53,397,91	38,252,56	CA/DC/LGCD	7,21
30,273,19		30,273,19	MMMR	-
-	-	-	PD	-
-	1	1	PD	-
-	ı	ı	PD	-
-	ı	ı	PD	-
-		-	PD	-
-	-	-	PD	-
1,339,466,49	- 53,397,91	1,286,068,58		7,92

TAXPAYER NAME
TAXPAYER IDENTIFICATION NUMBER (TPIN)
LICENCE NO/TYPE

	Kassim M. Basma		
1025212-6			
	DEL/10/2011	Diamonds Exporter's Licence	

MINERAL EXTRACTED		PRODUCTION
Diamonds		

Tax	Tax name
	Mining Companies
1	Mining Lease
2	Exploration Licence
3	Royalty
4	Corporate Tax
5	Environmental impact Assessment Licence
6	Environmental impact Assessment Monitoring Fee
7	Diamond Exporter' Licence
8	Export Duties
9	Surface Rent (Mining) to CA/DC
10	Agricultural Developement Fund
	Oil and Gas Companies
11	Training Fund for Oil
12	Sale of Geophysical Data
13	Surface Rent (Oil & Gas)
14	Signature Bonus Payement
15	Environmental impact Assessment Licence
16	Environmental impact Assessment Monitoring Fee
	Total payments

Per Company		
Original	Adjust	Final
-	-	-
-	-	-
-	-	-
30,167.61	-	30,167.61
-	-	-
-	-	-
41,337.21	- 6,337.21	35,000.00
341,231.00	-	341,231.00
-	-	ı
-	-	ı
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
412,735.82	- 6,337.21	406,398.61

Govt Agency Fin	•		Per Government
Dif	Final	Adjust	Original
NRA	-	-	-
NRA	-	-	-
NRA	-	-	-
NRA - 0.	30,168.27	30,168.27	60,336.54
EPA	-	-	-
EPA	-	-	1
NRA	35,000.00	-	35,000.00
MMMR - 2.	341,233.42	-	341,233.42
CA/DC/LGCD	-	-	-
MMMR	-	-	-
PD	-	-	-
PD	-	-	-
PD	-	-	-
PD	-	-	-
EPA	-	-	-
EPA	-	-	-
- 3.	406,401.69	30,168.27	436,569.96

TAXPAYER NAME TAXPAYER IDENTIFICATION NUMBER (TPIN) LICENCE NO/TYPE

Sierra Rutile Ltd	
1000306-2	
ML 2134	Mining Lease and Dredging licence

MINERAL EXTRACTED	PRODUCTION
Heavy Minerals Sand	

Tax	Tax name
Tax	Tax name
	Mining Companies
1	Mining Lease
2	Exploration Licence
3	Royalty
4	Corporate Tax
5	Environmental impact Assessment Licence
6	Environmental impact Assessment Monitoring Fee
7	Diamond Exporter' Licence
8	Export Duties
9	Surface Rent (Mining) to CA/DC
10	Agricultural Developement Fund
	Oil and Gas Companies
11	Training Fund for Oil
12	Sale of Geophysical Data
13	Surface Rent (Oil & Gas)
14	Signature Bonus Payement
15	Environmental impact Assessment Licence
16	Environmental impact Assessment Monitoring Fee
	Total payments

Per Company			
Original	Adjust	Final	
1 Or CO	2 Adj CO	3 Final CO	
157,001,00	-	157,001,00	
-	-	-	
327,958,00	-	327,958,00	
300,390,00	-	300,390,00	
-	-	-	
-	-	-	
-	-	-	
-	-	-	
538,622,51	- 402,690,70	135,931,81	
75,000,00	-	75,000,00	
-	-	-	
-	-	-	
-	-	-	
-	-	-	
-	-	-	
-	-	-	
1,398,971,51	- 402,690,70	996,280.81	

Per Government			Govt Agency	Final
Original	Adjust	Final	3,	Diff.
4 Or Gov	5 Adj Gov	6 Final Gov	7 Govt Agency	8 Diff.
157,001,00	-	157,001,00	NRA	-
	-	-	NRA	-
327,957,98	-	327,957,98	NRA	0,02
300,390,00	1	300,390,00	NRA	-
-	-	-	EPA	-
-	-	-	EPA	-
-	-	-	NRA	-
-	-	-	MMMR	-
490,506,94	- 354,688,81	135,818,13	CA/DC/LGCD	113,68
75,000,00	1	75,000,00	MMMR	-
-	ı	ı	PD	-
-	1	1	PD	-
-	ı	ı	PD	-
-	-	-	PD	-
-	-	-	EPA	-
-	-	-	EPA	-
1,350,855,92	- 354,688,81	996,167,11		113,70

TAXPAYER NAME
TAXPAYER IDENTIFICATION NUMBER (TPIN)
LICENCE NO/TYPE

Shawke B. Shour
1020041-5
14/2011

MINERAL EXTRACTED	PRODUCTION
Diamonds	

Tax	Tax name	
	Mining Companies	
1	Mining Lease	
2	Exploration Licence	
3	Royalty	
4	Corporate Tax	
5	Environmental impact Assessment Licence	
6	Environmental impact Assessment Monitoring Fee	
7	Diamond Exporter' Licence	
8	Export Duties	
9	Surface Rent (Mining) to CA/DC	
10	Agricultural Developement Fund	
	Oil and Gas Companies	
11	Training Fund for Oil	
12	Sale of Geophysical Data	
13	Surface Rent (Oil & Gas)	
14	Signature Bonus Payement	
15	Environmental impact Assessment Licence	
16	Environmental impact Assessment Monitoring Fee	
	Total payments	

Per Company		
Original	Adjust	Final
-	-	-
-	-	-
-	-	-
26,427.25	-	26,427.25
-	-	-
-	-	-
35,000.00	-	35,000.00
351,172.71	-	351,172.71
-	-	-
1	1	-
1	1	-
-	-	-
-	-	-
-	-	-
-	-	
-	-	
412,599.96	-	412,599.96

Per Government			Govt Agency	Final
	Adinat	Final	GOVE Agency	_
Original	Adjust	Final		Diff.
-	-	-	NRA	-
-	ı	-	NRA	-
-	-	-	NRA	-
52,854.50	- 26,427.25	26,427.25	NRA	-
-	Ī	-	EPA	-
-	-	-	EPA	-
35,000.00	1	35,000.00	NRA	-
351,172.71	ı	351,172.71	MMMR	-
-	ı	1	CA/DC/LGCD	-
-	-	-	MMMR	-
-	1	-	PD	-
-	-	-	PD	_
-	-	-	PD	-
-	-	-	PD	-
-	-	-	EPA	-
-	-	-	EPA	-
439,027.21	- 26,427.25	412,599.96		-

TAXPAYER NAME
TAXPAYER IDENTIFICATION NUMBER (TPIN)
LICENCE NO/TYPE

Cluff Gold (SL) LTD
1005704-8
ML02/08 Expl 03/04 APL 297

MINERAL EXTRACTED	PRODUCTION

Tax	Tax name	
	Mining Companies	
1	Mining Lease	
2	Exploration Licence	
3	Royalty	
4	Corporate Tax	
5	Environmental impact Assessment Licence	
6	Environmental impact Assessment Monitoring Fee	
7	Diamond Exporter' Licence	
8	Export Duties	
9	Surface Rent (Mining) to CA/DC	
10	Agricultural Developement Fund	
	Oil and Gas Companies	
11	Training Fund for Oil	
12	Sale of Geophysical Data	
13	Surface Rent (Oil & Gas)	
14	Signature Bonus Payement	
15	Environmental impact Assessment Licence	
16	Environmental impact Assessment Monitoring Fee	
	Total payments	

Per Company		
Original	Adjust	Final
231,525.00	ı	231,525.00
36,328.00	-	36,328.00
-	ı	-
-	-	-
-	-	-
-	-	-
-	-	1
-	ı	1
46,724.73	ı	46,724.73
_	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
314,577.73	-	314,577.73

Per Government			Govt Agency	Final
	A -11 4	Ein al	Govi Agency	
Original	Adjust	Final		Diff.
231,525.00	-	231,525.00	NRA	-
36,328.00	-	36,328.00	NRA	-
-	-	-	NRA	-
-	-	-	NRA	-
-	-	-	EPA	-
-	-	-	EPA	-
-	-	-	NRA	-
-	-	-	MMMR	-
-	46,724.73	46,724.73	CA/DC/LGCD	-
-	ı	-	MMMR	-
-	-	-	PD	-
-	-	-	PD	-
-	-	-	PD	-
-	-	-	PD	-
-	-	-	EPA	-
-	-	-	EPA	
267,853.00	46,724.73	314,577.73		-

TAXPAYER NAME
TAXPAYER IDENTIFICATION NUMBER (TPIN)
LICENCE NO/TYPE

Metal Exploration (SL) Limited
1020041-5

MINERAL EXTRACTED	PRODUCTION

Tax	Tax name	
	Mining Companies	
1	Mining Lease	
2	Exploration Licence	
3	Royalty	
4	Corporate Tax	
5	Environmental impact Assessment Licence	
6	Environmental impact Assessment Monitoring Fee	
7	Diamond Exporter' Licence	
8	Export Duties	
9	Surface Rent (Mining) to CA/DC	
10	Agricultural Developement Fund	
	Oil and Gas Companies	
11	Training Fund for Oil	
12	Sale of Geophysical Data	
13	Surface Rent (Oil & Gas)	
14	Signature Bonus Payement	
15	Environmental impact Assessment Licence	
16	Environmental impact Assessment Monitoring Fee	
	Total payments	

Per Company		
Original	Adjust	Final
-	-	-
287,484.00	6,775.00	294,259.00
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
_		
-	-	
287,484.00	6,775.00	294,259.00

	ı			
Per Government			Govt Agency	Final
Original	Adjust	Final		Diff.
-	-	-	NRA	-
294,259.00	-	294,259.00	NRA	-
-	-	-	NRA	-
-	-	-	NRA	-
-	-	1	EPA	-
-	1	-	EPA	-
-	-	-	NRA	_
-	-	-	MMMR	-
-	-	-	CA/DC/LGCD	-
-	-	ı	MMMR	-
-	-	-	PD	-
-	-	ı	PD	-
-	-	ı	PD	-
-	-	1	PD	-
-	-	1	EPA	-
-	-	-	EPA	-
294,259.00	-	294,259.00		-

TAXPAYER NAME
TAXPAYER IDENTIFICATION NUMBER (TPIN)
LICENCE NO/TYPE

Murray Investment Company Limited
1026512-3

MINERAL EXTRACTED	PRODUCTION	

Tax	Tax name
	Mining Companies
1	Mining Lease
2	Exploration Licence
3	Royalty
4	Corporate Tax
5	Environmental impact Assessment Licence
6	Environmental impact Assessment Monitoring Fee
7	Diamond Exporter' Licence
8	Export Duties
9	Surface Rent (Mining) to CA/DC
10	Agricultural Developement Fund
	Oil and Gas Companies
11	Training Fund for Oil
12	Sale of Geophysical Data
13	Surface Rent (Oil & Gas)
14	Signature Bonus Payement
15	Environmental impact Assessment Licence
16	Environmental impact Assessment Monitoring Fee
	Total payments

Per Company		
Original	Adjust	Final
-	-	-
-	-	-
-	-	_
9,939.09	-	9,939.09
-	-	-
-	-	-
35,000.00	-	35,000.00
113,251.80	-	113,251.80
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
	-	
-	-	
158,190.89	-	158,190.89

Per Government			Govt Agency	Final
Original	Adjust	Final		Diff.
-	-	-	NRA	-
-	-	-	NRA	-
-	-	-	NRA	-
19,878.16	- 9,939.08	9,939.08	NRA	0.01
-	-	1	EPA	-
-	1	-	EPA	-
35,000.00	-	35,000.00	NRA	-
113,251.80	-	113,251.80	MMMR	-
-	-	-	CA/DC/LGCD	-
-	-	-	MMMR	-
-	-	-	PD	-
-	-	-	PD	-
-	-	1	PD	-
-	-	-	PD	-
-	-	-	EPA	_
-	-	-	EPA	-
168,129.96	- 9,939.08	158,190.88		0.01

TAXPAYER NAME
TAXPAYER IDENTIFICATION NUMBER (TPIN)
LICENCE NO/TYPE

Marampa Iron Ore (SL) Limited
1001887-0
EL 06/09
RL 01/2011 EL 46/2011

MINERAL EXTRACTED	PRODUCTION	

Tax	Tax name
	Mining Companies
1	Mining Lease
2	Exploration Licence
3	Royalty
4	Corporate Tax
5	Environmental impact Assessment Licence
6	Environmental impact Assessment Monitoring Fee
7	Diamond Exporter' Licence
8	Export Duties
9	Surface Rent (Mining) to CA/DC
10	Agricultural Developement Fund
	Oil and Gas Companies
11	Training Fund for Oil
12	Sale of Geophysical Data
13	Surface Rent (Oil & Gas)
14	Signature Bonus Payement
15	Environmental impact Assessment Licence
16	Environmental impact Assessment Monitoring Fee
	Total payments

Per Company		
Original	Adjust	Final
1	ı	-
194,200.00	1	194,200.00
-	-	-
-	-	-
-	-	-
-	-	-
ı	1	-
1	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	
-	-	
194,200.00	-	194,200.00

Per Government			Govt Agency	Final
Original	Adjust	Final		Diff.
-	-	-	NRA	
194,200.00	-	194,200.00	NRA	
-	-	-	NRA	
-	-	-	NRA	
-	-	1	EPA	
-	-	-	EPA	
-	-	-	NRA	
-	-	-	MMMR	
-	-	-	CA/DC/LGCD	
-	-	-	MMMR	
-	-	-	PD	
-	-	-	PD	
-	-	-	PD	
-	-	-	PD	
-	-	-	EPA	
-	-	-	EPA	
194,200.00	-	194,200.00		

TAXPAYER NAME	Kingho Investment Company Limited	MINERAL EXTRACTED	PRODUCTION
TAXPAYER IDENTIFICATION NUMBER (TPIN)	1013683-0	Iron-ore	
LICENCE NO/TYPE	EL 21/2010 EL 22/2010 EL 23/2010 EL 32/2010 EL 33/2010 EL 34/2010 EL 40/2010 EL 41/2010 EL 42/2010 EL 43/2010		

		Per Company			Per Government	
Tax	Tax name	Original	Adjust	Final	Original	Adjust
	Mining Companies					
1	Mining Lease	-	-	-	-	-
2	Exploration Licence	179,782.00	-	179,782.00	179,782.00	-
3	Royalty	-	-	-	-	-
4	Corporate Tax	-	-	-	-	-
5	Environmental impact Assessment Licence	-	-	-	-	-
6	Environmental impact Assessment Monitoring Fee	-	-	-	-	-
7	Diamond Exporter' Licence	-	-	-	-	-
8	Export Duties	-	-	-	-	-
9	Surface Rent (Mining) to CA/DC	-	-	-	-	-
10	Agricultural Developement Fund	-	-	-	-	-
	Oil and Gas Companies					
11	Training Fund for Oil	-	-	-	-	-
12	Sale of Geophysical Data	-	-	-	-	-
13	Surface Rent (Oil & Gas)	-	-	-	-	-
14	Signature Bonus Payement	-	-	-	-	-
15	Environmental impact Assessment Licence	-	-	-	-	-
16	Environmental impact Assessment Monitoring Fee	-	-	-	-	-
	Total payments	179,782.00	-	179,782.00	179,782.00	-

Per Government			Govt Agency	Final
Original	Adjust	Final		Diff.
-	-	-	NRA	-
179,782.00	-	179,782.00	NRA	-
-	1	ı	NRA	-
-	1	ı	NRA	-
-	-	-	EPA	-
-	-	-	EPA	-
-	-	-	NRA	-
-	-	-	MMMR	-
-	-	-	CA/DC/LGCD	-
-	-	-	MMMR	-
-	1	ı	PD	-
-	ı	ı	PD	-
-	1	1	PD	-
-	-	1	PD	-
-	-	1	PD	-
-	-	-	PD	
179,782.00	-	179,782.00		-

TAXPAYER NAME
TAXPAYER IDENTIFICATION NUMBER (TPIN)

LICENCE NO/TYPE

AMR Gold (SL) Limited
10227606
APL326 EL 47/2011 APL329 EL 48/2011 APL327 EL 49/2011 APL328 EL 50/2011

MINERAL EXTRACTED		PRODUCTION
ALL MINERAL	-	

Tax	Tax name
	Mining Companies
1	Mining Lease
2	Exploration Licence
3	Royalty
4	Corporate Tax
5	Environmental impact Assessment Licence
6	Environmental impact Assessment Monitoring Fee
7	Diamond Exporter' Licence
8	Export Duties
9	Surface Rent (Mining) to CA/DC
10	Agricultural Developement Fund
	Oil and Gas Companies
11	Training Fund for Oil
12	Sale of Geophysical Data
13	Surface Rent (Oil & Gas)
14	Signature Bonus Payement
15	Environmental impact Assessment Licence
16	Environmental impact Assessment Monitoring Fee
	Total payments

Per Company		
Original	Adjust	Final
-	-	-
98,360.00	-	98,360.00
-	-	-
_	-	-
-	-	-
-	-	-
-	-	-
1,000.00	- 1,000.00	-
_	-	-
-	-	-
-	-	-
	-	-
_	-	-
-	-	-
-	-	-
-	-	-
99,360.00	- 1,000.00	98,360.00

Per Government			Govt Agency	Final
Original	Adjust	Final		Diff.
-	-	-	NRA	-
98,360.00	-	98,360.00	NRA	-
-	-	1	NRA	-
-	-	1	NRA	-
-	-	ı	EPA	-
-	1	-	EPA	-
-	-	-	NRA	-
-	-	-	MMMR	-
-	-	1	CA/DC/LGCD	-
-	-	1	MMMR	-
-	1	ı	PD	-
-	-	ı	PD	-
-	-	-	PD	-
-	-	-	PD	-
-	-	1	EPA	-
-	-	-	EPA	-
98,360.00	-	98,360.00		-

TAXPAYER NAME	West Africa Zircon Mining (SL) Limited
TAXPAYER IDENTIFICATION NUMBER (TPIN)	1016411-2
LICENCE NO/TYPE	EL 08/2010/APL-179 EL 07/2010/APL-177 EL 06/2010/APL-185 EL 05/2010/APL-181 EL 04/2010/APL-182 EL 03/2010/APL-183 EL 02/2010/APL-180 EL 01/2010APL-184 APL-179

MINERAL EXTRACTED	PRODUCTION	
İ		

Tax	Tax name	
	Environmental impact Assessment Licence	
1	Environmental impact Assessment Monitoring Fee	
2	Exploration Licence	
3	Royalty	
4	Corporate Tax	
5	Environmental impact Assessment Licence	
6	Environmental impact Assessment Monitoring Fee	
7	Diamond Exporter' Licence	
8	Export Duties	
9	Surface Rent (Mining) to CA/DC	
10	Agricultural Developement Fund	
	Oil and Gas Companies	
11	Training Fund for Oil	
12	Sale of Geophysical Data	
13	Surface Rent (Oil & Gas)	
14	Signature Bonus Payement	
15	Environmental impact Assessment Licence	
16	Environmental impact Assessment Monitoring Fee	
	Total payments	

Per Company		
Original	Adjust	Final
-	1	-
174,880.00	-	174,880.00
ı	-	-
-	-	-
ı	-	-
-	-	-
1	1	-
1	-	-
-	-	-
-	-	-
	-	
-	-	-
-	-	-
-	-	-
-	-	-
-	-	
-	-	
174,880.00	-	174,880.00

Per Government			Govt Agency	Final
Original	Adjust	Final	1	Diff.
			EPA	
-	-	-	NRA	-
174,880.00	-	174,880.00	NRA	-
-	-	-	NRA	-
-	-	-	NRA	-
-	-	1	EPA	-
-	-	-	EPA	-
-	-	-	NRA	-
-	-	1	MMMR	-
-	-	1	CA/DC/LGCD	-
-	-	ı	MMMR	-
-	-	-	PD	-
-	_	-	PD	-
-	-	ı	PD	-
-	-	1	PD	-
-	-	ı	EPA	-
-	-	-	EPA	-
174,880.00	-	174,880.00		-

Final Diff.

- 6,421.43

40,000.0074,840.19

- 121,261.62

TAXPAYER NAME
TAXPAYER IDENTIFICATION NUMBER (TPIN)
LICENCE NO/TYPE

ı	Lion Stones (SL) Ltd	
Г		

MINERAL EXTRACTED	PRODUCTION

Tax	Tax name	
	Mining Companies	
1	Mining Lease	
2	Exploration Licence	
3	Royalty	
4	Corporate Tax	
5	Environmental impact Assessment Licence	
6	Environmental impact Assessment Monitoring Fee	
7	Diamond Exporter' Licence	
8	Export Duties	
9	Surface Rent (Mining) to CA/DC	
10	Agricultural Developement Fund	
	Oil and Gas Companies	
11	Training Fund for Oil	
12	Sale of Geophysical Data	
13	Surface Rent (Oil & Gas)	
14	Signature Bonus Payement	
15	Environmental impact Assessment Licence	
16	Environmental impact Assessment Monitoring Fee	
	Total payments	

Don Compony		
Per Company		
Original	Adjust	Final
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-

Per Government			Govt Agency
Original	Adjust	Final	
-	1	-	NRA
1	1	-	NRA
-	-	-	NRA
12,842.86	- 6,421.43	6,421.43	NRA
-	-	-	EPA
-	-	-	EPA
40,000.00	1	40,000.00	NRA
74,840.19	1	74,840.19	MMMR
•	1	-	CA/DC/LGCD
1	1	-	MMMR
1	ı	-	PD
1	1	-	PD
-	-	-	PD
•	-	-	PD
-	-	-	EPA
-	-	-	EPA
127,683.05	- 6,421.43	121,261.62	

TAXPAYER NAME TAXPAYER IDENTIFICATION NUMBER (TPIN) LICENCE NO/TYPE

West Africa Group for Mining Gold and Diamond (SL) Ltd 1022766-9

MINERAL EXTRACTED	PRODUCTION

1000

Tax name		
	Mining Companies	
1	Mining Lease	
2	Exploration Licence	
3	Royalty	
4	Corporate Tax	
5	Environmental impact Assessment Licence	
6	Environmental impact Assessment Monitoring Fee	
7	Diamond Exporter' Licence	
8	Export Duties	
9	Surface Rent (Mining) to CA/DC	
10	Agricultural Developement Fund	
	Oil and Gas Companies	
11	Training Fund for Oil	
12	Sale of Geophysical Data	
13	Surface Rent (Oil & Gas)	
14	Signature Bonus Payement	
15	Environmental impact Assessment Licence	
16	Environmental impact Assessment Monitoring Fee	
	Total payments	

	1000	
Per Company		
Original	Adjust	Final
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-

Per Government			Govt Agency	Final
Original	Adjust	Final		Diff.
-	-	-	NRA	-
26,356.00	-	26,356.00	NRA	- 26,356.00
	-	-	NRA	-
22,716.05	-	22,716.05	NRA	- 22,716.05
-	-	-	EPA	-
-	-	-	EPA	-
35,000.00	-	35,000.00	NRA	- 35,000.00
230,212.28	-	230,212.28	MMMR	- 230,212.28
-	-	-	CA/DC/LGCD	-
-	-	-	MMMR	-
-	-	-	PD	-
-	-	-	PD	-
-	-	-	PD	-
-	-	-	PD	-
-	-	-	EPA	-
-	-	-	EPA	-
314,284.33	-	314,284.33		- 314,284.33

Final Diff.

- 6,267.51

- 35,000.00 - 192,847.68

- 234,115.19

TAXPAYER NAME
TAXPAYER IDENTIFICATION NUMBER (TPIN)
LICENCE NO/TYPE

Diam	Investment (S	L) Ltd	

MINERAL EXTRACTED	PRODUCTION

Tax	Tax name
	Mining Companies
1	Mining Lease
2	Exploration Licence
3	Royalty
4	Corporate Tax
5	Environmental impact Assessment Licence
6	Environmental impact Assessment Monitoring Fee
7	Diamond Exporter' Licence
8	Export Duties
9	Surface Rent (Mining) to CA/DC
10	Agricultural Developement Fund
	Oil and Gas Companies
11	Training Fund for Oil
12	Sale of Geophysical Data
13	Surface Rent (Oil & Gas)
14	Signature Bonus Payement
15	Environmental impact Assessment Licence
16	Environmental impact Assessment Monitoring Fee
	Total payments

Per Company		
Original	Adjust	Final
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
1	1	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	
-	-	
-	-	-

Per Government			Govt Agency
Original	Adjust	Final	
-	ı	1	NRA
-	-	-	NRA
-	-	-	NRA
6,267.51	-	6,267.51	NRA
-	-	-	EPA
-	-	-	EPA
35,000.00	-	35,000.00	NRA
192,847.68	ı	192,847.68	MMMR
-	1	ı	CA/DC/LGCD
•	ı	1	MMMR
•	ı	ı	PD
1	ı	ı	PD
-	-	1	PD
-	-	ı	PD
-	-	1	EPA
-	1	1	EPA
234,115.19	-	234,115.19	

Final Diff.

- 9,966.01

- 35,000.00 - 99,660.14

- 144,626.15

TAXPAYER NAME
TAXPAYER IDENTIFICATION NUMBER (TPIN)
LICENCE NO/TYPE

Danasha Gem (S.L) Ltd

MINERAL EXTRACTED	PRODUCTION

Tax	Tax name	
	Mining Companies	
1	Mining Lease	
2	Exploration Licence	
3	Royalty	
4	Corporate Tax	
5	Environmental impact Assessment Licence	
6	Environmental impact Assessment Monitoring Fee	
7	Diamond Exporter' Licence	
8	Export Duties	
9	Surface Rent (Mining) to CA/DC	
10	Agricultural Developement Fund	
	Oil and Gas Companies	
11	Training Fund for Oil	
12	Sale of Geophysical Data	
13	Surface Rent (Oil & Gas)	
14	Signature Bonus Payement	
15	Environmental impact Assessment Licence	
16	Environmental impact Assessment Monitoring Fee	
	Total payments	

Per Company		
Original	Adjust	Final
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	1	ı
-	-	-
_	-	-
-	-	-
_	-	-
_	-	-
_	-	-
_	-	
-	-	
-	-	-

Per Government			Govt Agency
Original	Adjust	Final	
-	1	-	NRA
-	1	-	NRA
-	ı	-	NRA
9,966.01	ı	9,966.01	NRA
-	-	-	EPA
-	-	-	EPA
35,000.00	1	35,000.00	NRA
99,660.14	1	99,660.14	MMMR
-	ı	-	CA/DC/LGCD
-	1	-	MMMR
-	1	-	PD
-	1	-	PD
-	-	-	PD
-	-	-	PD
-	-	-	EPA
-	-	-	EPA
144,626.15	-	144,626.15	

Final Diff.

- 6,092.20

- 35,000.00 - 61,743.10

- 102,835.30

TAXPAYER NAME
TAXPAYER IDENTIFICATION NUMBER (TPIN)
LICENCE NO/TYPE

Akar, Hasanein Ibrahim

MINERAL EXTRACTED	PRODUCTION

Tax	Tax name
	Mining Companies
1	Mining Lease
2	Exploration Licence
3	Royalty
4	Corporate Tax
5	Environmental impact Assessment Licence
6	Environmental impact Assessment Monitoring Fee
7	Diamond Exporter' Licence
8	Export Duties
9	Surface Rent (Mining) to CA/DC
10	Agricultural Developement Fund
	Oil and Gas Companies
11	Training Fund for Oil
12	Sale of Geophysical Data
13	Surface Rent (Oil & Gas)
14	Signature Bonus Payement
15	Environmental impact Assessment Licence
16	Environmental impact Assessment Monitoring Fee
	Total payments

Per Company		
Original	Adjust	Final
_	-	-
_		_
_		
_	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
_	_	
-	-	
-	-	-

Per Government			Govt Agency
Original	Adjust	Final	
1	ı	ı	NRA
-	1	1	NRA
-	ı	ı	NRA
6,092.20	ı	6,092.20	NRA
-	1	1	EPA
-	-	-	EPA
35,000.00	-	35,000.00	NRA
61,743.10	-	61,743.10	MMMR
-	-	-	CA/DC/LGCD
-	1	1	MMMR
-	1	1	PD
-	1	1	PD
-	-	-	PD
-	-	-	PD
-	-	-	EPA
1	-	-	EPA
102,835.30	-	102,835.30	

| Page 59

TAXPAYER NAME
TAXPAYER IDENTIFICATION NUMBER (TPIN)
LICENCE NO/TYPE
LICENCE NO/TYPE

Shanti Sierra Limited	
1027764-9	

MINERAL EXTRACTED	PRODUCTION

Tax	Tax name	
	Mining Companies	
1	Mining Lease	
2	Exploration Licence	
3	Royalty	
4	Corporate Tax	
5	Environmental impact Assessment Licence	
6	Environmental impact Assessment Monitoring Fee	
7	Diamond Exporter' Licence	
8	Export Duties	
9	Surface Rent (Mining) to CA/DC	
10	Agricultural Developement Fund	
	Oil and Gas Companies	
11	Training Fund for Oil	
12	Sale of Geophysical Data	
13	Surface Rent (Oil & Gas)	
14	Signature Bonus Payement	
15	Environmental impact Assessment Licence	
16	Environmental impact Assessment Monitoring Fee	
	Total payments	

Per Company		
Original	Adjust	Final
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-

Per Government			Govt Agency	Final
Original	Adjust	Final		Diff.
-	•	ı	NRA	-
-	-	ı	NRA	-
-	_	-	NRA	_
18,459.53	-	18,459.53	NRA	- 18,459.53
-	-	-	EPA	-
-	-	-	EPA	-
35,000.00	-	35,000.00	NRA	- 35,000.00
175,996.56	-	175,996.56	MMMR	- 175,996.56
-	-	-	CA/DC/LGCD	-
-	•	1	MMMR	-
-	-	-	PD	-
-	-	-	PD	-
-	-	-	PD	_
-	-	-	PD	_
-	-	-	EPA	-
-	-	-	EPA	-
229,456.09	-	229,456.09		- 229,456.09

TAXPAYER NAME
TAXPAYER IDENTIFICATION NUMBER (TPIN)
LICENCE NO/TYPE

Lukoil Oversas Sierra Leone

MINERAL EXTRACTED	PRODUCTION

Tax	Tax name	
	Mining Companies	
1	Mining Lease	
2	Exploration Licence	
3	Royalty	
4	Corporate Tax	
5	Environmental impact Assessment Licence	
6	Environmental impact Assessment Monitoring Fee	
7	Diamond Exporter' Licence	
8		
9		
10	Agricultural Developement Fund	
	Oil and Gas Companies	
11	Training Fund for Oil	
12	Sale of Geophysical Data	
13	Surface Rent (Oil & Gas)	
14	4 Signature Bonus Payement	
15	Environmental impact Assessment Licence	
16 Environmental impact Assessment Monitoring Fee		
	Total payments	

Per Company		
Original	Adjust	Final
-	-	-
-	-	-
-	1	-
-	1	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
125,000.00	1	125,000.00
-	-	-
140,770.00	-	140,770.00
4,900,000.00	-	4,900,000.00
-	-	-
-	-	-
5,165,770.00	-	5,165,770.00

Per Government			Govt Agency	Final
Original	Adjust	Final		Diff.
-	-	-	NRA	-
-	ı	ı	NRA	-
-	-	-	NRA	-
-	-	-	NRA	-
-	1	1	EPA	-
-	-	-	EPA	-
-	-	-	NRA	-
-	-	-	MMMR	-
-	-	-	CA/DC/LGCD	-
-	-	-	MMMR	-
125,000.00	-	125,000.00	PD	-
-	-	-	PD	-
140,740.00	1	140,740.00	PD	30.00
4,900,000.00	-	4,900,000.00	PD	-
-	-	-	EPA	-
-	-	-	EPA	-
5,165,740.00	-	5,165,740.00		30.00

TAXPAYER NAME	
TAXPAYER IDENTIFIC	CATION NUMBER (TPIN)
LICENCE NO/TYPE	

Anadarko (SL) Company
1105488-2
SL-078-11

MINERAL EXTRACTED	PRODUCTION
Hydrocarbons	

Tax	Tax name	
Tax	Tax name	
	Mining Companies	
1	Mining Lease	
2	Exploration Licence	
3	Royalty	
4	Corporate Tax	
5	Environmental impact Assessment Licence	
6	Environmental impact Assessment Monitoring Fee	
7	Diamond Exporter' Licence	
8	Export Duties	
9	Surface Rent (Mining) to CA/DC	
10	Agricultural Developement Fund	
	Oil and Gas Companies	
11	Training Fund for Oil	
12	Sale of Geophysical Data	
13	Surface Rent (Oil & Gas)	
14	Signature Bonus Payement	
15	Environmental impact Assessment Licence	
16	Environmental impact Assessment Monitoring Fee	
	Total payments	

Per Company		
Original	Adjust	Final
1 Or CO	2 Adj CO	3 Final CO
-	-	-
-	-	-
-	-	-
-	-	-
_	-	-
-	-	-
-	-	-
-	-	-
-	1	1
-	-	-
250,000.00	1	250,000.00
-	-	-
338,350.26	-	338,350.26
-	-	-
53,580.00	-	53,580.00
6,965.00	-	6,965.00
648,895.26	-	648,895.26

Per Government			Govt Agency	Final
Original	Adjust	Final		Diff.
4 Or Gov	5 Adj Gov	6 Final Gov	7 Govt Agency	8 Diff.
-	-	-	NRA	-
-	-	-	NRA	-
-	-	-	NRA	-
-	-	1	NRA	-
-	-	1	EPA	-
-	-	-	EPA	-
-	-	-	NRA	_
-	-	-	MMMR	-
-	-	-	CA/DC/LGCD	-
-	-	-	MMMR	-
250,000.00	-	250,000.00	PD	-
-	-	ı	PD	-
338,290.26	-	338,290.26	PD	60.00
-	-	1	PD	-
53,570.00	-	53,570.00	EPA	10.00
6,955.00	-	6,955.00	EPA	10.00
648,815.26	-	648,815.26		80.00

TAXPAYER NAME
TAXPAYER IDENTIFICATION NUMBER (TPIN)
LICENCE NO/TYPE

European I	Hydrocarbon Ltd. UK
SL-03	Exploration and Development Production

MINERAL EXTRACTED	PRODUCTION

Tax	Tax name
	Mining Companies
1	Mining Lease
2	Exploration Licence
3	Royalty
4	Corporate Tax
5	Environmental impact Assessment Licence
6	Environmental impact Assessment Monitoring Fee
7	Diamond Exporter' Licence
8	Export Duties
9	Surface Rent (Mining) to CA/DC
10	Agricultural Developement Fund
	Oil and Gas Companies
11	Training Fund for Oil
12	Sale of Geophysical Data
13	Surface Rent (Oil & Gas)
14	Signature Bonus Payement
15	Environmental impact Assessment Licence
16	Environmental impact Assessment Monitoring Fee
	Total payments

		I
Per Company		
Original	Adjust	Final
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
_	-	-
125,000.00	•	125,000.00
-	-	-
202,650.00	-	202,650.00
-	-	-
-	-	-
-	-	-
327,650.00	-	327,650.00

Per Government			Govt Agency	Final
Original	Adjust	Final	a.c.i.r.gcc,	Diff.
	·			
-	-	-	NRA	-
-	ı	1	NRA	-
-	-	1	NRA	-
-	ī	-	NRA	-
-	-	-	EPA	-
-	-		EPA	-
-	-	-	NRA	-
-	-	1	MMMR	-
-	-	1	CA/DC/LGCD	-
-	ı	1	MMMR	-
125,000.00	-	125,000.00	PD	-
-	ı	1	PD	-
202,650.00	ı	202,650.00	PD	-
-	-	-	PD	-
-	-	1	EPA	-
-		-	EPA	-
327,650.00	-	327,650.00		-

Final Diff.

- 72,905.00

- 109,321.14

- 182,226.14

TAXPAYER NAME
TAXPAYER IDENTIFICATION NUMBER (TPIN)
LICENCE NO/TYPE

	Talisman Sierra Leone BV/Prontinal Ltd
ſ	SL-4A-10

MINERAL EXTRACTED	PRODUCTION

Tax	Tax name	
	Mining Companies	
1	Mining Lease	
2	Exploration Licence	
3	Royalty	
4	Corporate Tax	
5	Environmental impact Assessment Licence	
6	Environmental impact Assessment Monitoring Fee	
7	Diamond Exporter' Licence	
8	Export Duties	
9	Surface Rent (Mining) to CA/DC	
10	Agricultural Developement Fund	
	Oil and Gas Companies	
11	Training Fund for Oil	
12	Sale of Geophysical Data	
13	Surface Rent (Oil & Gas)	
14	Signature Bonus Payement	
15	Environmental impact Assessment Licence	
16	Environmental impact Assessment Monitoring Fee	
	Total payments	

Per Company		
Original	Adjust	Final
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
1	-	-
-	-	-
-	-	-
-	-	-
52,024.00	-	52,024.00
-	-	-
-	-	-
9,000,000.00	-	9,000,000.00
-	-	-
-	-	-
9,052,024.00	-	9,052,024.00

Per Government			Govt Agency
Original	Adjust	Final	
-	-	-	NRA
-	-	-	NRA
-	-	-	NRA
-	-	-	NRA
-	-	-	EPA
-	-	-	EPA
-	-	-	NRA
-	-	-	MMMR
-	-	-	CA/DC/LGCD
-	-	-	MMMR
124,929.00	-	124,929.00	PD
-	-		PD
109,321.14	-	109,321.14	PD
9,000,000.00	-	9,000,000.00	PD
-	-	-	EPA
-	-	-	EPA
9,234,250.14	-	9,234,250.14	

Annex 4: Persons contacted or involved in the reconciliation work

Moore Stephens - Independent Reconciler		
Tim Woodward	Partner	
Radhouane Bouzaiane	Senior Manager – Mission Director	
Riadh Aouissi	Manager – Team Leader	
Maher Ben Mbarek	Audit Senior	
Elves Kooli	Audit Senior	

_	_	
cı		
O.		

Riachard Conteh	Champion	
Mina Horace	Programme Officer	
Josephine Saidu	Communications Officer	

Petroleum Directorate

Karefa A. Kargbo	Financial Controller
Sabieu Conteh	Accounting Manager

National Revenue Authority

Ibrahim Sorie Kamara	Commissioner, Domestic Tax Department
Donald Williams	Supervisor, Domestic Tax Dept.
Tom Vandy	Supervisor, Non Tax Revenue

Government Gold and Diamond Office (GGDO) /PMT

Salifu Conteh	Manager Trading & Audit Dept(PMT/NMA)
Sallieu Bah	Senior Trading & Audit Officer (PMT/NMA)

Environmental Protection Agency

Amadu Tucker Financial Services Manager

Lahai S. Keita Deputy Director Natural Resource Management

National Minerals Agency

Peter Bangura Dep Director, NMA
Eugene Norman Manager, Mining Cadastre

Accountant General's Department

Richard S. Williams Deputy Accountant General

Ministry of Mines and Mineral Resources

Fatmata Mustapha Permament Secretary

Ministry of Finance and Economic Development

Thomas Scurfield Economist within the Revenue and Tax Policy Division

Moore Stephens LLP | P a g e 65