SLEITI
Extractive Industries
Transparency Initiative
Sierra Leone

SIERRA LEONE EXTRACTIVE INDUSTRIES TRANSPARENCY INITIATIVE (SLEITI)

EITI REPORT 2022-2023

30 December 2024

BDO

This report has been prepared at the request of the Multi-Stakeholder Group (MSG) in charge of the implementation of the Sierra Leone Extractive Industries Transparency Initiative (SLEITI).

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

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LIST OF ABBREVIATIONS

ACC	Anti-Corruption Commission
AFROSAI	African Organization of Supreme Audit Institutions
AgTech	Agricultural Technology
AML	African Mineral Limited
AML/CFT	Anti-Money Laundering and Combating of Financing of Terrorism
ASGM	Artisanal and Small- scale Gold Mining
ASM	Artisanal and Small-Scale Mining
ASSL	Audit Service Sierra Leone
BADEA	Arab Bank for Economic Development in Africa
BGS	British Geological Survey
BO	Beneficial ownership
BSL	Bank of Sierra Leone
BUR	Biennial Update Report
CAC	Corporate Affairs Commission
CAGR	Compound Annual Growth Rate
CDA	Community Development Agreement
CDF	Community Development Fund
CGT	Capital Gains tax
CIT	Corporate Income Tax
CPI	Corruption Perceptions Index
CRET	Climate Resilience and Energy Transition
CSA	Climate Smart Agriculture
CSO	Civil Society Organization
DACDF	Diamond Area Community Development Fund
DELCO	Sierra Leone Development Company
DFC	Development Finance Corporation
EC	European Commission
EDSA	Electricity Distribution and Supply Authority
EGIMS	Enterprise Geoscientific Information Management System
EGTC	Electricity Generation and Transmission Company
EIA	Environmental Impact Assessment
EIRA	Extractive Industries Revenue Act
EITI	Extractive Industries Transparency Initiative
ElectriFI	Electrification Financing Initiative
EPA-SL	Environmental Protection Agency - Sierra Leone
ESG	Environmental, Social, and Governance
ESIA	Environmental and Social Impact Assessments
ETS	Emissions Trading Scheme
FATF	Financial Action Task Force
FCDO	Foreign Commonwealth and Development Office
FIA	Financial Intelligence Agency
FIFA	First-in first-assessed
FPIC	Free, Prior, and Informed Consent
GCF	Green Climate Fund

GDP	Gross Domestic Product
GEF	Global Environment Facility
GFS	Government Finance Statistics
GHG	Global Greenhouse Gas
GoSL	Government of Sierra Leone
GPFS	General Purpose Financial Statements
GST	Goods and Services Tax
HMC	Heavy Mineral Concentrate
HSE	Health Safety and Environmental
HSE	Health, Safety, and Environment
IA	Independent Administrator
IFAD	International Fund for Agricultural Development
IGR	Industrial Grade Rutile
ILO	International Labour Organization
IMF	International Monetary Fund
INTOSAI	International Organization of Supreme Audit Institutions
IOC	International Oil company
IOG	Innoson Oil and Gas
IPP	Independent Power Producer
ISRS	International Standard on Related Services
ISSAI	International Standards of Supreme Audit Institutions
ITAS	Integrated Tax Administration System
J4P	Justice for the Poor
JORC	Joint Ore Reserves Committee
LGU	Local Government Unit
LMC	London Mining Company
MAB	Minerals Advisory Board
MCAS	Mining Cadastre Administration System
MCMU	Mining Cadastre Management Unit
MCO	Mining Cadastre Office
MDAs	Ministries Department Agencies
MDDF	Mining District Development Fund
MLA	Mining Lease Agreement
MLGCA	Ministry of Local Government and Community Affairs
MMA	Mines and Minerals Act
MMDA	Mines and Minerals Development Act
MMMDC	Mines and Minerals Development and Management Corporation
MMMR	Ministry of Mines & Mineral Resources
MoF	Ministry of Finance
MoPED	Ministry of Planning and Economic Development
MoU	Memorandum of Understanding
MPs	Members of Parliament
MSG	Multi-Stakeholder Group
MTNDP	Medium-Term National Development Plan
NACS	National Anti-Corruption Strategy
NAP	National Adaptation Plan
NBSAP	National Biodiversity Strategy and Action Plan

NC	National Communications
NCCAP	National Climate Change Action Plan
NDC	Nationally Determined Contributions
NEEAP	National Energy Efficiency Action Plan
NMA	National Minerals Agency
NMJD	Network Movement for Justice and Development
NPI	National Pollutant Inventory
NPPA	National Public Procurement Authority
NRA	National Revenue Authority
NREAP	National Renewable Energy Action Plan
NRGI	Natural Resource Governance Institute
OCR	Optical character recognition
OECD	Organisation for Economic Co-operation and Development
OPEC	Organization of the Petroleum Exporting Countries
PA	Paris Agreement
PAYE	Pay As You Earn
PD-SL	Petroleum Directorate of Sierra Leone
PEP	Politically Exposed Person
PEPA	Petroleum Exploration and Production Act
PFM	Public Financial Management
PI	Presidential Initiative
PPP	Public-Private Partnership
REDD+	Reducing Emissions from Deforestation and forest Degradation program
RT	Reporting templates
SDG	Sustainable Development Goals
SEforALL	Sustainable Energy for All
SGR	Standard Grade Rutile
SHPL	Seli Hydropower Limited
SL	Sierra Leone
SLEITI	Sierra Leone Extractive Industries Transparency Initiative
SLIEPA	Sierra Leone Investment and Export Promotion Agency
SLLCA	Sierra Leone Local Content Agency
SMHL	Sierra Mineral Holdings Limited
SOE	State-Owned Enterprise
SRL	Sierra Rutile Limited
TCF	Trillion cubic feet
TLS	Transport Layer Security
ToR	Terms of Reference
UNDP	United Nations Development Programme
UNFCCC	United Nations Framework Convention on Climate Change
UNOPS	United Nations Office for Project Services
US$	United States Dollars
VCS	Verified Carbon Standard
W/H	Withholding tax
WB	World Bank
WGI	Worldwide Governance Indicators

INTRODUCTION

Extractive Industries Transparency Initiative (EITI)

Background

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

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

Evolving normative framework (2003-2023)

EITI reports should be prepared based on the 2023 EITI Standard (here in after referred to as the "The EITI Standard"). This is the fourth version of the Standard since the 2013 one. Please see Figure 1 below.

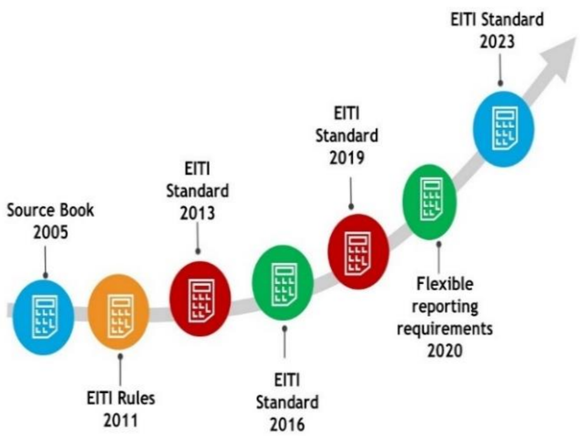
The EITI Standard has evolved to respond to stakeholder needs and a changing global context. Now it includes several new and refined provisions that enable countries to respond to the most pressing challenges that concern natural resource governance today.

These broadly cover four thematic areas:

- **Anti-corruption:** Enhance the ability of countries and companies to use the EITI platform for the identification and management of corruption risks in the natural resource sector.
- **Energy transition:** Supporting disclosure and public debate on the implications of energy transition by highlighting relevant policies, as well as revenues countries can expect from their oil, gas and minerals under different market scenarios.
- **Gender, social and environmental issues:** To help ensure that natural resources are managed in the interests of all citizens, there are stronger provisions to promote greater diversity in decision-making and disclosure, considering gender, social and environmental issues.
- **Revenue collection:** New and refined provisions require more comprehensive and detailed disclosures, which can help countries strengthen their tax base and raise revenues.

For further information about the 2023 EITI Standard, please refer to the summary of changes the EITI International Secretariat prepared in June 2023.

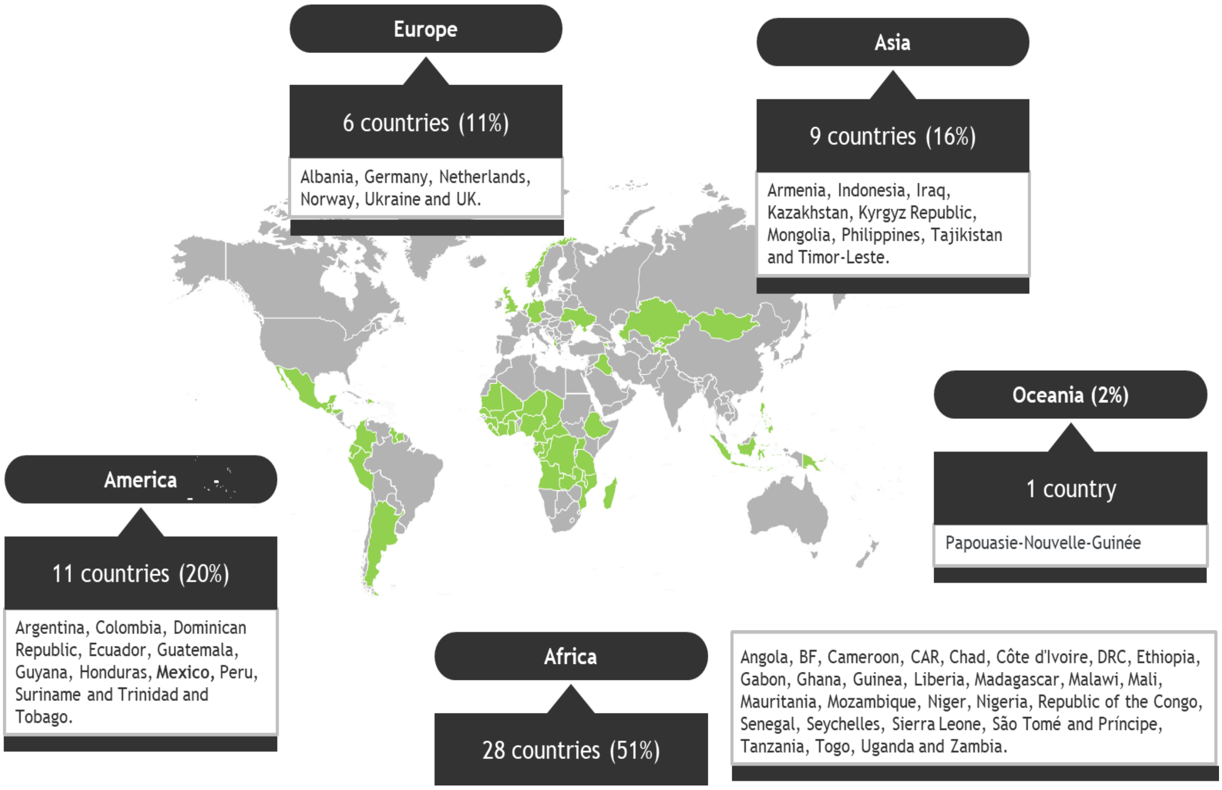
Figure 1: Evolving normative framework (2003-2023)



EITI Implementing countries

EITI is currently being implemented in 55 countries in Africa, Asia, Europe, the Americas and Oceania. Please see Figure 2 below.

FIGURE 2: MAP OF EITI IMPLEMENTING COUNTRIES



Independent evaluation of EITI

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

The study raised some findings in the following areas:

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

EITI in Sierra Leone

The Government of Sierra Leone (here after referred to as "GoSL") first announced its intention to join the EITI programme in June 2006 to promote transparency and accountability in the management of its mineral resources. The country formed its first multi-stakeholder group (MSG), the Sierra Leone Extractive Industries Transparency Initiative (SLEITI) in June 2007. Sierra Leone became an EITI Candidate in February 2008, and it became a compliant country in 2014.[1]

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

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

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

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

The **SLEITI Secretariat** is responsible for the implementation of planned and approved activities designed by the MSG's work plan and EITI Standard. Headed by a National Coordinator, the Secretariat includes key professional staff drawn from several professional backgrounds required for the day-to-day operations of the Secretariat.

The SLEITI process covers two sectors in Sierra Leone: mining and oil & gas. To date, eleven (11) EITI reports have been published covering the period from 1 January 2006 to 31 December 2021. This report is the twelfth EITI report which covers the period from 1 January 2022 to 31 December 2023.

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

TABLE 1: SLEITI KEY MILESTONES

Date	Event
June 2006	Government announced its intention to join the EITI programme
February 2008	Sierra Leone becomes a candidate country
March 2010	1st EITI Report published (Period covered: January 2006 - December 2007)
August 2010	First Validation (EITI Rules) - Candidate status renewed
September 2012	2nd EITI Report published (Period covered: January 2008 - December 2010)
February 2013	Suspended for failing Second Validation

[1] For more information on EITI in Sierra Leone, see the website here.

Date	Event
December 2013	3rd EITI Report published (Period covered: January 2011 - December 2011)
April 2014	Third Validation - Sierra Leone designated Compliant country
December 2015	Open-ended extension (due to Ebola outbreak) to submit 2012 report granted
October 2017	4th EITI Report published (Period covered: January 2012 - December 2012)
March 2016	5th EITI Report published (Period covered: January 2013 - December 2013)
December 2016	6th EITI Report published (Period covered: January 2014 - December 2014)
December 2017	7th EITI Report published (Period covered: January 2015 - December 2015)
June 2018	8th EITI Report published (Period covered: January 2016 - December 2016)
June 2019	Fourth Validation - Meaningful Progress
January 2020	9th EITI Report published (Period covered: January 2017 - December 2018)
December 2021	10th EITI Report published (Period covered: January 2019 - December 2019)
October 2022	Fifth Validation - High overall score in implementing the 2019 EITI Standard (87.5 points)
March 2023	11th EITI Report published (Period covered: January 2020 - December 2021)

EITI Validation

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

The next validation will commence in January 2027 in accordance with the validation schedule.

Scope of Work

BDO LLP was appointed as Independent Administrator (IA) for the preparation of the SLEITI report for the years 2022 and 2023. We have performed our work in accordance with ISRS 4400 (Engagements to perform agreed upon procedures regarding Financial Information). The procedures performed were those set out in the terms of reference as set out in the Contract for Consultants Services.

The compilation and reporting procedures carried out were not designed to constitute an audit or review in accordance with International Standards on Auditing or International Standards on Review Engagements and as a result we do not express any assurance on the transactions beyond the explicit statements set out in this report. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This Report includes six Sections as follows:

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

The data reported has been disaggregated by individual project, by company, by government agency and by revenue stream. The amounts in this report are stated in Leones (hereafter referred to as “Le”), unless otherwise stated. For payments made in other currencies, reporting entities were required to report in the currency of payment. Payments made in US$ have been converted to Le. The exchange rate used is in the General Purpose Financial Statements (GPFS) of the Consolidated Fund for the financial years ended 31 December 2022 and 31 December 2023.

- 2022: 1 US$ = Le 18,839[2]
- 2023: 1 US$ = Le 22,790[3]

As of 1 July 2022, Sierra Leone has changed its currency from the old Leone (SLL) to the new Leone (SLE). It is subdivided into 100 cents.

Our report includes information received up to **25 December 2024**. Any information received after this date has not, therefore, been taken into consideration.

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

[2] Annual-Public-Accounts-2023-MARCH-25TH-FINAL.pdf (mof.gov.sl)
[3] Annual-Public-Accounts-2023-MARCH-25TH-FINAL.pdf (mof.gov.sl)

1. EXECUTIVE SUMMARY

1.1. Objective of the Report

The purpose of this 12th SLEITI report is to compile and present the data provided by the extractive companies (hereinafter referred to as "companies") in comparison with the relevant data provided by government agencies for effective governance of the sector.

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

1.2. EITI Flexible Reporting

The EITI Board decided the extension of measures to provide flexibility in EITI implementation and reporting. These measures allow implementing countries to retain the momentum of the EITI process while adapting to local circumstances and urgent information needs.

Flexible EITI reporting

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

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

With flexible EITI reporting, implementing countries may deviate from the standard procedure for EITI reporting, including reconciliation for EITI Reports scheduled for publication by 31 December 2024. In doing so, the country must disclose the following information in their reporting:

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

The SLEITI MSG has agreed to prepare the 2022-2023 SLEITI report based on the flexible EITI reporting.

1.3. Key Conclusions

This SLEITI report summarises information about the revenues generated from the extractive industries in Sierra Leone during the years 2022 and 2023 as part of the EITI process. In this context, extractive companies and government agencies report payments, revenues and non-financial (contextual) information respectively.

a. EITI scope

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

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

b. Revenues generated from the extractive sector

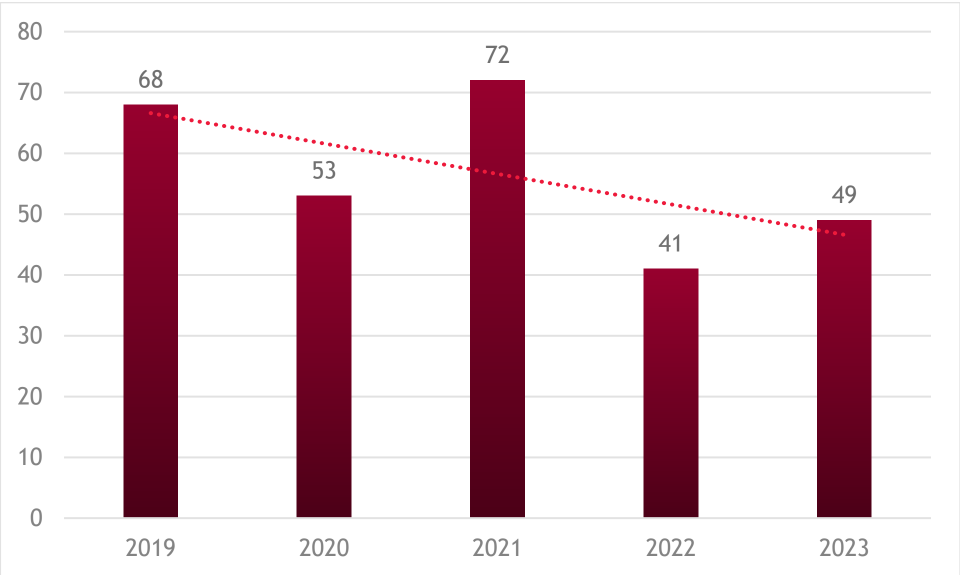
Based on the data collected from government agencies and extractive companies, the total revenues generated from the extractive sector in Sierra Leone (including social and environmental expenditure) amounted to **US$ 39 million (Le 1.1 bn)** and **US$ 48 million (Le 0.7 bn)** respectively in 2022 and 2023, a year-on-year increase of US$ 9 million or 22%.

c. Review of the extractive revenues between 2019 and 2023

The average annual decrease of extractive revenues between 2017 and 2021 was 8%. Revenues dropped by 43% between 2021 and 2022 because of the sharp drop in diamonds activity. During 2023, the figures improved compared with 2022 as new mining companies entered into activity.

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

FIGURE 3: TREND OF THE EXTRACTIVE REVENUES BETWEEN 2019 AND 2023 (IN US$ MILLION)



d. Breakdown by type of revenue

Analysis of the extractive revenues by type indicates that tax revenues represented approximately **85%** of the total revenues collected in 2022 and 2023. Surface rent paid by extractive companies to sub-national agencies accounted for less than **1%**, while social and environmental payments represented **15%**. The table and Figures below present the contribution by type of revenue.

TABLE 2: BREAKDOWN OF EXTRACTIVE REVENUES BY TYPE OF PAYMENT (2022 AND 2023)

In USD	Disclosed by	2023	%	2022	%
Tax revenues from in-scope companies	Government agencies	37,355,603	77.77%	29,782,102	75.83%
Tax revenues from out-of-scope companies	Government agencies	3,381,402	7.04%	4,417,023	11.25%
Surface rent	Sub-national agencies	259,118	0.54%	305,154	0.78%
Total tax revenues		**40,996,123**	**85.35%**	**34,504,279**	**87.85%**
Social payments	Mining companies	6,309,009	13.13%	3,862,768	9.83%
Environmental payments	Mining companies	728,322	1.52%	909,290	2.32%
Total social and environmental payments		**7,037,332**	**14.65%**	**4,772,059**	**12.15%**
	Total	**48,033,455**	**100.00%**	**39,276,338**	**100.00%**

FIGURE 4: BREAKDOWN OF EXTRACTIVE REVENUES BY TYPE OF PAYMENT (2022)

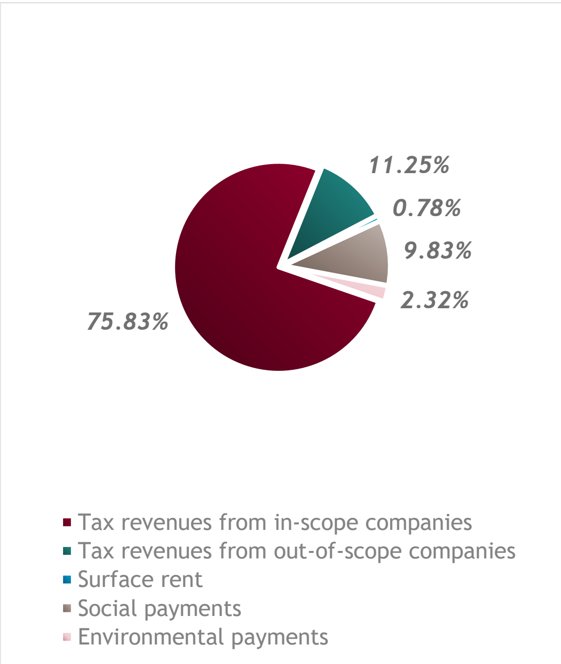
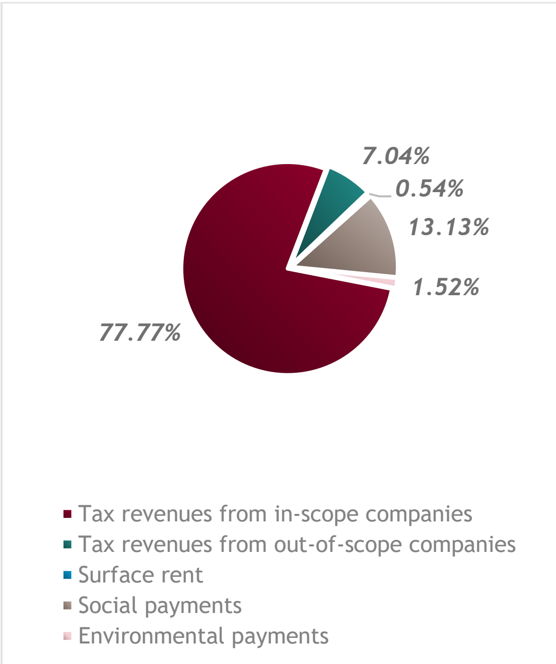


FIGURE 5: BREAKDOWN OF EXTRACTIVE REVENUES BY TYPE OF PAYMENT (2023)



e. Analysis of production data

The mining production value has increased by more than 33% between 2022 and 2023 reaching **US$ 1.1 billion** (Le 27.8 billion) in 2023. This was notably through the increase of Kingho Mining Company Limited's iron ore production in 2023 and the entry of the Heavy Minerals Concentrate's specialized company Jong Minerals Company Limited, in addition to the price increase of most minerals between 2022 and 2023. The table below shows the growth in production value by commodity.

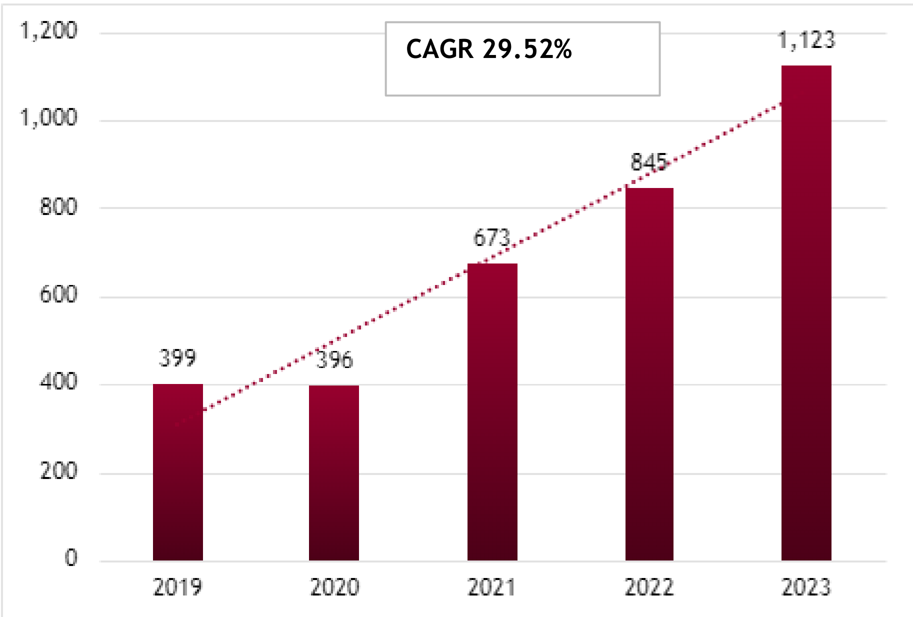
TABLE 3: GROWTH OF TOTAL VALUE OF MINING PRODUCTION BETWEEN 2022 AND 2023

In US$ Million	2023	2022	Variation	%
Iron ore	755	470	285	60.76%
Rutile	139	177	(38)	(21.71%)
HMC	78	103	(26)	(24.87%)
Diamond	75	21	54	264.75%
Bauxite	44	28	16	56.17%
Ilmenite	13	16	(3)	(19.93%)
Zircon	12	24	(12)	(50.61%)
Gold	7	6	1	16.65%
Total	**1,123**	**845**	**277**	**32.79%**

Source: NMA

The Figure below shows the trend of the mining production value over five years (2019-2023).

FIGURE 5: GROWTH OF TOTAL VALUE OF MINING PRODUCTION BETWEEN 2019 AND 2023 (IN US$ MILLION)



Section 4.1 of the report provides detailed information on the production volumes and values NMA provided for 2022 and 2023. Section 5.1 provides the production data disclosed by in-scope mining companies.

f. Analysis of export data

The mining exports value increased by 33% between 2022 and 2023 reaching **US$ 1.2 billion** (Le 27.3 billion) in 2023. This was notably through iron ore exports of Kingho Mining Company Ltd that doubled in 2023 and the increase of the mineral prices in the international market. The table below shows the evolution of the production value by commodity.

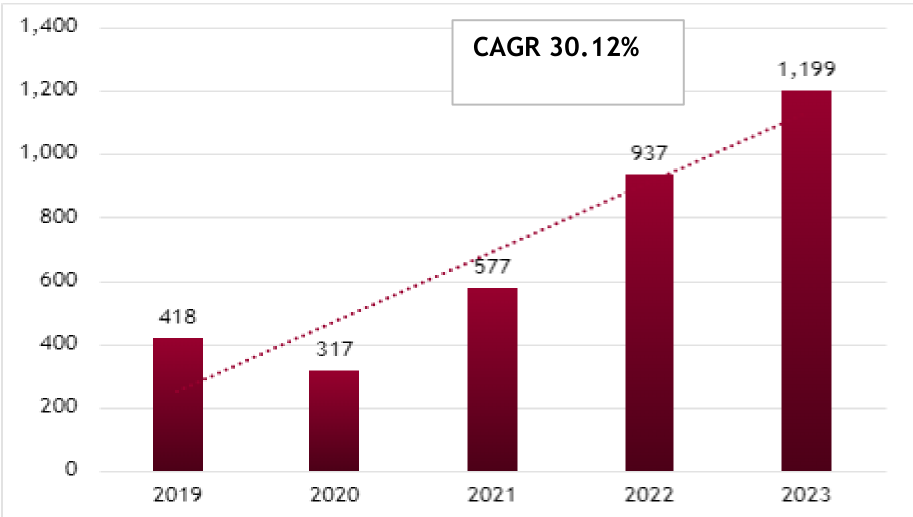
TABLE 4: GROWTH OF TOTAL VALUE OF MINING EXPORTS BETWEEN 2022 AND 2023

In US$ Million	2023	2022	Variation	%
Iron Ore	835	478	357	74.58%
Rutile	154	194	(41)	(20.90%)
HMC	74	24	49	203.93%
Diamond	67	103	(36)	(35.43%)
Bauxite	44	28	16	55.93%
Ilmenite	13	16	(3)	(17.70%)
Zircorn	8	68	(60)	(88.55%)
Gold	4	24	(21)	(85.13%)
Garnet	1	1	1	100.00%
Total	**1,199**	**937**	**262**	**27.96%**

Source: NMA

The Figure below shows the trend of the mining exports value over five years (2019-2023)

FIGURE 6: GROWTH OF TOTAL VALUE OF MINING EXPORTS BETWEEN 2019 AND 2023 (IN US$ MILLION)

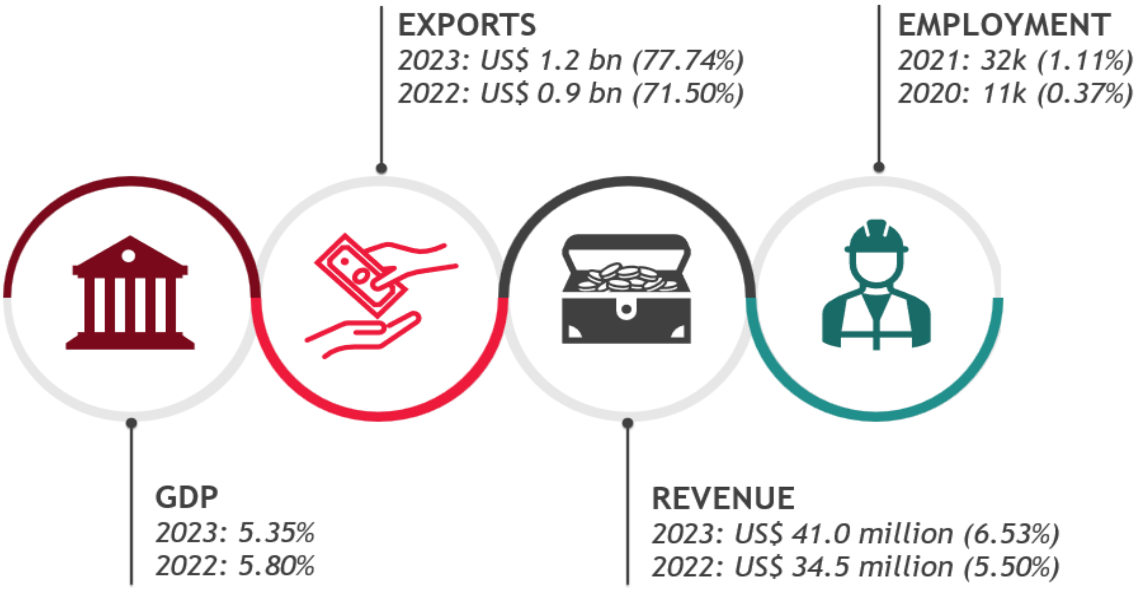


Section 4.1 of the report provides detailed information on the export volumes and values NMA provided for 2022 and 2023. Section 5.1 provides the export data disclosed by in-scope mining companies.

g. Contribution of the extractive sectors to the economy in 2022-2023

The figure below shows the contribution of the extractive sectors to the economy of Sierra Leone in 2022 and 2023.

FIGURE 7: CONTRIBUTION OF THE EXTRACTIVE SECTORS TO THE ECONOMY IN 2022 AND 2023



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

h. Data completeness

Government agencies

The SLEITI MSG agreed that seven (7) government agencies would be required to disclose the revenues received from extractive companies, contextual data related the exploration, production, exports, state participation, infrastructure provisions and barter agreements, environmental and social expenditure, and employment as required by the EITI Standard. The government agencies selected in the scope are presented in the table below.

TABLE 5: LIST OF IN-SCOPE GOVERNMENT AGENCIES (2022 AND 2023)

N°	Government Agency
1	National Revenue Authority (NRA)
2	National Minerals Agency (NMA)[4]
3	Ministry of Mines & Mineral Resources (MMMR)
4	Petroleum Directorate (PD-SL)
5	Environmental Protection Agency (EPA-SL)
6	District Councils / City Councils
7	Chiefdom Administrations

All in-scope government agencies have submitted their Reporting Templates (RTs).

[4] Including the Directorate of Precious Minerals Trading (PMT).

Extractive companies

The SLEITI MSG agreed that mining companies that paid US$ 200,000 and above during the years 2022 and 2023 should disclose the following information:

- surface rental payments;
- legal ownership;
- beneficial ownership (BO);
- exploration;
- production;
- exports;
- state participation;
- infrastructure provisions & barter agreements;
- environmental & social expenditure;
- employment statistics; and
- additional information required by the EITI 2023 Standard.

Based on the above, 18 and 21 mining companies were selected in the scope for 2022 and 2023 respectively as shown in the following two tables.

2022

TABLE 6: LIST OF IN-SCOPE COMPANIES (2022)

N°	Company
1	Tonguma Ltd
2	Newfield/Sierra Diamonds Ltd
3	Kingho Rail and Port
4	Koidu Ltd
5	Marampa Mines Ltd
6	Kingho Mining Company Ltd
7	Sierra Rutile Ltd
8	CTC MINING (SL) Ltd
9	Meya Mining
10	Gold Lion Mining Company
11	Afro-Asia mining Corporation
12	FG Gold Limited
13	Seawright mining Co Ltd
14	Cheng Li Trading Mining Comp. (SL) Ltd
15	Kasino Mining Company
16	Kingho/Northern Mining Co
17	Kingho/CKH Mining Company
18	Kingho/Mass Energy Mining Co

2023

TABLE 7: LIST OF IN-SCOPE COMPANIES (2023)

N°	Company
1	Koidu Limited
2	Marampa Mines Ltd
3	Kingho Mining Company Ltd
4	Sierra Rutile Ltd
5	CTC MINING (SL) Ltd
6	Meya Mining
7	Gold Lion Mining Company
8	Afro-Asia mining Corporation
9	FG Gold Ltd
10	Seawright mining Co Ltd
11	Cheng Li Trading Mining Comp. (SL) Ltd
12	Kasino Mining Company
13	Kingho/Northern Mining Co
14	Kingho/CKH Mining Company
15	Kingho/Mass Energy Mining Co
16	Jong Minerals Company Ltd
17	Foison Resources Ltd
18	F.S. Mining (SL) Ltd
19	Leone Afric Metals
20	Metals & Minerals/Pan-African Rare Metal
21	Sunshine Resources (SL) Ltd

The table below shows that two and five mining companies did not submit their RTs for the years 2022 and 2023 respectively.

TABLE 8: DETAILS OF NON-COMPLIANT COMPANIES (2022)

N°	Non-compliant Company	Payments (US$)	% to the total
1	Gold Lion Mining Company	700,982	2.03%
2	Afro-Asia Mining Corporation	489,632	1.42%
	Total	**34,504,276**	**3.45%**

TABLE 9: DETAILS OF NON-COMPLIANT COMPANIES (2023)

N°	Non-compliant Company	Payments (US$)	% to the total
1	Foison Resources Ltd	626,387	1.53%
2	Leone Afric Metals	624,716	1.52%
3	Afro-Asia Mining Corporation	523,647	1.28%
4	Sunshine Resources (SL) Ltd	303,687	0.74%
5	Gold Lion Mining Company	198,714	0.48%
	Total	**40,996,121**	**5.55%**

Assessment of the comprehensiveness

Based on above, we can confirm that both financial and non-financial data included in the SLEITI report for 2022 and 2023 is **comprehensive**.

i. Data quality and assurance

Government agencies

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

- co-signed by an authorised senior manager and the finance/tax officer; and
- certified by the Auditor General of Sierra Leone who should submit a report confirming that the figures and information reported in the government agencies' RTs are in accordance with instructions issued by SLEITI MSG, are comprehensive and agree with the government accounts for the years 2022 and 2023.

NMA,[5] PD-SL, NRA, MMMR and EPA-SL submitted signed and certified RTs by ASSL.

Additionally, we received only parts of the subnational agencies' (district councils and chiefdoms) RTs, signed by an authorised senior manager and the finance/tax officer, and certified by ASSL.

Assessment of the data quality of government agencies

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

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

Although MMMR and some of the sub-national agencies did not submit their signed and certified RTs, we can conclude that the data disclosed by government agencies was of high quality. Their

[5] Excluding the production and export figures.

contribution is less than 5% of the total government extractive revenues in 2022 and 2023, as detailed in section 1.3.c above.

Extractive companies

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

- co-signed by an authorised senior manager and the finance/tax officer;
- certified by an external auditor who should confirm that the figures and information included in the RTs are in accordance with instructions issued by SLEITI MSG, comprehensive and agree with the company's accounts for the FYs 2022 and 2023; and
- accompanied by the company audited financial statements for the years 2022 and 2023 in order to compare the information reported in their RTs against those of the audited financial statements.

Assessment of the data quality of extractive companies

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

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

The tables below provide the compliance status of each in-scope company for 2022 and 2023.

TABLE 10: DATA COMPLETENESS AND ASSURANCE COMPLIANCE BY MINING COMPANY (2022)

N°	Company	RTs (Excel)	BO declaration form	Legal ownership	RTs (Certified)	Audited financial statements	Status
1	Gold Lion Mining Company	No	No	No	No	No	Non-compliant
2	Afro-Asia mining Corporation	No	No	No	No	No	Non-compliant
3	Seawright mining Co Ltd	Yes	No	No	No	No	Partly compliant
4	Newfield/Sierra Diamond	Yes	Yes	Yes	No	No	Partly compliant
5	Tonguma Ltd	Yes	Yes	Yes	No	No	Partly compliant
6	Kingho Rail and Port	Yes	Yes	Yes	Yes	No	Mostly compliant
7	Kingho Mining Company Ltd	Yes	Yes	Yes	Yes	No	Mostly compliant
8	Sierra Rutile Ltd	Yes	Yes	Yes	Yes	No	Mostly compliant
9	FG Gold Ltd	Yes	No	Yes	Yes	Yes	Mostly compliant
10	Cheng Li Trading Mining Comp. (SL) Ltd	Yes	Yes	Yes	Yes	No	Mostly compliant
11	Kingho / Northern Mining Co	Yes	Yes	Yes	Yes	No	Mostly compliant
12	Kingho/CKH Mining Company	Yes	Yes	Yes	Yes	No	Mostly compliant
13	Kingho/Mass Energy Mining Co	Yes	Yes	Yes	Yes	No	Mostly compliant
14	CTC Mining (SL) Ltd	Yes	Yes	Yes	Yes	Yes	Compliant
15	Koidu Ltd	Yes	Yes	Yes	Yes	Yes	Compliant
16	Marampa Mines Ltd	Yes	Yes	Yes	Yes	Yes	Compliant
17	Meya Mining	Yes	Yes	Yes	Yes	Yes	Compliant
18	Kasino Mining Company	Yes	Yes	Yes	Yes	Yes	Compliant

Table 11: Data Completeness and Assurance Compliance by mining company (2023)

N°	Company	RTs (Excel)	BO declaration form	Legal ownership	RTs (Certified)	Audited Financial Statements	Status
1	Gold Lion Mining Company	No	No	No	No	No	Non-complaint
2	Afro-Asia mining Corporation	No	No	No	No	No	Non-complaint
3	Foison Resources Ltd	No	No	No	No	No	Non-complaint
4	Leone Afric Metals	No	No	No	No	No	Non-complaint
5	Sunshine Resources (SL) Ltd	No	No	No	No	No	Non-complaint
6	Seawright mining Co Ltd	Yes	No	No	No	No	Partly compliant
7	F.S. Mining (SL) Ltd	Yes	No	No	No	No	Partly compliant
8	Metals & Minerals/Pan-African Rare Metal	Yes	No	No	Yes	No	Partly compliant
9	Kingho Mining Company Ltd	Yes	Yes	Yes	Yes	No	Mostly compliant
10	Sierra Rutile Ltd	Yes	Yes	Yes	Yes	No	Mostly compliant
11	FG Gold Ltd	Yes	No	Yes	Yes	Yes	Mostly compliant
12	Cheng Li Trading Mining Comp. (SL) Ltd	Yes	Yes	Yes	Yes	No	Mostly compliant
13	Kingho /Northern Mining Co	Yes	Yes	Yes	Yes	No	Mostly compliant
14	Kingho /CKH Mining Company	Yes	Yes	Yes	Yes	No	Mostly compliant
15	Kingho /Mass Energy Mining Co	Yes	Yes	Yes	Yes	No	Mostly compliant
16	CTC Mining (SL) Ltd	Yes	Yes	Yes	Yes	Yes	Compliant
17	Koidu Ltd	Yes	Yes	Yes	Yes	Yes	Compliant
18	Marampa Mines Ltd	Yes	Yes	Yes	Yes	Yes	Compliant
19	Meya Mining	Yes	Yes	Yes	Yes	Yes	Compliant
20	Kasino Mining Company	Yes	Yes	Yes	Yes	Yes	Compliant
21	Jong Minerals Company Ltd	Yes	Yes	Yes	Yes	Yes	Compliant

The contribution of non-compliant mining companies represents 3.45% and 5.55% of total government extractive revenues in 2022 and 2023 respectively. This indicates high-quality data reported by extractive companies in 2022 and medium-quality data in 2023.

Assessment of the overall data quality and assurance

The assessment the overall data quality and assurance of the SLEITI report for the years 2022 and 2023 is based on a combination between the assessment of data quality for both government agencies and extractive companies as set out in the table below.

		Extractive companies		
		High data quality	*Medium data quality*	*Low data quality*
Government Agencies	*High data quality*	High data quality	High data quality	Medium data quality
	Medium data quality	Medium data quality	Medium data quality	Low data quality
	Low data quality	Medium data quality	Low data quality	Low data quality

Given the high quality of data reported by government agencies in both 2022 and 2023, and the high-quality data from extractive companies in 2022, along with medium-quality data from extractive companies in 2023, we can conclude the high quality of the overall data included in the SLEITI report for the years 2022 and 2023.

1.4. Findings and Recommendations

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

These recommendations are summarised in the following table:

TABLE 12: SUMMARY OF RECOMMENDATIONS

N°	Recommandations
1	Updating data on the contribution of the informal mining sector (EITI Requirement 6.3)
2	Public disclosure of beneficial ownership information (EITI Requirement 2.5)
3	Improving the traceability and management of sub-national transfers (EITI Requirement 5.2)
4	Enhancing the licensing award process (EITI Requirement 2.2)
5	Improving the accuracy of production data (EITI Requirement 3.2)
6	Improving the accuracy of export data (EITI Requirement 3.3)

These recommendations are detailed in Section 6.1 of the report.

Section 6.2 of this report shows the progress the SLEITI MSG made towards the implementation of the previous IA recommendations.

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30 December 2024

2. APPROACH AND METHODOLOGY

The EITI reporting process consisted of the following steps:

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

2.1. Scoping Study

In accordance with our terms of reference, we carried out a scoping study and reported to SLEITI on matters which should be considered in determining the scope of the 2022-2023 report, including:

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

During the data collection phase, we were able to obtain an understanding of the regulatory and fiscal frameworks of the extractive sector, the revenue collection process and any key events that occurred in 2022-2023.

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

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

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

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

To conduct the preliminary analysis, we performed the following:

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

2.2. Data Collection

We developed instructions, including RTs and reporting guidelines, requesting extractive companies and government agencies to report all required data. The reporting package, including RTs and the instructions for their completion, was sent electronically to the stakeholders on 14th October 2024, who were given two weeks to fill in the RTs.

Extractive companies and government agencies were required to report directly to the IA, to whom they were also requested to direct any queries about the RTs.

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

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

2.3. Reliability and Certification of Data Reported

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

Extractive companies

The RTs should be:

- co-signed by an authorised senior manager and the finance/tax officer.
- certified by an external auditor who should confirm that the figures and information included in the RTs are in accordance with instructions issued by SLEITI MSG, comprehensive and agree with the company's accounts for 2022 and 2023; and
- accompanied by the company audited financial statements for 2022 and 2023 in order to compare information reported in their RTs against those of the audited financial statements.

Government agencies

The RTs should be:

- co-signed by an authorised senior manager and the finance/tax officer; and
- certified by the Auditor General of Audit Service Sierra Leone (ASSL) who should submit a report confirming that the figures and information reported in the Government Agencies' RTs are in accordance with instructions issued by SLEITI MSG, are comprehensive and agree with the government accounts for 2022 and 2023.

2.4. Accounting Records

The data collection was carried out on a cash basis. Accordingly, any payment made prior to 1 January 2022 has been excluded. The same applies to any payments made after 31 December 2023.

2.5. Government Agencies

In respect of government agencies, care has been taken to ensure that amounts shown on the "Payment/Receipt Report" include all receipts collected in 2022-2023 irrespective of whether the receipt was allocated in the government agencies' records against amounts due in a previous or subsequent financial year.

3. SCOPE OF THE SLEITI REPORT

For more information on the scope, please read the inception report for the 2022 and 2023 years that is available on SLEITI's website.

3.1. Reporting Periods

The SLEITI process covers two extractive sectors in Sierra Leone: mining and oil & gas. To date eleven (11) EITI Reports have been published covering the period from 1 January 2006 until 31 December 2021.

This twelfth EITI Report is for the years 2022 and 2023 and covers the periods:

- 1 January 2022 to 31 December 2022; and
- 1 January 2023 to 31 December 2023.

3.2. Level of Disaggregation

Requirement 4.7 of the 2023 EITI Standard states that: 'It is required that EITI data is disaggregated by individual project, by company, by government agency and by revenue stream.

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

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

TABLE 13: LIST OF SPECIFIC REVENUE STREAMS

Revenue stream	Government agencies
Mineral resources royalty	NRA
Mining license	NRA
Corporate tax	NRA
Diamond & Gold export duties	NRA
Exploration license	NRA
Environmental license fee	EPA-SL
Environmental monitoring fee	EPA-SL

3.3. Government Agencies

The SLEITI MSG agreed that seven (7) Government agencies would be required to disclose the revenues received from extractive companies, contextual data related the exploration, production, exports, state participation, infrastructure provisions and barter agreements, environmental and social expenditure, and employment as required by the EITI Standard.

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

TABLE 14 : LIST OF IN-SCOPE GOVERNMENT AGENCIES

N°	Government Agency
1	National Revenue Authority (NRA)
2	National Minerals Agency (NMA)[6]
3	Ministry of Mines & Mineral Resources (MMMR)
4	Petroleum Directorate (PD-SL)
5	Environmental Protection Agency (EPA-SL)
6	District Councils / City Councils
7	Chiefdom Administrations

The SLEITI MSG agreed that these ten government agencies were required to submit individual RTs for each mining company that paid **US$ 200,000** and above during the fiscal years 2022 and 2023. Accordingly, government agencies were invited to submit separate RTs for 19 and 21 in-scope mining companies respectively for the years 2022 and 2023 as presented in the section 3.4.a below.

For the remaining mining companies which contributed below the materiality threshold, the government agencies were required to submit one RT including all revenues received from those companies.

3.4. Extractive Companies

a. Mining sector

The SLEITI MSG agreed that the mining companies that held an active mining license which paid US$ 200,000[7] and above during the years 2022 and 2023 should disclose the following information:

- Payments to the Government including surface rental payments to landowners and paramount chiefs;
- legal ownership;
- beneficial ownership (BO);
- exploration;
- production;
- exports;
- state participation;
- infrastructure provisions and barter agreements;
- environmental and social expenditure;
- employment; and
- additional information required by the EITI 2023 standard.

[6] Including the Directorate of Precious Minerals Trading (PMT).
[7] During the scoping phase, it was noted that companies holding active mining license and having made payments over US$ 200,000 contributed 87% and 91% to the total Government extractive revenues in 2022 and 2023 respectively.

Accordingly, 18 and 21 mining companies were invited to submit their RTs respectively for the years 2022 and 2023 as presented in the tables below.

TABLE 15: LIST OF IN-SCOPE COMPANIES FOR LIMITED DISCLOSURE IN 2022

N°	Company	N°	Company
1	Tonguma Ltd	10	Gold Lion Mining Company
2	Newfield/Sierra Diamonds Ltd	11	Afro-Asia mining Corporation
3	Kingho Rail and Port	12	FG Gold Ltd
4	Koidu Ltd	13	Seawright mining Co Ltd
5	Marampa Mines Ltd	14	Cheng Li Trading Mining Comp. (SL) Ltd
6	Kingho Mining Company Ltd	15	Kasino Mining Company
7	Sierra Rutile Ltd	16	Kingho/Northern Mining Co
8	CTC MINING (SL) Ltd	17	Kingho/CKH Mining Company
9	Meya Mining	18	Kingho/Mass Energy Mining Co

TABLE 16: LIST OF IN-SCOPE COMPANIES FOR LIMITED DISCLOSURE IN 2023

N°	Company	N°	Company
1	Koidu Limited	12	Kasino Mining Company
2	Marampa Mines Ltd	13	Kingho/Northern Mining Co
3	Kingho Mining Company Ltd	14	Kingho/CKH Mining Company
4	Sierra Rutile Ltd	15	Kingho/Mass Energy Mining Co
5	CTC MINING (SL) Ltd	16	Jong Minerals Company Limited
6	Meya Mining	17	Foison Resources Ltd
7	Gold Lion Mining Company	18	F.S. Mining (SL) Ltd
8	Afro-Asia mining Corporation	19	Leone Afric Metals
9	FG Gold Limited	20	Metals & Minerals/Pan-African Rare Metal
10	Seawright mining Co Ltd	21	Sunshine Resources (SL) Ltd
11	Cheng Li Trading Mining Comp. (SL) Ltd		

b. Oil and gas sector

The government agencies did not report any revenues from oil and gas companies during 2022 and 2023.

The Petroleum Directorate of Sierra Leone (PD-SL) confirmed that, as of December 2023, only two (2) companies held active oil and gas licenses in Sierra Leone, one registered in 2022 and another in 2023. The MSG Technical committee concluded that the exploration fees from these companies should not be classified as extractive revenue.

The exploration fees reported by the PD-SL for the year 2023 are detailed below:

TABLE 17: PETROLEUM EXPLORATION FEES REPORTED BY THE PD-SL IN 2023

Company	Revenue stream	Amount (US$)	Amount (Le)
TGS ASA	Sale of geophysical data	1,463,387	27,712,943
Innoson Oil & Gas	Surface rent	241,052	5,072,358
Innoson Oil & Gas	Corporate social responsibility	99,999	2,104,246
Innoson Oil & Gas	Training funds	89,999	1,893,812
Total		**1,894,437**	**36,783,359**

3.5. Revenue Streams

In order to ensure consistent and comprehensive disclosures, the SLEITI MSG agreed to keep the list of revenue streams included in the 2020-21 EITI Report for the 2022-23 Report.

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

TABLE 18: IN-SCOPE REVENUE STREAMS FOR THE 2022 AND 2023 SLEITI REPORT

N°	Revenue stream	Government agency
1	Royalty	NRA
2	Mining license	NRA
3	Corporate tax	NRA
4	Import and export duties	NRA
5	Exploration license	NRA
6	Diamond & gold exporters licence	NRA
7	PAYE	NRA
8	W/H 5% contract	NRA
9	Diamond & gold export duties	NMA/NRA
10	Environmental licence fee	EPA
11	Environmental monitoring fee	EPA
12	Surface rent	District Councils Chiefdom Councils Members of Parliament (MPs) MLGCA

3.6. Other Information in line with the EITI Standard

The SLEITI MSG agreed that the following information should be included in the scope of the 2022-2023 SLEITI report as required by the EITI Standard:

- Legal framework and fiscal regime (EITI requirement 2.1);
- Contract and license allocations (requirement 2.2);
- Register of licenses (EITI requirement 2.3);
- Government's policy on disclosure of contracts and licenses (EITI requirement 2.4);
- Beneficial ownership (EITI requirement 2.5);
- State participation in the extractive industries (EITI requirement 2.6);
- An overview of the extractive industries, including any significant exploration activities (EITI requirement 3.1);
- Production data (EITI requirement 3.2);
- Export data (EITI requirement 3.3);
- Infrastructure provisions and barter arrangements (EITI requirement 4.3)
- Transportation revenues (requirement 4.4);
- Environmental expenditure by extractive companies (EITI requirement 6.1);
- Subnational payments (EITI requirement 4.6);
- Sub-national transfers (EITI requirement 5.2);
- Social expenditure by extractive companies (EITI requirement 6.1);

- Quasi-fiscal expenditure (EITI requirement 6.2);
- Distribution of revenues from the extractive industries (EITI requirement 5.1); and
- Contribution of the extractive industries to the economy (EITI requirement 6.3).

3.7. Additional disclosure in 2022-2023 SLEITI Report

The SLEITI MSG agreed to include in the scope of the report and to the extent possible the following additional information, in accordance with the new requirements of the EITI Standard:

TABLE 19: ADDITIONAL DISCLOSURE

Topic	Additional disclosure in 2022-23 SLEITI Report
Energy transition	An assessment of the implications of the transition to cleaner energy in the extractive sector and the actions already taken. This includes contextual and financial data on the impact of carbon pricing on revenues or commodity prices as well as the carbon price assumptions of operating companies in Sierra Leone.
Corruption risks	An assessment of the corruption index for Sierra Leone and the measures taken from the GoSL to mitigate this risk. An overview of the relevant laws and regulations, including laws related to preventing corruption in the extractive sector as well as collecting anti-corruption policies from in-scope companies.
Gender equality	An assessment of the gender parity and the measures taken from the GoSL towards gender equality.
Environmental impact of extractive activities	Using the Sierra Leone's Updated Nationally Determined Contribution (NDC) of July 2022 to the UNFCCC as a basis, we reviewed progress of SL NDC commitments including efforts to "ensure reclamation of mine out areas by extractive industries through a progressive rehabilitation and address legacy environmental issues in the mining sector".

4. CONTEXTUAL INFORMATION ON THE EXTRACTIVE SECTORS

4.1. Mining Sector

a. General context of the mining sector

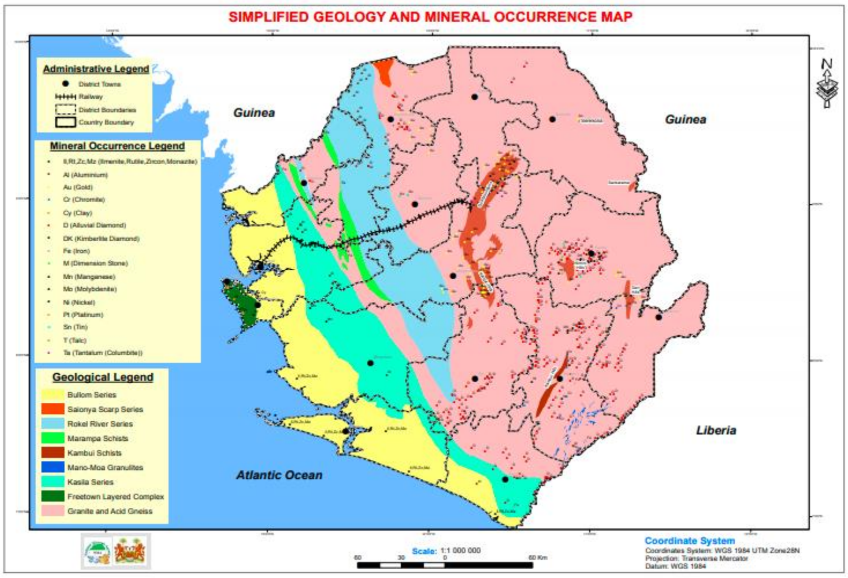
Sierra Leone is rich in natural resources and, in particular, minerals which include diamonds, rutile, bauxite, gold, iron ore, limonite, platinum, chromite, coltan, tantalite, columbite and zircon. In the 1990s, the 11-year civil war funded with revenues from the minerals sector engulfed the country,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

The GoSL set up the National Minerals Agency under the Ministry of Mines and Mineral Resources in 2012 with a mandate to implement clear policies and regulations, enhance transparency and accountability and ensure mineral resources support economic and social development. Sierra Leone became a member of the Kimberley Process in 2003 to protect the legitimate trade in rough diamonds, and in 2007 enacted the Diamond Cutting and Polishing Bill to issue licenses entitling the holder to buy, deal in, export, import as well as cut, polish, crush and set diamonds for the purposes of trade.[8]

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

Apart from iron ore, the country has proven deposits of bauxite, chromite, diamonds, gold, platinum and rutile with several foreign operators already involved in most of these sub-sectors. All operators are being challenged by current adverse world supply and demand conditions, and it is highly likely that these conditions will persist for the foreseeable future.[9]

FIGURE 8: GEOLOGY AND MINERAL OCCURRENCE MAP[10]



[8] https://www.trade.gov/country-commercial-guides/sierra-leone-mining-and-mineral-resources
[9] http://documents1.worldbank.org/curated/zh/272761511578835426/pdf/SIERRA-LEONE-PAD-11032017.pdf
[10] Source: National Minerals Agency (NMA).

Diamonds

Sierra Leone is known for its rich diamond deposits and has been one of the world's prominent sources of high-quality diamonds.

Sierra Leone's diamond mining sector is primarily concentrated in the eastern and southern provinces, where major mining operations, both large scale and artisanal, extract diamonds.

Sierra Leone is the world's eighth-largest producer of diamonds in 2023, with output up by 10% on 2022. Over the five years to 2022, production from Sierra Leone increased by a CAGR of 4% and is expected to rise by a CAGR of 10% between 2023 and 2027.[11]

Gold

Gold in Sierra Leone is an important and growing sector of the country's mining industry. Gold deposits are primarily found in the eastern and southern parts of the country, particularly in regions such as Kono, Tonkolili, and Kenema.

The gold industry in Sierra Leone is characterized by both small-scale artisanal mining and larger commercial operations. Artisanal miners, often working with rudimentary tools, make up a significant portion of gold extraction in the country.

In 2022, Sierra Leone exported US$ 5.44 million in gold, making it the 136th largest exporter of gold in the world.[12]

Iron ore

Iron ore is one of Sierra Leone's most important natural resources and a key export product for the country. The country has significant iron ore deposits, and the sector has historically contributed to the economy.

Iron ore mining in Sierra Leone is primarily concentrated in the northern and eastern regions of the country. The most significant iron ore deposits are located in Tonkolili District in the Northern Province, which is home to one of the largest iron ore mines, the Tonkolili mine. The Marampa mine, located in the Northern Province as well, is another key site. In addition, Bumbuna, in the northern region, is known for its potential iron ore resources. There are also exploration activities in the Kailahun and Kono districts, both in the eastern part of the country.

In 2022, Sierra Leone exported US$ 477 million in iron ore, making it the 18th largest exporter of iron ore in the world. In the same year, iron ore was the most exported product in Sierra Leone.[13]

Bauxite

Sierra Leone has significant bauxite deposits, particularly in the southern and eastern regions of the country. Bauxite is a key raw material used in the production of aluminium, and Sierra Leone's bauxite industry plays an important role in its mining sector.

Key locations for bauxite deposits include Bonthe District in the southern region, which is home to some of the largest bauxite mining operations in Sierra Leone. The Pujehun District, also in the south, contains significant bauxite reserves, with active mining taking place. Additionally, Kailahun District in the eastern region has notable bauxite resources, contributing to the country's overall production. These areas form the core of Sierra Leone's bauxite industry.

[11] https://www.mining-technology.com/data-insights/diamond-in-sierra-leone/
[12] https://oec.world/en/profile/bilateral-product/gold/reporter/sle
[13] https://oec.world/en/profile/bilateral-product/iron-ore/reporter/sle

Bauxite mining in Sierra Leone is predominantly carried out by large-scale operations. The country is a key exporter of bauxite, with demand driven by the global aluminium industry.

Sierra Leone was the world's tenth largest producer of bauxite in 2023, with production increasing by 5% from 2022. Over the five years to 2022, Sierra Leone's production declined at a Compound Annual Growth Rate (CAGR) of 17.22% and is expected to increase at a CAGR of 3% between 2023 and 2027.[14]

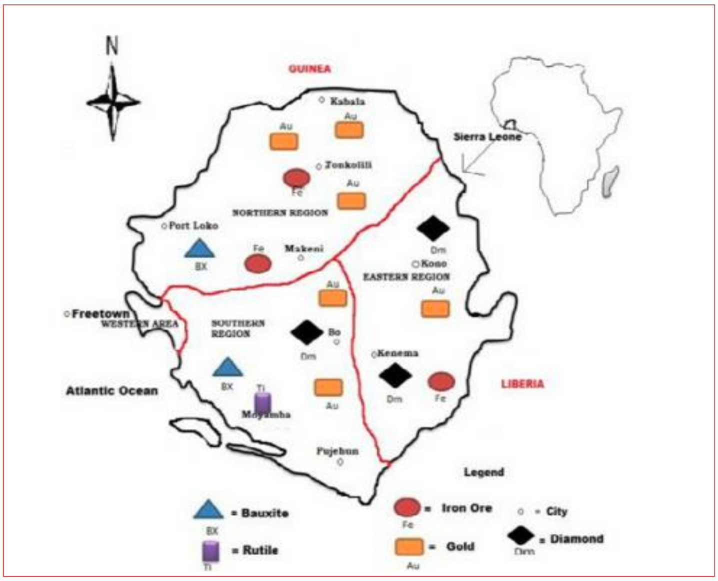
Rutile

Sierra Leone is one of the world's leading producers of rutile, a mineral that is primarily used in the production of titanium dioxide, which is found in products like paints, plastics, and sunscreen. The country is rich in rutile deposits, particularly in the southern and eastern regions, and its rutile mining industry plays a significant role in the country's economy.

One of the key locations is Bonthe District, which is home to some of Sierra Leone's largest rutile deposits and major mining operations, particularly through Sierra Rutile Limited. In addition, Kenema District in the east is another significant area for rutile extraction and smaller deposits are also found in the Tonkolili District in the north and the Masiaka in Western area.

Sierra Rutile Limited is one of the world's largest natural rutile producers. The company ships its standard grade rutile (SGR) product direct to major customers globally and stores industrial grade rutile (IGR) at its warehouse in Amsterdam for sale to a wide range of welding customers.[15]

FIGURE 9: MINERAL DEPOSITS MAP



b. Exploration activities

Overview

In 2018, GoSL launched a countrywide airborne geophysical survey. This survey, which forms a vital component of the NMA's strategy to encourage investment in the minerals sector, was completed in December 2021.

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

[14] https://www.mining-technology.com/data-insights/bauxite-in-sierra-leone/
[15] https://sierra-rutile.com/our-company/

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

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

During the geochemical mapping orientation survey, 57 stream sediments, 63 pan (heavy mineral concentrate) and 34 bulk samples were collected from 58 sampling sites across the various lithological units. Sediments and bulk samples were sun-dried at the NMA laboratory, and all pan concentrates were oven-dried. Sample preparation was undertaken by the BGS and NMA geologists and technicians at the NMA laboratory in June 2019. All samples were dispatched to ALS Laboratories in South Africa in November 2019 for multi-elemental analysis.[16]

This geophysical survey, funded by the World Bank and conducted by Xcalibur Airborne Geophysics, covered the entire country using advanced magnetic and radiometric technology. The data collected, totalling over 547,000 line kilometers, is among the most detailed and high-resolution geophysical datasets globally. The primary goal is to integrate this information with geological and geochemical data to improve the assessment of Sierra Leone's mineral resources and attract credible investments into the mining sector.[17]

NMA is currently working to implement the Enterprise Geoscientific Information Management System (eGIMS), a digital platform aimed at centralising geological, geophysical, and geochemical data. This system is part of efforts to modernise resource management, improve transparency, and attract investment in the mining sector. Expected to be operational soon, eGIMS will provide stakeholders with accessible and detailed data for exploration and policy development.[18]

[16] Source: National Minerals Agency.
[17] https://www.nma.gov.sl/sierra-leone-completes-first-phase-of-countrywide-airborne-geophysical-survey/
[18] https://www.nma.gov.sl/geodata-information-services/

Main on-going mining projects

We present in the table below the main on-going mining projects in Sierra Leone:

TABLE 20: MAIN ON-GOING MINING PROJECTS [19]

Project	Commodity	Location	Company	Description
Lanti and Gangama Rutile mine Project	Rutile	Bonthe and Moyamba Districts	Sierra Rutile Ltd	The company has the world's largest natural rutile deposit and encompasses two operations at Lanti and Gangama; a mineral separation plant; and a dedicated port facility. Sierra Rutile's main product stream is natural rutile and the operation also produces smaller quantities of ilmenite and zircon (in concentrate). Sierra Rutile has an established operating history of more than 50 years and further mine life of at least 20 years, depending on future development options. The Lanti Dry expansion and the Gangama expansion increased the capacity of each mine from 500-600 tonnes per hour of ore to 1,000-1,200 tonnes per hour.[20]
Koidu Kimberlite Project	Diamond	Kono District	Koidu Ltd	The Koidu Kimberlite Project is situated in the Kono District of Sierra Leone, approximately 330 km east of the capital city, Freetown. The mining lease area is 4km^2 and comprises two kimberlite pipes, four dyke zones and a number of blows off the dykes. In 2003, Koidu Holdings set up operations on the property and began dewatering and removing silt from the existing 30m excavation of the No.1 Pipe. While the original planning for the pipes included conventional open pit operations, mitigating factors such as the proximity of the town, the presence of houses close to the perimeter of the pit, the size of the kimberlite pipe and the planned open pit depth, combined with relevant stripping ratios and uncertainties on the grades concerning an underground operation, lent themselves to the vertical pit concept.[21]
Gondama Project	Bauxite	Moyamba, Bo and Bothe Districts	Sierra Minerals Holdings No.1 Ltd	The Gondama Project, operated by Sierra Mineral Holdings I Limited (SMHL), is a significant bauxite mining operation located in the Moyamba District of Sierra Leone. SMHL holds a mining lease covering 321.7 km^2 along the same geological belt as Guinea's renowned bauxite deposits. The company has been a reputable large-scale bauxite producer in Sierra Leone, contributing substantially to the local economy and community development. In May 2024, SMHL announced plans to temporarily cease operations at the Gondama site to focus on constructing a new site in Mokanji, also in the Moyamba District. This transition led to the redundancy of 162 out of 398 staff members, with some employees placed on administrative leave with partial salaries. The company committed to complying with Sierra Leone's labor laws regarding redundancy and assured that funds were available to compensate affected workers[22].
Marampa iron ore mine project	Iron Ore	Port Loko District	SL Mining Ltd	The Marampa iron ore deposits have been traced as far as Kukuna near the Guinea border and to the south at Toma and Makalawa.

[19] SLEITI | Overview of the Extractive Industries in Sierra Leone
[20] https://iluka.com/operations-resource-development/operations/sierra-leone
[21] https://www.srk.com/en/publications/koidu-vertical-pit-sierra-leone
[22] https://ayvnews.com/sierra-mineral-holdings-to-redundant-162-of-398-staff/?utm_source=chatgpt.com

Project	Commodity	Location	Company	Description
				Located in the Port Loko District, in the country's north, SL Mining is engaged in the exploration, development and production of a high-grade iron ore concentrate with >65% Fe content. The company estimates that Marampa holds about 1 billion tonnes of iron ore with a potential lifespan of 30 years.
Masumbiri Gold project	Gold	Tonkolili District	Dayu Mining Company	Dayu Mining, which operates the country's largest gold mine, has started mining gold concentrate in Masumbiri, Simiria chiefdom.[23]
Baomahun Gold Project[24]	Gold	Bo and Tonkolili Districts	FG Gold Ltd	The Baomahun Gold Project is set to become Sierra Leone's first large scale commercial gold mine. Covering a land area of 124.27km², Baomahun has a Joint Ore Reserves Committee (JORC) certified resource of 5.81Moz of gold across both open pit and underground mining, making it one of the largest gold development projects in Africa. With all mining permits and environmental licenses granted, the project is currently in construction phase with first gold pour set for 2025. The project is situated approximately 200km east of the capital Freetown, in the Valunia and Kunike Barina Chiefdoms in the Bo and Tonkolili Districts respectively.

Major changes in the exploration activities

The financial statements of the company 'Sierra Rutile Limited' for the FY 2023 show that the GoSL notified the company in January 2024 of their intention to ratify the fiscal arrangements with the company and that might result in an amended agreement. The company estimates that the proposed arrangements would render Area 1 uneconomic and therefore issued a suspension notice covering the area that took effect starting from 11 March 2024, highlighting the difficulty it faces to draw ongoing strategic, capital or investment decisions due to the 'material uncertainty' related to the fiscal regime, and therefore the ability of the company to continue as a going concern that is conditioned to the factors below:

- the successful and timely resolution of negotiations with GoSL resulting in only a limited suspension in operations;
- no or limited interruption of power supply to area 1 operations during next 12 months;
- achieving production volumes and costs in compliance to budgetary provisions; and
- no further decline in market prices or conditions impacting the company and its shareholders' ability to achieve forecast sales volumes and prices.

[23] http://www.mercuryconvention.org/Portals/11/documents/NAP/Sierra-Leone-ASGM-NAP-2020.pdf
[24] https://fggoldmining.com/projects/baomahun-gold-project/

c. Legal Framework

Current legal framework

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

TABLE 21: MINING SECTOR LEGAL FRAMEWORK

Framework
Policies (including URL links)
The Sierra Leone Minerals Policy, 2018
The Geo-data Management Policy, 2018
The Artisanal Mining Policy, 2018
Legislative Instruments (including URL links)
Core Legal Instruments
The Mines and Minerals Development Act, 2023
The Mines and Minerals Development Regulations, 2023
The National Minerals Agency Act, 2023
The Sierra Leone Mines and Minerals Development and Management Corporation Act, 2023
The Sierra Leone Mines and Minerals Development Corporation (Allocated Minerals and Mineral-Related Assets) Regulations 2024
Environmental Instruments
Environment Agency Protection Act, 2022
The National Protected Area Authority and Conservation Trust Fund Act, 2012
Local Content Instruments
The Sierra Leone Local Content Agency Act, 2016
Other Related Instruments
The Customary land Right Act, 2022
The Local Government Act, 2021
The National Land Commission Act, 2022
Fiscal Instruments
The Extractive Industries Revenue Act, 2018
The Income Tax Act, 2000
The Finance Acts and their Amendments

Legal reforms in the mining sector

The Mines and Minerals Development Act (MMDA), 2023

The Mines and Minerals Development Act (MMDA), 2023 represents a major reform in Sierra Leone's mining sector, replacing the Mines and Minerals Act of 2009. It aims to address governance challenges, improve resource management, and ensure mining activities benefit citizens and the environment. Below is a summary of key changes:

- Role of the National Minerals Agency (NMA): NMA has been empowered with expanded oversight responsibilities under the MMDA, 2023. It will monitor compliance with environmental, health, safety, and licensing regulations, helping to ensure that mining operations align with national goals.
- Beneficial Ownership Transparency (BOT): The MMDA, 2023 mandates that mining companies disclose their beneficial ownership. It is required that the identities of natural person/s or beneficial owner/s with 5% or more shares in any company operating in the

mining sector in Sierra Leone should be disclosed. The Act further requires mandatory disclosure of Politically Exposed Persons.

- Environmental, Social, and Governance (ESG) standards in the mining sector. The Act mandates that mining companies conduct Environmental and Social Impact Assessments, implement Free, Prior, and Informed Consent (FPIC) with local communities, and ensure gender inclusion in land management. Mining companies are now also required to provide annual ESG reports, detailing their environmental and social performance. These reports must include information on the outcomes of ESIAs, the company's adherence to environmental laws, community engagement activities, and any contributions to local development projects.
- State Participation: GoSL to acquire 10% free carried interest in new companies registered to operate in the mining sector. The Sierra Leone Mines and Minerals Development and Management Corporation (MMMDC) to be created to allow greater state involvement in mining, ensuring that the government shares in the benefits of resource extraction.
- Community Development Fund (CDF): community mining companies must contribute not less than 1% of their annual revenue to support community development projects in mining-affected areas, including infrastructure, health, and education.
- Mining District Development Fund (MDDF): The Act established the MDDF to manage mining revenues for chiefdoms within mining districts not covered by community development agreements. Its funding is to be sourced from 20% of all mining royalties.
- Stronger Governance and Licensing: Competitive bidding for mining licenses is introduced, promoting fairness and transparency in the allocation of mining rights.
- Support for Artisanal and Small-Scale Mining (ASM): The Act provides a framework for formalising and supporting ASM operations through simplified licensing and training, promoting safer and more sustainable practices.
- Transparency in Reporting and Contracting: The Act introduces requirements for mining companies to publicly disclose contracts and agreements, including financial terms, ensuring that the public and government have access to key information.
- Sustainability and Resource Management: The Act emphasises the need for responsible mining practices that prioritize long-term environmental sustainability. Mining companies are required to set aside funds for environmental rehabilitation.

The Mines and Minerals Development Regulations, 2023

The Mines and Minerals Development Regulations, 2023 were introduced to operationalise the provisions of the MMDA, 2023 in Sierra Leone. These regulations focus on ensuring the effective implementation of the Act's goals by providing clear guidelines for:

- Environmental and Social Compliance: They mandate mining companies to conduct Environmental and Social Impact Assessments and engage local communities through Free, Prior, and Informed Consent (FPIC). They also promote gender inclusion in community decision-making processes, particularly ensuring at least 30% female representation in land management committees.
- ESG Reporting: Mining companies are required to submit annual Environmental, Social, and Governance (ESG) reports that cover environmental practices, social impacts, and contributions to local development.
- Transparency Measures: The regulations require mining companies to disclose beneficial ownership and provide detailed information on their financial dealings, environmental assessments, and the benefits delivered to affected communities.

- Community Development Contributions: The regulations enforce the commitment to allocate not less than 1% of mining revenues to support local development projects in mining-impacted areas.

The Mines and Minerals Development and Management Corporation (MMDMC) Act, 2023

The Sierra Leone Mines and Minerals Development and Management Corporation Act, 2023 establishes the Mines and Minerals Development and Management Corporation (MMDMC) with the purpose of managing and overseeing the development of the country's mineral resources.

As a statutory body with corporate legal status, MMDMC has perpetual succession, the ability to hold and dispose of property, and the capacity to sue or be sued in its own name. The Corporation is tasked with advancing Sierra Leone's mining sector by integrating state participation and fostering partnerships with the private sector.

The MMDMC will be governed by a board that is composed as follows:

- The Minister of Finance or his representative: Chairman;
- The Minister of Mines and Mineral Resources: Member;
- The Attorney General and Minister of Justice: Member;
- The Minister of Environment: Member;
- The Minister responsible for lands: Member;
- The Governor of the Bank of Sierra Leone: Member; and
- Three eminent persons of good repute and proven integrity, appointed by the President.

The Corporation's mandate is to manage mineral development on behalf of the Republic of Sierra Leone. Key functions include:

- Establishing project companies and managing state participation in mining ventures;
- Holding equity in mining entities both locally and internationally;
- Promoting, financing, and guaranteeing mining operations;
- Conducting research and development to identify mining opportunities;
- Entering into agreements and contracts to further its objectives; and
- Aligning with government policies and directives from the responsible Minister.

The SLMMDMC is currently building its operational capacity. While foundational structures such as governance frameworks and legal provisions are in place, the Corporation is in the process of fully scaling up activities, including finalising operational infrastructure, partnerships, and technical initiatives.

The National Minerals Agency (NMA) Act, 2023

The National Minerals Agency (NMA) Act, 2023 aims to ensure the continued operation of the NMA while enhancing its efficiency and effectiveness in regulating Sierra Leone's mineral sector. The Act provides a legal framework to improve the administration of the Agency and aligns with the MMDA, 2023. This includes reforms to streamline regulatory processes, enhance transparency, and foster sustainable management of the country's mineral resources.

Key aspects of the Act focus on strengthening governance mechanisms, improving compliance with industry standards, and enhancing the oversight of mining activities to ensure the benefits from the mineral sector are maximised for the country's development. The Act also includes provisions for the NMA's role in the implementation of policies and regulations in line with the broader framework of the MMDA, 2023.

The Sierra Leone Mines and Minerals Development Corporation (Allocated Minerals and Mineral-Related Assets) Regulations 2024

The Sierra Leone Mines and Minerals Development and Management Corporation (Allocated Minerals and Mineral-Related Assets) Regulations, 2024 aim to implement provisions outlined in the Sierra Leone MMDA Act, 2023. The regulations cover the allocation and management of mining and mineral-related assets on behalf of the government. This includes the development, exploration, and extraction of minerals, promoting sustainable economic benefits, and ensuring that such assets are effectively managed for the national interest.

The Sierra Leone Extractive Industries Transparency Initiative (SLEITI) bill[25]

The Sierra Leone Extractive Industries Transparency Initiative (SLEITI) bill, which is still under discussion, is designed to enhance transparency and accountability in the management of the country's natural resources. It aims to establish stronger regulations for disclosure in the mining, oil, and gas sectors, including contract transparency and beneficial ownership reporting. The bill would empower SLEITI to require companies to disclose detailed information about their contracts, payments to the government, and the receipt of those payments by authorities. It also includes provisions to ensure that mining agreements are accessible to the public, thereby addressing challenges related to the lack of access to contracts and other critical data.

In November 2023, a key stakeholder meeting in Freetown discussed the SLEITI bill. During the meeting, some issues were raised, including the need for transparent processes in the appointment of members to the Multi-Stakeholder Group (MSG) and the election of its chairperson. Additionally, stakeholders want to include industries such as forestry and fisheries in the scope of the bill, with a focus on logging, sand mining and marine life.

d. Institutional Framework

The mining sector is regulated by multiple institutions with clear mandates and responsibilities. These include responsibilities in allocation of rights, application of taxation, environmental management, export and imports of materials, finance related activities, among others. The Ministry of Mines and Mineral Resources (MMMR) and the National Minerals Agency (NMA) are the main government agencies responsible for the promotion and control of exploration and mining activities in Sierra Leone. However, several other institutions play other relevant roles in the regulation of the mining sector.

The key institutions involved in the administration of the mining sector in Sierra Leone are as follows:

TABLE 22: MINING SECTOR INSTITUTIONAL FRAMEWORK

Entity	Functions
MMMR	MMMR is responsible for policy making in the extractive sector. It oversees the issuance of all mineral rights and the administration and supervision of all activities under these rights and administers regulations on mining and marketing of precious minerals through the Precious Mineral Trading. Further information is available on their website on: https://www.slminerals.org/

[25] https://politicosl.com/articles/stakeholders-meet-evaluate-sierra-leones-extractives-draft-bill

Entity	Functions
NMA	NMA was set up in 2012 by the National Minerals Agency Act 2012. Its mandate is the administration and regulation of the minerals sector. It is responsible for the day-to-day implementation of the Mines and Minerals Development Act (2022) and other mining acts and other relevant regulations. This includes responsibility for mineral rights management, collecting and disseminating geological information and regulating the trading of precious minerals. It provides fairer and more predictable implementation of laws and regulations, which aims to encourage investment in the minerals sector. NMA also works closely with other government agencies with responsibilities in the sector such as the NRA and the EPA-SL to support them in implementing those policy areas for which they are responsible and impact upon the minerals sector. Further information is available on their website on: https://www.nma.gov.sl/
Mining Cadastre Office (MCO)	MCO is responsible for the management of the Mining Cadastre Administration System (MCAS) including: • the processing of mineral rights applications, the issuance and administration of licenses and permits; • the maintenance of cadastral records, registers, and maps; and • the receipt and safe keeping of reports in a non-discretionary and transparent manner in accordance with the laws of Sierra Leone. All applications, requests, and communications regarding a mining license and documents required to maintain and manage a license should be addressed to MCO directly. This Unit sits within the Directorate of Mines at NMA's Headquarters. Further information is available on their website on: https://www.nma.gov.sl/mining-cadastre-office/
Sierra Leone Mines and Minerals Development and Management Corporation (SL-MMDMC)	The SL-MMDMC was established following the Sierra Leone Mines and Minerals Development and Management Corporation Act (2023), whose objective is to hold shares or interest in an undertaking, enterprise or project associated with prospecting, exploration, mining of minerals and any other related and associated activities in or outside Sierra Leone, and hold and manage state participation interest under any license, lease, mining agreement, mining venture or projects in which the country is entitled to participate under the Mines and Minerals Development Act or any other Act.
Environmental Protection Agency - Sierra Leone (EPA-SL)	EPA-SL was created following the Environmental Protection Agency Act (2008) as amended in 2022. Its objective is to create and enforce strict regulatory framework for environmental regulation in Sierra Leone. Its mandate is to coordinate, monitor and evaluate the implementation of national environmental policies, programmers, and projects, including issuing Environmental Impact Assessment (EIA) licenses. It also effectively protects and manages the environment by monitoring and regulation of companies with EIA licenses. Additionally, EPA-SL investigates illegal operations that have an impact on the environment and advises the Minister of Environment and Climate Change on all environmental matters. Further information is available on their website on: https://epa.gov.sl/
National Revenue Authority (NRA)	NRA was set up by the National Revenue Act 2002 (Act No-11) in September 2002. It is responsible for assessing and collecting domestic taxes, customs duties and other revenues specified by law, as well as administering and enforcing laws related to these revenues. Further information is available on their website on: https://www.nra.gov.sl/
Ministry of Local Government and Community Affairs (MLGCA)	The Ministry of Local Government and Community Affairs is responsible for local government, which comprises six urban councils (Freetown, Bo, Kenema, Makeni, Koidu and Bonthe) and 16 district councils under the Local Government Act 2004. In the third sphere of Government, there are chiefdom councils. Local authorities and chiefdom councils have revenue-raising powers, and they impose levy property taxes and license fees for mining activities in host communities. Further information is available on their website on: https://mlgrd.gov.sl/
Chiefdoms and District Councils	The paramount chiefs and ruling families in the chiefdoms have been recognised and empowered by Sierra Leone's British Colonial Administration. All Chiefdoms have been constituted into district councils. These sub-national government agencies receive surface rentals from mining companies.

Entity	Functions
Members of Parliament	Parliament oversees the activities of the extractive sector in Sierra Leone. Members of Parliament who receive 10% surface rent from mining companies or more must disclose payments received from mining companies to the IA during the data collection phase.
Minerals Advisory Board	The Minerals Advisory Board advises the Minister in the discharge of his statutory responsibilities under the Mines and Minerals Act. In fact, the act restricts the wide range of discretionary powers the minister had under the previous legislation. The Board is made up of fourteen (14) members including the Director of Mines as Secretary and the Director of Geological Survey as member. The local Chamber of Mines is well represented on the Board with others from the industry and together, presents an informed voice of the industry in its deliberation. The Secretary to the Board is a senior member of the Ministry of Mineral Resources. Composition of the Minerals Advisory Board: • Chairman; • Director of Mines (Secretary of the Minerals Advisory Board); • Director of Geological Survey; • Commissioner-General of National Revenue Authority; • Representative of Attorney-General and Minister of Justice; • Representative of the Ministry responsible for local government; • Representatives of the Ministry of Environment and Climate Change; • The Permanent Secretary of the Ministry of Mines and Mineral Resources; and • Two persons with considerable qualifications and experience in the mining industry.[26]

e. Tax regime

The tax regime in the mining sector is governed by:

- the Income Tax Act, 2000 as amended by subsequent Finance Acts;
- the Mines and Minerals Development Act, 2023; and
- the Extractive Industries Revenue Act (EIRA), 2018.

The fiscal regime for the mining sector in Sierra Leone includes the following payment streams:

TABLE 23: MAIN PAYMENT STREAMS IN THE MINING SECTOR

Tax	Description
Royalties	The EIRA 2018 sets out the rates of royalty as follows: For minerals other than by artisanal mining licenses: ▪ 8% for special stones; ▪ 6.5% for precious stones other than special stones; ▪ 5% for precious metals; and ▪ 3% in other cases, including bulk minerals. 3% for minerals obtained pursuant to an artisanal mining license. Samples of minerals obtained for purposes of assay, analysis or other examination or testing are exempt from royalties, but royalties apply if a sample is sold.
Corporate income tax (CIT)	The CIT rate for mineral and petroleum operations is 25% on profits, as amended by the Financial Act 2022.
Mining license fees	In accordance with section 152 of the MMDA 2023, the annual charge in respect of mineral rights is payable to the Government by the holder of any mineral right. The annual charge payable pursuant is payable on the grant of a mineral right and thereafter annually on the anniversary of the grant until the termination of the mineral right.

[26] https://www.slminerals.org/structure-of-the-ministry/

Tax	Description
Surface rental	According to paragraph 36.A of the MMDA (2023) land lease or other rights to use land obtained by the holder of a large-scale mining license, shall be subject to surface rent which shall be distributed as follows: • 70% >> Landowners • 10% >> District Council • 10% >> Paramount Chiefs • 10% >> Constituency Development Fund This distribution replaces the old rates provided by the MMA (2009) that was as follows: ▪ 50% >> Landowners ▪ 15% >> District Council ▪ 15% >> Paramount Chiefs ▪ 10% >> Chiefdom Administration ▪ 10% >> Constituency Development Fund
Goods and services tax (GST)	The GST Act 2009 stipulates that a tax on the domestic consumption of imported and locally produced goods and/or services, is payable as a percentage of their value at the time they are imported, sold, exchanged, or delivered. From 01 September 2009, 15% GST is applicable on most goods and services (including imports) supplied in Sierra Leone for local use or benefit.
Withholding of tax by employers	According to the Income Tax Act 2000 as amended by subsequent Finance Acts, an employer shall withhold tax from employment income as instructed by the Commissioner: (a) in the case of an employee who is resident or temporarily resident in Sierra Leone, at the rates prescribed in Part I of the First Schedule; or (b) in the case of an employee who is not resident in Sierra Leone at the rate prescribed in Part II of the Second Schedule.
Capital gains tax (CGT)	CGT is a tax on gains, the profit realised on the sale of a non-inventory assets that was purchased at a cost that was lower than the amount realised on the sale. 30% of the capital gain acquired from the disposal of a chargeable asset is taxable.
Environmental license fee	License obtained after conducting environmental impact studies and approval by the EPA-SL Board. It is a pre-requisite for obtaining a mining license. Its payment is based on the Environmental Protection Act 2008 as amended in 2010.
Environmental monitoring fee	Amount levied to enable the EPA-SL to ensure compliance and enforcement.

Tax policy amendment

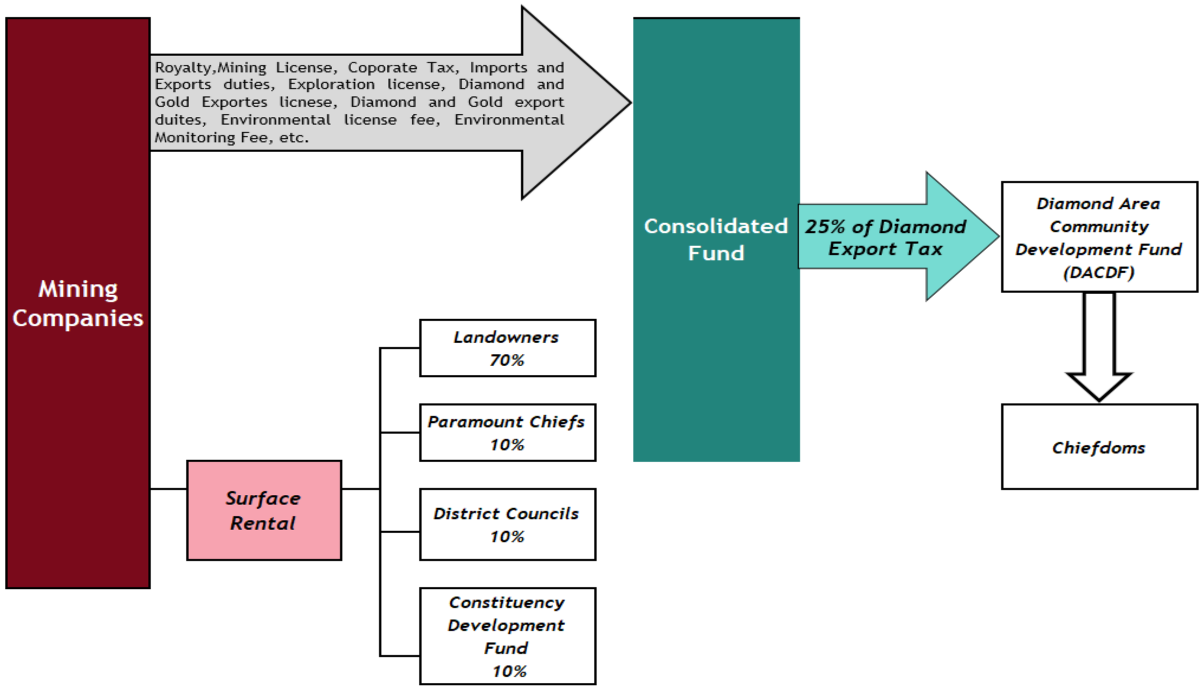
The Finance Act for the FY 2023 amended the royalty rates provided by the Extractive Industries Revenue Act (2018) and the FA 2022 amended the Corporate Income tax rate to 25%. According to the 2023 amendment, other precious metals, including gold are now subject to royalties at a rate of 1%.

In addition, the Finance Act for 2024 also stated new royalty rates for minerals obtained pursuant to an artisanal mining license, initially fixed at a rate of 3% notwithstanding the type of metal extracted, becoming as follows:3% for precious stones other than special stones;

- 8% for special stones;
- 1% for gold; and
- 3% for other cases, including bulk minerals.

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

FIGURE 10: MINING REVENUE COLLECTIONS FRAMEWORK



f. Types of licenses

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

TABLE 24: TYPES OF MINING LICENSES

Type	Duration	Rights conferred
Reconnaissance License	One year renewable once*	A reconnaissance license is the first stage in the mining enterprise entitles the holder to search for all minerals by geological, geophysical, and geochemical means. In general, reconnaissance licenses do not allow drilling, excavation, or other physical activities on the land, except where such activity is specifically mentioned by the license. A reconnaissance area shall not exceed 10,000 square kilometres.
Exploration License	Three years, renewable twice (for 2 years each)*	Exploration licenses which cover the second stage of mining operations entitle the holder to search for the stipulated minerals and to determine their extent and economic value. The size of the concession granted for the first 3 years is a maximum of 250 km^2. This size is halved (i.e. 125 km$^{2)}$ from the 4th year onwards. 90 days prior to the expiry of the exploration license, the holder shall apply for a small-scale, large-scale mining license or a combination of both without overlap.
Small Scale Mining License	Limited to four years, renewable over the commercial life of the deposit.	Between 50 and 200 hectares. The holder of a small-scale-mining license shall have the exclusive right to carry on exploration and mining operations in the licensed area.

Type	Duration	Rights conferred
Large Scale Mining License	Limited to 25 years renewable for a period limited to 15 years at each application over the commercial life of the deposit.*	The holder of a large-scale mining license shall have the exclusive right to carry on exploration and mining operations in the large-scale mining license area.
Artisanal Mining License	One year, renewable on an annual basis for the commercial life of the deposit.	An artisanal mining license area shall not be more than 2.5 acres. The holder of an artisanal license shall have the exclusive right to carry on exploration and mining operations in the licensed area.

Source: Mines and Minerals Development Act (MMDA, 2023 Act)

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

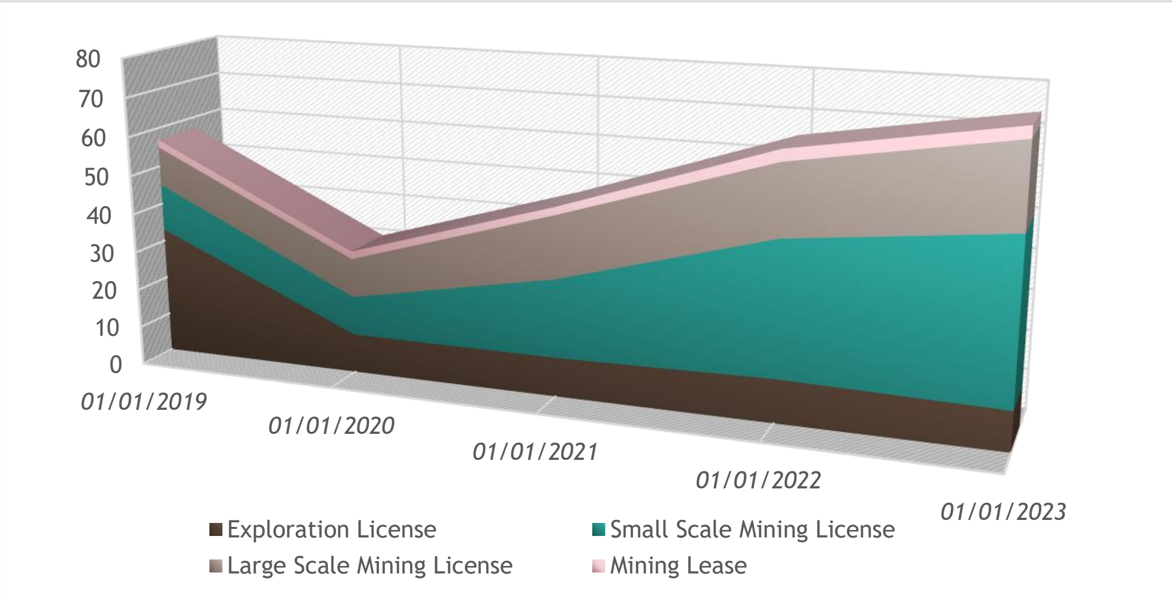
Active mining licenses on 31 December 2022-2023

The table and Figure below show the evolution of active mining licenses at the end of years 2019-2023 according to data provided by the NMA.

TABLE 25: EVOLUTION OF ACTIVE MINING LICENSES BETWEEN 2019 AND 2023

Type of License \ number	31/12/2019	31/12/2020	31/12/2021	31/12/2022	31/12/2023
Exploration License	33	10	10	11	10
Small Scale Mining License	12	10	20	34	41
Large Scale Mining License	10	10	16	18	21
Mining Lease	2	2	2	3	3
Total	**57**	**32**	**48**	**66**	**75**

FIGURE 11: EVOLUTION OF ACTIVE MINING LICENSES BETWEEN 2019 AND 2023



Artisanal Mining Licenses

The active artisanal mining licenses as of 31 December 2023 are detailed as follows:

TABLE 26: ACTIVE ARTISANAL MINING LICENSES

Mineral /District	Number as at 31 December 2023
Diamonds	**268**
Artisanal Mining License (Kono)	178
Artisanal Mining License (Kenema)	71
Artisanal Mining License (Bo)	15
Artisanal Mining License (Makeni)	4
Gold	**80**
Artisanal Mining License (Makeni)	57
Artisanal Mining License (Bo)	10
Artisanal Mining License (Kono)	8
Artisanal Mining License (Kenema)	5
Columbite	**4**
Artisanal Mining License (Kenema)	2
Artisanal Mining License (Makeni)	2
Total	**352**

Source: GoSL Online Repository portal

Mineral Dealers and Exporters Licenses

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

- Diamond or gold Exporter License;
- Diamond or Gold Exporter Agent; and
- Diamond or Gold Dealer Agent.

The active other mining licenses as of 31 December 2023 are detailed as follows:

TABLE 27: ACTIVE MINING DEALERS & EXPORTERS LICENSES

Type of License	Number as at 31 December 2023
Diamond Dealer Agent	10
Diamond Dealer License	14
Diamond Exporter Agent	9
Diamond Exporter License	4
Gold Dealer Agent	24
Gold Dealer License	31
Gold Exporter License	5
Total	**97**

Source: GoSL Online Repository portal

g. Mining Cadastre Office (MCO)

According to section 8 of the MMDA 2023 Act, the NMA shall establish and maintain a Mining Cadastre Office which shall be accessible to the Public.

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

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

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

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

h. Register of mining licenses

According to section 9 of the MMDA 2023 Act, the Mining Cadastre Office shall open and maintain for the purposes of this Act registers and a cadastral survey map, to be known collectively as the mining cadastre, comprising:

- the license applications;
- the cadastral survey map of mineral rights and mineral rights applications; and
- non-confidential reports and agreements submitted by past and present holders.

Section 9 (1§a) stipulates that the mining cadastre shall be in a digital format for registering and administering applications and licenses.

Sierra Leone has an online cadastre system, the Mining Cadastre Administration System (MCAS) which provides information on the following with the view to ensuring transparency in the management of minerals rights. This online repository of mining licenses contains data on all issued mineral rights, exploration, mining, as well as dealers and export licenses, related payments (type of license, license holder, license code, status active/non active, coordinates, start date, expiry date, application date, the commodity being produced, etc.).

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

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

The list of Small and Large-scale mining licenses is provided in Annex 1 to this Report.

The list contains the following information:

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

i. Mining lease agreements

The Mining Lease Agreements (MLAs) are legally binding agreements between mining companies and the GoSL and they set out the main rules regarding the following:

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

The list of active mining lease agreements in 2022 and 2023 as provided by the NMA is presented in the table below:

Table 28: List of active mining lease agreements in 2022 and 2023

Company	2023	2022
FG Gold Ltd	Yes	No
Sierra Rutile Ltd	Yes	Yes
Marampa Mines Ltd	Yes	Yes
Koidu Ltd	Yes	Yes
Kingho Mining Company Ltd	Yes	Yes
Tonguma Ltd	Yes	Yes
Sierra Minerals Holdings 1 Ltd	Yes	Yes
Kingho Railway & Port Ltd	Yes	Yes

Source: NMA

j. Public disclosure of mining contracts

The EITI Standard stipulates in respect to Requirement 2.4 that implementing countries are required to disclose any contracts and licenses that are granted, entered into force or amended from 1 January 2021.

Section 190 of the MMDA Act (2023) states that "applications, non-confidential agreements, and non-confidential reports submitted by past and present holders shall be published and open to inspection by members of the public during normal office hours and members of the public shall be permitted to take copies thereof on payment of the prescribed fee'. In addition, the Right to Access Information Act 2013 has its preamble stating that 'Being an Act to provide for the disclosure of information held by public authorities or by persons providing services for them and to provide for other related matters".

The following large-scale mining contracts are publicly available on NMA's website, but we are unable to confirm the completeness of this list. In addition, the RTs received from the NMA included only three out of the twelve MLAs detailed below:

TABLE 29: LIST OF MLAS PUBLICLY AVAILABLE

N°	Mining Company	Year	Commodity	Link to the MLA	2022*	2023*	Included in the Online Repository
1	CTC Mining (SL) Ltd **	2024	Bauxite	link	N/A	N/A	No
2	Kingho Mining	2022	Iron Ore	link	Active	Active	No
3	Marampa Mines Ltd	2021	Iron Ore	link	Active	Active	No
4	SL Mining Limited	2017	Iron Ore	link	Inactive	Inactive	No
5	London Mining Company Ltd	2012	Iron Ore	link	Inactive	Inactive	No
6	Tonguma Ltd	2012	Diamonds Gold	link	Active	Active	No
7	Sierra Minerals Holdings 1	2012	Bauxite	link	Active	Active	Yes
8	African Minerals Ltd	2010	Iron Ore	link	Inactive	Inactive	No
9	Koidu Holdings SA	2010	Diamonds	link	Active	Active	Yes
10	Sierra Rutile Ltd	2002	Rutile	link	Active	Active	Yes
11	FG Gold Ltd	2021	Gold	N/A	Inactive		Yes***
12	Kingho Railway and Port ****	2021	****	N/A	Active	Active	No

** According to the list of active MLAs confirmed by the NMA*
*** Fiscal stabilisation agreement for large-scale mining*
**** Large-scale mining license*
***** Management, use, maintenance and rehabilitation of the port and railway in the Port Loco District*

The full text of the active MLAs above was published on NMA and Resource Contract website.

The online cadastral system provides information on license holder, coordinates of the licensed areas, date of application award and duration of the license as well as the commodity being produced. However, we noted that the full text of mining licenses and the license templates are not publicly available.

k. Licences allocation

It is strictly forbidden for individuals or companies to prospect for minerals or carry out mining operations or mineral processing operations without a mining right or a mineral processing licence being granted under the MMDA 2023 Act. The table below summarises the allocation process of each type of mining licence:

TABLE 30: LICENCE ALLOCATION PROCESS

N°	Type	Granted by	Granting process
1	Reconnaissance License	Minister of Mines upon advice of the Minerals Advisory Board.	An application shall be submitted to the NMA in the prescribed form and content.
2	Exploration License	Same as above	Same as above
3	Small Scale Mining License	Same as above	Same as above
4	Large Scale Mining License	Same as above	Same as above
5	Artisanal mining License	Director-General of the NMA.	An application shall be made to the Director-General of the NMA in such form as may be prescribed.

Licensing method

The 2023 MMDA stipulates that mining licences are awarded on a first-in first-assessed (FIFA) basis.

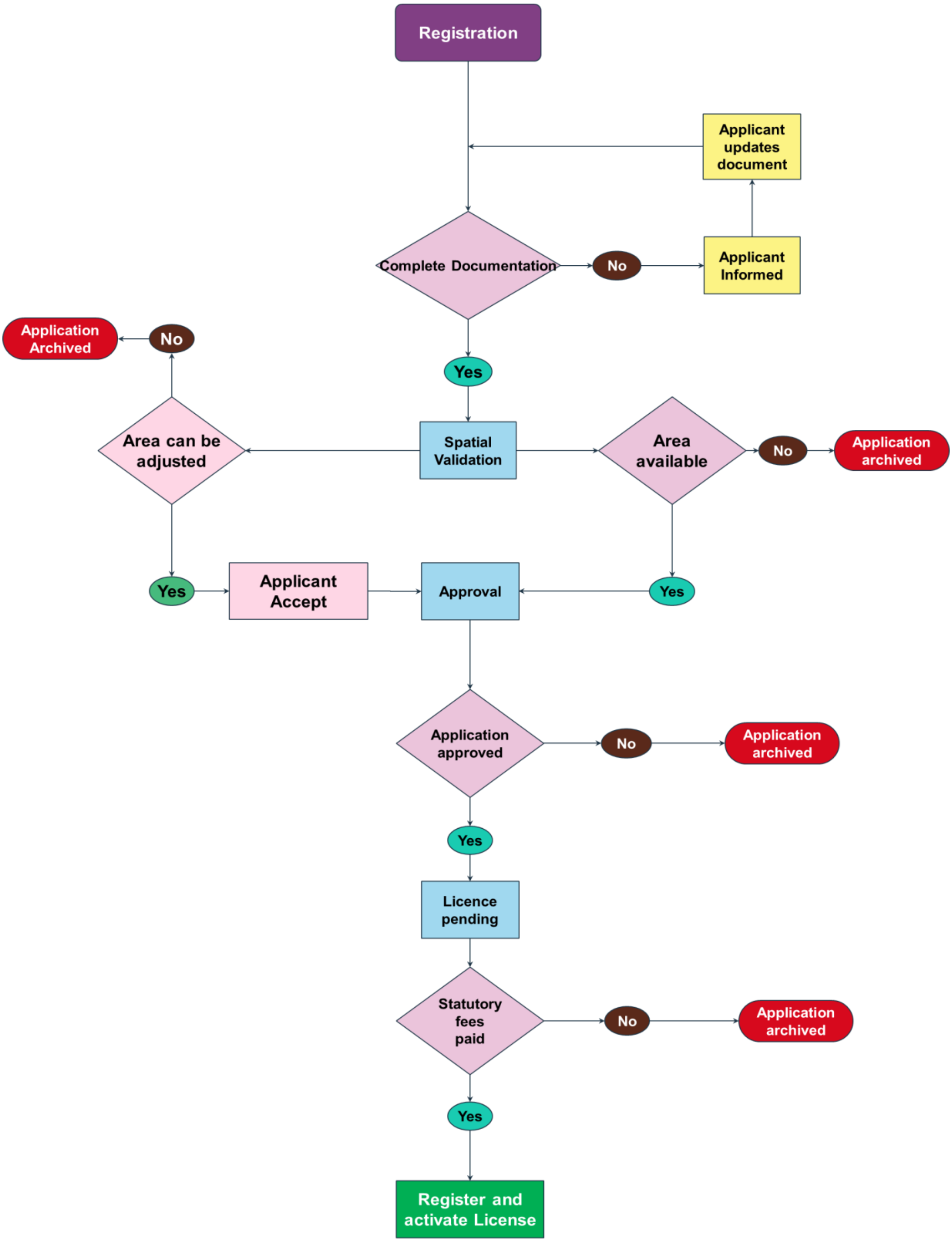
Licensing process

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

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

The figure below describes the licencing process:

FIGURE 12: LICENSING PROCESS



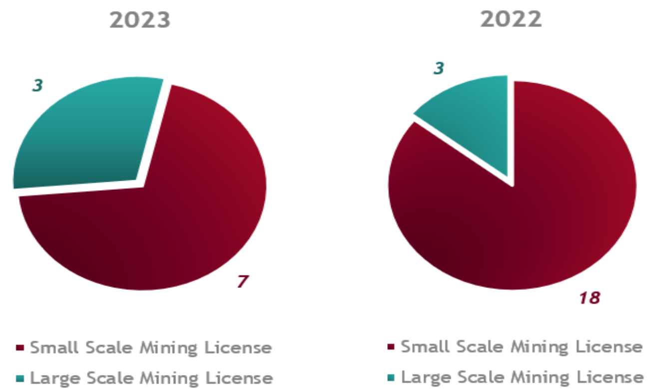
Mining licenses awarded during 2022-2023

The table below shows the mining licenses awarded during 2022 and 2023.

TABLE 31: MINING LICENCES AWARDED DURING 2022 AND 2023

Type of Licence	2023	2022
Small Scale Mining License	7	18
Large Scale Mining License	3	3
Total	**10**	**21**

FIGURE 13: MINING LICENCES AWARDED DURING 2022 AND 2023



The 21 new licences awarded in 2022 are listed below:

TABLE 32: MINING LICENCES AWARDED IN 2022

N°	Licence type	Licence holder	Commodity	Start Date
1	Large Scale	CTC Mining (SL) Ltd	Bauxite	18/11/2022
2	Large Scale	CTC Mining (SL) Ltd	Bauxite	18/11/2022
3	Large Scale	Millennium Panorama (SL) Ltd	Iron Ore	07/02/2022
4	Small Scale	WGT Minerals Company Ltd	Ilmenite, Rutile, Zircon	02/12/2022
5	Small Scale	Afro-Asia Mining Corporation Ltd	Ilmenite, Titanium, Zircon	09/11/2022
6	Small Scale	DELCO SL Ltd	Gold	19/10/2022
7	Small Scale	Bright Continent Minerals Ltd	Associated Minerals, Gold	14/10/2022
8	Small Scale	Yidesheng Mining (SL) Company Ltd	Associated Minerals, Zircon	28/09/2022
9	Small Scale	Foison Resources (SL) Ltd	Associated Minerals, Rutile	13/09/2022
10	Small Scale	Jong Minerals Company Ltd	Associated Minerals, Ilmenite, Rutile, Zircon	18/08/2022
11	Small Scale	Leone Minerals Ltd	Associated Minerals, Ilmenite, Rutile, Zircon	18/08/2022
12	Small Scale	DDE F-Tech Africa (SL) Ltd	Gold	19/07/2022
13	Small Scale	DZT Resources Ltd	Associated Minerals, Zircon	18/07/2022
14	Small Scale	Bravura (SL) Ltd	Gold	23/06/2022
15	Small Scale	Simira Chiefdom Gold Mining Company Ltd	Gold	01/06/2022
16	Small Scale	Tejan Jalloh Brothers Investment Ltd	Gold	30/05/2022
17	Small Scale	Jong Minerals Company Ltd	Associated Minerals, Ilmenite, Rutile, Zircon	05/05/2022
18	Small Scale	Sahanik Resources (SL) Ltd	Diamonds	04/05/2022
19	Small Scale	Universal Mining Company	Gold	03/05/2022

N°	Licence type	Licence holder	Commodity	Start Date
20	Small Scale	JINGXIANG Mining Company Ltd	Titanium	16/02/2022
21	Small Scale	General Minerals and Articles of Association of World Minerals Company (SL) Ltd	Associated Minerals, Gold	01/02/2022

Source: NMA

The ten new licences awarded in 2023 are listed below:

TABLE 33: MINING LICENCES AWARDED IN 2023

N°	Licence type	Licence holder	Commodity	Start Date
1	Large Scale	Jong Minerals Company Ltd	Associated Minerals, Ilmenite, Rutile, Zircon	09/05/2023
2	Large Scale	Leone Afric Metals (SL) Ltd	Titanium	24/02/2023
3	Large Scale	Majestic Gold Mining Ltd	Gold	01/02/2023
4	Small Scale	Zhongfu mining Co. (SL) Ltd	Gold	15/11/2023
5	Small Scale	Fourah Bay Mining Company Ltd	Ilmenite, Titanium	15/11/2023
6	Small Scale	Sierra Sand Mining Investment Company Ltd	Associated Minerals, Rutile	03/11/2023
7	Small Scale	Shun Da Ore Trading Company	Associated Minerals, Columbite	25/10/2023
8	Small Scale	Jinshi Mining (SL) Ltd	Rutile	05/05/2023
9	Small Scale	Sunshine Resources (SL) Ltd	Associated Minerals, Rutile	03/03/2023
10	Small Scale	F.S. Mining Company (SL) Ltd	Zircon	09/01/2023

Source: NMA

Technical and financial criteria

According to Section 72 (6b) of the MMDA 2023 Act, the application for an exploration license shall be accompanied by a statement giving particulars of the technical and financial resources available by the applicant, and a certified copy of its audited accounts for the year preceding the application.

Section 94 stipulates that the application for a small-scale mining license shall include, among others, a statement giving detailed forecast of capital investment, operating costs and revenues and the anticipated type and source of financing, as well as a certified statement confirming financial capacity to fund bonds required under the laws of Sierra Leone. Same is required for large-scale mining license applications pursuant to section 105 (1) of the MMDA Act (2023).

Artisanal mining license applications shall also include a statement giving particulars of the technical expertise and the financial resources available to the applicant to implement the license pursuant to section 85 of the MMDA Act (2023).

Transfer of mineral rights

Section 49 of the MMDA Act (2023) granted the right of transfer, assignment, lease, pledge or mortgage only to:

- Exploration licenses;
- Large-scale mining licenses; and
- Small-scale mining licenses.

Pursuant to section 47 of the MMDA Act (2023), the holder of one of the aforementioned licenses shall notify both the Director-General of the NMA and the Minister when there is a proposed change in the control of ownership or control of the license including transfer, lease, mortgage or other conveyance or when a single interest in the license exceeds 20%. Such change shall not have legal effect until approval of the Minister and registration within the NMA.

The table below shows the transfer process for mineral rights.

TABLE 34: TRANSFER PROCESS FOR MINERAL RIGHTS

N°	Type	Transfer process	Technical and financial criteria of the transferee
1	**Reconnaissance License**	A reconnaissance license is not transferable.	NA
2	**Exploration License**	An application for transfer of an exploration license shall be made to the Director General of the NMA and the Minister in the prescribed form and shall state details of the transfer as may be prescribed.	The transferee shall have the technical and financial resources available, as for the application for the exploration license.
3	**Large-scale mining license**	An application for transfer of a large-scale mining license shall be made to the Director General of the NMA and the Minister in the prescribed form and shall state details of the transfer as may be prescribed.	The transferee shall have the technical and financial resources available as for the application for the **large-scale mining license**.
4	**Small-scale mining license**	An application for transfer of a small-scale mining license shall be made to the Director General of the NMA and the Minister in the prescribed form and shall state details of the transfer as may be prescribed.	The transferee shall have the technical and financial resources available as for the application for the **small-scale mining license**.
5	**Artisanal mining License**	An artisanal mining license is not transferable.	NA

Source: MMDA 2023 Act

The NMA informed us that the gold large-scale mining license ML 1/2023 initially awarded to Wongor Investment & Mining in February 2023 with an expiry in June 2024 and covering a mining area of 96 km^2 was transferred to Gold Lion Mining Company.

Except for the mining license above, we were not informed of any other transfer of mining license during the reporting period.

Review of awarding process during 2022-2023

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

TABLE 35: LIST OF MINING LICENSES PROPOSED FOR REVIEW

License Type	License Holder	Start Date	Expiry Date	Commodity
Large Scale	Wongor Investment & Mining	01/02/2023	11/06/2024	Gold (For licence transfer)
Large Scale	Jong Minerals Company Ltd	09/05/2023	08/05/2093	Associated minerals, Ilmenite, Rutile, Zircon
Small Scale	Zhongfu Mining Co. (SL) Ltd	15/11/2023	14/11/2035	Gold
Small Scale	Delcore SL Ltd	19/10/2022	18/10/2034	Gold

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

TABLE 36: LIST OF DOCUMENTS CHECKED

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

The IA review was performed in December 2024 at NMA premises. The required documents for the selected sample were checked and the following deviations from the applicable legal and regulatory framework were noted:

- The technical and financial assessments for all licences awarded were not provided.
- The file of the small-scale license 'Zhongfu Mining (SL) Limited' was unavailable for verification.

I. State participation in the mining sector

State-owned enterprises (SOEs) in the mining sector

We were not informed of any SOE operating in the mining sector in Sierra Leone during the reporting period.

Government ownership in companies' equity operating within the mining sector

To ensure maximum benefits for the government and the people of Sierra Leone, it was provided for the Government, as per section 161 of the MMDA Act (2023), to acquire a non-dilutable free carried of interest 10% shares in any of the Large-Scale Mining companies. Additionally, the Government may acquire further shares up to 35% on terms that will be negotiated and agreed by the parties.

The company 'Marampa Mines Limited' provided its legal ownership structure showing that the GoSL holds a direct interest of 10% (500 shares for a value of US$ 5,000) in the company's large-scale mining license ML4/2021 since 2021. No change took place in the company's ownership structure in 2022 and 2023.

The company's audited financial statements for 2022 and 2023 show a net income of US$ 20.9 million in 2023 (US$ 14.9 million in 2022), all presented as retained earnings. The audited financial statements did not provide information on the distribution of dividends to shareholders or on related party transactions with the GoSL.

Except for the above-mentioned state participation, government agencies and mining companies did not report any State participation (interests) in any of the large-scale mining operations in Sierra Leone between 2022 and 2023.

m. In-kind payments

The SLEITI MSG agreed that there were no in-kind revenues from the mining sector in Sierra Leone between 2022 and 2023.

n. Infrastructure provisions and barter arrangements

Railway and Port lease to 'Kingho Railway and Port Company Limited'

Pursuant to the lease agreement signed on 8 January 2021, the GoSL agreed with the company **'Kingho Railway and Port Company Limited'** on the lease of the port transhipment and loading facilities in the port of Pepel and 200 km railway from Pepel to Tonkolili in the Port Loko district to the company that will have the right to occupy, manage, use, operate, maintain and rehabilitate the leased facilities until January 2027 with the possibility to extend the term upon consent between both parties.

The lease agreement fixes the lease rental due to the GoSL at US$ 1,250,000 per annum payable within 60 days of the payment due date, otherwise an interest rate of 10% per annum will be applied to the amounts due.

The afore-mentioned facilities were initially leased to African Minerals Ltd (later Shandong Steel) that developed significant port and rail infrastructural support through its subsidiary African Rail and Port Services (SL) Limited in which the GoSL holds 10% share capital. However, in 2019, the GoSL withdrew the license and took over the port and rail infrastructure in 2020.

It is to be noted that the lease agreement is not publicly available on the NMA website.

Infrastructure provisions and barter arrangements disclosed by extractive companies

Government agencies and mining companies were required to report information on the active infrastructure provisions and barter agreements during 2022 and 2023 including the parties involved, the resources which have been pledged by the state and the value of the balancing benefit stream (e.g., infrastructure works).

The extractive companies disclosed infrastructure provisions and barter arrangements for a total budgeted amount of US$ 221 million, US$ 28 million of which were disbursed in 2022 while US$ 153 million were disbursed in 2023 as shown in the table below:

TABLE 37: INFRASTRUCTURE PROVISIONS & BARTER ARRANGEMENTS DURING 2022-2023

in US$

Company	Total budget	Cost incurred in 2022	Cost incurred in 2023	Cumulative cost until 31 December 2023
Jong Minerals Company Ltd	55,785	-	44,210	44,210
Marampa Mines Ltd	220,865,506	28,309,568	153,234,725	255,311,617
Total	**220,921,291**	**28,309,568**	**153,278,935**	**255,355,827**

The full detail of the related infrastructure and barter arrangements is presented in Annex 6 to this report.

Except for the infrastructure provisions and barter arrangements set out above, neither the extractive companies nor the government agencies disclosed any infrastructure and barter arrangements during the reporting period.

Government agencies and mining companies were required to report information on the active infrastructure provisions and barter agreements during 2022 and 2023 including the parties involved, the resources which have been pledged by the state and the value of the balancing benefit stream (e.g., infrastructure works).

o. Transportation revenues

The SLEITI MSG agreed that there were no transportation revenues received by GoSL from mining sector between 2022 and 2023.

p. Artisanal mining

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

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

Some of the most lucrative mines are in remote and inaccessible areas in the forest regions, and it is challenging for the Government to effectively monitor mining activities.

Artisanal mining in Sierra Leone, particularly for diamonds and gold, plays a crucial role in supporting the livelihoods of an estimated 300,000 Sierra Leoneans, with around 10% of the population relying on the sector. According to a 2021 Baseline Study[27] funded by the World Bank and conducted by Levin Sources and Cemmats Group, the country's annual artisanal diamond production is estimated at between 180,000 and 200,000 carats, valued at approximately US$ 27 million at the miner level (around 40% of the export value of US$ 65 million). The study also estimates annual gold production at 3 metric tons, or about 2.6 tons of pure gold, with a total value of US$ 86.7 million at the time of the study. However, the report notes that only about 4% of this unrefined gold is exported legally, while the remainder is smuggled out of the country. The same Baseline Study also indicated that women play an important role in supporting mining, especially in gold. The survey found that 17% of those involved in site management were women, with half of them serving as project supporters, especially in gold mining.[28]

The GoSL also published a report on the National Action Plan for Reducing Mercury Use in the Artisanal and Small-scale Gold Mining (ASGM) Sectors in April 2020. For further information, please see the study here.

The Minerals and Mines Development Act (MMDA), 2023, which replaced the earlier 2009 version, provides clear guidelines for artisanal miners to obtain licenses, ensuring that mining activities are recognised and legal. It also promotes the establishment of mining cooperatives that will enable artisanal miners to have greater access to resources, tools, and support.

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

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

[27] https://www.sleiti.gov.sl/index.php/documents/sierra-leone-asm-baseline-study-report
[28] https://www.delvedatabase.org/uploads/resources/Delve-2023-State-of-the-Sector-Report-Launch-COMP.pdf

q. Sub-national payments

In application of EITI Requirement 4.6, mining companies perform direct payments to subnational government agencies in accordance with Section 36 (A) of the MMDA (2023) that stipulates that **Surface Rent** is a sub-national payment made by companies or holders of mining licenses and which should be shared amongst four categories of recipients as follows:

- Landowners;
- Paramount chiefs;
- District councils; and
- Constituency development fund.

The SLEITI MSG agreed to include the Ministry of Local Government and Community Affairs (MLGCA), the District Councils, the Chiefdom Councils and the Constituency development fund in SLEITI 2022-2023 scope in order to report revenues received directly from the mining companies. The SLEITI MSG also agreed that mining companies should provide information of payments made to Paramount Chiefs and Landowners unilaterally.

The Districts Councils and Chiefdom Councils have submitted RTs indicating surface rental revenues from mining companies.

The Mining companies have also reported surface rental payments to Landowners and Paramount chiefs.

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

r. Sub-national transfers

Diamond Area Community Development Fund (DACDF)

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

The main reasons for setting up DACDF were:

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

The SLEITI MSG agreed that government agencies should report transfers made to DACDF and disbursements made to Chiefdoms in 2022-2023.

For more information on DACDF, please see its Operational Procedures and Guidelines issued in November 2008, here.

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

Transfers made to DACDF during 2022 and 2023

The DACDF reported Le 3.6 million of transfers in 2022. The table below shows a comparison of the amount due of transfers to DACDF (i.e., 25% of the total Diamond Export duties) between 2022 and 2021:

TABLE 38: AMOUNT DUE OF THE TRANSFERS TO DACDF

In Leones	2022	2021	Variance	%
Amount due of the transfers to DACDF	3,609,002	4,245,396	(636,394)	-14.99%

Source: MMMR

However, no information was provided by the MMMR regarding transfers to the DACDF in 2023.

Disbursements made from DACDF during 2022 and 2023

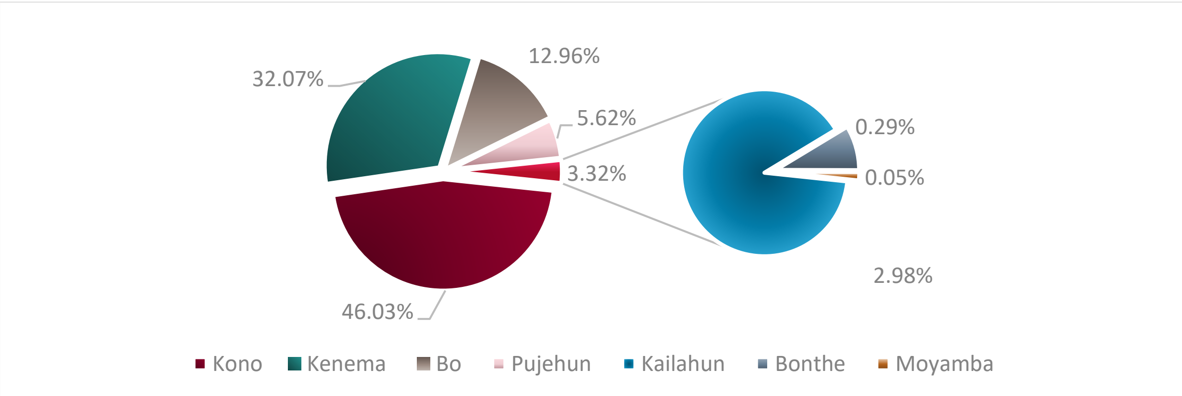
We were not informed of any disbursement to districts/Chiefdoms made from the DACDF during 2022 and 2023. However, the MMMR provided us with disbursements made to districts/Chiefdoms in 2024 for a total amount of Le 8,854,330 as a result of the collections made in 2020, 2021 and 2022. Below is the presentation of payments by district:

TABLE 39: DACDF TRANSFERS BY DISTRICT

District	Amount (Le)	%
Kono District	4,075,914	46.03%
Kenema District	2,839,979	32.07%
Bo District	1,147,115	12.96%
Pujehun District	497,194	5.62%
Kailahun District	263,858	2.98%
Bonthe District	25,515	0.29%
Moyamba District	4,756	0.05%
Total	**8,854,330**	**100.00%**

Source: MMMR

FIGURE 14: PORTION OF EACH DISTRICT IN DACDF TRANSFERS



As presented above, Kono, Kenema and Bo districts top the list with 91% of the DACDF transfers.

The detail of transfers by Chiefdom is presented in Annex 7 to this report.

Mining District Development Fund (MDDF)

Pursuant to article 144 of the MMDA, 2023, a mining district development fund shall be established to facilitate management of mining revenues for Chiefdoms of mining districts not subject to community development agreements. The MDDF established shall be administered by the MMMR in collaboration with Members of Parliament for the Mining District and the Ministries responsible for Finance, Rural Development, Planning and Economic Development, and financed by the transfer of 20% of all mining royalties.

However, no information has been made available regarding the operational status of the MDDF or any transfers to it for the period 2022 - 2023.

s. Environmental impact of extractive activities

The Environment Protection Agency Act, 2022 (Act No. 15 of 2022) replaces the 2008 version as amended in 2010 (No. 11 of 2008) that establishes the Environment Protection Agency (EPA-SL), defines its functions and powers, provides for its organisation and administration and sets out the rules for various matters regarding the environment in Sierra Leone such as environmental impact assessments and the control of ozone-depleting substances.

The MMDA (2023) requires mining companies to acquire Environmental Impact Assessment (EIA) licences before they can be granted mining licences. It also requires every mineral rights holder to protect the environment and carry out operations in a way that will minimise and manage negative environmental impact. In doing this, the EPA-SL should ensure that environmental impact assessments are conducted to ascertain the impact that mining operations will cause.

The factors below help determine as to whether a project requires an environmental impact assessment:

- the environmental impact on the community;
- the location of the project;
- whether the project transforms the locality;
- whether the project has or is likely to have substantial impact on the ecosystem of the locality;
- whether the project results in the diminution of the aesthetic, recreational, scientific, historical, cultural or other environmental quality of the locality;
- whether the project will endanger any species of flora or fauna or the habitat of the flora or fauna;
- the scale of the project;
- the extent of the degradation of the quality of the environment;
- whether the project will result in an increase in demand for natural resources in the locality; and
- the cumulative impact of the project together with other activities or projects, on the environment.

Such assessment shall include the information below:

- the location of the project and its surroundings;
- the principle, concept and purpose of the project;
- the direct or indirect effects that the project is likely to have on the environment;
- the social, economic and cultural effect that the project is likely to have on people and society;
- the communities, interested parties and Government ministries consulted;
- any actions or measures which may avoid, prevent, change, mitigate or remedy the likely effect on people and society;

- any alternatives to the proposed project;
- natural resources in the locality to be used in the project;
- the plans for decommissioning of the project; and
- such other information as may be necessary for a proper review of the potential environmental impact of the project.

The environmental impact assessment provided to the EPA-SL shall be published on the Agency's website or newspaper for inspection and comments of the public, including relevant Government Ministries, professional bodies or associations and non-governmental organisations within 14 days of the publishing date. The public comments received shall be submitted by the EPA's chairman to the board that will take them into consideration while deciding on whether to accept or reject the license application.

In addition, the EPA Act 2022 forbids discharging toxic and hazardous substances into the air or in, on or under the land and water of the country, or introduce and import them, including internationally banned chemicals or substances for storage or disposal by any means whatsoever. Failures to comply with these provisions are liable to a Le 1 billion fine for corporate bodies and a Le 50 million fine or at least 10 year-imprisonment term for individuals.

The environmental impact of the extractive industries on Sierra Leone is presented in detail in Section 4.10 of this report.

Public disclosure of environmental impact assessments

The environmental impact assessments available on the Resource Contracts website are presented in the table below:[29]

TABLE 40: LIST OF PUBLICLY AVAILABLE ENVIRONMENTAL IMPACT ASSESSMENTS

Document	Year	Commodity
London Mining Company Ltd	2012	Iron Ore
Tonguma Ltd	2014	Diamonds Gold
African Minerals Ltd	2010	Iron Ore
Koidu Holdings SA	2011	Diamonds
Sierra Minerals Holdings 1, 28N Gria Zone	2012	Bauxite

Source: Resource Contract website

t. Social and Environmental Expenditure

Social expenditure

Following the review of several mining agreements, we note that these agreements include mandatory social expenditure to be made by mining companies regarding medical services, education and training. In addition, the MMDA (2023) provides for the following social mandatory contributions:

Community Development Fund (CDF)

Section 141 requires from holders of small or large-scale mining licences to implement a Community development agreement (CDA) with the primary host community.

[29] https://resourcecontracts.org/countries/sl

The holder of small or large-scale mining licences shall assist in the development of mining communities affected by their operations to promote sustainable development, enhance the general welfare and the quality of life of the inhabitants, and shall recognise and respect rights, customs, traditions and religion of local communities (MMDA, 2023). These should be achieved through CDAs.

Holders of small or large-scale mining licences should use at least **1%** of the gross revenue amount earned by the mining operations in the previous year to implement the agreement (Section 143(4); MMDA, 2023). Community Development Committees comprising the representatives from the company and the community are responsible for managing the CDF.

The CDF payments in 2022 and 2023 as disclosed by the reporting mining companies are presented in the table below:

TABLE 41: CDF PAYMENTS BY EXTRACTIVE COMPANIES IN 2022 AND 2023

In Le

Company	2023	2022
Marampa Mines Ltd	9,677,796	-
Meya Mining Ltd	83,127	-
Sierra Rutile Ltd	-	2,645,139
Total	**9,760,923**	**2,645,139**

Source: In-scope extractive companies

Social expenditure disclosed by reporting extractive companies

The SLEITI MSG agreed that social expenditure (mandatory and voluntary) made by mining companies should be included in the EITI Report based on unilateral disclosure from mining companies. Information collected shows a total amount of Le 143 million in 2023 compared to Le 73 million in 2022. The breakdown of these amounts is presented in the table below:

TABLE 42: SOCIAL EXPENDITURE PAID BY THE EXTRACTIVE COMPANIES IN 2022 AND 2023

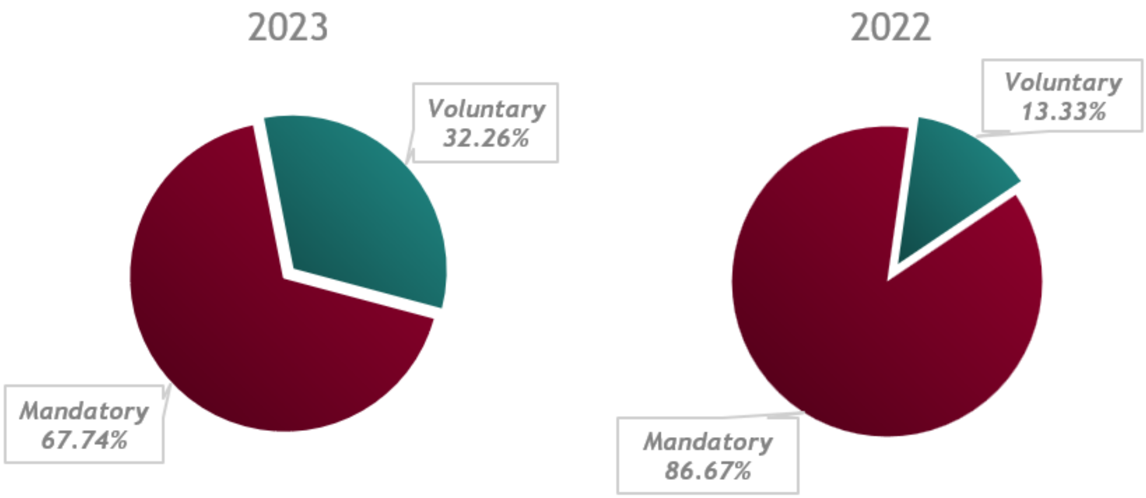
Company	2023		2022		Variance (%)
	In Le	*As a %*	*In Le*	*As a %*	
Mandatory	**97,399,547**	**67.74%**	**63,129,503**	**86.67%**	**54.29%**
Cash	85,649,433	59.57%	40,721,756	55.91%	110.33%
In-kind	11,750,114	8.17%	22,407,747	30.76%	-47.56%
Voluntary	**46,382,771**	**32.26%**	**9,707,783**	**13.33%**	**377.79%**
Cash	4,557,325	3.17%	3,118,550	4.28%	46.14%
In-kind	41,825,446	29.09%	6,589,234	9.05%	534.75%
Total	**143,782,318**	**100.00%**	**72,837,287**	**100.00%**	**97.40%**

Source: In-scope extractive companies

As shown above, social expenditure noted a considerable increase of 97% between 2022 and 2023, most of it coming from the voluntary in-kind payments that present 29% of 2023 social payments compared to only 9% in 2022.

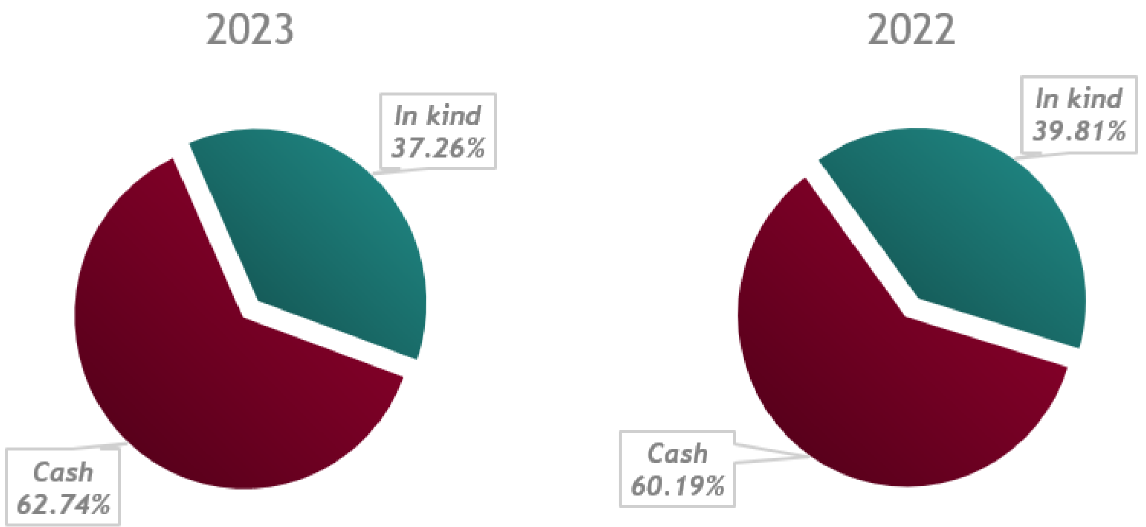
The graph below presents the proportion of mandatory and voluntary social expenditure in 2022 and 2023:

FIGURE 15: SOCIAL EXPENDITURE BY CATEGORY



Cash payments remain the most used means of payment for extractive companies with 63% in 2023 compared to 60% in 2022. Below is the composition of social payments by payment type:

FIGURE 16: SOCIAL EXPENDITURE BY PAYMENT TYPE



The mandatory and voluntary social expenditures companies made between 2022 and 2023 are presented in Annex 11 to this report.

Environmental expenditure

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

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

Reporting companies disclosed total environmental expenditure for an amount of Le 16,598,469 in 2023 compared to Le 17,130,123 in 2022, registering thus a slight decrease of 3%. It is to be noted that all environmental expenditure reported was paid in cash.

The detail of environmental expenditure is presented in Annex 12 to this report.

u. Local content

Role of Sierra Leone Local Content Agency (SLLCA)

The Sierra Leone Local Content Agency (SLLCA)[30] was established under the Sierra Leone Local Content Agency Act, 2016. Its primary objective is to promote and ensure the participation of Sierra Leoneans in the country's economy by maximising the use of local goods, services, and workforce across various sectors, including mining, oil and gas, agriculture, and construction.

SLLCA plays a pivotal role in enhancing local participation in the mining sector by ensuring that mining companies integrate Sierra Leoneans into their operations and value chains. Its efforts focus on fostering economic growth and reducing dependency on foreign resources.

SLLCA is tasked also with enforcing local content requirements for mining companies as outlined in the Mines and Minerals Development Act (MMDA), 2023.

Local content of mining Law

The Mines and Minerals Development Act (MMDA), 2023 introduces comprehensive measures to strengthen local content development in Sierra Leone's mining sector. Below are the key aspects of local content as outlined by the MMDA, 2023:

Local Workforce Development

Mining companies are required to prioritise the employment of Sierra Leoneans at all levels, particularly for unskilled and semi-skilled roles. For skilled positions, companies must provide training programs and support knowledge transfer to ensure that local workers can take on higher-level roles over time.

Promotion of Local Businesses

The MMDA 2023 emphasises the use of local suppliers and contractors for goods and services required in mining operations. Companies must give preference to Sierra Leonean businesses unless such resources are unavailable locally or lack the required standards.

To support this, the government is developing a local supplier database and provides certification to ensure that companies can identify and engage compliant Sierra Leonean businesses.

Local Content Plans and Reporting

Mining companies are mandated to submit annual local content reports that demonstrate compliance with the requirements. These reports include details on workforce composition, supplier engagement, and expenditures on local goods and services.

The Sierra Leone Local Content Agency (SLLCA) monitors these reports and enforces penalties for non-compliance, ensuring that foreign investors align their operations with the national interest.

[30] Sierra Leone Local Content Agency (SLLCA) - Website

Skills Transfer and Capacity Building

Companies must include technical and vocational training programs in their local content plans to up skill Sierra Leoneans. This includes scholarships, internships, and apprenticeships for communities affected by mining operations.

The MMDA 2023 also supports partnerships between mining companies and educational institutions to strengthen local expertise in mining-related disciplines.

Enhancing Local Participation in Value Addition

The Act encourages mining companies to invest in downstream industries, such as mineral processing and manufacturing, within Sierra Leone. This aims to maximise the value extracted from the country's mineral resources while creating more jobs for locals.

Community Development Agreements (CDAs)

Companies must negotiate and implement Community Development Agreements with mining-affected communities. These agreements often include provisions for local employment, infrastructure development, and funding for community projects.

Local content of the MDAs

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

v. Production and exports

Production

The table below provides the production data detailed by volume and value between 2022 and 2023:

TABLE 43: PRODUCTION DATA ACCORDING TO NMA

Commodity	Unit	2023		2022		Variance (%)	
		Volume	Value (US$)	Volume	Value (US$)	Volume	Value (US$)
Iron ore	WMT	10,413,287	827,318,845	7,586,499	473,386,536	37.26%	74.77%
Rutile	DMT	112,241	159,306,707	135,812	195,924,769	(17.36%)	(18.69%)
HMC	DMT	87,259	92,558,097	29,970	20,557,902	191.15%	350.23%
Diamond	Carat	445,653	66,842,924	525,971	97,961,485	(15.27%)	(31.77%)
Bauxite	DMT	1,353,708	44,832,200	973,424	32,344,446	39.07%	38.61%
Ilmenite	DMT	44,839	15,791,906	58,590	14,874,976	(23.47%)	6.16%
Zircon	DMT	27,776	7,960,509	10,709	17,435,173	159.37%	(54.34%)
Gold	Grams	113,537	5,522,297	113,628	7,204,312	(0.08%)	(23.35%)
Total			**1,220,133,485**		**859,689,598**	**(13.82%)**	**41.93%**

Source: NMA

The production of iron, the main tradable commodity for the country, noted an important increase of 33% compared to 2022 following the higher demand in the international market following the COVID-19 pandemic that impacted the market. The entry into activity of the company 'Jong Minerals Company Limited' in 2023 resulted in a significant increase in the production Heavy Mineral Concentrate (HMC).

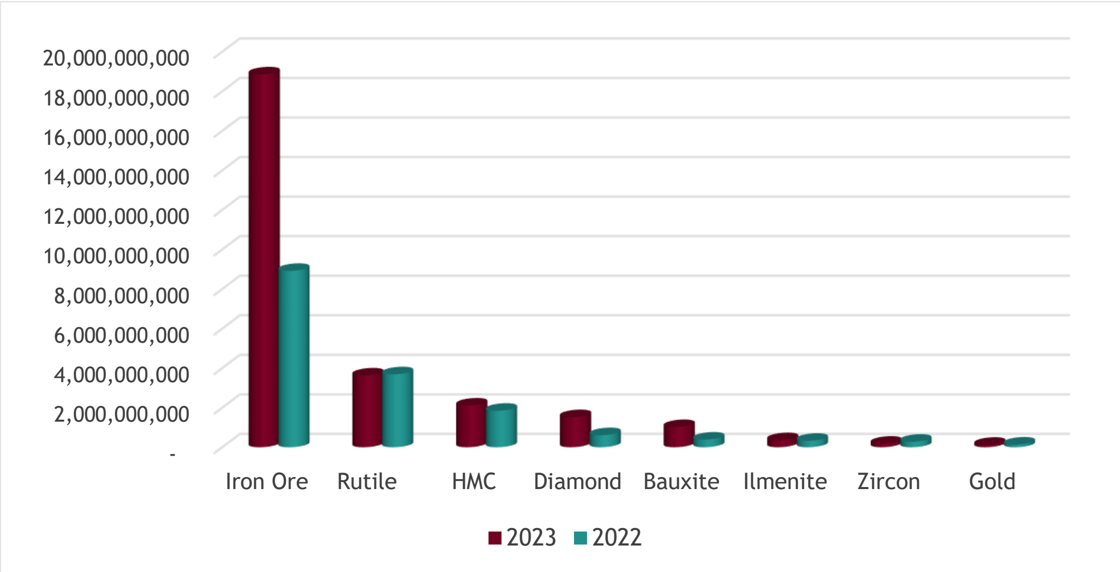
TABLE 44: TOP MINERALS PRODUCED IN 2022 AND 2023

No	Commodity	2023 Value (Le)	%	No	Commodity	2022 Value (Le)	%
1	Iron ore	18,854,596,487	67.81%	1	Iron ore	8,918,128,947	55.06%
2	Rutile	3,630,599,847	13.06%	2	Rutile	3,691,026,715	22.79%
3	HMC	2,109,399,037	7.59%	3	Diamond	1,845,496,417	11.39%
4	Diamond	1,523,350,227	5.48%	4	Bauxite	609,337,017	3.76%
5	Bauxite	1,021,725,848	3.67%	5	HMC	387,290,308	2.39%
6	Ilmenite	359,897,527	1.29%	6	Zircon	328,461,224	2.03%
7	Zircon	181,420,000	0.65%	7	Ilmenite	280,229,667	1.73%
8	Gold	139,813,315	0.45%	8	Gold	135,722,039	0.84%

Source: NMA

As presented above, iron ore tops the list of commodities produced with 68% (55% in 2022), followed by Rutile (13% in 2023 vs. 23% in 2022). HMC (8% in 2023) replaces diamonds (11% in 2022) in the third place.

FIGURE 17: TOP MINERALS PRODUCED IN 2022 AND 2023



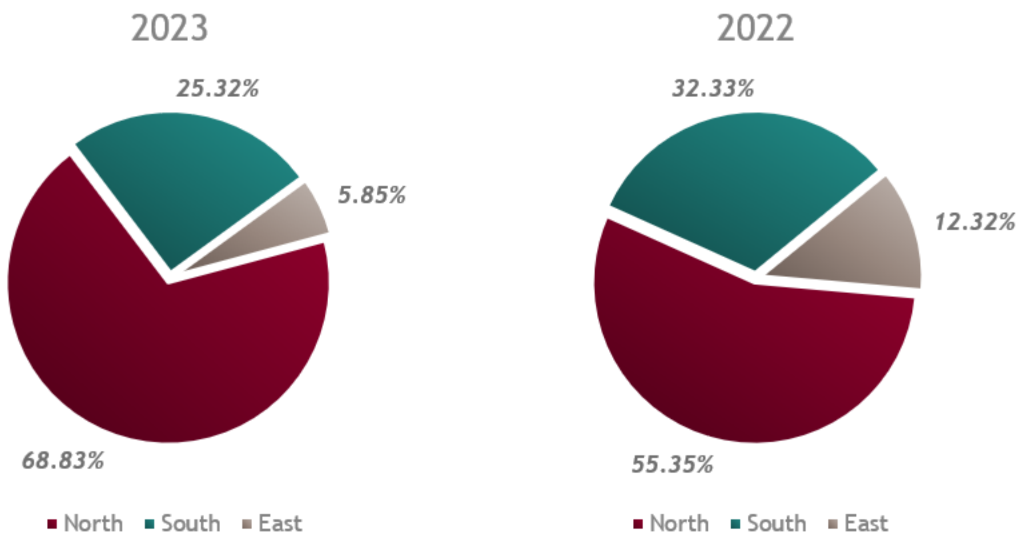
The analysis of the production data by region shows that most of mineral production comes from the north, followed by the south and then by the east as presented in the table below:

TABLE 45: MINING PRODUCTION BY REGION

Region	2023 Value (Le)	2023 %	2022 Value (Le)	2022 %
North	19,139,360,651	68.83%	8,963,690,962	55.35%
South	7,040,193,794	25.32%	5,236,483,946	32.33%
East	1,627,287,683	5.85%	1,995,517,425	12.32%
Total	**27,806,842,128**	**100.00%**	**16,195,692,333**	**100.00%**

Source: NMA

FIGURE 18: MINING PRODUCTION BY REGION



Artisanal and small-scale mining production data

The NMA data shows that the artisanal and small-scale mining activity production totalled US$ 207 million in 2023 versus US$ 248 million in 2022, registering thus a decrease of 16%. The detailed production is presented in the table below:

TABLE 46: ASM PRODUCTION DATA

Commodity	Unit	2023		2022		Variance (%)	
		Volume	Value ($)	Volume	Value ($)	Volume	Value ($)
Diamond	Carats	85,492	37,445,496	144,583	91,635,790	(40.87%)	(59.14%)
Gold	Kg	1,114	1,879,318	25	1,354,966	4,306.65%	38.70%
HMC	DMT	86,953	167,936,016	-	-	100.00%	100.00%
Coltan	DMT	-	-	230	2,465,801	(100.00%)	(100.00%)
Zircon	DMT	-	-	32,511	79,383,441	(100.00%)	(100.00%)
Titanium Dioxide	DMT	-	-	33,035	73,160,277	(100.00%)	(100.00%)
Total			**207,260,830**		**248,000,275**		**(16.43%)**

Source: NMA

Exports

According to data provided by the NMA, the mining exports generated almost Le 26 billion (US$ 1.2 billion) in 2023 compared to Le 16 billion (US$ 846 million) in 2022, registering thus an increase of 22.83% in volume and 60.68% in value as presented in the table below:

TABLE 47: EXPORTS DATA ACCORDING TO NMA IN 2022 AND 2023

Commodity	Unit	2023		2022		Variance (%)	
		Volume	Value (US$)	Volume	Value (US$)	Volume	Value (US$)
Iron Ore	DMT	10,203,854	834,563,882	7,831,996	478,038,112	30.28%	74.58%
Rutile	DMT	108,349	153,782,685	134,771	194,423,004	-19.61%	-20.90%
HMC	DMT	87,259	73,751,655	27,945	24,265,710	100.00%	100.00%
Diamond	Carat	442,276	66,521,588	551,553	103,015,525	-19.81%	-35.43%
Bauxite	DMT	1,332,349	44,123,954	851,641	28,297,901	56.44%	55.93%

Commodity	Unit	2023		2022		Variance (%)	
		Volume	Value (US$)	Volume	Value (US$)	Volume	Value (US$)
Ilmenite	DMT	36,995	13,029,317	62,360	15,832,113	-40.68%	-17.70%
Zircorn	WMT	27,024	7,744,988	41,564	67,669,767	-34.98%	-88.55%
Gold	Gram	74,241	3,610,989	521,103	24,285,067	-85.75%	-85.13%
Garnet	DMT	7,000	1,435,350	7,002	864,476	-0.03%	66.04%
Total		**12,319,347**	**1,198,564,408**	**10,029,935**	**936,691,674**	**22.83%**	**27.96%**

Source: NMA

The important increase of exports is due to the rise in the applied iron ore prices (going from US$ 62.75/WMT in 2022 to US$ 74/WMT in) and the entry into or resuming of activity in 2023 of many extractive companies that procured an additional DMT 62.5 thousand of HMC for a total value of Le 1.2 billion (US$ 54 million).

As presented below, iron ore (70% vs. 51%) and Rutile (13% vs.21%) respectively remained the major tradeable commodities of the country. HMC (6% in 2023) replaced diamonds (11% in 2022) in3rd place:

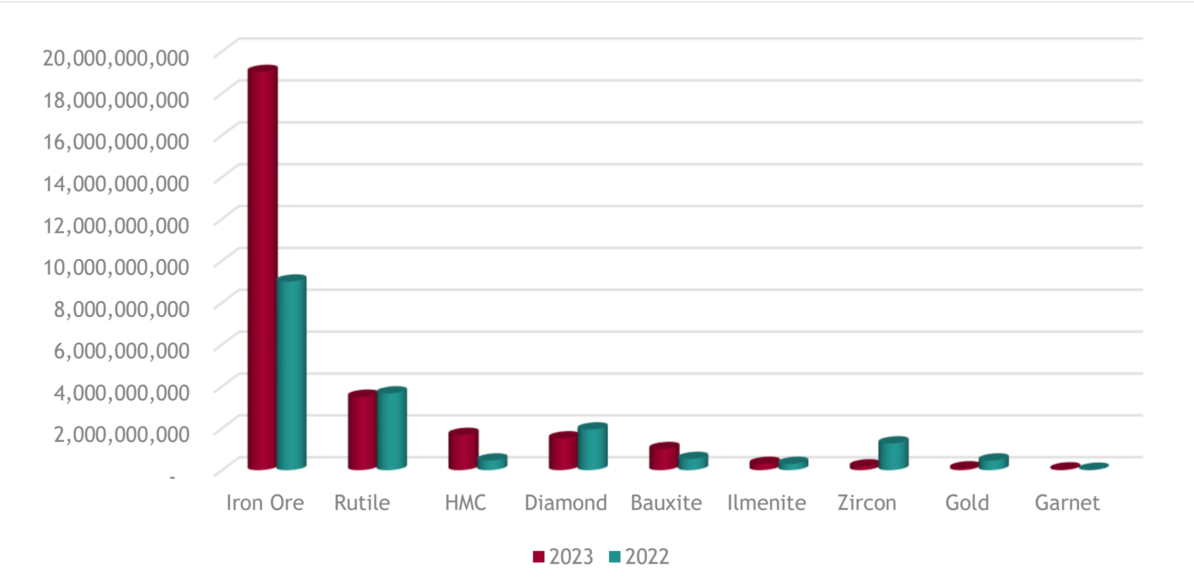
TABLE 48: EXPORTS DATA BY COMMODITY

No	Commodity	2023 Value (Le)	%
1	Iron Ore	19,019,710,872	69.63%
2	Rutile	3,504,707,396	12.83%
3	HMC	1,680,800,213	6.15%
4	Diamonds	1,516,026,990	5.55%
5	Bauxite	1,005,584,907	3.68%
6	Ilmenite	296,938,135	1.09%
7	Zircon	176,508,284	0.65%
8	Gold	82,294,442	0.30%
9	Garnet	32,711,627	0.12%
		27,315,282,865	

No	Commodity	2022 Value (Le)	%
1	Iron Ore	9,005,759,993	51.03%
2	Rutile	3,662,734,968	20.76%
3	Diamond	1,940,709,477	11.00%
4	Zircon	1,274,830,731	7.22%
5	Bauxite	533,104,163	3.02%
6	Gold	457,506,373	2.59%
7	HMC	457,141,711	2.59%
8	Ilmenite	298,261,171	1.69%
9	Garnet	16,285,863	0.09%
		17,646,334,450	

Source: NMA

FIGURE 19: EXPORTS BY COMMODITY IN 2022 AND 2023



The NMA data show that Kingho Mining Company Ltd, Marampa Mines Ltd and Sierra Rutile Ltd are the major exporters of minerals with slightly more than 80%. The list of the top five companies contributing to extractive exports is presented as follows:

TABLE 49: TOP 5 EXPORTING COMPANIES

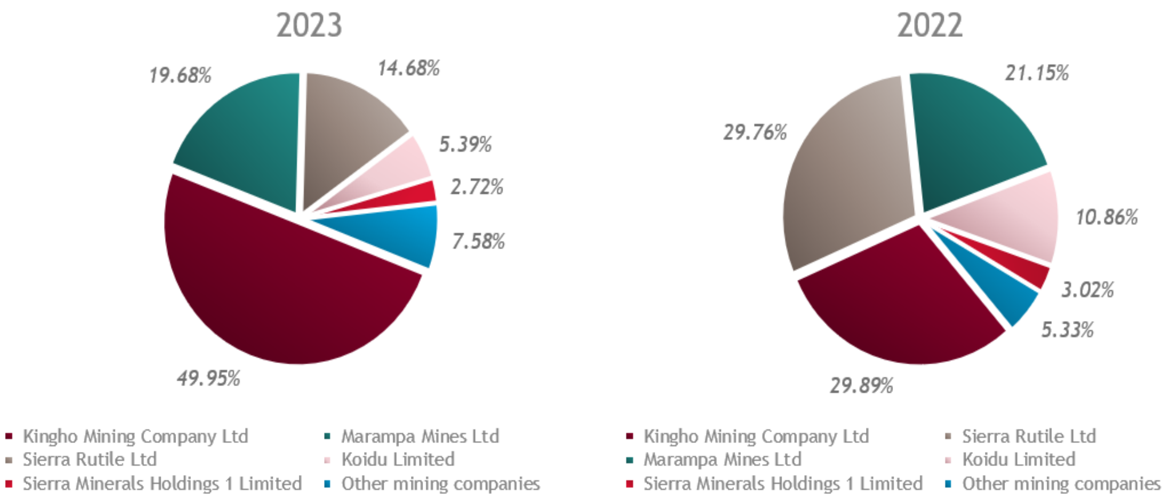
2023

No	Company	Commodity	Value (Le)	Share of exports %	Cum. Share of exports %
1	Kingho Mining Company Ltd	Iron ore	13,645,270,935	49.95%	49.95%
2	Marampa Mines Ltd	Iron ore	5,374,439,937	19.68%	69.63%
3	Sierra Rutile Ltd	Rutile, Ilmenite, Zircon, Garnet	4,010,865,441	14.68%	84.31%
4	Koidu Ltd	Diamond	1,472,258,137	5.39%	89.70%
5	Sierra Minerals Holdings 1 Ltd	Bauxite	742,736,442	2.72%	92.42%
	Other mining companies		2,069,711,973	7.58%	100.00%
	Total		**27,315,282,865**	**100.00%**	

2022

No	Company	Commodity	Value (Le)	Share of exports %	Cum. Share of exports %
1	Kingho Mining Company Ltd	Iron ore	5,274,112,746	29.89%	29.89%
2	Sierra Rutile Ltd	Rutile, Ilmenite, Zircon, Garnet	5,252,112,733	29.76%	59.65%
3	Marampa Mines Ltd	Iron ore	3,731,647,247	21.15%	80.80%
4	Koidu Ltd	Diamond	1,915,595,249	10.86%	91.65%
5	Sierra Minerals Holdings 1 Ltd	Bauxite	533,104,163	3.02%	94.67%
	Other mining companies		939,762,312	5.33%	100.00%
	Total		**17,646,334,450**	**64.60%**	

FIGURE 20: TOP 5 EXPORTING COMPANIES



The NMA did not provide the exports by destination.

Artisanal and small-scale mining exports data

The NMA data shows that the artisanal and small-scale mining activity exported minerals worth US$ 103 million in 2023 compared to US$ 68 million in 2022, registering thus an important increase of 52% mainly coming from the HMC exports (US$ 72 million). The detailed production is presented in the table below:

TABLE 50: ASM EXPORTS DATA

Commodity	Unit	2023		2022		Variance (%)	
		Volume	Value (US$)	Volume	Value (US$)	Volume	Value (US$)
Diamonds	Carats	85,492	27,169,477	144,583	40,687,741	(40.87%)	(33.22%)
Gold	Kg	1,114	4,894,666	25	1,368,927	4306.65%	257.55%
HMC	DMT	86,953	71,221,455	-	-	100.00%	100.00%
Coltan	DMT	-	-	230	2,465,801	(100.00%)	(100.00%)
Zircon	DMT	-	-	32,511	4,282,110	(100.00%)	(100.00%)
Titanium Dioxide	DMT	-	-	33,035	19,074,970	(100.00%)	(100.00%)
Total			**103,285,598**		**67,879,549**		**52.16%**

Source: NMA

4.2. Oil & Gas Sector

a. Context of the oil & gas sector in Sierra Leone

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

A new impetus was added when in 2011 new legislation was passed – the Petroleum Exploration and Production Act (PEPA) 2011. The Third Bid Round was held in 2012 with 69 applications received for 9 open blocks. Up to 2013/14, the GoSL had granted 11 Blocks to 9 international oil corporations.

Four discoveries have so far been made, although none of these have resulted in commercial operations. Owing to a combination of factors including the global decline in commodity prices, and the Ebola breakout, most of these companies withdrew from the exploration landscape. By 2014 and 2015, following the twin shocks of Ebola and sliding oil prices, about six companies operating in Sierra Leone either voluntarily withdrew from the basin or were terminated on grounds of non-compliance with their contractual obligations.

The licenses of non-performing / non-compliant operators were revoked and the exploration space was redefined and a Fourth Licensing Round was initially launched in 2018 and eventually closed in February 2020. Six pre-qualified applications were received. Two out of the six pre-qualified companies were successful and provisional licenses were granted to Cluff Energy Africa and Innoson Oil and Gas. Following intensive negotiations, only Innoson Oil and Gas (IOG) was awarded an Exploration Licence, for a period of seven years.

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

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

With the gradual recovery of the global price of oil, coupled with the managing of the COVID-19 pandemic, the prospect for oil and gas exploration seems promising. It is hoped that the transformative potential of this sector will translate into concrete outcomes in the immediate-medium term.[31]

[31] Petroleum Directorate.

The PD-SL provides comprehensive technical data as part of its efforts to promote investment in the country's oil and gas sector. These data rooms are located in Freetown, London, and Houston, providing seismic data, well logs, and exploration details to pre-qualified investors. The available data includes 2D and 3D seismic surveys, well data from the six recent wells, and older data from wells drilled in the 1980s.

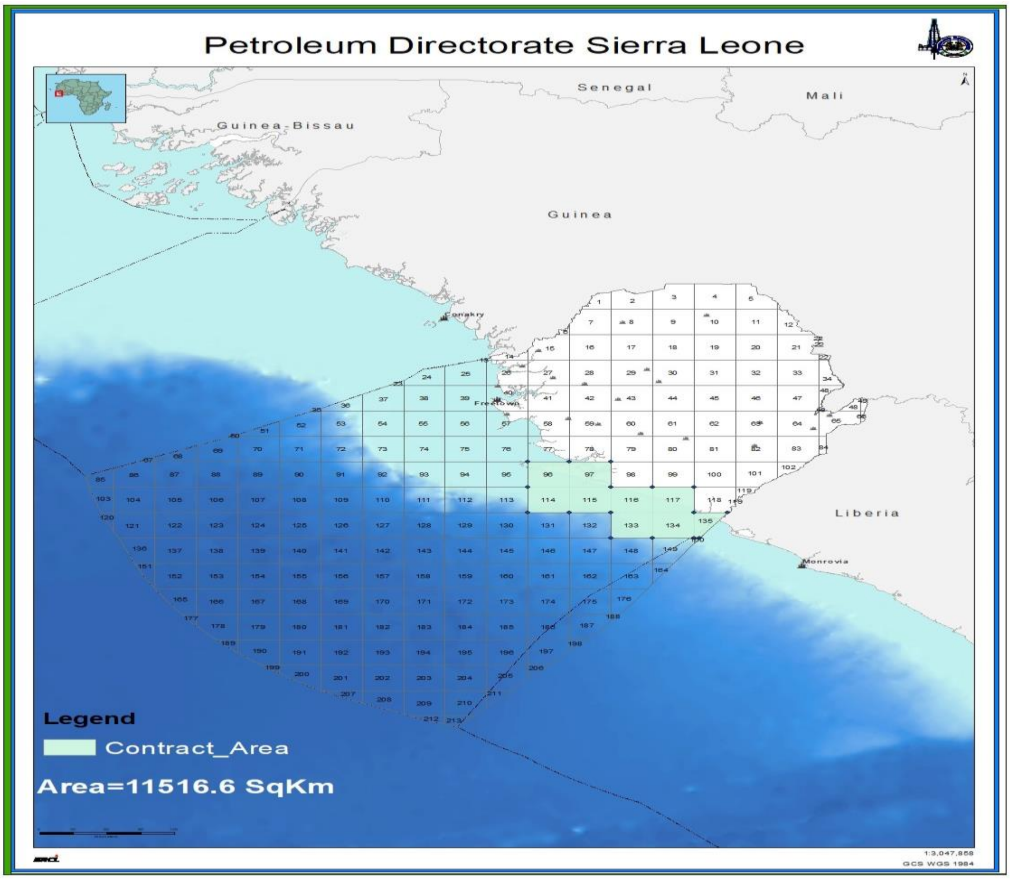
The PD-SL also offers a data catalogue and data room rules, which detail the conditions for accessing these datasets:

TABLE 51: PD-SL DATA CATALOGUE AND DATA ROOM RULES

Document
Data Catalogue
The Sierra Leone Data Room Rules
The London & Houston Data Room Rules

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

FIGURE 21: MAP OF ONSHORE AND OFFSHORE BLOCKS IN SIERRA LEONE



In May 2022, Sierra Leone launched its 5th petroleum licensing round, offering over 63,000 Km^2 of offshore acreage for exploration. This effort aimed to attract international oil companies (IOCs) to develop the country's upstream oil and gas sector. Following a streamlined evaluation process, the round concluded in September 2023, with three companies prequalified for exploration and production negotiations. By December 2023, six blocks were awarded to F.A. Oil Ltd, spanning 9,700 Km^2.

b. Exploration activities during 2022 and 2023

In May 2022, INNOSON Oil & Gas Ltd announced a huge gas discovery in the Sierra Leonean basin with estimated recoverable resources of 8.2 TCF and 234 MMbbl of gas and condensate respectively. According to the press release, *'A recently concluded independent third-party evaluation, by the Ryder Scott Company, revealed an SPE-PRMS P50 estimated unrisked gross prospective recoverable resources of 8.2 TCF and 234 MMbbl of gas and condensate respectively, attributable to the Innoson Oil & Gas (IOG) concession offshore Sierra Leone'*.

It is to be noted that the company has a 100% working interest on the prospect with a 10% carried, plus an optional 5% paid interest for the state of Sierra Leone.[32]

c. Legal Framework

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

TABLE 52: OIL AND GAS SECTOR LEGAL FRAMEWORK

Framework
Policies (including URL links)
The Petroleum Policy, 2010
Legislative Instruments (including URL links)
Core Legal Instruments
The Petroleum Exploration and Production Act (PEPA), 2011
The Petroleum Exploration and Production Amendment Act, 2014
Model Petroleum Agreements
Model Petroleum License Agreement
Model Reconnaissance Permit Agreement
Environmental Instruments
Environment Agency Protection Act, 2022
Local Content Instruments
The Sierra Leone Local Content Agency Act, 2016
Fiscal Instruments
The Extractive Industries Revenue Act (EIRA), 2018
The Income Tax Act, 2000
The Finance Acts and their Amendments

There were no legal reforms in the oil and gas sector in Sierra Leone during 2022 and 2023. However, there are on-going efforts to amend the PEPA 2011 to improve the regulatory framework for the oil and gas sector.

d. Institutional Framework

The Petroleum Directorate of Sierra Leone (PD-SL) has a statutory responsibility for regulating the upstream oil and gas sector and ensuring that all operators conducting petroleum operations comply with the applicable petroleum legislation and any other regulations or guidelines governing the upstream oil and gas operations in Sierra Leone.

Below are the key functions of the PD-SL:

[32] https://pd.gov.sl/wp-content/uploads/2024/04/IOG-Press-Release.pdf

- Monitoring and supervising all petroleum industry operations under license to ensure compliance and congruence with international best practices;
- Marketing and promoting the petroleum potential of the country to the international investment community;
- Assessing prospective holders of petroleum licences for the purposes of prequalification for participation in licensing rounds;
- Processing all applications for licensing of blocks and overseeing the participation of commercial entities in the sector;
- Reviewing all proposed reconnaissance, exploration and appraisal work plans, plans for development and operation, and complimentary budgets;
- Promoting and ensuring well planned and executed cost efficient operations;
- Encouraging and enforcing the standards of operation and code of practice for petroleum operations;
- Ensuring efficient and safe petroleum operations in line with international best practices;
- Acting as Technical Adviser to Ministries, Departments and Agencies (MDAs) on all matters that may impact on the management of upstream petroleum activities in the country; and
- Maintaining and managing records on petroleum industry operations, including all types of petroleum data.

e. Tax regime

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

- the Income Tax Act, 2000 as amended by subsequent Finance Laws;
- the PEPA 2011; and
- the EIRA, 2018.

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

TABLE 53: TAXES PAYABLE BY OIL AND GAS COMPANIES

Tax	Description
Royalties	The holder of a petroleum right shall pay royalties for petroleum obtained pursuant to the right. The royalty rates: ▪ for crude oil - **10%**; and ▪ for natural gas - **5%**. Royalties may be paid in kind in accordance with section 107 of the Petroleum (Exploration and Production) Act, 2011, provided that no more than 15% of royalties are payable under a petroleum right for a year of assessment may be paid in kind unless the Minister of Finance agrees otherwise.
Income Tax	The income tax for petroleum operations for a year of assessment shall be calculated by applying the rate set out in paragraph 4 of the Second Schedule to a person's chargeable income from petroleum operations for the year and if the person has other chargeable income, that income shall be charged at the appropriate rate under the Income Tax Act, 2000. The CIT rate for mineral and petroleum operations is **25%** on profits, as amended by the Financial Act 2022.
Petroleum resource rent tax	Paragraph 30 of the EIRA stipulates that the holder of a petroleum license who has accumulated net receipts or a year of assessment from production activities of a separate petroleum operation shall pay petroleum resource rent tax. The amount of petroleum resource rent tax shall be calculated by applying the rate specified in paragraph 6 of the Second Schedule of the EIRA to the accumulated net receipts for the year.

f. Types of licenses

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

TABLE 54: OIL AND GAS LICENCES

Type	Duration	Rights conferred
Reconnaissance permit	Specified in the reconnaissance permit	A non-exclusive right to undertake reconnaissance operations in the permit area.
Petroleum license	30 years from the effective date, unless sooner cancelled or terminated	An exclusive right to undertake exploration and production within a license area.

Source: PEPA (2011)

g. Licenses allocation

Award Process

The table below shows the award process of each type of oil & gas licence:

TABLE 55: OIL AND GAS AWARD PROCESS

Type	Awarded by	Award process
Reconnaissance permit	The Minister on the advice of the Directorate	A company or group of companies may, upon payment of the prescribed non-refundable application fee, apply to the Minister for a reconnaissance permit.
Petroleum License	The Minister	The Minister may prescribe a petroleum license shall be acquired through: • a call for tenders; or • direct negotiations.

Source: PEPA (2011)

The table below details the licensing process:

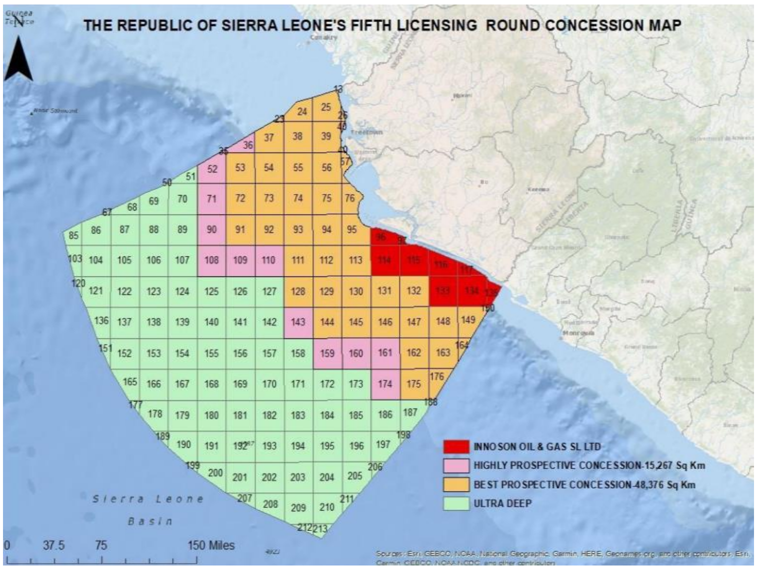
TABLE 56: OIL AND GAS AWARD PROCESS (DETAILED)

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

Sierra Leone fifth offshore licensing round 2022

The 5th offshore petroleum licensing round was launched in May 2022 for a nine-month period, extended to September 2023. Managed by the PD-SL, the round offered extensive offshore acreage of 63,643 Km^2 in the Atlantic Ocean for exploration. The map below shows the offshore blocks proposed for the 5th licensing round in Sierra Leone.

FIGURE 22: CONCESSION MAP FOR THE FIFTH LICENSING ROUND



Application documents

The table below provides links to the application documentation for the fifth licensing round as published in the PD-SL website:

TABLE 57: APPLICATION DOCUMENTS OF THE FIFTH LICENSING ROUND

Document
Application Documents
Section A - Applicant details and financial information
Section B - Technical summary
Section C - Commercial proposal
Section D - HSE summary
Application Procedure
Application procedure
Licensing Round Guidelines
Prequalification guidelines for investors
Application guidelines for investors
Reconnaissance Permit
Reconnaissance permit fees & application requirements
Bid Evaluation Scorecard
Bid Evaluation score card

Technical and financial criteria

The table below provides an overview of the technical and financial criteria adopted by the PD-SL during the 5th licensing round:

TABLE 58: TECHNICAL AND FINANCIAL CRITERIA OF THE FIFTH LICENSING ROUND

Evaluation procedure	Criteria
Technical Evaluation	- The technical competence and financial strength of the applicant to be able to safely carry out exploration and production of hydrocarbons within the legal requirements and industry standards.
	- The technical database used in making the application.
	- The technical evaluation and work programme - preference will be given to bids which demonstrate a cost effective and technically robust programme.
	- HSE - detailed environmental policies of the company should be stated with particular reference to environmental impact analysis and HSE Management. Company should show evidence of compliance with ISO 14001 in its previous operations.
	- Social projects and level of training - local content in terms of commitment to training and growth of indigenous capability, indigenous manpower and the use of services of the local industry should be indicated.
	- Only bids that achieve a pass in HSE will be taken to the final stage where the technical and commercial evaluation will take place.
Financial Evaluation	- The Minimum Work Commitment in US Dollars.
	- The biddable elements.
	- Projects to be undertaken in Sierra Leone.
	- The evaluation of the commercial offer will be based on a direct computation of all the commercial components of the offer.

Results of the 5th licensing round

The round concluded in September 2023, with three companies prequalified for exploration and production negotiations. By December 2023, six blocks were awarded to F.A. Oil Ltd, spanning 9,700 Km^2.[33]

Transfer of Oil & Gas licenses

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

According to the PD-SL, there was no transfer of oil or gas licences in 2022-2023.

Review of awarding process during 2022-2023

The SLEITI MSG agreed to select the F.A. Oil Limited petroleum license, awarded as result of the 5th offshore licensing round, for verification for material deviations from the applicable legal and regulatory framework governing licence awards in the petroleum sector.

Despite several attempts to engage with the PD-SL, we were unable to perform the review of the awarding process for the selected license. The application documents and the technical and financial criteria that applied during the 5th licensing round are publicly available in the PD-SL website, as detailed above. However, detailed information regarding the evaluation process, including the scoring for each bid and the specific criteria used, were not available.

[33] https://pd.gov.sl/wp-content/uploads/2024/04/Petroleum-Licence-Awarded-to-F-A-Oil-Limited.pdf

h. Oil and gas licences register

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

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

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

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

According to the PD-SL, the following are the active holders of oil and gas licences during 2022 and 2023:

Petroleum licenses

TABLE 59: PETROLEUM ACTIVE LICENSES DURING 2022 AND 2023

Company	Application date	Award date	Duration	Product	Blocks
INNOSON Oil & Gas Ltd	29/04/2020	16/12/2020	30 years	Oil & Gas	96-97-114- 115-116-117-133-134-135
F.A. Oil Ltd	04/08/2023	04/12/2023	30 years	Oil & Gas	53-54-55-72-73-74

Reconnaissance permit

In May 2022, The PD-SL announced that it had entered into a Reconnaissance Permit Agreement (RPA) with Wildcat Petroleum Plc (WCAT), a company targeting investment opportunities in business and assets within the upstream sector of the petroleum industry. The RPA covers 20 offshore petroleum blocks in Sierra Leone territorial waters comprising a total 24,000 Km^2. This permit grants WCAT a non-exclusive right to conduct reconnaissance operations within the relevant blocks for a period of six months from the start of the Agreement.[34]

i. Public disclosure of oil and gas agreements

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

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

At the time of writing, no petroleum agreement had been published on the Petroleum Directorate website or other websites.

[34] https://pd.gov.sl/wp-content/uploads/2024/04/New-Reconnaissance-Permit-Agreement.pdf

However, the models of the Petroleum Licence Agreement[35] and Reconnaissance Permit Agreement[36] that might be used in case of agreement with petroleum companies are available on the Petroleum Directorate website.

j. State participation in the Oil & Gas sector

State-owned enterprise in the oil and gas sector

SLEITI MSG agreed that there are no state-owned enterprises in the oil and gas sector in Sierra Leone.

State participation in petroleum agreements

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

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

The PD-SL did not inform us of any state participation in oil and gas licenses or agreements during 2022 and 2023.

k. Sub-national payments in the oil & gas sector

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

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

l. Sub-national transfers in the oil & gas sector

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

[35] Model-Petroleum Licence Agreement
[36] Model Reconnaissance Permit-Agreement

m. Infrastructure provisions and barter arrangements

The SLEITI MSG agreed that there were no active infrastructure provisions and barter arrangements in the oil & gas sector in Sierra Leone between 2022 and 2023 as defined by EITI Requirement 4.3.

n. Transportation revenues

The SLEITI MSG agreed that there were no transportation revenues from the oil and gas sector in Sierra Leone in 2022-2023 as defined by EITI Requirement 4.4.

o. Social and environmental expenditure

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

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

There was no social and environmental expenditure made by oil and gas companies in 2022 - 2023.

Beneficial Ownership

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

a. Beneficial Ownership disclosure requirements in the extractive sector

Mining sector

Section 160 of **the MMDA, 2023 Act** stipulates that the holder of a reconnaissance license, exploration license, large-scale mining license or small-scale mining license shall disclose details of persons holding a participating interest in the license. A person who holds a **5%** or more interest shall be defined as holding a "participating interest" in the shares and shall declare such interests to the NMA and other authorised institutions. The details of such persons shall include the full name, nationality and country of origin and percentage / number of shares held.

Oil and gas

Section 21 (a) of the **Petroleum (Exploration and Production) Act 2011** dictates that an application for a reconnaissance permit shall contain the name of each person who is the beneficial owner of 5% or more of the shares issued by the company or companies. Section 37 of **Petroleum (Exploration and Production) Act 2011** dictates the same regarding applications for a petroleum license.

Section 37 (a) of the petroleum exploration and production license provides that applications for petroleum licenses must contain, among other things, the name of every person who is a beneficial owner of 5% or more of the shares issued by the company.

All sectors

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

b. Beneficial ownership (BO) road map

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

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

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

For further information on the BO roadmap, please see here.

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

TABLE 60: DEFINITION OF BO AND PEP

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

c. Progress made on BO

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

The consultant performed the following tasks:

- mapping of existing CAC/NMA/PD-SL processes;
- stakeholder mapping and engagement;
- review the findings and recommendations of the 2017 report;
- review and update of template for the collection of BO information;
- inter-agency coordination, data collection, and sharing:
- support SLEITI and CAC/NMA in technical capacity building and transfer of expert knowledge in the field;
- undertake an initial paper-based BO disclosure based on reviewed BO declaration forms for the upcoming validation; and
- report and roadmap for phase two.

The table below summarises the main recommendations of the report.

TABLE 61: MAIN RECOMMENDATIONS OF THE BO REPORT

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

For further information, please see the BO report here.

In November 2024, SLEITI held a meeting with the National Investment Board (NIB) to explore establishing a BO national register. This initiative is part of efforts to improve transparency and accountability in Sierra Leone's extractive industries and investment sectors.

Key highlights from this meeting include:

- **Partnership and collaboration:** SLEITI and NIB will jointly develop BO disclosure regulations, working alongside the Bank of Sierra Leone, Anti-Corruption Commission, Financial Intelligence Agency, etc.

- **Regulatory reforms:** Develop a regulation to require BO disclosures from both public and private companies, strengthening the foundation of BO regulation in Sierra Leone.
- **Technical Working Group reactivation:** A dedicated BO technical working group will be reactivated to drive policy and regulatory reforms, ensuring comprehensive BO disclosure.
- **Data collection:** NIB will gather BO data as part of its investment vetting process, enhancing investor confidence while ensuring transparency in Sierra Leone's business environment.

d. Beneficial ownership reporting

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

To comply with Requirement 2.5 (C) for collecting BO data of the extractive companies operating in Sierra Leone for the 2022/23 EITI report, the SLEITI MSG agreed to maintain the definition of BO and PEP as adopted by the BO working group.

The disclosure threshold therefore agreed upon by the SLEITI MSG to collect information about the BO of the extractive companies operating in Sierra Leone for 2022-2023 was set at **5% or more** according to MMDA (2023) and PEPA (2011).

The SLEITI MSG agreed that the information on BO should be included through the reporting process of extractive companies included in the reporting scope **(19 and 21 mining companies respectively for the years 2022 and 2023).**

The SLEITI MSG agreed to use the BO declaration form (high quality data collection) recommended by the EITI International Secretariat.

With respect of EITI Requirement 2.5 (e), the SLEITI MSG agreed that the BO declaration form should be signed off by a member of the senior management team or senior legal counsel.

Results of BO reporting

2022

The table below shows that nine (09) out of the eighteen (18) in-scope companies submitted their completed BO declaration forms, and four (04) other companies provided information on their legal ownership.

TABLE 62: RESULTS OF BO REPORTING (2022)

N°	Company	BO information (Yes/No)	Legal ownership (Yes/No)
1	Kingho Rail and Port	Yes	Yes
2	Koidu Limited	Yes	Yes
3	Marampa Mines Ltd	Yes	Yes
4	Kingho Mining Company Ltd	Yes	Yes
5	Meya Mining	Yes	Yes
6	Cheng Li Trading Mining Comp. (SL) Ltd	Yes	Yes
7	Kingho/Northern Mining Co	Yes	Yes
8	Kingho/CKH Mining Company	Yes	Yes
9	Kingho/Mass Energy Mining Co	Yes	Yes

N°	Company	BO information (Yes/No)	Legal ownership (Yes/No)
10	Sierra Rutile Ltd	No	Yes
11	CTC MINING (SL) Ltd	No	Yes
12	FG Gold Limited	No	Yes
13	Kasino Mining Company	No	Yes
14	Tonguma Limited	No	No
15	Newfield/Sierra Diamond	No	No
16	Gold Lion Mining Company	No	No
17	Afro-Asia mining Corporation	No	No
18	Seawright mining Co Ltd	No	No

2023

The table below shows that nine (09) out of the twenty-one (21) in-scope companies submitted their completed BO declaration forms, while four (04) other companies provided information on their legal ownership without additional data on the ultimate beneficial ownership.

TABLE 63: RESULTS OF BO REPORTING (2023)

N°	Company	BO information (Yes/No)	Legal ownership (Yes/No)
1	Koidu Ltd	Yes	Yes
2	Marampa Mines Ltd	Yes	Yes
3	Kingho Mining< Company Ltd	Yes	Yes
4	Meya Mining	Yes	Yes
5	Cheng Li Trading Mining Comp. (SL) Ltd	Yes	Yes
6	Kingho/Northern Mining Co	Yes	Yes
7	Kingho/CKH Mining Company	Yes	Yes
8	Kingho/Mass Energy Mining Co	Yes	Yes
9	Jong Minerals Company Ltd	Yes	Yes
10	Sierra Rutile Ltd	No	Yes
11	CTC MINING (SL) Ltd	No	Yes
12	FG Gold Ltd	No	Yes
13	Kasino Mining Company	No	Yes
14	Gold Lion Mining Company	No	No
15	Afro-Asia mining Corporation	No	No
16	Seawright mining Co Ltd	No	No
17	Foison Resources Ltd	No	No
18	F.S. Mining (SL) Ltd	No	No
19	Leone Afric Metals	No	No
20	Metals & Minerals/Pan-African Rare Metal	No	No
21	Sunshine Resources (SL) Ltd	No	No

Annexes 9 and 10 to this Report present the BO and legal ownership information disclosed by mining companies.

4.3. Collection and Distribution of the Extractive Revenues

a. Budget process

Budget preparation

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

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

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

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

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

Budget Implementation

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

b. Revenues Collection

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

Revenue collection in the mining sector

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

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

Mining lease holders also pay surface rentals to district councils, Paramount Chiefs/ Chiefdom Administrations, Constituency Development Fund, and individuals with surface rights within their areas of operation. Surface rent is paid in accordance with section 35 of the MMDA Act 2023. Surface rents are negotiated between the companies and the communities.

c. Budget Audit

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

Section 119 of the constitution of Sierra Leone mandates ASSL to audit the Public Accounts of Sierra Leone and all public offices, including courts, the accounts of the central and local government administration, universities and public institutions of like nature, statutory corporations, companies or other bodies and organisations, set up by an Act of Parliament or statutory instrument or otherwise set up partly or wholly out of public funds shall be audited and reported by or on behalf of the Auditor General.[37]

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

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

The 2022 Annual Financial Report can be found here.

4.4. Assessment of Subnational Revenues

a. EITI Requirement

Pursuant to the EITI Requirement 4.6, the MSG is **required** to establish whether direct payments, within the scope of the agreed benefit streams, from companies to subnational government entities are material. Where material, the MSG is **required** to ensure that company payments to subnational government entities and the receipts of these payments are disclosed.

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

Some extractive companies make direct payments to subnational government entities, such as regional governments, municipalities and chiefdoms. Other extractive companies make

[37] http://www.sierra-leone.org/Laws/constitution1991.pdf

payments directly to the central government which devises a revenue sharing mechanism that stipulates that a share of revenues collected by the central government is transferred to subnational government entities. While these payments may represent only a portion of revenues at the national level, they are often an important source of income for local governments. Transparency regarding these payments and transfers can be useful in holding local authorities to account.

FIGURE 23: SUBNATIONAL PAYMENTS

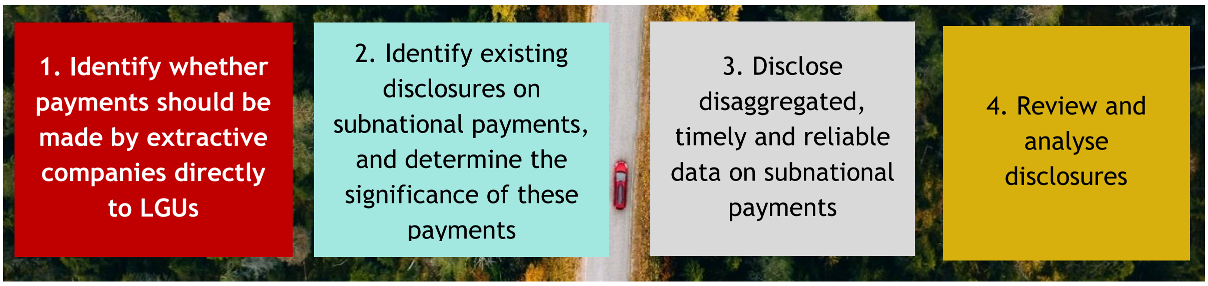
b. Local government units

According to the International Monetary Fund, subnational governments, also known as local government units (LGUs), are “institutional units whose fiscal, legislative, and executive authority extends over the smallest geographical areas distinguished for administrative and political purposes. The scope of their authority is generally much less than that of central government or state governments, and they may, or may not, be entitled to levy taxes on institutional units resident in their areas. They are often heavily dependent on grants (transfers) from higher levels of government, and they may also act, to some extent, as agents of central or regional governments.”[38]

c. Implementation process

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

FIGURE 24: IMPLEMENTATION OF EITI REQUIREMENT 4.6



[38] Source: IMF (2014), Government Finance Statistics Manual 2014, Paragraph 2.95, available here.

For further information, please refer to the Guidance Note on Subnational payments available here.

d. Subnational payments in Sierra Leone

Subnational revenues remain an important source of revenue to several communities in Sierra Leone. As a result, stakeholders remain committed to expanding transparency of subnational revenues and broadening accountability of the impact of such revenues on communities. A recent report commissioned by the SLEITI MSG in 2021 - Assessment of the Impact of EITI and Socioeconomic Benefits Derived from Subnational Extractive Revenues by Mining Communities – found that while subnational payments (in the form of surface rent, CDA, DACDF, crop compensation and other fees) are being made by large-scale and small-scale mining companies to host communities and landowning families, the positive social impacts of these payments are limited. The MSG seeks to make progress in addressing the challenges and identifying opportunities to improve oversight and impact of subnational revenues.

Surface rent is paid by mining licenses holders in accordance with Section 36 §A of the MMDA, 2023 and is negotiated between the companies and the communities.

e. Formula for distribution

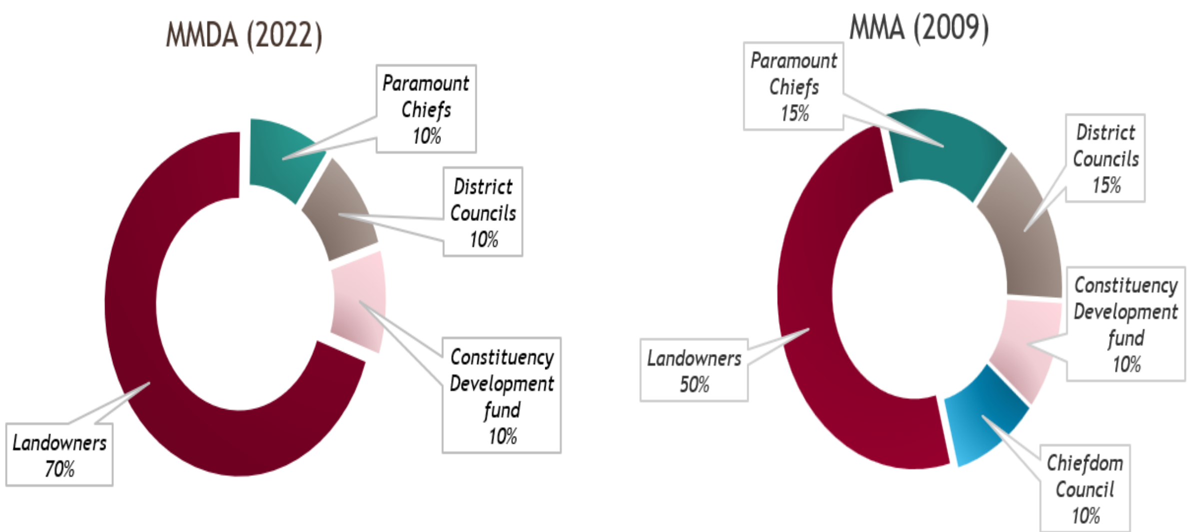
Surface rent is allocated as follows:

- 70% - Landowners
- 10% - Paramount Chiefs
- 10% - District Councils
- 10% - Constituency Development Fund

It is to be noted that the Chiefdom Councils benefited from 10% of surface rental under the MMA (2009).

Below is a comparison of the allocation basis under the MMA (2009) and the MMDA (2023):

FIGURE 25: SURFACE RENT ALLOCATION UNDER THE MMA (2009) AND THE MMDA (2023)



4.5. Energy Transition in Sierra Leone

Energy transition in Sierra Leone focuses on shifting from a reliance on traditional energy sources, such as biomass and fossil fuels, to modern, sustainable, and cleaner energy solutions. Like many developing nations, Sierra Leone faces challenges in energy access, with only 34% of the population having electricity access, and the majority of rural communities relying on firewood and charcoal for energy.

The Government is prioritising renewable energy, such as solar, hydropower, thermal and wind, as part of its commitment to reducing greenhouse gas emissions and improving energy security. Key initiatives include scaling up small-scale solar projects, leveraging the country's significant hydropower potential, and partnering with international organisations to fund renewable energy infrastructure.

Despite progress, challenges remain, including limited financing, inadequate grid infrastructure, and a need for skilled labor in the energy sector. However, Sierra Leone's energy transition holds promise for economic development, improved living standards, and environmental sustainability.

a. National Commitments to the Energy Transition

Sierra Leone has made a series of commitments to the global energy transition, with a focus on increasing the share of renewable energy, improving energy access, and addressing climate change. Below are some of the key actions and commitments made by the government of Sierra Leone:

First National Dialogue on Energy Transition

In October 2023, Sierra Leone's President convened the First National Dialogue on Energy Transition, a significant step toward shaping the country's energy future. The dialogue brought together key stakeholders, including government officials, private sector actors, civil society, and development partners, to discuss and commit to a comprehensive energy transition plan. During the dialogue, several key commitments were made to accelerate the transition towards a sustainable and resilient energy system for Sierra Leone.

Below are the primary commitments and actions outlined during this event:

- **Expansion of Renewable Energy:** The Government aims to mobilise investments for one gigawatt of energy generation capacity within the next 10-15 years, leveraging the country's renewable energy potential for both local consumption and regional exports;
- **Climate Resilience:** Moves toward low-carbon sources of energy to reduce global greenhouse gas (GHG) emissions;
- **Energy Access:** Recognising the vulnerability to climate change, the government pledged to reduce energy poverty and increase access to modern energy systems, addressing the needs of the 64% of the population still without electricity;
- **Integration of Energy with Socio-Economic Goals:** The plan emphasizes energy as a driver for industrialisation, job creation, and agricultural development, aligning with broader goals of poverty reduction and sustainable food systems;
- **Inclusivity and Gender Equity:** The dialogue highlighted the need for an inclusive transition, ensuring gender equity and local participation in energy policies and programs; and
- Collaborations and Legislation: The government intends to build partnerships with local and international stakeholders and develop supportive legislation to drive climate-positive and scalable energy solutions.

Climate Resilience and Energy Transition Dialogue (CRET 2024)

In November 2024, The Office of the Presidential Initiative on Climate Change, Renewable Energy, and Food Security (PI-CREF), in partnership with key ministries hosted the second edition of a two-day Climate Resilience and Energy Transition Dialogue (CRET 2024).[39]

Over 400 stakeholders from the public and private sectors in energy, climate change, health, agriculture, and other productive sectors of the economy, as well as representatives from CSOs and academia attended the dialogue.

The SLEITI secretariat participated in this national dialogue with the theme: "From Commitments to Actions" on Climate Resilience and Energy Transition. The key objectives included planning for the long-term Energy Transition Investment, Access to Modern Energy Cooking Services, Climate Finance and Funding Locally Led Climate Action, Off grid Energy Solutions and Scaling Up Mini Grids, Unlocking Renewable Energy Investment Opportunities in Sierra Leone, and Integrating Food Systems Resilience into the "Feed Salone" programme among others.

Below are the key highlights from this dialogue:

- To increase energy supply to 4.5 gigawatts by 2050;
- Prioritisation of energy transition to unlock productivity, an enabler to national development;
- Sustainable energy for mining companies;
- Shared knowledge on new perspective and solutions to a sustainable access to energy in Sierra Leone;
- Pledges by several donor partners to improve the energy sector;
- Mini grid and off grid solutions to light up Sierra Leone by 2050;
- Launching of the strategic plan for 2024-2030 for climate resilience and economic growth, energy transition and Green Growth Development plan for 10 years;
- A net zero emission to be reached by 2050;
- Female participation on energy transition with special reference to clean cooking and agriculture to be incorporated;
- Setting up of the first radiotherapy center in Sierra Leone by the International Atomic Energy Agency and renewable and smart agriculture;
- Establishment of a climate finance unit at the ministry of finance to deal with all climate issues and production of a Climate Fiscal policy for Sierra Leone by 2025;
- Accelerating electricity in the rural areas of Sierra Leone needs more mini grids, with the Kambia District to be lit up by 2025; and
- Commitment to the Energy Transition and Acceleration of Access to Electricity.

Launch of the Energy Transition and Green Growth Plan

Following the Climate Resilience and Energy Transition Dialogue in November 2024, the GoSL launched an ambitious Green Growth Plan,[40] marking a significant step towards achieving 100% electrification by 2040. The plan aims to transition the country to sustainable energy sources, including hydropower and solar, while reducing reliance on biomass and oil. This initiative is aligned with Sierra Leone's broader climate goals and development strategies, including its Nationally Determined Contributions (NDCs).

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[39] Climate Resilience and Energy Transition Dialogue (CRET 2024)
[40] https://sierraloaded.sl/news/government-green-seforall-electrification-2040/

The plan envisions massive investments, with projections for approximately US$ 39 billion by 2050 to support energy infrastructure, including mini-grids, grid reinforcements, and the electrification of the transport sector. This transformation is expected to generate significant economic benefits, such as creating around 30,000 jobs. The government is working closely with international partners, such as the Sustainable Energy for All (SEforALL) program, to bring this vision to fruition.

Nationally Determined Contributions (NDCs) under the Paris Agreement (PA)

As a signatory to the Paris Agreement, Sierra Leone has committed to reducing its greenhouse gas emissions and transitioning to a more sustainable energy system.

Sierra Leone's NDC responds to Article 4, paragraph 2 of the PA, which requires parties to the United Nations Framework Convention on Climate Change (UNFCCC) to prepare, communicate and maintain successive Nationally Determined Contributions (NDCs) that they intend to achieve.

The NDC serves as an instrument to guide the country's climate actions of the various mitigation and adaptation options in reducing GHG emissions and accompanying climate change challenges.

The table below shows the Nationally Determined Contributions (NDCs) submitted by the GoSL to fulfill its commitments under the Paris Agreement and the United Nations Framework Convention on Climate Change (UNFCCC):

TABLE 64: SIERRA LEONE NATIONALLY DETERMINED CONTRIBUTIONS (NDCS)

Document	Date of submission	Link
Sierra Leone's Intended Nationally Determined Contribution (INDC)	01/11/2016	*Link*
Sierra Leone's Updated Nationally Determined Contribution (Updated NDC)	31/07/2021	*Link*

The updated NDC covers mitigation actions for energy, industrial process and product use, waste, agriculture, forestry and other land use, blue economy as well as adaptation actions for agriculture and food security, water resources, energy, coast zone management, ecosystem management, disaster management, gender and social inclusion, and infrastructure.

In its updated NDC, Sierra Leone aims to:

- **Increase renewable energy:** Sierra Leone targets achieving 22% of its energy from renewable sources by 2030. This includes expanding hydropower, solar, and wind energy generation.
- **Mitigate global GHG emissions:** Sierra Leone's commitment is to reduce its domestic GHG emissions of 10% by 2030, with an intermediary indicative mitigation target of 5% reduction by 2025 against the same baseline. In the longer term, Sierra Leone's mitigation ambition is to cut GHG emission by 25% in 2050.
- **Improve energy access:** The government has committed to providing electricity to 75% of the population by 2030. This will involve both on-grid and off-grid solutions, particularly solar energy for rural areas.
- **Improve energy efficiency:** The government has included energy efficiency measures in its NDCs to improve the overall performance of the energy sector.
- **Devise adaptation strategies:** In addition to mitigation actions, Sierra Leone's NDCs also highlight the need for adaptation strategies in the energy sector to cope with the impacts of climate change.

The table below outlines the strategies adopted by the Government of Sierra Leone for implementing mitigation actions until 2030 under the updated NDC:

TABLE 65: STRATEGIES FOR IMPLEMENTING MITIGATION ACTIONS UNTIL 2030 UNDER THE UPDATED NDC

Strategies	Actions	Targeted Period	
		By 2025	By 2030
Improve mechanisms for multilevel climate governance and coordination	- Review existing policies, plans and regulations to mainstream climate change actions.	✓	
	- Enhance technical and human capacities of MoEnv, EPA-SL and SLMet to facilitate the implementation, monitoring and reporting of NDC actions.	✓	
	- Enhance the climate change committees through policy and community engagement.	✓	
	- Establish a centralised climate change Monitoring, Reporting, and Verification (MRV) system at EPA-SL/SLMet to enhance data generation analysis and management.	✓	
	- Develop a communication and visibility strategy for mitigation actions in the NDC.	✓	
	- Review existing strategies/work plan.		
	- Enhance technical and human capacities of their relevant sectors.	✓	
Increase energy efficiency and access through the dissemination of clean energy technologies	- Switching and promotion for renewable energy (Solar Energy & LPG).		✓
	- Provider of alternative energy sources such as Biofuels.		✓
	- Promoting briquettes made from grass and other waste materials.	✓	
	- Promote access to off-grid solar energy sources/ Street lightening in public places and buildings using energy efficient appliances/lamps.		✓
	- Develop and promote a minimum energy efficient performance standard.	✓	
	- Gradually phasedown fluorinated gases with climate friendly refrigerants as per the phasedown schedule of the Kigali amendment to the Montreal Protocol.		✓
	- Support private sector led initiative for the promotion of clean energy technologies.	✓	
	- Monitor and track emission from the extractive and manufacturing sector and regulate actions through environment social health and impact assessment.		✓
	- Development of the BIO energy policy and strategy.	✓	
Promote the mainstreaming of climate actions into processes within industries	- Promote the use of clean and renewable energy in the extractive and manufacturing sector.		✓
	- Promote grid and/or on-site renewable power production to be replaced by use of diesel/HFO by industries.		✓
	- Ensure reclamation of mine out is by extractive industries through a progressive rehabilitation and address legacy environmental issues in the mining sector.		✓
	- Monitor and track emission from the extractive and manufacturing sector and regulate actions through an Environmental Impact Assessment (EIA) Process		✓
Improve and maintain Sierra Leone's forests as a major carbon sink	- Develop a national forest inventory and forest management information system.	✓	
	- Develop new REDD+ initiatives for terrestrial forest.	✓	
	- Reforest 14,000 hectares degraded economic and agroforestry.	✓	
	- Develop REDD+ initiative for the Mangrove reserve in the Sierra River Estuary.	✓	

Strategies	Actions	Targeted Period	
		By 2025	By 2030
Enhance integrated waste management system in the country	- Increase waste management infrastructure and ease access.		✓
	- Promote waste to energy through the extraction gas.		✓
	- Develop incineration facilities in Freetown and other major facilities to reduced CH4 emissions from landfill sites.		✓
	- Reducing methane emissions from wastewater and providing a nutrient-rich digestate that can be used as a fertilizer (Reduction of CH4 and CO2 emissions)	✓	
	- Investment in reuse and recycling technology and create employment opportunity for youth, through the circular economy approach.		✓
	- Development of commercial scale aerobic composting systems for agricultural and forestry residue, manure, food processing, household kitchen and garden waste, and biosolids (organic solids from treated sewage). Reduction in CH4 emissions, since methane-producing microbes are not active in the presence of oxygen.		✓
Sustainable management of water sheds and fresh water resources for human ecological benefits	- Enforcement of by-laws for land use management and water sheds.	✓	
	- Established Watershed and fresh water committee that are gender sensitive for responsible and sustainable water management.	✓	
	- Review and update of National Laws towards Water Sheds.	✓	
Maintain the integrity of the marine and coastal environment	- Capacity building and sensitization of communities to waste segregation (Door to door campaign).	✓	
	- Building the Capacity of community Youth to transform waste into wealth.	✓	
Diversification of economic growth through strengthened transport sub-sector	- Designing and improvement of provincial and feeder roads using Climate resilient surfacing materials.		✓
	- Mass transportation (rail, road and water) for passengers and cargoes using clean alternative energy sources.		✓
	- Improvement of the water transport system.		✓
	- Quality control for spare parts for all types of vehicles.	✓	
	- Promote emission testing for all heavy types of machinery and vehicles.	✓	
	- Development of transport infrastructure to incorporate walkways and bicycle tracks.		✓
	- Introduce E-mobility programme and plans to promote the use of electric buses, passenger vehicles (cars) and motor tricycles, resulting in displaced conventional vehicle sales, transport fuel imports and associated GHG emissions.	✓	
	- Develop strategy on the age limit of vehicles imported into Sierra Leone.	✓	
Adoption and application of climate smart and conservation agriculture	- Using modern machinery and technology to increase production yield.		✓
	- Shifting from high to low and wetland to reduce deforestation.		✓
	- Organic manure to reduce fertilizer use that has the tendency of depleting the soil fertility and polluting the water bodies of the wetlands.		✓

The actions have a total value of around US$ 2,764 billion. Various domestic and international vehicles will be explored by the GoSL for resource mobilisation, as international public financing sources. The table below shows the progress to date made towards financing NDC Implementation plan outcomes:

TABLE 66: PROGRESS TOWARDS FINANCING NDC IMPLEMENTATION PLAN OUTCOMES[41]

Outcome	Output	Implementing Entity	Funding Source	Total Budget	Period
Resilient Urban Sierra Leone Project	Improve Integrated Urban management service delivery, and disaster emergency management in Freetown and select cities in Sierra Leone.	MoF and some Municipal Councils	World Bank and GoSL	US$ 56.7 million	2020-2025
Integrated and Resilient Urban Mobility Project	Improve the Quality of Public Transport, address climate resilience, improve road safety in selected areas, and enhance institutional capacity in the transport sector.	Ministry of Transport and Aviation	World Bank and GoSL	US$ 50 million	2020-2025
Agricultural Value Chain Development Project	Strengthen climate-proof rural infrastructure through the rehabilitation of feeder roads and warehouses to improve product drying and storage capacity.	Ministry of Agriculture and Forestry	IFAD, OPEC Fund and GoSL	US$ 0.1 million	2018-2025
Adapting to Climate Change Induced Coastal Risks in Sierra Leone	Strengthening the ability of government institutions and coastal communities to systematically manage climate change risks and impacts on physical infrastructure and socio-economic development.	UNDP	GEF	US$ 9.9 million	2016-to date
Environment and Natural Disaster Management Project	Support natural resource governance in the key area of natural resource management, environmental protection, policy and legal frameworks within the extractive sector, land tenure policy, and adapting to the impact of climate change and other man-made natural disasters.	UNDP	UNDP	US$ 0.8 million	2016-to date
Energizing Development Project	Achieve a long-term improvement in the lives of people who are most at risk of poverty. For example, it strives to create economic opportunities and jobs by building up markets for renewable energy.	GIZ	GIZ	Not indicated	2015-2025

National Adaption Plan (NAP) Process

Sierra Leone's commitments under the National Adaptation Plan (NAP) process are vital components of the country's broader strategy to address the impacts of climate change, particularly in the context of its energy transition.

The NAP process is a structured approach that allows countries to plan, implement, and monitor their adaptation efforts over time. It is aligned with the United Nations Framework Convention on Climate Change (UNFCCC) and is designed to support developing countries like Sierra Leone in their long-term adaptation strategies.

The key tools under the NAP process are the National Adaptation Plan (NAP), National Communications (NC), and Biennial Update Reports (BURs), each playing a distinct role in supporting climate resilience efforts.

[41] Sierra Leone | NDC Partnership-Country Engagement Update Report-September 2024

National Adaptation Plan (NAP)

The NAP serves as the primary tool for identifying and planning for climate change adaptation at the national level. It outlines the country's long-term goals, strategies, and sector-specific actions to reduce vulnerabilities and enhance resilience to climate impacts. The NAP is a dynamic and iterative process that is updated periodically to reflect emerging challenges and evolving climate data.

National Communications (NC)

The NC is a reporting tool that allows countries to communicate their climate actions to the UNFCCC. The NC provides a detailed account of the country's climate vulnerabilities, adaptation strategies, and progress. It also includes information on greenhouse gas inventories, financial needs, and the support required to implement climate actions.

Biennial Update Reports (BURs)

The BURs provide regular updates on the country's progress in implementing its climate change actions, including both mitigation and adaptation measures. These reports track progress on the Nationally Determined Contributions (NDCs) and provide information on the country's greenhouse gas emissions, adaptation efforts, and financial support needed for further climate action.

Below is a summary of NAPs, NCs and BURs submitted by Sierra Leone to UNFCCC:

TABLE 67: SIERRA LEONE NATIONAL ADAPTATION PLAN (NAP) DOCUMENTS

Document
Initial National Adaptation Plan (INAP), 2021
Third National Communication (NC 3)
Second National Communication (NC 2)
First National Communication (NC 1)
First Biennial Update Report (BUR 1), 2024

International Partnerships

In 2020, Sierra Leone joined the NDC Partnership,[42] a global coalition of countries and institutions working together to achieve ambitious climate goals under the Paris Agreement. The partnership focal institutions in Sierra Leone are the Environment Protection Agency (EPA-SL) and the Ministry of Planning and Economic Development (MoPED).

Through this membership, Sierra Leone seeks to strengthen its capacity to implement its Nationally Determined Contributions (NDCs) by accessing technical and financial support. The NDC Partnership helps Sierra Leone to mobilise funding for renewable energy, sustainable agriculture, reforestation, and climate adaptation initiatives. It facilitates connections with international donors, development partners, and global climate funds such as the Green Climate Fund (GCF) and the Global Environment Facility (GEF).

To date, a number of partners are supporting the energy transition and implementation of NDC in Sierra Leone, which includes:

[42] *Sierra Leone | NDC Partnership*

FIGURE 26: PARTNERS SUPPORTING ENERGY TRANSITION AND NDC IMPLEMENTATION IN SIERRA LEONE[43]

In June 2024, Sierra Leone's President secured US$ 800 million in pledges at the High-level Sierra Leone Investment Roundtable on Renewable Energy and Food Security in Vienna, Austria.[44] The pledges include:

- US$ 250 million from the OPEC Fund;
- US$ 250 million from the Arab Bank for Economic Development in Africa (BADEA);
- US$ 130 million from Africa50;
- US$ 90 million from the International Fund for Agricultural Development (IFAD); and
- US$ 80 million from the Qatar Fund for Development.

Involving the Private Sector

The GoSL is actively involving the private sector in the country's energy transition through several initiatives. These efforts aim to increase renewable energy capacity, attract investment, and provide sustainable energy access across the country, including:

- **Engagement with the Mining Sector:** The government is encouraging mining companies to transition from diesel generators to grid-connected renewable energy, ensuring a steady demand for clean energy and enhancing the viability of private investments. Mining companies, which currently self-generate 500 MW using diesel, are required to connect to the national grid by 2040 to enhance demand for renewable energy investments.[45]
- **Public-Private Partnerships (PPPs):** The PPP Unit[46] in Sierra Leone was established in 2014. Its creation was aimed at enhancing the country's infrastructure development by fostering collaboration between the public and private sectors, including in the energy sector, where it plays a crucial role in supporting sustainable energy projects and facilitating the country's

[43] *Sierra Leone | NDC Partnership-Country Engagement Update Report-September 2024*
[44] *Sierra Leone's President Julius Maada Bio Secures US$ 800 million Pledges at High-level Sierra Leone Investment Roundtable on Renewable Energy and Food Security – Sierra Leone State House Sierra Leone*
[45] https://www.mining-technology.com/news/sierra-leone-miners-renewable-energy/
[46] https://ppp.gov.sl/

energy transition. The PPP Unit works to attract private investments in energy projects, such as renewable energy (solar, hydro, wind) and energy efficiency.

- **Investment Promotion through the Sierra Leone Investment and Export Promotion Agency (SLIEPA):**[47] SLIEPA plays a key role in attracting private investments into the energy sector. By providing support to investors and showcasing opportunities in renewable energy, SLIEPA aligns its initiatives with national energy goals, particularly in scaling solar and hydropower projects, as well as improving rural electrification.
- **Incentives for Private Investors:** The government is also providing special financial incentives to investors in the renewable energy sector. These include duty-free importation of renewable energy equipment, tax exemptions for projects meeting specific investment thresholds, and support for mini-grid and off-grid solutions[48].

Energy Sector Institutional Reforms[49]

To ensure the effectiveness of its energy transition, Sierra Leone is reforming its energy sector, including improvements in governance, regulatory frameworks, and sectoral coordination.

Key reforms include the creation of the Electricity and Water Regulatory Commission (EWRC) in 2014, which plays a central role in regulating tariffs and overseeing the relationships between electricity providers, including the Electricity Generation and Transmission Company (EGTC) and Independent Power Producers (IPPs).

The restructuring of the National Power Authority (NPA) into EGTC and the Electricity Distribution and Supply Authority (EDSA), in 2015 was another crucial step. EGTC is responsible for electricity generation and transmission, while EDSA, holding a monopoly as both the sole buyer from IPPs and the sole seller to consumers, plays a pivotal role in electricity distribution.

b. Key Frameworks to the Energy Transition in Sierra Leone

Sierra Leone has developed several legislations, policies and plans to support its energy transition and improve access to sustainable energy. Below are key frameworks:

Table 68: Key Frameworks to the Energy Transition in Sierra Leone

Key Frameworks	Description
Laws and regulations (including URL links)	
Sierra Leone Meteorological Agency Act, 2017	This Act establishes the Sierra Leone Meteorological Agency in place of the Department of Meteorology. It notably grants the agency the duty to advise the government on climate change matters.
Public-Private Partnership Act, 2014	This act governs the development of public-private partnerships, including those in the energy sector, to facilitate investment in infrastructure such as renewable energy projects.
The National Protected Area Authority and Conservation Trust Fund Act, 2012	This Act establishes the National Protected Area Authority (NPAA) to oversee Sierra Leone's protected areas and create a Conservation Trust Fund to support biodiversity conservation. The Act highlights also the importance of sustainable resource use, which is an integral part of energy transition efforts, particularly in reducing dependence on non-renewable resources and fostering sustainable energy solutions.
SLEWRC Act, 2011	This Act establishes the Sierra Leone Electricity and Water Regulatory Commission (SLEWRC), which regulates electricity tariffs, quality of service, and licensing, creating an enabling environment for renewable energy development.
Electricity Act, 2011	This act establishes a regulatory framework to promote electricity access, private sector involvement, and the integration of renewable energy into the national grid. The Act empowers the SLEWRC to oversee generation, distribution, and pricing, facilitating the country's energy transition toward cleaner, sustainable sources like solar and hydro power.

[47] SLIEPA - Invest in Energy in Sierra Leone
[48] SLIEPA - Invest in Energy in Sierra Leone
[49] *Sierra Leone - Energy Infrastructure*

Key Frameworks	Description
SLEWRC MINI-GRID REGULATIONS, 2019	These regulations set out the framework for the development and operation of mini-grids. They include licensing requirements for mini-grid developers, with options for basic or full mini-grid licenses based on the scale of generation. These regulations ensure that off-grid systems meet technical and operational standards and that private operators can legally distribute and sell electricity in underserved areas.
Policies (including URL links)	
National Energy Policy, 2009	This policy provides the framework for diversifying Sierra Leone's energy supply. It emphasizes: - expanding access to affordable and reliable electricity across the country; - promoting the use of renewable energy to reduce reliance on imported fossil fuels; and - integrating sustainable energy practices and improving energy governance.
Renewable Energy Policy, 2016	This policy emphasizes the importance of renewable energy in achieving national energy security and environmental sustainability. Key priorities include: - accelerating investment in renewable energy technologies such as hydropower, solar, wind, and biomass; - promoting off-grid solutions and mini-grids to electrify rural areas; and - providing incentives, such as tax exemptions for solar equipment, to attract private sector participation.
Energy Efficiency policy, 2016	This policy aims to optimise energy use, reduce waste, and lower energy costs. Key components include: - promoting energy-efficient appliances and technologies; - implementing standards and regulations to improve efficiency in residential, commercial, and industrial sectors; and - raising public awareness and fostering capacity-building programs on energy conservation.
National Climate Change Policy, 2021	This policy aims to foster a climate-resilient economy through low-carbon development. It includes initiatives for greenhouse gas (GHG) reduction, climate adaptation, and the promotion of renewable energy and energy efficiency. It emphasizes gender equality, technology adoption, and sustainable land management.
National plans and guidelines (including URL links)	
Medium-Term National Development Plan (MTNDP), 2024-2030	The plan outlines a commitment to significantly expand renewable energy infrastructure, with a focus on solar, wind, and hydroelectric power, to reduce reliance on fossil fuels and improve energy access across the country. It highlights the goal of achieving more sustainable, affordable, and reliable energy, particularly through decentralised solutions like mini-grids, which are key to reaching remote communities.
National Biodiversity Strategy and Action Plan (NBSAP), 2017-2026	The NBSAP is a cross sectorial national strategy whose main objective is to conserve Sierra Leone's biodiversity well through sound and holistic national legislation and policy implementation across all sectors. While its primary focus is on wildlife, forests, and coastal ecosystems, it indirectly supports the energy transition by promoting sustainable land use and the efficient production of fuel wood.
National Energy Efficiency Action Plan (NEEAP), 2015	The NEEAP targets energy efficiency improvements, particularly in lighting, electricity distribution, and industrial energy use. By 2030, it aims for 100% penetration of energy-efficient lighting and significant reductions in transmission and distribution losses.
National Renewable Energy Action Plan (NREAP), 2015	This plan outlines strategies to increase the use of renewable energy, focusing on solar, hydro, wind, and biomass. It highlights the goal of enhancing rural electrification and reducing dependency on imported fossil fuels, which heavily burden the economy. The NREAP also includes provisions for addressing deforestation linked to traditional energy sources like fuelwood and promoting off-grid renewable solutions.
National Climate Change Action Plan (NCCAP), 2015	Provides a comprehensive framework for climate adaptation and mitigation, focusing on capacity building, renewable energy integration, and resilience in vulnerable sectors such as agriculture and coastal management.

c. Carbon Pricing Mechanisms in Sierra Leone

The carbon market in Sierra Leone remains at a nascent stage, with activities primarily focused on voluntary carbon markets and natural resource-based carbon offset projects. While the country does not yet have a regulated carbon market or formal mechanisms like an emissions trading system or carbon tax, it has potential for growth due to its rich ecosystems and commitment to climate action under international agreements.

Below are the key features of the carbon market in Sierra Leone:

Voluntary Carbon Market Participation[50]

Sierra Leone engage in the voluntary carbon market by generating carbon credits through particularly forest conservation initiatives like the REDD+ (Reducing Emissions from Deforestation and Forest Degradation) program.

The Gola REDD+ Project is Sierra Leone's pioneering carbon credit initiative, aimed at preserving the Gola Rainforest, one of the most biodiverse regions in West Africa. Established in partnership with local communities, international donors, and conservation organizations, the project focuses on reducing greenhouse gas emissions through forest conservation while enhancing local livelihoods.

This project has been highly successful, achieving a 30% in targeted communities, which equates to avoiding the loss of 929 hectares of forest on a yearly basis. Through this mechanism, the project also led to 340,000 tons of avoided CO2 emissions per year.[51]

Carbon credits are also generated by avoiding emissions from deforestation and forest degradation through the Gola REDD+ Project. These credits are certified under the Verified Carbon Standard (VCS) and sold on international voluntary carbon markets to fund the project. Between 2016 and 2021, Sierra Leone issued 1 million carbon credits on the voluntary carbon credit market, primarily through the Gola REDD+ Project.

Carbon Pricing Policy Frameworks

The country's Nationally Determined Contributions (NDCs) under the Paris Agreement, highlight its intention to integrate carbon market mechanisms as part of its low-carbon development strategy. However, the lack of a formal regulatory framework limits its progress in developing a domestic carbon market.

In June 2024, the Climate Finance Unit of the Ministry of Finance, in collaboration with the United Nations Development Programme (UNDP), organised an inception workshop on the development of a carbon market policy framework for Sierra Leone.[52]

Planned Carbon Pricing Mechanisms in Sierra Leone[53]

Sierra Leone is working to integrate carbon pricing into its climate and economic policies as part of its strategy to combat climate change and promote sustainable development. Such mechanisms or initiatives include:

- **Carbon Tax and Emissions Trading Scheme (ETS):** Sierra Leone plans to explore either a carbon tax, an ETS, or a combination of both. This exploration aims to leverage the simplicity of the carbon tax, which makes it easier for businesses and regulators to understand and implement, while also considering the potential benefits of an ETS.
- **EU's Emissions Trading Scheme:** Sierra Leone referenced the European Union's Emissions Trading Scheme as a potential vehicle for climate financing in its Nationally Determined

[50] https://cadmusgroup.com/wp-content/uploads/2024/07/Analysis-of-the-Carbon-Market-Landscape-in-Sierra-Leone.pdf
[51] https://www.lse.ac.uk/granthaminstitute/news/realising-the-promise-of-forest-carbon-credits-embedding-rigorous-learning-into-redd-programme-design/
[52] https://mof.gov.sl/the-ministry-of-finance-undp-organised-a-day-inception-workshop-on-the-development-0f-a-carbon-market-policy-framework-for-sierra-leone/
[53] Carbon_Pricing_Report_WA_Final_Alt

Contributions (NDCs). This indicates a commitment to exploring advanced carbon pricing mechanisms and aligning with international standards.

- **IMF Program Considerations:** As part of its policy commitments under the IMF program, Sierra Leone is considering levying carbon taxes on certain sectors of the economy. This move aims to restore stability, maintain debt sustainability, and finance climate action.

Challenges for the development of a formal carbon market

The implementation of a carbon market in Sierra Leone faces several challenges,[54] including:

- **Capacity and Policy Gaps:** Weak institutional frameworks and limited technical capacity hinder the development of a formal carbon market.
- **Technical expertise:** Developing and fostering a carbon market is complex and requires technical expertise, strong guidance, reliable data, effective data monitoring, vast financial resources and credible reporting.
- **Land-use conflicts and deforestation:** The country has experienced high rates of deforestation, with approximately 25% of its forests lost over two decades due to agricultural expansion, logging, and mining activities. These pressures often lead to conflicts between conservation initiatives and local communities that depend on land for farming and livelihoods.
- **Community Involvement:** The success of carbon projects depends on equitable benefit-sharing with local communities. In Sierra Leone, limited community involvement and unclear benefit distribution mechanisms can undermine carbon projects.
- **Community conservation:** Carbon credit and offset projects, while promising for climate mitigation, can lead to unintended consequences. These initiatives may displace local communities by restricting access to land and resources, exacerbating poverty among vulnerable populations. Additionally, such projects may result in carbon leakage, where deforestation or emissions shift to areas not covered by the initiative, undermining environmental gains.

Opportunities for Growth

The carbon market in Sierra Leone presents significant opportunities for growth, driven by the country's commitment to reducing carbon emissions and promoting sustainable development. Such opportunities include:[55]

- Sierra Leone's ecosystems, including forests and mangroves (blue carbon), provide significant potential for nature-based solutions in the carbon market.
- The implementation of Article 6 of the Paris Agreement could enable Sierra Leone to engage in international cooperative approaches for carbon trading.
- Several strong case studies, policy frameworks and examples that have proven successful in other African nations (e.g., Ghana and Rwanda) are available for the GoSL to build from.

[54] https://cadmusgroup.com/wp-content/uploads/2024/07/Analysis-of-the-Carbon-Market-Landscape-in-Sierra-Leone.pdf
[55] https://cadmusgroup.com/wp-content/uploads/2024/07/Analysis-of-the-Carbon-Market-Landscape-in-Sierra-Leone.pdf

d. Main Renewable Energy Projects in Sierra Leone

The table below gives an overview on the major on-going and expected renewable energy projects in Sierra Leone:

TABLE 69: MAIN ON-GOING AND EXPECTED RENEWABLE ENERGY PROJECTS IN SIERRA LEONE

Project	Description	Start date	Budget	Financed by	Implemented by	Location
Solar Energy Projects						
Lungi Solar PV Park[56]	The Lungi Solar PV Park, aimed at boosting the country's electricity supply with a 65 MW solar power plant and battery storage (28 MWh). The project, part of the Regional Emergency Solar Power Intervention Project (RESPITE), seeks to enhance energy access, reduce reliance on fossil fuels, and promote environmental sustainability. It will help stabilize the national grid, foster economic growth, and create jobs, while addressing long-standing energy challenges in the Lungi region.	In development, expected to start soon	US$ 75 million	Expected to be financed through international investment and development funds.	To be implemented by the Electricity and Water Regulatory Commission (EWRC), in collaboration with the Ministry of Energy (MoE)	Lungi, Northern region
Rural Renewable Energy Project (RREP)[57]	The RREP focuses on deploying solar mini-grids and off-grid solar systems in rural areas to enhance energy access. In June 2021, the project reached the milestone of completing 10,000 connections. An estimated 9,340 households, 832 businesses, 104 schools, 54 Community Health Centres (CHCs) and 129 other public institutions are electrified across 67 rural communities of Sierra Leone.	Started in 2016	Approximately US$ 43 million (GB£ 34 million)	United Kingdom Foreign, Commonwealth and Development Office (FCDO)	Implemented by the United Nations Office for Project Services (UNOPS) on behalf of the Ministry of Energy (MoE)	Rural regions across Sierra Leone

[56] https://politicosl.com/articles/sierra-leone-benefit-renewable-energy-project
[57] Sierra leone-RREP-Factsheet_2021

Project	Description	Start date	Budget	Financed by	Implemented by	Location
Solar Park Freetown[58]	This 6 MW solar power plant, located in Freetown, is designed to provide reliable electricity to urban and rural areas around the capital. The solar power plant will be connected to the national grid, supplying approximately 8.76 gigawatt-hours (GWh) of electricity annually, improving grid stability and boosting supply during peak demand.	Started in 2020	US$ 18 million[59]	GoSL and part funding of $9 million from the Abu Dhabi Fund for Development (ADFD)	Implemented by the Ministry of Energy (MoE)	Freetown
Hydropower Projects						
Bumbuna II Hydroelectric Project[60]	This expansion of the existing Bumbuna I hydroelectric 50MW power plant aims to add 143 MW of capacity. The project involves two dams (Bumbuna and Yiben), including solar hybrid integration, which will support year-round power generation.	In development, expected to be completed in 2026	US$ 750 million	African Development Bank, European Commission (EC) through the Electrification Financing Initiative (ElectriFI) and private funds	Implemented by Seli Hydropower Limited (SHPL)	Bumbuna, Northern region
Thermal Power Projects						
Western Area Power Generation Project (WAGP)[61]	The WAPGP is a thermal power plant. Specifically, it is a heavy fuel oil (HFO)-fired power plant that will generate 57 MW of electricity. This thermal plant is part of Sierra Leone's strategy to improve energy generation and reliability, particularly for Freetown, by providing a more stable power source compared to the existing reliance on diesel generators.	In development, expected to be completed in mid-2027	US$ 414 million[62]	The U.S. International Development Finance Corporation (DFC)	Milele Energy (Kenyan-based power company) and TCQ Power (UAE power development company)	Freetown

[58] IRENA-ADFD_Advancing Renewables 2020
[59] https://www.pv-magazine.com/2016/03/24/sierra-leone-to-commence-work-on-6-mw-pv-park-backed-by-irena_100023878/
[60] Bumbuna Hydroelectric Power Plant, Sierra Leone
[61] https://www.dfc.gov/media/press-releases/dfc-deputy-ceo-sierra-leone-participates-groundbreaking-power-generation
[62] https://energycapitalpower.com/dfc-sierra-leone-power-generation-project/

4.6. Environmental impact of extractive activities

a. Overview

Sierra Leone, as all other countries in the world, faces significant environmental challenges that threaten its sustainable development. Only 35.12% of forest area remains in the country (estimated to be 25,348.8 km^2 out of 72,180 km^2) and 54.7% of agricultural land (estimated to be 39,490 km^2). Weak implementation of environmental protection laws, combined with lack of inter-sectorial coordination, and gaps in expertise and capacity have hindered efforts in environmental protection. Major threats to the forest cover reside in illegal mining and logging activities, while unsustainable agricultural practices and urbanization have reduced agricultural productivity, worsened food insecurity, and contributed to environmental degradation. Population growth (2.2% annually) puts natural resources under increased pressure as wood and charcoal are increasingly being used as the dominant cooking fuel.

The coastal zone of Sierra Leone is also highly vulnerable to the increased frequency and severity of coastal erosion, flooding and storm surges which severely impact social wellbeing, livelihood security and major economic sectors such as fishing, tourism, water resources and agriculture. Coastal communities are already experiencing considerable repercussions of these impacts, notably on their livelihoods with reduced fishing productivity, ecosystem degradation and low farming outputs.

Sierra Leone's coastline, home to critical marine habitats like mangrove forests, is also under threat from pollution, mining and coastal erosion.

The UN Sustainable Development Cooperation Framework report for 2025-2030 considers that addressing these challenges is conditioned by strengthening the implementation of environmental protection laws, promoting sustainable land management practices, investing in alternative livelihoods for forest-dependent and coastal communities, reorienting education to help nurture competences necessary to address climate change challenges and to protect the environment, and protecting cultural heritage in all its forms. The government should also prioritize reforestation initiatives, reinforce the protection of protected areas, and promote alternative energy sources to reduce reliance on fuel wood. Sierra Leone must also continue to develop and implement climate change adaptation and mitigation strategies, such as the National Adaptation Plan (NAP) and the Nationally Determined Contribution (NDC) under the Paris Agreement. As highlighted in pillar five Agricultural Technology (AgTech) and Climate Smart Agriculture (CSA) of the Feed Salone Strategy, the government should also endeavour to explore climate smart agriculture initiatives as means to combat climate change impacts.[63]

b. Transformation strategy 2024-2030

As part of its continuous efforts to preserve the country's environment, EPA-SL published its transformation strategy for the 2024-2030 period. The report published in December 2023 highlights the responsibility of the extractive sector in the worsening of environment threats, as mining processes are considered to be very water-intensive, since water is used for operational activities such as transporting ore, separation of minerals through chemical processes, and dust suppression to reduce the impact on the environment and human health.

[63] UN Sustainable Development Cooperation Framework 2025-2030_0.pdf

Water is also used in ore processing to increase the quality and concentration of iron. Surface runoff from the mine site may cause erosion and also contain acid mine drainage. Tailings composed of silicon rock, other heavy metals and acid mine drainage can contaminate surface water and place significant strain on water supply efforts.

Besides, the exploitation of zircon, gold, bauxite and one of the world's largest deposits of rutile in Yawri Bay has resulted in illegal discharge of wastewater and tailings into the coastal zone and placed a significant strain on local water resources. These mining activities cause rapid sedimentation of the estuary. Concentrations of three trace metals--Arsenic (As), Chromium (Cr) and Nickel (Ni)--in sub-tidal sediment samples from the estuary exceed levels of toxicity for sensitive fauna and flora species. Rutile mining has increased deforestation in the Sherbro River Estuary leading to the loss of 1.25 km^2 of mangrove forests. Additional mining operations already planned threaten further mangrove destruction.

The EPA-SL also highlighted the fact that on-going exploration for oil and gas in Pujehun District in the south will have considerable adverse impacts on coastal biodiversity, water quality, and livelihoods. The mass extraction of sand in coastal wetlands will aggravate the risks of coastal flooding by rapidly deepening the waters near the coast, increasing erosion, and preventing forests from regenerating.[64]

In order to address these issues, the GoSL fixed, through the UN Updated Nationally Determined contribution published in July 2021, its mitigation strategy that is articulated around the following:

- Institutionalization of coordination, monitoring, reporting and verification of climate change issues by strengthening the EPA-SL for effective and efficient provision of technical policy advice;
- Transformation of the National Meteorological Services of Sierra Leone and strengthening of Climate Change Early Warning System;
- Promotion of energy efficiency, enhanced management and expansion of the energy mix through uptake of renewable energy sources;
- Enhancement of waste management systems to reduce pollution and greenhouse gas emissions; and
- Diversification of economic growth through strengthened transport sub-sector.

In order to put this national strategy into action, the following achievements -among many others- shall take place by 2030:

- Switching and promotion for renewable energy (Solar Energy & LPG);
- Providing alternative energy sources such as Biofuels (from corn, sugarcane, rice husk etc.);
- Promote access to off-grid solar energy sources/ Street lightening in public places and buildings using energy efficient appliances/lamps;
- Develop and promote a minimum energy efficient performance standard;
- Monitor and track emission from the extractive and manufacturing sector and regulate actions through environment social health and impact assessment;
- Promote the use of clean and renewable energy in the extractive and manufacturing sector;

[64] Microsoft Word - NEW DRAFT_EPATS_final-19012024.docx

- Ensure reclamation of mined out areas by extractive industries through a progressive rehabilitation and address legacy environmental issues in the mining sector;
- Monitor and track emission from the extractive and manufacturing sector and regulate actions through an Environmental Impact Assessment (EIA) Process;
- Integrate climate change adaptation into the mining/extractive sector;
- Effective implementation of EIA within the mining sector;
- Promote Afforestation practices;
- Create alternative livelihoods of women in the mining sector through effective corporate social responsibilities
- Support the development, validation and enforcement of by-laws on mangrove wood harvesting, fishing and sand mining, at local and regional levels to promote mangrove conservation and adaptation to climate change.[65]

c. EPA's action plan 2024-2030

The EPA's action plan for 2024-2030 articulates around 3 major pillars: Natural Resources, Climate Change and Environmental Health. The plan proposes, among other numerous general-purpose points, some action points directly related to the extractive sector that can be summarized in the table below:

TABLE 70: EPA'S PLANNED ACTIONS RELATED TO THE EXTRACTIVE SECTOR

Pillar	No.	Intervention	Outcome target	Progress marker	Boundary partner
Natural Resources	NR008	Produce literature and field assessments of assets, vulnerabilities, and structures of key resource value chains (sand mining, artisanal mining charcoal burning wood fuel cutting, etc) to develop terms of work for NEECoM	Consumer awareness and behaviours have shifted towards products and services of lower environmental footprints	Number of reported issues addressed	Sand miners, charcoal burners, wood sellers, land grabbers headmen, chiefs
Natural Resources	NR014	Promote mercury reduction in Artisanal and Small-scale Gold Mining (ASGM)	All of government approach contributes to inclusive mercury risk knowledge and management	Number of MDAs and CSOs using maps generated by the EPA-SL	MDAs, CSOs, miners, mine owners
Evidence Technology and Innovation	ETI21	Conduct risk assessment for toxic chemicals used in gold mining and agriculture	Risk assessments are conducted	Number of risk assessments conducted	Academia, MDAs, Local authorities
Policy Coherence and Enforcement	PCE10	Review the Environment Protection (Mines and Minerals) Regulations 2013	Mines and Minerals regulations are reviewed	Number of MDAs and CSOs adopting or applying revised regulations	MDAs, CSOs

Source: EPA transformation strategy 2024-2030

[65] https://unfccc.int/sites/default/files/NDC/2022-06/210804%202125%20SL%20NDC%20%281%29.pdf

In order to achieve its strategy, the EPA-SL planned several actions for a budgeted amount of US$ 15 million, among which we can present those related to the extractive sector in the table below:

TABLE 71: PLANNED ACTIONS BY THE EPA-SL IMPACTING THE EXTRACTIVE SECTOR (2024-2030)

Intervention	Actor	Timeframe	Budget (US$)	Endline target	Verification
Strengthen mine rehabilitation planning activities	EPA NMA	2024-2027	100,000	100 pilot plans	Annual ESHIA audits
Promote mercury reduction in Artisanal and Small- scale Gold Mining (ASGM)	EPA NMA	2024-2027	200,000	10 pilot districts	Progress reports
Climate proof transportation and energy projects	EPA GCA	2024-2027	300,000	5 projects	Progress reports
Prepare a National Pollutant Inventory (NPI)	EPA	2024-2025	25,000	1 inventory (2 updates)	Inventory
Develop national profiles for key pollutants and chemicals (based on NPI)	EPA	2024-2027	10,000	3 profiles	Profiles
Conduct risk assessment for toxic chemicals used in gold mining and Agriculture	EPA	2024-2025	10,000	2 assessments	Research reports
Advocacy for policy reforms on gender equality in Artisanal and Small-scale Mining (ASM)	EPA	2024-2027	20,000	1,000 women	Campaign report
Undertake civil and criminal compliance and enforcement actions	EPA	2024-2027	50,000	250 trainees	Training reports
Develop and enact key regulations (Integrated Coastal and Marine Protection Regulations, Integrated Air Quality and Pollution Regulations, Hazardous and Toxic Chemical Regulations, Waste Management Regulations, EIA license fee regulation etc)	EPA	2024-2027	50,000	5 regulations	Revised regulations

Source: EPA transformation strategy 2024-2030

d. ESG reporting in the extractive sector

Pursuant to article 134 of the MMDA (2023), mining companies are required to submit annual reports on environmental and social impacts and mitigation actions. These reports hall be made available to the public including but not limited to:

- environmental screening reports;
- environmental impact assessments; and
- environmental and social management plans.

As agreed by the MSG, extractive companies were required to provide their latest information about ESG matters.

As presented in the table below, 9 out of 24 extractive companies submitted their ESG reports:

TABLE 72: ESG REPORTS SUBMISSION SUMMARY

N°	Company	ESG reports
1	Kingho Rail and Port	Yes
2	Koidu Ltd	Yes
3	Marampa Mines Ltd	Yes
4	Kingho Mining Company Ltd	Yes
5	Kasino Mining Company	Yes
6	Kingho/Northern Mining Co	Yes
7	Kingho/CKH Mining Company	Yes
8	Kingho/Mass Energy Mining Co	Yes
9	Jong Minerals Company Ltd	Yes
10	Tonguma Ltd	No
11	Newfield/Sierra Diamond	No
12	Sierra Rutile Ltd	No
13	CTC MINING (SL) Ltd	No
14	Meya Mining	No
15	Gold Lion Mining Company	No
16	Afro-Asia mining Corporation	No
17	FG Gold Ltd	No
18	Seawright mining Co Ltd	No
19	Cheng Li Trading Mining Comp. (SL) Ltd	No
20	Foison Resources Ltd	No
21	F.S. Mining (SL) Ltd	No
22	Leone Afric Metals	No
23	Metals & Minerals/Pan-African Rare Metal	No
24	Sunshine Resources (SL) Ltd	No

4.7. The Fight against Corruption in Sierra Leone

Sierra Leone has established a legal and institutional framework to combat corruption and financial crimes. These mechanisms address various facets of corruption, including public sector integrity, financial accountability, money laundering, and the financing of terrorism. The extractive sector, being a major contributor to the national economy, is explicitly targeted within this framework due to its vulnerability to corruption and mismanagement.

The GoSL has also shown its commitment to combating corruption through participation in initiatives such as the EITI, which ensures transparency in the management of revenues from the country's natural resources. Additionally, Sierra Leone is a member of the Open Government Partnership (OGP), aiming to promote transparency, accountability, and citizen engagement in governance. These commitments, alongside national efforts, reflect the Government's focus on improving governance and tackling corruption across various sectors.

a. Key Frameworks for Anti-Corruption in Sierra Leone

Sierra Leone has established several legislations, strategies and plans to support its anti-corruption efforts. The key frameworks include:

TABLE 73: KEY FRAMEWORKS FOR ANTI-CORRUPTION IN SIERRA LEONE

Framework	Description
Legislations (including URL links)	
The Anti-Corruption Act, 2008	The Anti-Corruption Act, 2008, is the foundational legislation for combating corruption in Sierra Leone. It: - Established the Anti-Corruption Commission (ACC) as an independent body to investigate and prosecute corruption cases. - Defined key corruption-related offenses such as bribery, misappropriation of funds, and abuse of office. - Introduced measures to enforce asset declaration by public officials.
The Anti-Corruption (Amendment) Act, 2019	The 2019 amendment strengthened the 2008 Act by: - Enhancing the ACC's prosecutorial powers, allowing it to recover stolen assets and prosecute cases without prior approval from the Attorney General. - Introducing stiffer penalties for corruption offenses and provisions for the confiscation of unexplained wealth, empowering the ACC to target illicit enrichment. - Expanding the scope of offenses to include public-private partnerships and third-party agents involved in corrupt practices.
The Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) Act, 2012	The AML/CFT Act (2012) is Sierra Leone's first comprehensive legislation targeting money laundering and the financing of terrorism. It: - Criminalised money laundering and the financing of terrorism. - Required financial institutions and designated non-financial businesses and professions (DNFBPs) to report suspicious transactions. - Established mechanisms for freezing, seizing, and confiscating proceeds of crime.
The AML/CFT (Amendment) Act, 2019	This amendment built upon the 2012 Act by: - Expanding the scope of financial crimes to align with international standards. - Strengthening reporting requirements for financial institutions and DNFBPs and enhancing penalties for non-compliance. - Supporting closer collaboration between the Financial Intelligence Unit (FIU) and other regulatory bodies.
The Audit Service Act, 2014	This legislation empowers the Audit Service Sierra Leone (ASSL) to audit Government expenditures, ensuring public funds are used appropriately.
The Public Financial Management (PFM) Act, 2016	This Act ensures transparency and accountability in the management of public finances, including budgeting, expenditure control, and financial reporting.
The Public Procurement Act, 2016	This law regulates public procurement processes to prevent corruption and promote transparency. It mandates the National Public Procurement Authority (NPPA) to oversee procurement activities in all Government Ministries, Departments, and Agencies (MDAs).
The Mines and Minerals Development Act, 2022	This Act governs the mining and minerals sector in Sierra Leone, emphasizing transparency and accountability. It: - Regulates licensing, royalties, and revenue management in the mining industry. - Mandates disclosure of mining contracts and revenues in line with the EITI standards. - Establishes mechanisms to address corruption risks in the extractive sector, including the mismanagement of natural resource revenues.
The Petroleum (Exploration and Production) Act, 2011	This Act governs petroleum exploration and production activities in Sierra Leone. It contains provisions to promote transparency and accountability in the sector, specifically by: - Mandating the disclosure of petroleum contracts and agreements. - Requiring companies to adhere to good governance principles, including transparency in revenue payments and environmental practices. - Aligning with the EITI to ensure public disclosure of revenues from petroleum operations. - Stipulating penalties for non-compliance and corrupt practices in the awarding of licenses and contracts.
Strategies and Plans (including URL links)	
National Anti-Corruption Strategy (NACS), 2019- 2023	The national anti-corruption strategy serves as a model for developing a set of shared responsibilities across sectors and is intended to intervene at the legal, policy, technical and institutional levels within the public and private sectors. The 4th NACS for the period 2019-2023 is built on the following pillars: - Strengthen and enforce anti-corruption laws through exemplary punishment of offenders. - Improve transparency in Government, businesses and civil society.

Framework	Description
	- Improve the integrity of citizens and public institutions to ensure fair, effective and efficient use of resources. - Support citizen empowerment in the fight against corruption, including increased support for whistle-blowers. - Develop a sustainable partnership with stakeholders to reduce corruption and improve the integrity management. - Strengthen oversight and governance mechanism in the government sector. - Strengthen the resourcing, cooperation and independence of dedicated anti-corruption agencies. - Build specific programmes to reduce corruption and improve integrity in sectors particularly sectors vulnerable to corruption.
Medium-term National Development Plan (MTNDP), 2024-2030	This plan integrates anti-corruption measures aimed at improving governance and transparency. Key strategies focus on strengthening the Anti-Corruption Commission (ACC), enhancing public sector efficiency, and implementing systems to prevent corruption.

b. Key Institutions for Anti-Corruption in Sierra Leone

Anti-Corruption Commission (ACC)

The Anti-Corruption Commission (ACC) of Sierra Leone is an independent body established by the Anti-Corruption Act, 2008, with its primary role being to fight corruption across various sectors of society. The commission operates under the principle of ensuring accountability, transparency, and integrity in the country's public and private institutions.

The ACC is mandated to:[66]

- **Investigation and Prosecution:** The ACC investigates alleged corruption offenses and takes legal action to prosecute those found guilty of engaging in corrupt practices. It has the authority to pursue individuals, both in public and private sectors, involved in embezzlement, bribery, fraud, and other corrupt acts.
- **Prevention of Corruption:** Through a variety of strategies, the commission aims to prevent corruption before it occurs. This includes advising government bodies on ways to minimize corruption risks, reviewing public sector activities, and fostering transparent decision-making processes.
- **Asset Recovery:** The ACC is tasked with identifying and recovering assets acquired through corrupt means. This includes both domestic and international efforts to trace stolen funds and property linked to corruption.
- **Public Engagement and Education:** The commission engages the public to raise awareness about the dangers and impact of corruption. It promotes citizen participation in anti-corruption initiatives and educates the public on how to report corruption and unethical behaviour.
- **Advisory and Policy Development:** The ACC works with the government to design and implement anti-corruption laws and policies. This includes offering advice on strengthening the legal and institutional frameworks to support anti-corruption efforts.
- **Whistleblower Protection:** The commission ensures the safety and protection of whistleblowers who report corrupt activities, thereby encouraging more people to come forward with vital information without fear of retaliation.

The ACC is headed by a Commissioner and a Deputy Commissioner, both appointed by the President of Sierra Leone upon approval of the Parliament.

The latest annual report available is that of 2023 and is available on the ACC's website. According to this report, the ACC performed the final nationwide monitoring of the National

[66] https://www.anticorruption.gov.sl/en_GB/mandates-by-departments

Anti-Corruption Strategy 2019-2023 that covered Ministries, Directorates, Agencies and Councils and that showed a total compliance of 93% to the action points as shown in the table below:

TABLE 74: MDAS AND LOCAL COUNCILS COMPLIANCE

Institution	Action points	Full compliance	Compliance score	Outstanding action points
Ministries, Directorates and Agencies	587	529	90%	58
Local Councils	245	242	99%	3
Total	**832**	**771**	**93%**	**61**

Source: ACC annual report 2023

In addition, the ACC received 309 corruption-related complaints in 2023, and processed 441 complaints in total, 184 of which were carried over from 2022. The Investigation Department concluded an examination of 81 complaints. Moreover, the ACC secured two convictions and draft 21 legal opinions in relation to money laundering and terrorism financing.

Corruption attempts and suspicions can be reported anonymously to the "Pay No Bribe" call center or to the Anti-Corruption Commission Report Center.

The ACC investigated 47 cases since 2018. According to a public notice on 16 August 2022, 31 of which were against the current administration back then.[67]

Financial Intelligence Agency (FIA)

The Financial Intelligence Agency (FIA) of Sierra Leone is a government agency established to combat money laundering, terrorism financing, and other financial crimes. It operates under the mandate provided by the Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) Act and works to safeguard the country's financial system.

The FIA is mandated to:[68]

- **Collection and Analysis of Financial Information:** The FIA is responsible for receiving, processing, and analysing financial transactions that may indicate money laundering, terrorism financing, or other illicit financial activities. It uses sophisticated tools and methods to detect suspicious patterns in financial data.
- **Dissemination of Financial Intelligence:** Once suspicious activities are identified, the FIA shares its findings with law enforcement agencies, regulatory bodies, and other relevant authorities for further investigation and action. This helps prevent and detect financial crimes.
- **Compliance and Supervision of Reporting Entities:** The FIA oversees financial institutions (such as banks, insurance companies, and other financial services) to ensure they comply with national and international anti-money laundering and anti-terrorism financing standards.
- **Capacity Building and Awareness:** The FIA plays an important role in educating and training financial institutions, law enforcement, and other relevant stakeholders on recognizing and reporting suspicious financial activities. It also works to raise public awareness about the risks of money laundering and terrorism financing.
- **Monitoring and Reporting to the Government:** The FIA regularly reports to the government, providing information and analysis that support the development of effective

[67] Anti-Corruption Commission-SL (anticorruption.gov.sl)
[68] https://fiu.gov.sl/about-us/

policies to counter money laundering, terrorism financing, and other financial crimes. It also contributes to the overall assessment of the country's financial crime risks.

- **Asset Recovery:** The FIA works alongside law enforcement agencies to support the identification and recovery of illicit financial assets linked to money laundering or terrorism financing activities.
- **Cooperation with International Bodies:** The FIA cooperates with international counterparts to share information and collaborate in the global fight against financial crimes.

Audit Service Sierra Leone (ASSL)

The Audit Service Sierra Leone (ASSL) is an independent government agency tasked with ensuring accountability and transparency in the use of public funds. It operates under the mandate provided by the Audit Service Act, 2014 and is responsible for auditing the financial activities of government institutions and public entities to promote good governance.

The ASSL is mandated to:[69]

- **Audit of Public Accounts:** The ASSL is responsible for auditing the accounts of the Government of Sierra Leone, including ministries, departments, agencies (MDAs), and other public entities. It ensures that public funds are used in compliance with laws, regulations, and approved budgets.
- **Audit of Public Enterprises and Local Government:** The ASSL also audits the financial operations of state-owned enterprises (SOEs), local governments, and other public sector entities to ensure that their financial activities align with legal and regulatory standards.
- **Issuance of Audit Reports:** After conducting audits, the ASSL issues audit reports that highlight findings, including any irregularities, inefficiencies, or mismanagement of funds. These reports are submitted to the President, Parliament, and other relevant authorities to facilitate accountability and transparency.
- **Performance Audits:** In addition to financial audits, the ASSL conducts performance audits to assess the effectiveness, efficiency, and economy of government programs, projects, and operations. This helps ensure that public resources are used effectively to achieve intended outcomes.
- **Fraud and Financial Mismanagement Investigations:** The ASSL is tasked with identifying fraud, mismanagement, or misuse of public funds and making recommendations to address these issues. It can also make referrals to law enforcement agencies for further investigation.
- **Advisory and Capacity Building:** The ASSL provides advisory services to government ministries, departments, and agencies to improve financial management and internal controls. It also offers capacity-building programs to enhance the skills of government auditors and staff involved in public financial management.
- **Support for Anti-Corruption Efforts:** By auditing the financial management practices of public institutions, the ASSL supports anti-corruption initiatives in Sierra Leone. It works closely with the Anti-Corruption Commission (ACC) to detect irregularities and financial misconduct.
- **Promotion of Public Financial Management Reforms:** The ASSL plays a role in promoting reforms in public financial management to improve accountability, transparency, and the overall management of public resources. It works with other government institutions to strengthen financial reporting and oversight systems.

National Public Procurement Authority (NPPA)

[69] https://website.auditservice.gov.sl/mandates-framework/

The National Public Procurement Authority (NPPA) of Sierra Leone, established under the Public Procurement Act, 2004, is the regulatory body responsible for overseeing public procurement processes in the country. Its primary function is to ensure that public procurement is conducted in a transparent, fair, and accountable manner, adhering to national and international standards.

The NPPA is mandated to:[70]

- Regulation of Public Procurement: The NPPA is responsible for regulating and overseeing all public procurement activities in Sierra Leone. This includes ensuring that procurement processes across Government Ministries, Departments, and Agencies (MDAs) comply with the Public Procurement Act, 2016 and other relevant laws.
- Establishing Procurement Policies and Guidelines: The NPPA develops and issues policies, guidelines, and best practices for public procurement. These documents help standardize procurement processes across government institutions, ensuring consistency and fairness in the awarding of contracts.
- **Monitoring and Auditing Procurement Processes:** The NPPA monitors the procurement activities of government entities to ensure compliance with legal and procedural requirements. It reviews procurement reports and audits contracts to identify irregularities, inefficiencies, or corruption.
- **Capacity Building and Training:** The NPPA provides training and capacity-building programs for public procurement officers and other stakeholders to improve their understanding of procurement rules, procedures, and best practices. This helps strengthen the procurement system and ensures that officials are well-equipped to carry out their duties effectively.
- **Approval of Procurement Plans and Budgets:** Government Ministries and Agencies are required to submit their annual procurement plans and budgets to the NPPA for approval. The NPPA reviews these documents to ensure that procurement activities are aligned with government priorities and that public funds are used efficiently.
- **Facilitating Open and Competitive Bidding:** The NPPA promotes transparency in the procurement process by ensuring that bidding for public contracts is open, competitive, and fair. It sets rules for tendering processes and oversees the evaluation and award of contracts to ensure that they are done without favouritism or corruption.
- **Adjudication of Procurement Disputes:** The NPPA acts as an independent body that resolves disputes arising from procurement processes. It investigates complaints related to procurement irregularities and takes appropriate action to address grievances and uphold the integrity of the process.
- **Ensuring Anti-Corruption Measures in Procurement:** The NPPA works closely with the Anti-Corruption Commission (ACC) to detect and prevent corrupt practices within the public procurement system. It supports efforts to promote integrity and accountability in procurement activities.
- **Public Procurement Transparency and Reporting:** The NPPA ensures transparency by publishing procurement plans, award notices, and contracts for public viewing. This allows citizens and stakeholders to hold public officials accountable for procurement decisions and spending.
- **Coordination with International Development Partners:** The NPPA works with international donors, development partners, and other countries to align Sierra Leone's procurement practices with international standards and best practices.

[70] https://nppa.gov.sl/

Parliamentary Oversight Committees

In Sierra Leone, Parliamentary Oversight Committees are established to monitor and review the activities of the executive branch of Government, ensuring that public resources are used efficiently, transparently, and in accordance with the law. These committees serve as a vital part of the democratic governance framework, promoting accountability and transparency within the public sector

The Parliamentary Oversight Committees mandates,[71] include:

- Oversight of Government Ministries, Departments, and Agencies (MDAs): Parliamentary Oversight Committees are responsible for monitoring the actions of MDAs. They ensure that government activities align with national policies, laws, and the approved budget. Committees review the financial and operational performance of these entities, identifying inefficiencies, mismanagement, or deviations from the law.
- **Review of Public Expenditure and Budget Implementation:** These committees monitor the allocation and use of public funds, ensuring that expenditures are in line with the approved budget. They assess the effectiveness of government spending, especially in key sectors such as education, health, infrastructure, and social welfare, to ensure that resources are used for their intended purposes.
- **Examination of Audit Reports:** Parliamentary Oversight Committees review audit reports from the Audit Service Sierra Leone (ASSL) and other relevant bodies. They analyse findings related to financial mismanagement, corruption, or inefficiencies and recommend corrective actions. The committees may also summon officials to explain discrepancies and take action to address identified issues.
- **Investigating Complaints and Public Concerns:** Parliamentary Oversight Committees serve as a forum for investigating complaints or concerns raised by the public, civil society organizations, or whistleblowers. They may conduct inquiries into specific issues, such as corruption, poor service delivery, or human rights violations, and hold government officials accountable.
- **Monitoring the Implementation of Laws and Regulations:** These committees ensure that laws and regulations passed by Parliament are properly implemented by the executive branch. They monitor the progress of legislation, evaluate its impact, and assess whether public institutions are complying with the legal framework.
- **Public Hearings and Stakeholder Engagement:** Committees hold public hearings to engage with citizens, stakeholders, and experts on various government activities. These hearings promote transparency, allowing the public to participate in decision-making processes, provide feedback, and hold the government accountable.
- **Enhancement of Government Accountability and Integrity:** By holding the government accountable for its actions, Parliamentary Oversight Committees help strengthen democratic governance in Sierra Leone. They ensure that government operations are conducted with transparency and integrity, discouraging corruption and mismanagement.
- **Approval and Monitoring of International Agreements and Loans:** Committees review international agreements, loans, and contracts that the government enters into. They ensure that these agreements are in the best interest of the country, properly negotiated, and do not undermine national sovereignty or development goals.
- **Reports to Parliament and the Public:** The committees prepare reports on their findings and present them to Parliament. These reports often include recommendations for reform or corrective actions, and they are made available to the public to foster transparency and trust in the political process.

[71] https://www.parliament.gov.sl/committee-mendate.html

c. Governance indices

The World Bank published the Worldwide Governance Indicators (WGI) updated in 2023.[72] The WGI are produced by Daniel Kaufmann from the Natural Resource Governance Institute (NRGI) and Brookings Institution and Aart Kraay from the World Bank Development Research Group.

Indicators are a research dataset summarising the views on the quality of governance provided by many enterprises, citizen, and expert survey respondents in industrial and developing countries. These data are gathered from several survey institutes, think tanks, non-governmental organisations, international organisations, and private sector firms.

The WGI do not reflect the official views of the Natural Resource Governance Institute, the Brookings Institution, the World Bank, its Executive Directors, or the countries they represent.

The following table defines each of the Indices.

TABLE 75: DEFINITION OF THE WB GOVERNANCE INDICATORS

N°	Indices	Description
1	Control of Corruption	Reflects perceptions of the extent to which public power is exercised for private gain, including both petty and grand forms of corruption, as well as "capture" of the state by elites and private interests.
2	Voice and Accountability	Reflects perceptions of the extent to which a country's citizens can participate in selecting their government, as well as freedom of expression, freedom of association, and a free media.
3	Political Stability - No Violence	Measures perceptions of the likelihood of political instability and/or politically motivated violence, including terrorism.
4	Government Effectiveness	Reflects perceptions of the quality of public services, the quality of the civil service and the degree of its independence from political pressures, the quality of policy formulation and implementation, and the credibility of the government's commitment to such policies.
5	Regulatory Quality	Reflects perceptions of the ability of the government to formulate and implement sound policies and regulations that permit and promote private sector development.
6	Rule of Law	Reflects perceptions of the extent to which agents have confidence in and abide by the rules of society, and in particular the quality of contract enforcement, property rights, the police, and the courts, as well as the likelihood of crime and violence.

Source: World Bank (WB)

[72] https://www.worldbank.org/content/dam/sites/govindicators/doc/wgidataset.xlsx

As presented in the table below, Sierra Leone is ranked amongst the lowest nations when it comes to good governance with slightly notable improvement between 2012 and 2022 but still below the average, except for Regulatory Quality index where the country lost 26 places between 2012 and 2022.

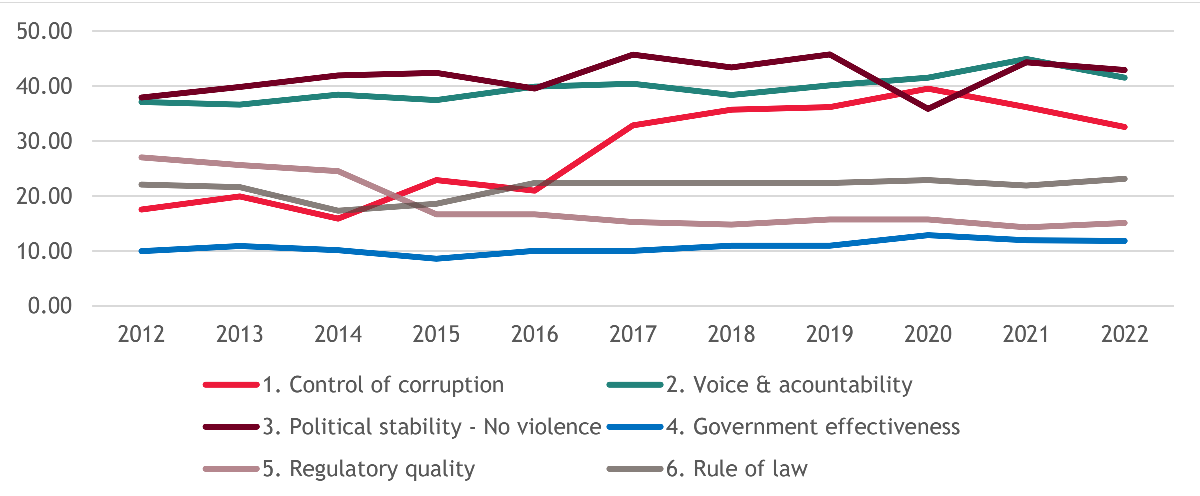
TABLE 76: SIERRA LEONE'S WGI BETWEEN 2012 AND 2022

N°	Indices	2022			2012		
		Highest country	Sierra Leone	Lowest country	Highest country	Sierra Leone	Lowest country
1	Control of Corruption	**Denmark** Rank 1 Score = 100	Rank 144 Score = 32.55	**South Sudan** Rank 211 Score = 0	**Denmark** Rank 1 Score = 100	Rank 175 Score = 17.54	**Somalia** Rank 212 Score = 0
2	Voice and Accountability	**Norway** Rank 1 Score = 100	Rank 122 Score = 41.55	**Korea, Dem. Rep.** Rank 214 Score = 0	**Norway** Rank 1 Score = 100	Rank 135 Score = 37.09	**Turkmenistan** Rank 214 Score = 0
3	Political Stability - No Violence	**Cayman Islands** Rank 1 Score = 100	Rank 122 Score = 42.92	**Syria** Rank 213 Score = 0	**Greenland** Rank 1 Score = 100	Rank 132 Score = 37.91	**Somalia** Rank 212 Score = 0
4	Government Effectiveness	**Singapore** Rank 1 Score = 100	Rank 188 Score = 11.79	**South Sudan** Rank 211 Score = 0	**Finland** Rank 1 Score = 100	Rank 191 Score = 9.95	**Somalia** Rank 212 Score = 0
5	Regulatory Quality	**Singapore** Rank 1 Score = 100	Rank 181 Score = 15.09	**Korea, Dem. Rep.** Rank 211 Score = 0	**Singapore** Rank 1 Score = 100	Rank 155 Score = 27.01	**Korea, Dem. Rep.** Rank 212 Score = 0
6	Rule of Law	**Finland** Rank 1 Score = 100	Rank 164 Score = 23.11	**Somalia** Rank 214 Score = 0	**Norway** Rank 1 Score = 100	Rank 167 Score = 22.07	**Somalia** Rank 214 Score = 0

Source: WB

The graph below shows the evolution of Sierra Leone score by index:

FIGURE 27: SIERRA LEONE'S WGI SCORE EVOLUTION BETWEEN 2012 AND 2022



d. Corruption Perceptions Index

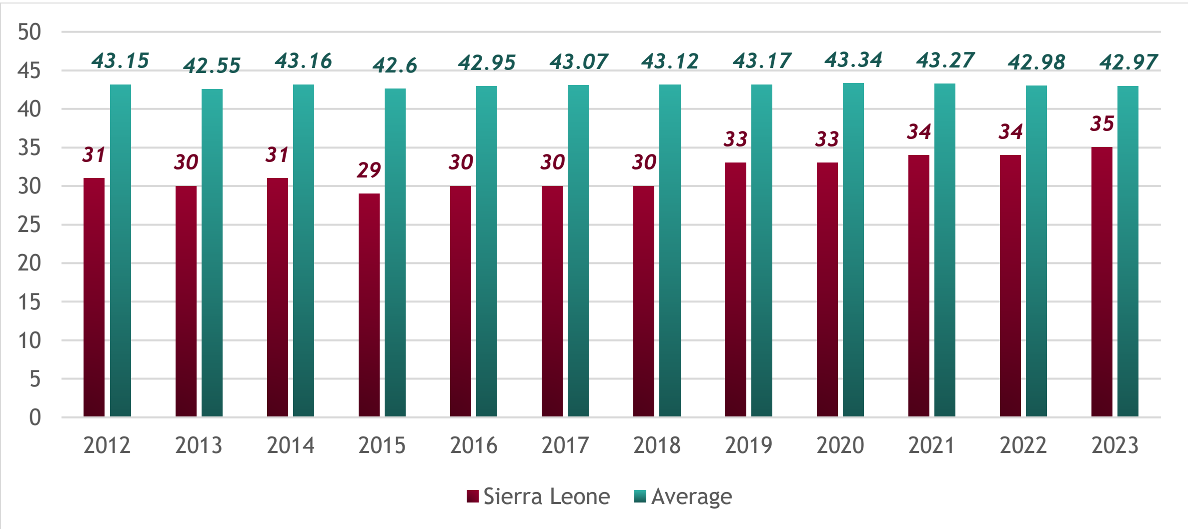
The Corruption Perceptions Index (CPI) is an index which ranks countries by their perceived levels of corruption, as determined by expert assessments and opinion surveys. The CPI generally defines corruption as an "abuse of entrusted power for private gain". The index is published annually by the non-governmental organisation Transparency International (TI) since 1995 and uses a scale from 0 (highly corrupt) to 100 (very clean).

In the most recent data, Sierra Leone was ranked 108th out of 180 countries in 2023, with a score of 35 which falls below the average (43). Denmark, Finland, New Zealand, Norway, Singapore, Sweden and Switzerland are perceived as the least corrupt nations in the world, ranking consistently high among international financial transparency, while the most apparently corrupt are Somalia (scoring 12), Syria and South Sudan (both scoring 13).

The global average remains stable for over a decade at just 43 out of 100. More than two-thirds of countries score below 50, while 53 countries have fallen to their lowest scores yet. Despite concerted efforts and hard-won gains by some, 157 countries have made no significant progress against corruption or have declined since 2012.

The evolution of the Sierra Leone's score between 2012 and 2023 is presented in the graph below:

FIGURE 28: CPI SCORE EVOLUTION BETWEEN 2012 AND 2023



Source: Transparency International CPI 2023

4.8. Notes towards gender sensitive SLEITI reporting and implementation

a. Legislative & Policy Framework for Gender Equality in Sierra Leone

As part of its efforts to promote gender equality in the country, the GoSL established in 2021 the "Gender Empowerment Act, 2022" that sets requirements and provision towards better inclusion of women in the political, decision making and economic affairs. In fact, the Gender Empowerment Act, 2022 provides for a minimum representation quota of 30% for elective and public officer positions. In addition, the Law requires from public and private employers, including civil society organisations, to employ a minimum of 30% of each gender, including decision-making positions within the entity.

The Gender Empowerment Act, 2022 provides also for equal gender pay for the same work done given the same qualifications, experience, grade and job description. This is also applicable to training, education and scholarship opportunities.

Besides, the Law sets provisions encouraging equal access and rights to credit and financial services, transactions and products. Pursuant to this Law, the MoF and the governmental financial institutions including the Bank of Sierra Leone are mandated to prescribe the procedures for improving females' access to finance. Any discrimination noted towards females in this regard will be liable on conviction to a fine of at least Le 50,000 or to a one-year imprisonment or both.

Pursuant to Article 9 of this Law, the related entities are required to submit to the Parliament -through the competent Ministry- an annual report containing measures planned and implemented to promote gender parity, including the factors and challenges affecting such implementation.[73]

b. Statistics on gender parity in Sierra Leone

Sierra Leone is ranked 157th in the Gender Inequality Index with a band score of 0.613 according to the 2022 Human Development report established by United Nations Development Program, which is below the world average of 0.462. The table below contains the main figures outlined from the UNDP data:

TABLE 77: GENDER INEQUALITY INDEX[74]

Index	Sierra Leone		World		Gap	
	Female	Male	Female	Male	Female	Male
Population with at least some secondary education	14.52%	33.87%	64.12%	70.97%	**-49.60%**	**-37.10%**
Labour force participation rate	48.28%	55.91%	46.80%	73.88%	**1.48%**	**-17.97%**
Share of seats in parliament	12.33%	87.67%	26.18%	73.82%	**-13.85%**	**13.85%**
Gender Inequality Index	**0.613**		**0.462**		**-0.151**	
Human Development Index	0.432	0.488	0.719	0.756	-0.287	-0.268
Gender Development Index	**0.885**		**0.951**		**-0.066**	

Source: UNDP Human Development Reports

UN Women in its turn also publishes yearly statistics on gender data gaps by country. According to the Agency's report for Sierra Lone, work still needs to be done in Sierra Leone to achieve gender equality.

Below is a selection of major statistics that best reflect gender inequality in Sierra Leone:

[73] https://www.un.org/sites/www.un.org.africarenewal/files/ACT%20MOGCA.pdf
[74] https://hdr.undp.org/data-center/documentation-and-downloads

TABLE 78 : OTHER GENDER PARITY STATISTICS[75]

Index	Women	Men	Total
1. No Poverty			
1.1.1 Employed population below international poverty line, by sex and age (%)	33.98	23.58	28.61
3. Good Health & Wellbeing			
3.1.1 Maternal mortality ratio (Per 100,000 live births)	442.83	-	-
3.4.1 Mortality rate attributed to cardiovascular disease, cancer, diabetes or chronic respiratory disease (probability)	24.9	22.1	23.5
3.7.2 Adolescent birth rate (per 1,000 women aged 15-19 years)	101.94	-	-
4. Quality Education			
4.3.1 Participation rate in formal and non-formal education and training, by sex (%)	15.14	49.3	2.09
4.c.1 Proportion of teachers who have received at least the minimum organized teacher training (e.g. pedagogical training) pre-service or in-service required for teaching at the relevant level in a given country, by sex and education level (%)	87.04	80.31	81.44
5. Gender Equality			
5.5.1 Proportion of seats held by women in national parliaments (% of total number of seats)	18.2	-	-
5.5.2 Proportion of women in managerial positions (%)	35.91	-	-
8. Decent Work to Economic Growth			
8.3.1 Proportion of informal employment in non-agriculture employment, by sex (ILO harmonized estimates) (%)	96.63	89.28	93.11
8.5.2 Unemployment rate, by sex and age (%)	2.18	4.27	3.19
8.6.1 Proportion of youth not in education, employment or training, by sex and age (%)	34.81	31.23	33.17
8.7.1 Proportion of children engaged in economic activity and household chores, by sex and age (%)	24.8	25.6	25.2
8.10.2 Proportion of adults (15 years and older) with an account at a financial institution or mobile-money-service provider, by sex (% of adults aged 15 years and older)	24.76	33.35	22.4

Source: UN Women

According to the statistics set out above, only 15.1% of females have access to formal or informal education and training programs against 49.3% for males. Furthermore, females' financial inclusion represents 24.7% compared to 33.3% for males. Nevertheless, females occupy 35.9% of managerial positions, which exceeds the minimum of 30% required by the Gender Empowerment Act, 2022. On the other hand, females occupy only 12.3% of parliamentary seats.

c. Gender parity in the extractive companies in Sierra Leone

According to data collected from the in-scope extractive companies in Sierra Leone, females represent only 10.9% of the workforce in the extractive sector in 2023 with 3,544 workers, compared to 1,048 female workers (9.9%) in 2022, registering thus a slight increase of 1% between 2022 and 2023.

The table below presents the main statistics on gender parity in the extractive sector according to data received from reporting mining companies:

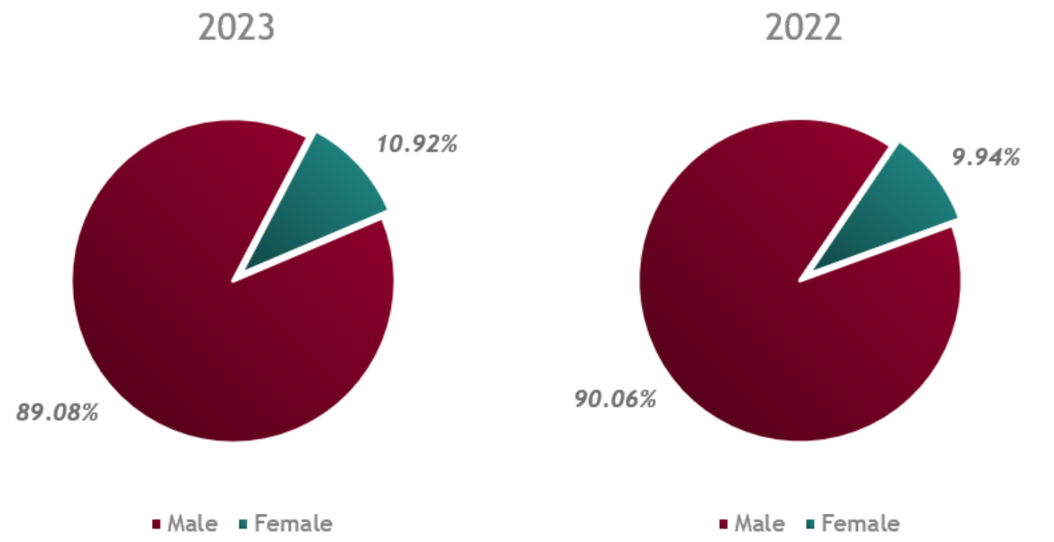
[75] https://data.unwomen.org/country/sierra-leone

TABLE 79: GENDER PARITY IN THE EXTRACTIVE SECTOR IN 2022 AND 2023

Category	2023				2022			
	Male		Female		Male		Female	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
By employment regime								
Permanent	28,344	89.1%	3,476	10.9%	8,957	90.1%	989	9.9%
Non-permanent	555	89.1%	68	10.9%	534	90.1%	59	9.9%
By nationality								
Domestic	28,428	89.1%	3,476	10.9%	9,076	89.8%	1,025	10.1%
Foreigner	471	87.4%	68	12.6%	415	94.7%	23	5.2%
Total	**28,899**	**89.1%**	**3,544**	**10.9%**	**9,491**	**90.1%**	**1,048**	**9.9%**

Source: extractive companies

FIGURE 29: GENDER PARITY IN THE SIERRA LEONE'S EXTRACTIVE SECTOR



The detailed employment figures reported by the extractive companies are presented in Annex 8 to this report.

5. ANALYSIS OF EITI DATA

5.1. Production

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

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

2022

TABLE 80: DETAILS OF PRODUCTION DISCLOSED BY IN-SCOPE COMPANIES (2022)

No	Company name	Commodity	Region	License	Unit	Volume	Value (Le)
1	Cheng Li Trading Mining	Gold	North	ML2/2020	Gr	17,306	19,258,812
2	Kasino Mining Company Ltd	HMC	South	SML10/2019	WMT	10,500	79,123,800
3	Kingho Mining Company Ltd	Iron Ore	North	ML4/2014	WMT	5,871,870	8,296,511,920
4	Koidu Ltd	Diamond	Eastern	ML06/95	carats	516,694	1,841,759,022
5	Marampa Mines Ltd	Iron Ore	North	ML 4/2021	DMT	2,046,976	2,296,603,788
6	Meya Mining Ltd	Diamond	Kono	ML 2/2019	carats	1,612	8,516,245
7	Sierra Rutile Ltd	Rutile	South	ML-2134	WMT	138,504	4,019,073,960
8	Sierra Rutile Ltd	Ilmenite	South	ML-2134	WMT	62,385	307,016,564
9	Sierra Rutile Ltd	Zircon	South	ML-2134	WMT	41,564	387,392,046
10	Sierra Rutile Ltd	GIC	South	ML-2134	WMT	7,002	51,675,434
11	Tonguma Ltd	Diamond	East	ML02/2012	carats	7,784	1,666,404
	Total						**17,308,597,995**

The total production value NMA provided amounted to Le 16,196 million (US$ 860 million) compared to Le 17,309 million (US$ 918 million) provided by the extractive companies. The difference is due to the gap in quantities and values between both sources of data as presented below:

TABLE 81: DIFFERENCES BETWEEN NMA AND MINING COMPANIES' PRODUCTION DATA (2022)

Company name	Commodity	Extractive company		NMA		Difference	
		Volume	Value (Le)	Volume	Value (Le)	Volume	Value (Le)
Cheng Li Trading Mining	Gold	17,306	19,258,812	17,306	19,258,812	-	-
Kasino Mining Company Ltd	HMC	10,500	79,123,800	5,265	102,935,676	3,910	(23,811,876)
Kingho Mining Company Ltd	Iron Ore	5,871,870	8,296,511,920	5,339,812	4,903,084,048	532,058	3,393,427,871
Koidu Ltd	Diamond	516,694	1,841,759,022	516,694	1,818,018,558	-	23,740,464
Marampa Mines Ltd	Iron Ore	2,046,976	2,296,603,788	2,246,687	4,015,044,898	(199,711)	(1,718,441,111)
Meya Mining Ltd	Diamond	1,612	8,516,245	1,612	5,853,565	-	2,662,680
Sierra Rutile Ltd	Rutile	138,504	4,019,073,960	135,812	3,691,026,715	2,692	328,047,245
Sierra Rutile Ltd	Ilmenite	62,385	307,016,564	58,590	280,229,667	3,795	26,786,898

Company name	Commodity	Extractive company		NMA		Difference	
		Volume	Value (Le)	Volume	Value (Le)	Volume	Value (Le)
Sierra Rutile Ltd	Zircon	41,564	387,392,046	10,709	328,461,224	30,855	58,930,823
Sierra Rutile Ltd	GIC	7,002	51,675,434	-	-	7,002	51,675,434
Tonguma Ltd	Diamond	7,784	1,666,404	7,665	21,624,294	119	(19,957,890)
Total			**17,308,597,995**		**15,185,537,457**	**-**	**2,123,060,538**

It is to be noted that in addition to the companies above, the NMA provided us with the production data for 2022 of the following companies:

- Gold Lion Mining Company;
- Afro Asia Mining Corporation;
- CFS Construction & General Supplies (SL) Ltd;
- Dayu Mining Ltd;
- DZT Resources Ltd;
- Hong Peng Resources (SL) Mining Ltd; and
- Sierra Minerals Holdings 1 Ltd.

2023

Table 82: Details of Production Disclosed by In-scope Companies (2023)

N°	Company	Commodity	Region	Licence	Unit	Volume	Value (Le)
1	Cheng Li Trading Mining	Gold	North	ML2/2020	Gr	16,506	18,296,522
2	Jong Minerals Company Ltd	HMC	South	ML03/2023	WMT	15,355	139,976,180
3	Kasino Mining Company Ltd	HMC	South	SML10/2019	WMT	10,464	95,385,266
4	Kingho Mining Company Ltd	Iron Ore	North	ML4/2014	WMT	6,874,209	11,749,741,733
5	Kingho Mining Company Ltd	Iron Ore	North	ML4/2014	WMT	786,397	1,738,432,800
6	Koidu Ltd	Diamond	Eastern	ML06/95	carats	438,693	11,064,886,554
7	Marampa Mines Ltd	Iron Ore	North	ML 4/2021	DMT	2,869,464	3,746,588,555
8	Meya Mining Ltd	Diamond	Kono	ML 2/2019	carats	6,371	45,684,652
9	Sierra Rutile Ltd	Rutile	South	ML-2134	WMT	102,172	3,294,205,984
10	Sierra Rutile Ltd	Ilmenite	South	ML-2134	WMT	37,133	293,258,780
11	Sierra Rutile Ltd	Zircon	South	ML-2134	WMT	27,024	373,730,726
12	Sierra Rutile Ltd	GIC	South	ML-2134	WMT	7,000	56,712,983
	Total						**32,616,900,734**

The total production value NMA provided amounted to Le 27,821 million (US$ 1.2 billion) compared to Le 32,617 million (US$ 1.4 billion) provided by the extractive companies. The difference is due to the gap in quantities and values between both sources of data as presented below:

TABLE 83: DIFFERENCES BETWEEN NMA AND MINING COMPANIES' PRODUCTION DATA (2023)

Company name	Commodity	Extractive company		NMA		Difference	
		Volume	Value (Le)	Volume	Value (Le)	Volume	Value (Le)
Cheng Li Trading Mining	Gold	16,506	18,296,522	19,771	35,875,859	(3,265)	(17,579,337)
Jong Minerals Company Ltd	HMC	15,355	139,976,180	14,324	316,939,703	1,031	(176,963,523)
Kasino Mining Company Ltd	HMC	10,464	95,385,266	6,590	152,997,541	3,874	(57,612,275)
Kingho Mining Company Ltd	Iron Ore	7,660,606	13,488,174,533	7,293,555	12,689,935,189	367,051	798,239,344
Koidu Ltd	Diamond	438,693	11,064,886,554	438,680	1,488,082,669	13	9,576,803,884
Marampa Mines Ltd	Iron Ore	2,869,464	3,746,588,555	3,119,732	6,164,661,298	(250,268)	(2,418,072,743)
Meya Mining Ltd	Diamond	6,371	45,684,652	6,437	33,761,690	66	11,922,961
Sierra Rutile Ltd	Rutile	102,172	3,294,205,984	112,241	3,630,599,847	(10,069)	(336,393,863)
Sierra Rutile Ltd	Ilmenite	37,133	293,258,780	44,839	359,897,527	(7,706)	(66,638,747)
Sierra Rutile Ltd	Zircon	27,024	373,730,726	27,776	181,420,000	(752)	192,310,725
Sierra Rutile Ltd	GIC	7,000	56,712,983	-	-	7,000	56,712,983
Total			**32,616,900,734**		**25,054,171,324**		**7,562,729,410**

It is to be noted that in addition to the companies above, the NMA provided us with the production data for 2023 of the following companies:

- CTC Mining (SL) Ltd;
- Gold Lion Mining Company;
- Afro Asia Mining Corporation;
- Foison Resources Ltd;
- F.S. Mining (SL) Ltd;
- CFS Construction & General Supplies (SL) Ltd;
- Tonguma Ltd;
- DZT Resources Ltd;
- Leone Minerals Ltd;
- Hong Peng Resources (SL) Mining Ltd;
- Sierra Minerals Holdings 1 Ltd; and
- WGT Minerals Company Ltd.

5.2. Exports

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

2022

TABLE 84: DETAILS OF EXPORTS DISCLOSED BY IN-SCOPE COMPANIES (2022)

N°	Company	Commodity	License	Volume	Unit	Total value (Le)
1	Kasino Mining Company Ltd	HMC	SML10/2019	8,505	WMT	64,090,278
2	Kingho Mining Company Ltd	Iron Ore	ML4/2014	5,896,093	WMT	8,330,737,287
3	Koidu Ltd	Diamond	ML06/95	540,426	Carat	1,909,338,181
4	Marampa Mines Ltd	Iron Ore	ML 4/2021	2,160,479	WMT	3,290,250,603
5	Meya Mining Ltd	Diamond	ML 2/2019	1,255	Carat	6,628,220
6	Sierra Rutile Ltd	Rutile	ML-2134	150,520	WMT	4,404,322,942
7	Sierra Rutile Ltd	Ilmenite	ML-2134	62,385	WMT	307,016,567
8	Sierra Rutile Ltd	Garnet	ML-2134	7,002	WMT	51,675,436
9	Sierra Rutile Ltd	Zircon	ML-2134	41,564	WMT	387,392,041
10	Tonguma Ltd	Diamond	ML02/2012	7,784	Carat	1,666,404
Total						**18,753,117,957**

The total exports value NMA provided amounted to Le 17,646 million (US$ 937 million) compared to Le 18,753 million (US$ 995 million) provided by the extractive companies. The difference is due to the gap in quantities and values between both sources of data as presented below:

TABLE 85: DIFFERENCES BETWEEN NMA AND MINING COMPANIES' EXPORTS DATA (2022)

Company name	Commodity	Extractive company		NMA		Difference	
		Volume	Value (Le)	Volume	Value (Le)	Volume	Value (Le)
Kasino Mining Company Ltd	HMC	8,505	64,090,278	8,505	166,314,271	-	(102,223,993)
Kingho Mining Company Ltd	Iron Ore	5,896,093	8,330,737,287	5,743,889	5,274,112,746	152,204	3,056,624,541
Koidu Ltd	Diamond	540,426	1,909,338,181	544,426	1,915,595,249	(4,000)	6,257,068
Marampa Mines Ltd	Iron Ore	2,160,479	3,290,250,603	2,088,107	3,731,647,247	72,372	(441,396,643)
Meya Mining Ltd	Diamond	1,255	6,628,220	1,255	5,910,076	-	718,144
Sierra Rutile Ltd	Rutile	150,520	4,404,322,942	134,771	3,662,734,968	15,749	741,587,974
Sierra Rutile Ltd	Ilmenite	62,385	307,016,567	62,360	298,261,171	25	8,755,396
Sierra Rutile Ltd	Garnet	7,002	51,675,436	7,002	16,285,863	-	35,389,572
Sierra Rutile Ltd	Zircon	41,564	387,392,041	41,564	1,274,830,731	-	(887,438,691)
Tonguma Ltd	Diamond	7,784	1,666,404	5,872	19,204,152	1,912	(17,537,748)
Total			**18,753,117,957**		**16,364,896,474**		**2,388,221,483**

It is to be noted that in addition to the companies above, the NMA provided us with the exports data for 2022 of the following companies:

- Gold Lion Mining Company;
- Afro-Asia Mining Corporation;
- CFS Construction & General Supplies (SL) Ltd;
- Dayu Mining Ltd;
- DZT Resources Ltd;
- Hong Peng Resources (SL) Mining Ltd; and
- Sierra Minerals Holdings 1 Ltd.

2023

TABLE 86: DETAILS OF EXPORTS DISCLOSED BY IN-SCOPE COMPANIES (2023)

N°	Company	Commodity	License	Volume	Unit	Total value (Le)
1	Jong Minerals Company Ltd	HMC	ML03/2023	16,812	WMT	153,258,192
2	Kasino Mining Company Ltd	HMC	SML10/2019	6,590	WMT	60,074,440
3	Kingho Mining Company Ltd	Iron Ore	ML4/2014	7,545,054	WMT	13,242,612,010
4	Koidu Ltd	Diamond	ML06/95	435,291	Carat	1,682,153,747
5	Marampa Mines Ltd	Iron Ore	ML 4/2021	2,894,022	WMT	5,491,770,203
6	Meya Mining Ltd	Diamond	ML 2/2019	6,205	Carat	44,496,924
7	Sierra Rutile Ltd	Rutile	ML-2134	112,142	WMT	3,670,556,144
8	Sierra Rutile Ltd	Ilmenite	ML-2134	36,995	WMT	296,761,864
9	Sierra Rutile Ltd	Garnet	ML-2134	7,000	WMT	56,712,972
10	Sierra Rutile Ltd	Zircon	ML-2134	27,024	WMT	327,785,111
Total						**25,026,181,608**

The total exports value NMA provided amounted to Le 27,315 million (US$ 1,198 million) compared to Le 25,026 million (US$ 1,098 million) provided by the extractive companies. The difference is due to the gap in quantities and values between both sources of data as presented below:

TABLE 87: DIFFERENCES BETWEEN NMA AND MINING COMPANIES' EXPORTS DATA (2023)

Company name	Commodity	Extractive company		NMA		Difference	
		Volume	Value (Le)	Volume	Value (Le)	Volume	Value (Le)
Jong Minerals Company Ltd	HMC	16,812	153,258,192	14,324	289,947,525	2,488	(136,689,333)
Kasino Mining Company Ltd	HMC	6,590	60,074,440	6,590	152,889,450	-	(92,815,010)
Kingho Mining Company Ltd	Iron Ore	7,545,054	13,242,612,010	7,545,054	13,645,270,935	-	(402,658,925)
Koidu Ltd	Diamond	435,291	1,682,153,747	434,015	1,472,258,137	1,276	209,895,610
Marampa Mines Ltd	Iron Ore	2,894,022	5,491,770,203	2,658,800	5,374,439,937	235,222	117,330,266
Meya Mining Ltd	Diamond	6,205	44,496,924	6,205	37,992,617	0	6,504,307
Sierra Rutile Ltd	Rutile	112,142	3,670,556,144	108,349	3,504,707,396	3,793	165,848,749
Sierra Rutile Ltd	Ilmenite	36,995	296,761,864	36,995	296,761,854	-	10
Sierra Rutile Ltd	Garnet	7,000	56,712,972	7,000	32,711,627		24,001,346
Sierra Rutile Ltd	Zircon	27,024	327,785,111	27,024	176,508,284	-	151,276,828
Total			**25,026,181,608**		**24,983,487,761**		**42,693,846**

It is to be noted that in addition to the companies above, the NMA provided us with the exports data for 2023 of the following companies:

- CTC Mining (SL) Ltd
- Gold Lion Mining Company
- Afro-Asia Mining Corporation
- Foison Resources Ltd
- F.S. Mining (SL) Ltd
- CFS Construction & General Supplies (SL) Ltd
- DZT Resources Ltd
- Leone Minerals Ltd
- Sierra Minerals Holdings 1 Ltd
- Tonguma Ltd
- WGT Minerals Company Ltd

5.3. Analysis of Government Revenues from the Extractive Sector

In Sierra Leone extractive revenues are derived entirely from the mining sector. The petroleum sector has yet to contribute to the Government revenues for the years 2022 and 2023.

This section shows the details of Government tax revenues by:

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

Annexes 2-4 to this report provide the full list of payments made by taxpayers.

a. Analysis by extractive company

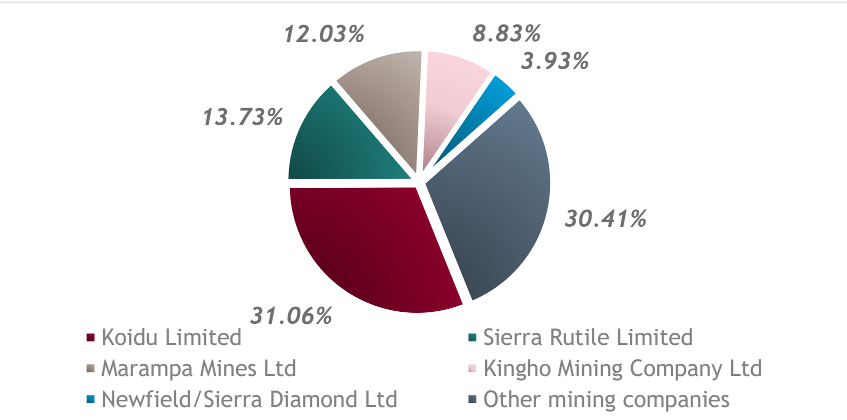
2022

The analysis of tax revenues from the extractive industries shows that top 10 companies contributed almost **81%** of the total revenues. Koidu Limited, Sierra Rutile Limited and Marampa Mines Ltd accounted for **57%**. The table and Figure below set out the breakdown of extractive revenues by mining company.

TABLE 88: BREAKDOWN OF EXTRACTIVE REVENUES BY COMPANY (2022)

No	Company	Commodity	Amount (US$ million)	Weight (%)	Cum. Weight (%)
1	Koidu Ltd	Diamond	10.72	31.06%	31.06%
2	Sierra Rutile Ltd	Rutile	4.74	13.73%	44.79%
3	Marampa Mines Ltd	Iron Ore	4.15	12.03%	56.83%
4	Kingho Mining Company Ltd	Iron ore	3.05	8.83%	65.66%
5	Newfield/Sierra Diamond Ltd	Diamond	1.35	3.93%	69.59%
6	CTC MINING (SL) Ltd	Bauxite	1.23	3.55%	73.14%
7	Meya Mining	Diamond	1.00	2.89%	76.03%
8	Gold Lion Mining company SL Ltd	Gold	0.70	2.03%	78.06%
9	Dayu Mining Company	Gold	0.62	1.79%	79.85%
10	Seawright mining Co Ltd	Diamond	0.53	1.55%	81.39%
11 to 335	Other (325) mining companies		6.42	18.61%	100.00%
	Total		**34.50**	**100.00%**	

FIGURE 30: BREAKDOWN OF EXTRACTIVE REVENUES BY COMPANY (2022)



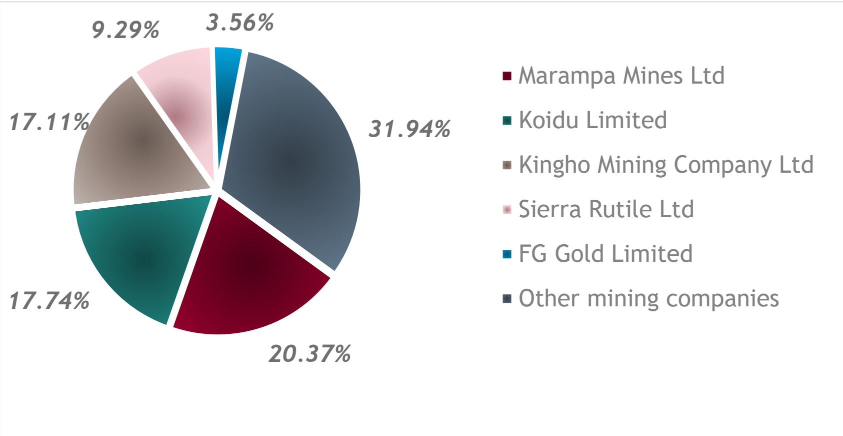
2023

The analysis of tax revenues from the extractive industries shows that the top 10 companies contributed **80%** of the total revenues. Marampa Mines, Koidu and Kingho Mining Company accounted for **55%**. The table and Figure below set out the breakdown of extractive revenues by mining company.

TABLE 89: BREAKDOWN OF EXTRACTIVE REVENUES BY COMPANY (2023)

No	Company	Commodity	Amount (US$ million)	Weight (%)	Cum. Weight (%)
1	Marampa Mines Ltd	Iron Ore	8.35	20.37%	20.37%
2	Koidu Ltd	Diamond	7.27	17.74%	38.11%
3	Kingho Mining Company Ltd	Iron Ore	7.01	17.11%	55.22%
4	Sierra Rutile Ltd	Rutile	3.81	9.29%	64.51%
5	FG Gold Ltd	Gold	1.46	3.56%	68.07%
6	CTC Mining (SL) Ltd	Bauxite	1.35	3.29%	71.36%
7	Seawright mining Co Ltd	Diamond	1.10	2.69%	74.05%
8	Jong Minerals Company Ltd	HMC	0.94	2.29%	76.34%
9	Meya Mining	Diamond	0.91	2.21%	78.55%
10	Foison Resources Ltd	HMC	0.63	1.53%	80.08%
11 to 278	Other (268) mining companies		8.17	19.92%	100.00%
	Total		**41.00**	**100.00%**	

FIGURE 31: BREAKDOWN OF EXTRACTIVE REVENUES BY COMPANY (2023)



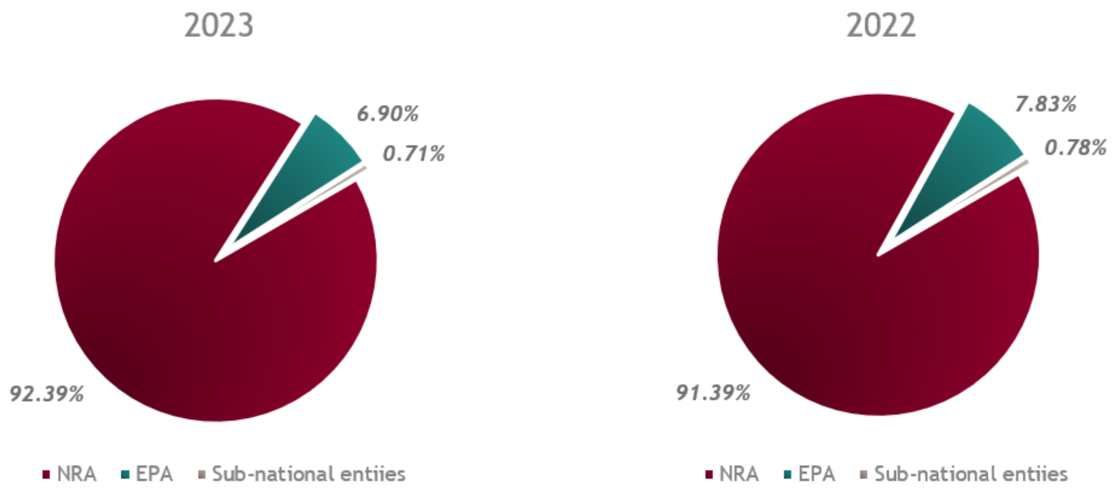
b. Analysis by government agency and sub-national entity

The analysis of tax revenues from the extractive industries shows that NRA contributed **92%** of the total revenues in 2023 and **91%** in 2022. The table and Figure below set out the breakdown of extractive revenues by government agency.

TABLE 90: BREAKDOWN OF EXTRACTIVE REVENUES BY AGENCY IN 2022 AND 2023

Government Agency	2023		2022	
	Amount (US$ million)	Weight (%)	Amount (US$ million)	Weight (%)
NRA	37.88	92.39%	31.53	91.37%
EPA-SL	2.85	6.96%	2.67	7.75%
NMA	0.01	0.02%	-	0.00%
Sub-national entities	0.26	0.63%	0.31	0.88%
Total	**41.00**	**100.00%**	**34.50**	**100.00%**

FIGURE 32: BREAKDOWN OF EXTRACTIVE REVENUES BY AGENCY IN 2022 AND 2023



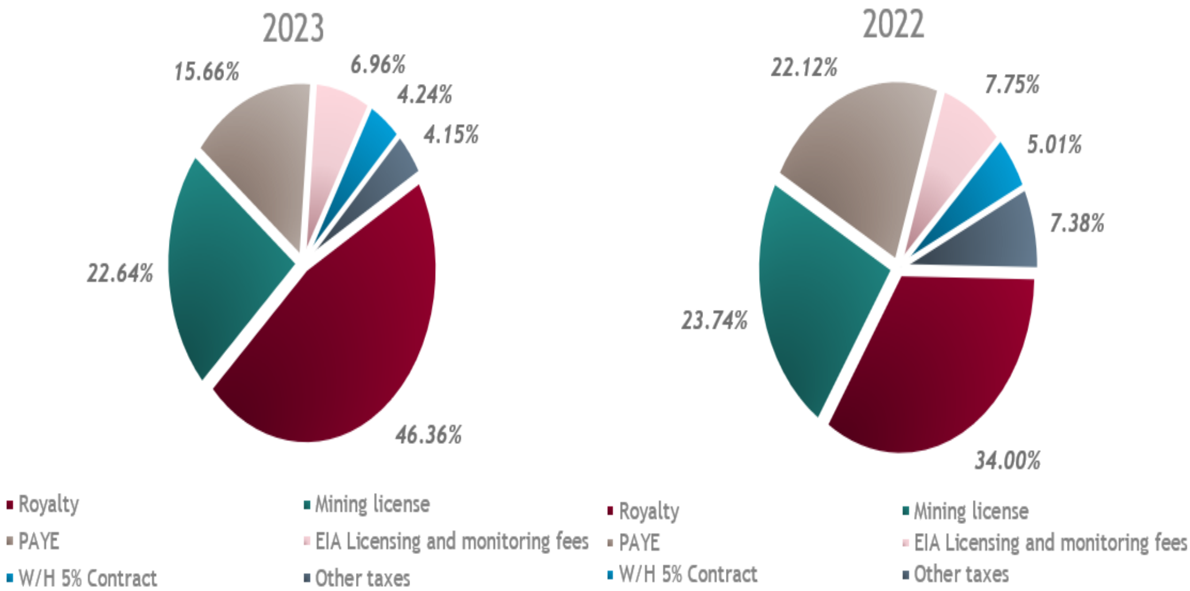
c. Analysis by revenue stream

The analysis of tax revenues from the extractive industries shows that the top 5 revenue streams contributed almost for **96%** of the total revenues in 2023 (**93%** in 2022). The table and Figure below set out the breakdown of extractive revenues by revenue stream.

TABLE 91: BREAKDOWN OF EXTRACTIVE REVENUES BY REVENUE STREAM IN 2022 AND 2023

No	Revenue stream	2023			2022		
		Amount (US$ million)	Weight (%)	Cum. Weight (%)	Amount (US$ million)	Weight (%)	Cum. Weight (%)
1	Royalties	19.00	46.36%	46.36%	11.73	34.00%	34.00%
2	Mining licenses	9.28	22.64%	69.00%	8.19	23.74%	57.74%
3	PAYE	6.42	15.66%	84.66%	7.63	22.12%	79.86%
4	EIA Licensing and monitoring fees	2.85	6.96%	91.62%	2.67	7.75%	87.61%
5	W/H 5% Contract	1.74	4.24%	95.85%	1.73	5.01%	92.62%
	Other taxes	1.74	4.15%	100.00%	2.55	7.38%	100.00%
	Total	**41.00**	**100.00%**		**34.50**	**100.00%**	

FIGURE 33: BREAKDOWN OF EXTRACTIVE REVENUES BY REVENUE STREAM IN 2022 AND 2023



d. Analysis by commodity

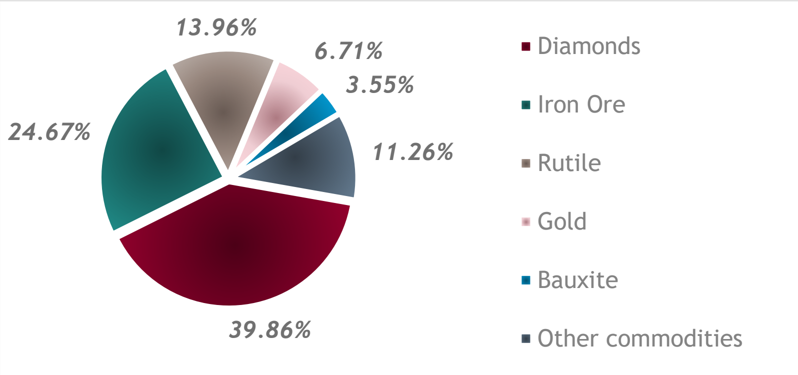
2022

The analysis of tax revenues from the extractive industries shows that **rutile** accounted for approximately **40%** the total revenues. Top 5 commodities accounted for almost **89%**. The table and Figure below set out the breakdown of extractive revenues by commodity.

TABLE 92: BREAKDOWN OF EXTRACTIVE REVENUES BY COMMODITY (2022)

N°	Commodity	Contribution to tax revenues (US$ million)	Weight (%)	Cumulative weight (%)
1	Diamonds	13.79	39.9%	39.9%
2	Iron ore	8.51	24.7%	64.5%
3	Rutile	4.82	14.0%	78.5%
4	Gold	2.29	6.7%	85.2%
5	Bauxite	1.23	3.6%	88.7%
	Other commodities	3.87	11.3%	100.0%
	Total	**34.50**	**100.0%**	

FIGURE 34: BREAKDOWN OF EXTRACTIVE REVENUES BY COMMODITY (2022)



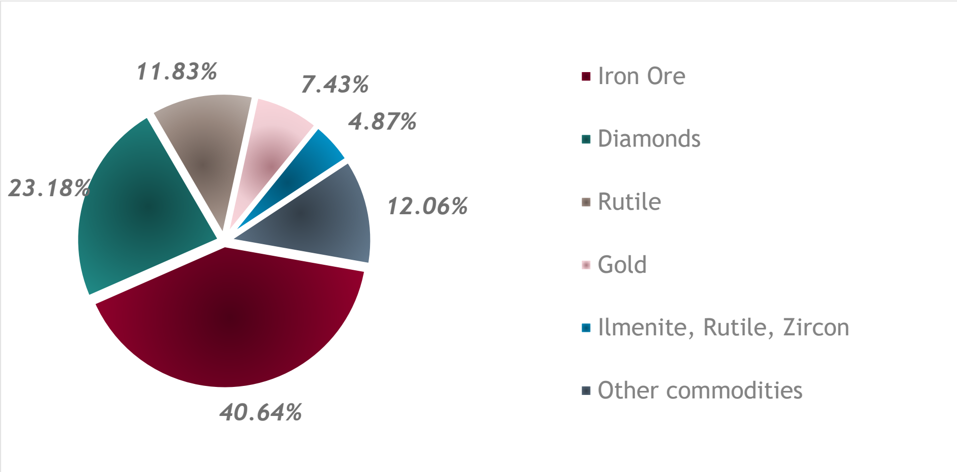
2023

The analysis of tax revenues from the extractive industries shows that **iron ore** accounted for approximately **41%** the total revenues. The top 5 commodities accounted for **88%**. The table and Figure below set out the breakdown of extractive revenues by commodity.

TABLE 93: BREAKDOWN OF EXTRACTIVE REVENUES BY COMMODITY (2023)

N°	Commodity	Contribution to tax revenues (US$ million)	Weight (%)	Cumulative weight (%)
1	Iron ore	16.66	40.6%	40.6%
2	Diamond	9.46	23.2%	63.8%
3	Rutile	4.85	11.8%	75.6%
4	Gold	3.05	7.4%	83.1%
5	Ilmenite, Rutile, Zircon	2.00	4.9%	87.9%
	Other commodities	4.97	12.1%	100.0%
	Total	**41.00**	**100.00%**	

FIGURE 35: BREAKDOWN OF EXTRACTIVE REVENUES BY COMMODITY (2023)



e. Analysis by project (mining agreement)

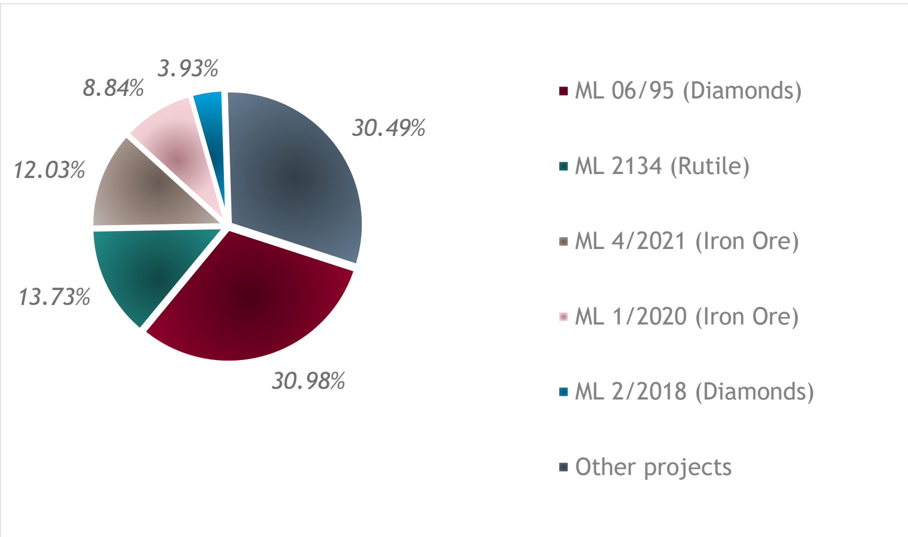
2022

The analysis of tax revenues from the extractive industries shows that project **ML 06/95** operated by **Koidu Ltd** accounted for **31%** the total revenues. The table and Figure below set out the breakdown of extractive revenues by project.

TABLE 94: BREAKDOWN OF EXTRACTIVE REVENUES BY PROJECT (2022)

No	Project	Company	Start Date	Commodity	Amount (US$ million)	Weight (%)	Cum. Weight (%)
1	ML 06/95	Koidu Ltd	22/07/1995	Diamonds	10.72	31.06%	31.0%
2	ML 2134	Sierra Rutile Ltd	09/09/2010	Rutile	4.74	13.73%	44.79%
3	ML 4/2021	Marampa Mines Ltd	20/05/2021	Iron Ore	4.15	12.03%	56.83%
4	ML 1/2020	Kingho Mining Company	07/01/2020	Iron Ore	3.05	8.83%	65.66%
5	ML 2/2018	Sierra Diamonds Ltd	16/05/2018	Diamonds	1.35	3.93%	69.59%
	Other projects				10.49	30.41%	100.0%
	Total				**34.50**	**100.00%**	

FIGURE 36: BREAKDOWN OF EXTRACTIVE REVENUES BY PROJECT (2022)



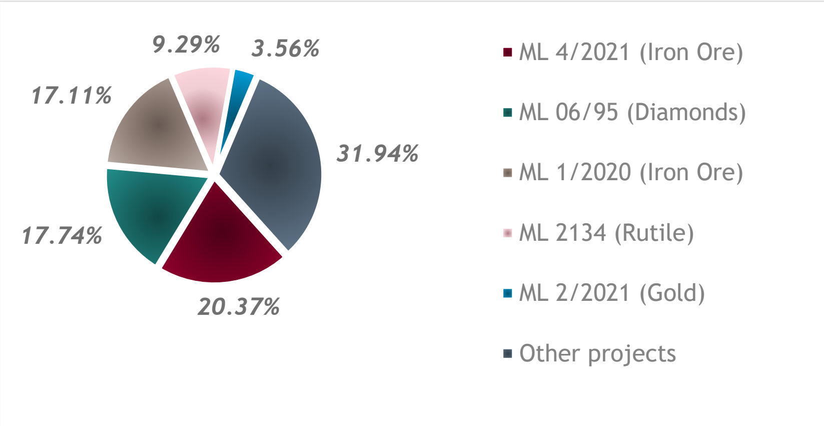
2023

The analysis of tax revenues from the extractive industries shows that project **ML 4/2021** operated by **Marampa Mines Ltd** accounted for **20%** the total revenues. The table and Figure below set out the breakdown of extractive revenues by project.

TABLE 95: BREAKDOWN OF EXTRACTIVE REVENUES BY PROJECT (2023)

No	Project	Company	Start Date	Commodity	Amount (US$ million)	Weight (%)	Cum. Weight (%)
1	ML 4/2021	Marampa Mines Ltd	20/05/2021	Iron Ore	8.35	20.4%	20.4%
2	ML 06/95	Koidu Ltd	22/07/1995	Diamonds	7.27	17.7%	38.1%
3	ML 1/2020	Kingho Mining Company	07/01/2020	Iron ore	7.01	17.1%	55.2%
4	ML 2134	Sierra Rutile Ltd	09/09/2010	Rutile	3.81	9.3%	64.5%
5	ML 2/2021	FG Gold Ltd	19/01/2021	Gold	1.46	3.6%	68.1%
	Other projects				13.01	31.9%	100.0%
	Total				**41.00**	**100.00%**	

FIGURE 37: BREAKDOWN OF EXTRACTIVE REVENUES BY PROJECT (2023)



5.4. Analysis of Sub-national Payments

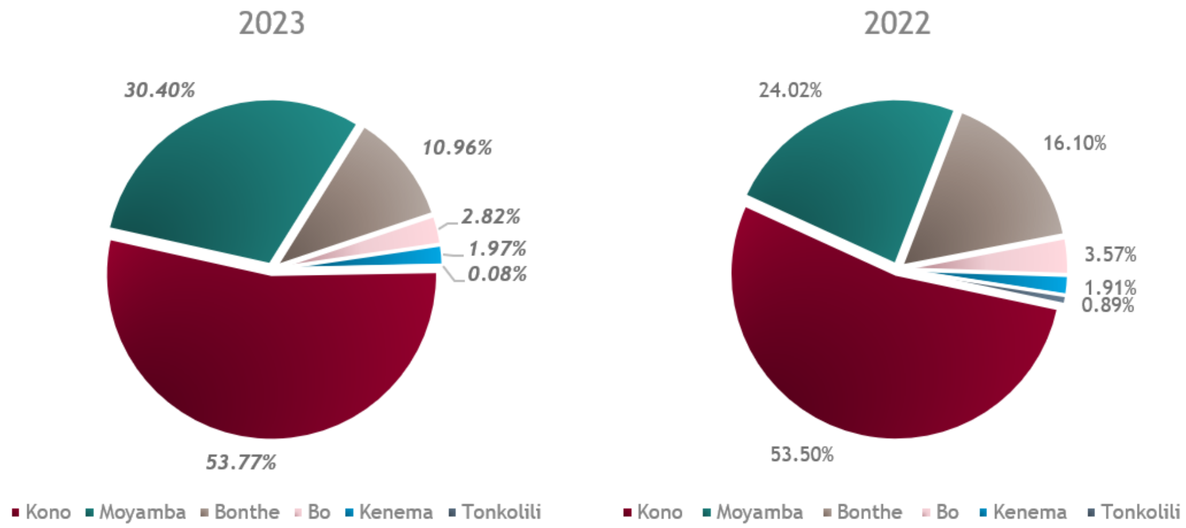
Surface rent collected by District / Chiefdom councils and Paramount chiefs from mining companies amounted to **US$ 305,154** and **US$ 259,118** respectively in 2022 and 2023.

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

TABLE 96: BREAKDOWN OF SURFACE RENT BY REGION (2022 AND 2023)

District	2023 In US$%	%	2022 In US$%	%
Kono	139,319	53.77%	163,257	53.50%
Moyamba	78,769	30.40%	73,311	24.02%
Bonthe	28,396	10.96%	49,140	16.10%
Bo	7,314	2.82%	10,907	3.57%
Kenema	5,101	1.97%	5,833	1.91%
Tonkolili	219	0.08%	2,706	0.89%
Total	**259,118**	**100.00%**	**305,154**	**100.00%**

FIGURE 38: BREAKDOWN OF SURFACE RENT BY REGION (2022 AND 2023)



As presented in the table below, Meya Mining and Sierra Rutile Ltd are the major contributors of surface rent with 61% in 2023 and 57% in 2022.

TABLE 97: BREAKDOWN OF SURFACE RENT BY COMPANY (2022 AND 2023)

Company	2023		2022	
	Amount (US$)	%	Amount (US$)	%
Sierra Rutile Ltd	74,012	28.56%	78,096	25.59%
Meya Mining Company	69,635	26.87%	78,764	25.81%
Koidu Ltd	51,287	19.79%	49,700	16.29%
Sierra Mineral Holding	26,673	10.29%	7,907	2.59%
Seawright Mining Company	18,397	7.10%	16,957	5.56%
Sierra Mineral Holding Ltd	11,151	4.30%	20,129	6.60%
Sierra Diamond Ltd	5,101	1.97%	5,833	1.91%
Sierra Rutile Ltd	2,643	1.02%	24,226	7.94%
Dayu Mining Company	219	0.08%	583	0.19%
F. G Gold	-	0.00%	3,000	0.98%
Metals and Minerals Company	-	0.00%	11,148	3.65%
Kingho Mining Company	-	0.00%	1,996	0.65%
Metals & Minerals / PAN African Rare Metal Mining Company	-	0.00%	6,815	2.23%
Total	**259,118**	**100.00%**	**305,154**	**100.00%**

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

5.5. Analysis of Social Payments

The extractive companies selected to submit RTs have reported mandatory and voluntary social payments amounting to **US$ 3.9 million** and **US$ 6.3 million** during the years 2022 and 2023 respectively. The tables below summarise these social payments by company and type of payment.

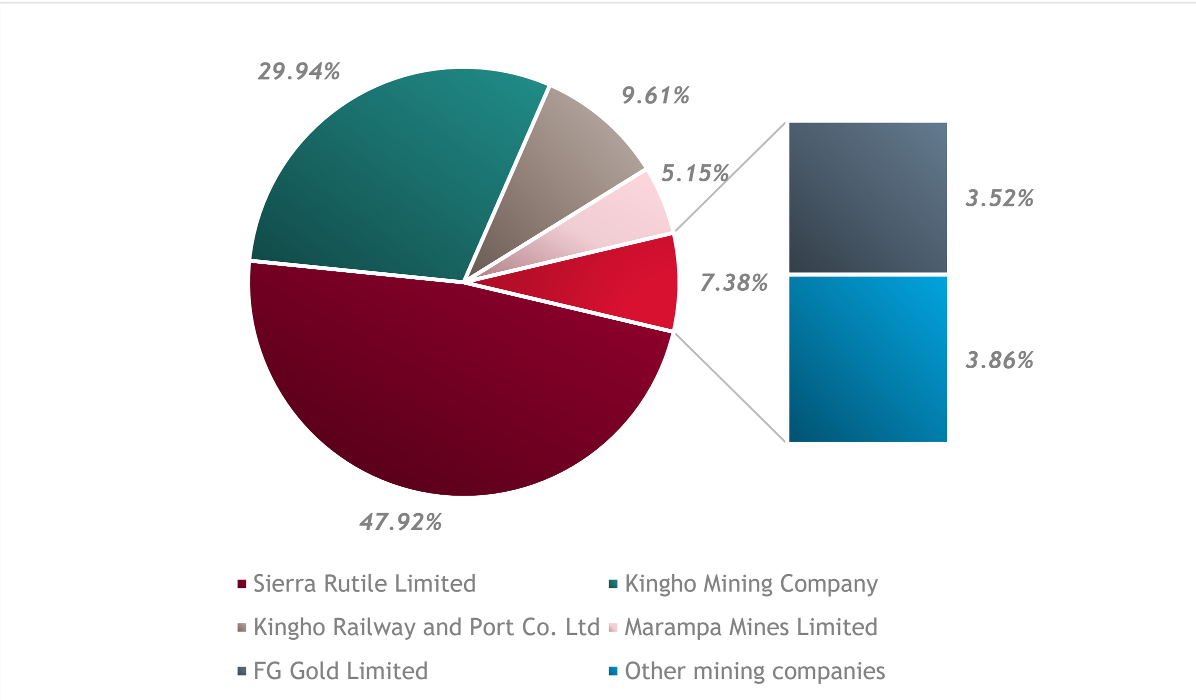
2022

TABLE 98: BREAKDOWN OF SOCIAL PAYMENTS BY COMPANY AND TYPE OF PAYMENT (2022)

in US$

Company	Mandatory social payments		Voluntary social payments		Total	%
	Cash	In Kind	Cash	In Kind		
Sierra rutile Ltd	1,734,697	-	-	116,155	1,850,851	47.9%
Kingho Mining Company	21,453	1,131,038	4,139	-	1,156,630	29.9%
Kingho Railway and Port Co. Ltd	304,033	54,861	1,375	10,791	371,060	9.6%
FG Gold Ltd	-	-	269	198,741	199,010	5.2%
Meya Mining Ltd	11,414	-	124,380	-	135,794	3.5%
Tonguma Ltd	31,221	-	-	15,924	47,146	1.2%
Marampa Mines Ltd	-	-	35,374	-	35,374	0.9%
Cheng Li Trading Mining Company	23,887	-	-	1,327	25,214	0.7%
Kingho/Northern Mining Company	20,275	-	-	-	20,275	0.5%
Sierra Diamond Ltd	13,380	-	-	6,828	20,208	0.5%
Kingho/CKH Mining Company Ltd	1,207	-	-	-	1,207	0.0%
Total	**2,161,567**	**1,185,899**	**165,537**	**349,766**	**3,862,768**	**100.0%**

FIGURE 39: BREAKDOWN OF SOCIAL PAYMENTS BY COMPANY AND TYPE OF PAYMENT (2022)



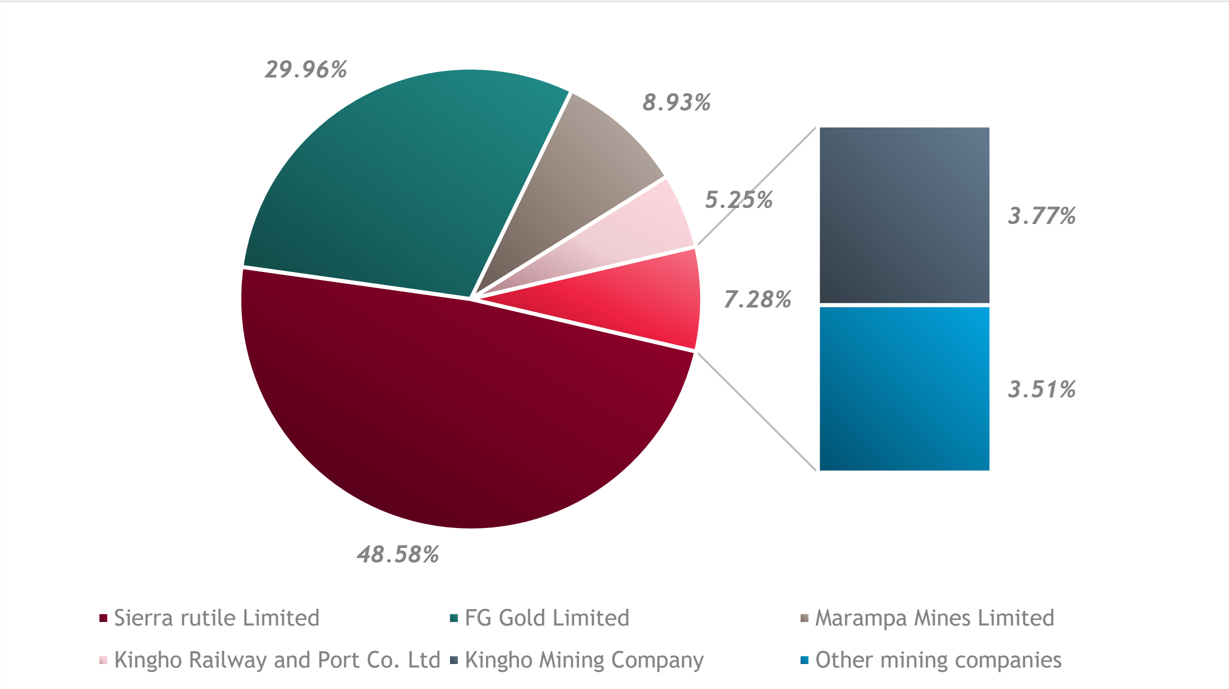
2023

TABLE 99: BREAKDOWN OF SOCIAL PAYMENTS BY COMPANY AND TYPE OF PAYMENT (2023)

In US$

Company	Mandatory social payments		Voluntary social payments		Total	%
	Cash	In Kind	Cash	In Kind		
Sierra Rutile Ltd	2,900,457	-	-	164,347	3,064,804	48.6%
FG Gold Ltd	234,798	-	9,290	1,646,335	1,890,423	30.0%
Marampa Mines Ltd	424,651	-	138,783	-	563,434	8.9%
Kingho Railway and Port Co. Ltd	-	329,791	1,137	-	330,928	5.2%
Kingho Mining Company	24,339	185,791	27,760	-	237,890	3.8%
Jong Minerals Company Ltd	67,423	-	23,000	-	90,423	1.4%
Kasino Mining Company Ltd	50,495	-	-	-	50,495	0.8%
Kingho/CKH Mining Company Ltd	16,243	-	-	-	16,243	0.3%
Meya Mining Ltd	14,977	-	-	-	14,977	0.2%
Tonguma Ltd	-	-	-	14,919	14,919	0.2%
Kingho/Mass Energy Mining Company Ltd	13,563	-	-	-	13,563	0.2%
Kingho/Northern Mining Company	11,256	-	-	-	11,256	0.2%
Sierra Diamond Ltd	-	-	-	9,653	9,653	0.2%
Total	**3,758,202**	**515,582**	**199,970**	**1,835,254**	**6,309,009**	**100.0%**

FIGURE 40: BREAKDOWN OF SOCIAL PAYMENTS BY COMPANY AND TYPE OF PAYMENT (2023)



The full details of social payments reported by each company are presented in Annex 11 to this report.

5.6. Analysis of Environmental Payments

The extractive companies selected to submit RTs have reported environmental payments amounted for **US$ 909,290 (Le 5.18 million)** and **US$ 728,322 (Le 6.76 million)** during 2022 and 2023 respectively. The tables below summarise these environmental payments by company and type payment.

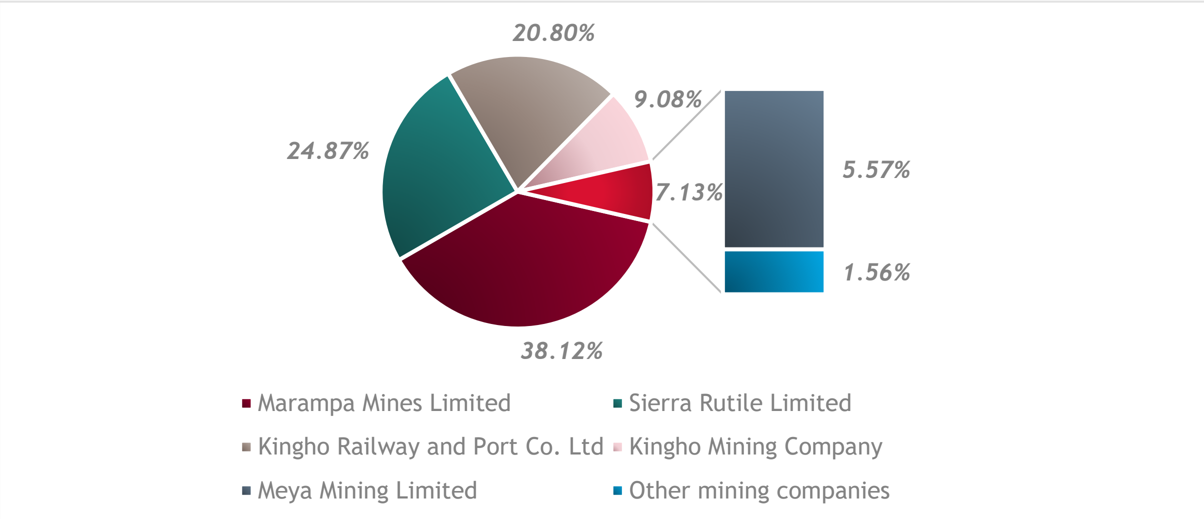
2022

TABLE 100: BREAKDOWN OF ENVIRONMENTAL PAYMENTS BY COMPANY AND TYPE OF PAYMENT (2022)

In US$

Company	Paid to private entities	Paid to public agencies	Total	%
Marampa Mines Ltd	346,581	-	346,581	38.1%
Sierra Rutile Ltd	-	226,156	226,156	24.8%
Kingho Railway and Port Co. Ltd	-	189,168	189,168	20.8%
Kingho Mining Company	-	82,576	82,576	9.1%
Meya Mining Ltd	50,633	-	50,633	5.6%
Kingho/Northern Mining Company	-	6,485	6,485	0.7%
Kingho/Mass Energy Mining Company Ltd	-	6,485	6,485	0.7%
Kingho/CKH Mining Company Ltd	-	1,207	1,207	0.2%
Total	**397,213**	**512,077**	**909,290**	**100.0%**

FIGURE 41: BREAKDOWN OF ENVIRONMENTAL PAYMENTS BY COMPANY AND TYPE OF PAYMENT (2022)



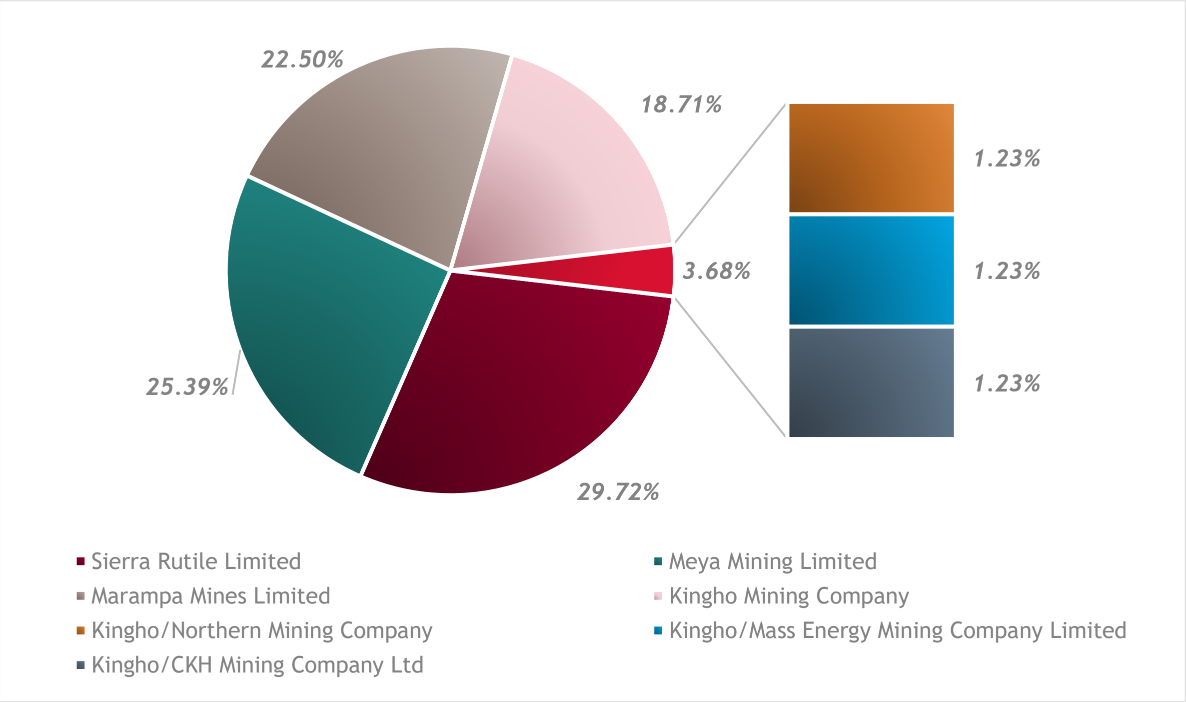
2023

TABLE 101: BREAKDOWN OF ENVIRONMENTAL PAYMENTS BY COMPANY AND TYPE OF PAYMENT (2023)

In US$

Company	Paid to private entities	Paid to public agencies	Total	%
Sierra Rutile Ltd	453	216,034	216,487	29.7%
Meya Mining Ltd	184,888		184,888	25.4%
Marampa Mines Ltd	163,874		163,874	22.5%
Kingho Mining Company		136,245	136,245	18.7%
Kingho/Northern Mining Company		8,943	8,943	1.3%
Kingho/Mass Energy Mining Company Ltd		8,943	8,943	1.3%
Kingho/CKH Mining Company Ltd		8,943	8,943	1.3%
Total	**349,214**	**379,108**	**728,322**	**100.0%**

FIGURE 42: BREAKDOWN OF ENVIRONMENTAL PAYMENTS BY COMPANY AND TYPE OF PAYMENT (2023)



Details of environmental payments reported by each company are presented in Annex 12 to this report.

5.7. Contribution of the Extractive Sectors to the Economy

a. Contribution to the Government revenues

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

TABLE 102: CONTRIBUTION TO THE GOVERNMENT REVENUES (2022 AND 2023)

US$ million	2023	2022
Extractive revenues[76]	41.00	34.50
Total domestic revenues[77]	627.47	578.59
Contribution	**6.53%**	**5.50%**

b. Contribution to Gross Domestic Product (GDP)

The table below shows the contribution of the extractive sector to GDP.

TABLE 103: CONTRIBUTION TO THE GDP (2022 AND 2023)[78]

US$ million	2023	2022
GDP, Mining & Quarrying	190.70	116.04
GDP at current prices	3,561.56	3,053.19
Contribution of the extractive sector	**5.35%**	**3.80%**

c. Contribution to total exports

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

TABLE 104: CONTRIBUTION TO TOTAL EXPORTS (2022 AND 2023)

US$ million	2023	2022
Total mining exports[79]	1,198.56	936.69
Total Sierra Leone exports[80]	1,541.85	1,310.00
Contribution %	**77.74%**	**71.50%**

d. Contribution to employment

The table below shows that the in-scope mining companies' contribution to employment represented 1.11% in 2023 of the population compared to 0.37% in 2022.

TABLE 105: CONTRIBUTION OF THE EXTRACTIVE SECTOR TO EMPLOYMENT (2022 AND 2023)

Contribution to Labour force	2023	2022
Employees of the extractive sector[81]	32,443	10,539
Labour force[82]	2,912,540	2,829,083
Contribution of the extractive sector	**1.11%**	**0.37%**

Annex 8 to this report presents the 2022 and 2023 employment data reported by in-scope mining companies disaggregated by company, by gender, by nationality and by employment type.

[76] Source: EITI data.
[77] https://bsl.gov.sl/Annual%20Report%20and%20Statement%20of%20Accounts%202023.pdf
[78] https://www.statistics.sl/images/StatisticsSL/Documents/gdp/gdp_2022/GDP_Report_2022_2023.pdf
[79] Source: EITI data.
[80] https://tradingeconomics.com/sierra-leone/exports-of-goods-and-services-us-dollar-wb-data.html
[81] EITI Data
[82] https://data.worldbank.org/indicator/SL.TLF.TOTL.IN?locations=SL

6. RECOMMENDATIONS

6.1. Findings and recommendations raised during 2022-2023

We have made recommendations with a view to improve the EITI process in Sierra Leone as well as governance and revenue management in the extractive sector.

These recommendations are as follows:

Recommendation n°1:	**Updating data on the contribution of the informal mining sector**

Type of finding: Requirement 6.3

Relevant entity: MMMR & NMA

Description:

EITI Requirement 6.3.a requires implementing countries to disclose information about the contribution of informal sector activities, including but not necessarily limited to Artisanal and Small-Scale Mining (ASM).

According to a 2021 baseline study funded by the World Bank, artisanal mining in Sierra Leone, particularly of diamonds and gold, directly employs an estimated 300,000 people, with about 10% of the population relying on the sector. The study estimates annual artisanal diamond production at 180,000 to 200,000 carats, valued at approximately US$ 27 million at the miner level, representing 40% of the US$ 65 million export value. It also estimates annual gold production at 3 metric tons, or roughly 2.6 tons of pure gold, with a total value of US$ 86.7 million at the time of the study.

The ASM contribution was not included in the extractive sector's contribution to the economy for 2022-23 due to the lack of updated estimates available.

Recommendation:

We recommend that further studies be conducted to document the contribution of the informal mining sector in the country's economy. This would support MMMR and NMA to better control of the mining sector.

Recommendation n°2:	**Public disclosure of beneficial ownership information**
Type of finding: Requirement 2.5	
Relevant entity: SLEITI MSG & NIB	

Description:

EITI Requirement 2.5 stipulates that: 'As of 1 January 2020, it is required that implementing countries request, and companies publicly disclose, beneficial ownership (BO) information. This applies to corporate entities that apply for or hold a participating interest in an exploration or production oil, gas or mining license or contract and should include the identities of their beneficial owners, the level of ownership and details about how ownership or control is exerted.'

Extractive companies included in the reporting scope have been requested to submit information on their beneficial owners as detailed in Section 4.3 of this report.

In November 2024, SLEITI held a meeting with the National Investment Board (NIB) to explore establishing a BO National Register. This initiative is part of efforts to improve transparency and accountability in Sierra Leone's extractive industries and investment sectors.

Key highlights from this meeting include:

- **Partnership and Collaboration:** SLEITI and NIB will jointly develop BO disclosure regulations, working alongside the Bank of Sierra Leone, Anti-Corruption Commission, Financial Intelligence Unit etc.
- **Regulatory Reforms:** Develop a Regulation to require BO disclosures from both public and private companies, strengthening the foundation of BO regulation in Sierra Leone.
- **Technical Working Group Reactivation:** A dedicated BO technical working group will be reactivated to drive policy and regulatory reforms, ensuring comprehensive BO disclosure.
- **Data Collection:** NIB will gather BO data as part of its investment vetting process, enhancing investor confidence while ensuring transparency in Sierra Leone's business environment.

Recommendation:

We recommend expediting the BO register implementation and to put in place:

- an assurance process of information and due diligence procedures to ensure reliability of the information declared; and
- plans for developing a database that would be filled in by reporting entities systematically online.

Recommendation n°3:	**Improving the traceability and management of sub-national transfers**
Type of finding: Requirement 5.2	
Relevant entity: MMMR	

Description:

EITI Requirement 5.2 requires implementing countries to disclose subnational transfers from resource revenues to ensure transparency and accountability. This includes reporting on the flow of revenues from the extractive sector to subnational entities, such as local governments or community development funds. The objective is to ensure that affected communities receive fair and equitable shares of resource revenues while promoting transparency in the management and use of these funds in accordance with relevant legal frameworks.

Diamond Area Community Development Fund (DACDF)

The SLEITI MSG agreed that the Diamond Area Community Development Fund (DACDF) is a sub-national transfer in Sierra Leone. DACDF was formally approved by Sierra Leone's Ministry Mines and Mineral Resources (MMMR) in December 2001, as part of a broader reform programme for the diamond sector initiated after the end of the civil war. The main funding of DACDF consists of 25% of the government's 3% diamond export tax.

The MMMR reported LE 3.6 million of transfers to DACDF in 2022. However, no information was provided regarding transfers to the DACDF for 2023.

The MMMR provided us also, with the disbursements made to districts and chiefdoms in 2024 for a total amount of Le 8.85 million as a result of the collections made in 2020, 2021 and 2022. However, the MMMR did not provide calculation details to confirm whether these disbursements were consistent with the revenue-sharing formula or accurately reflected DACDF transfers to the respective communities.

Mining District Development Fund (MDDF)

In accordance with Article 144 of the MMDA 2023, a Mining District Development Fund (MDDF) is to be established to manage mining revenues for chiefdoms within mining districts that are not covered by community development agreements. The MDDF is to be administered by the Ministry of Mineral Resources and Mines (MMMR) in collaboration with Members of Parliament representing the mining district, as well as the Ministries responsible for Finance, Rural Development, Planning, and Economic Development. It is funded through the transfer of 20% of all mining royalties.

However, no information has been made available regarding the operation status of the MDDF or any transfers to it for the period between 2022 and 2023.

Recommendation:

The MMMR should consistently disclose all transfers to the DACDF, including those for 2023, which were not provided, to enhance transparency and accountability. This aligns with EITI Requirement 5.2, which mandates clear reporting of subnational transfers.

To comply with EITI Requirement 5.2, the MMMR should also disclose the detailed calculation methodology for DACDF transfers to each district and chiefdom. This should include the amounts collected, the basis for allocations, and how the revenue-sharing formula is applied to ensure accuracy and fairness in distributions to communities.

In addition, the MMMR should prioritise the formal establishment and operationalisation of the Mining District Development Fund (MDDF) as required by Article 144 of the MMDA, 2023. This step is essential to comply with the law and meet EITI Requirement 5.2 on subnational transfers. The MMMR should disclose details of transfers made to the MDDF, including amounts allocated, dates, and the percentage of mining royalties used. If no transfers have been made, the reasons should be clearly explained in Sierra Leone's EITI reporting.

Recommendation n°4:	Enhancing the licensing award process

Type of finding: Requirement 2.2

Relevant entity: NMA & PD-SL

Description:

EITI Requirement 2.2 requires implementing countries to disclose information related to all contract and license awards and transfers taking place during the accounting period covered by the most recent EITI disclosures, including for companies whose payments fall below the agreed materiality threshold. This must include any material deviations from the applicable legal and regulatory framework governing license transfers and awards, including an explanation of the methodology adopted for the assessment.

The SLEITI MSG agreed to select the following mining and petroleum licenses awarded or transferred during 2022 and 2023, to be verified for material deviations from the applicable legal and regulatory framework governing licence transfers and awards:

License Type	License Holder	Start Date	Expiry Date	Commodity
Large Scale	Wongor Investment & Mining	01/02/2023	11/06/2024	Gold (For licence transfer)
Large Scale	Jong Minerals Company Ltd	09/05/2023	08/05/2093	Associated minerals, Ilmenite, Rutile, Zircon
Small Scale	Zhongfu Mining Co. (SL) Ltd	15/11/2023	14/11/2035	Gold
Small Scale	Delcore SL Ltd	19/10/2022	18/10/2034	Gold
License	F.A. Oil Ltd	04/12/2023	03/12/2053	Oil & Gas

Mining sector

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

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

The IA review was performed in December 2024 at NMA premises. The required documents for the selected sample were checked, and the following deviations from the applicable legal and regulatory framework were identified:

- The technical and financial assessments for all licences awarded were not provided.

- The file of the small-scale license 'Zhongfu Mining (SL) Ltd' was unavailable for verification.

Oil and Gas sector

The SLEITI MSG agreed to select the **F.A. Oil Ltd** petroleum license, awarded as result of the Fifth Offshore Licensing Round, for verification for material deviations from the applicable legal and regulatory framework governing licence awards in the petroleum sector.

Despite several attempts to engage with the PD-SL, we were unable to perform the review of the awarding process for the selected license. The application documents and the technical and financial criteria that should be used during the 5th licensing round are publicly available in the PD-SL website and detailed in Section 4.2.g of the report. However, detailed information regarding the evaluation process, including the scoring for each bid and the specific criteria used for assessment, are not available.

Recommendation:

The NMA should strengthen the document management process, to ensure that all required documents related to license awards and transfers are systematically archived and easily accessible for review.

The PD-SL should enhance stakeholder engagement by establishing structured communication protocols to ensure timely and effective responses to information requests, while aligning with EITI standards to promote greater accountability, transparency, and trust. Additionally, it is recommended that the PD-SL publish detailed information about the evaluation process during the 5th licensing offshore round, including the scoring for each bid and the specific criteria used.

We also recommend that an independent audit of the licence awards and transfers in the mining and petroleum sector be conducted. This will help improve the licensing process.

Recommendation n°5:	Improving the accuracy of production data

Type of finding: Requirement 3.2

Relevant entity: NMA

Description:

EITI Requirement 3.2 requires implementing countries to disclose:

- timely production data, including production volumes and values by commodity and by project.
- an estimate of production resulting from artisanal and small-scale activities.
- the sources of and the methods for calculating production volumes and values.
- existing mechanisms to monitor and verify the accuracy of production data and document findings, including any weaknesses related to the comprehensiveness and reliability of publicly available production data.

During our review, we noted:

- discrepancies of production value and volumes between NMA and in-scope companies as shown in tables 79 and 81 in this report; and
- discrepancies of production value and volumes between the disaggregated data by commodity and the disaggregated data by company provided by the NMA for large-scale mining companies. The tables below summarise the differences noted:

2022

Commodity	Unit	1st version		2nd version		Difference	
		Volume	Value (US$)	Volume	Value (US$)	Volume	Value (US$)
Iron Ore	WMT	7,586,499	473,386,536	3,914,966	282,825,714	3,671,533	190,560,822
Diamond	Carats	525,971	97,961,485	494,735	106,875,118	31,236	(8,913,633)
Gold	Kg	114	7,204,312	109	6,184,317	4	1,019,995
Gold Conc.	WMT	-	-	514	1,396,210	(514)	(1,396,210)
Bauxite	WMT	973,424	32,344,446	946,532	31,442,928	26,892	901,518
Rutile	DMT	135,812	195,924,769	125,536	179,423,783	10,276	16,500,986
Ilmenite	DMT	58,590	14,874,976	54,514	14,031,242	4,076	843,734
HMC	DMT	29,970	20,557,902	-	-	29,970	20,557,902
Zircon	DMT	10,709	17,435,173	7,531	14,446,613	3,178	2,988,560
Total		**9,321,089**	**859,689,598**	**5,544,436**	**636,625,925**	**3,776,652**	**223,063,673**

2023

Commodity	Unit	1st version		2nd version		Difference	
		Volume	Value (US$)	Volume	Value (US$)	Volume	Value (US$)
Iron Ore	WMT	10,413,287	827,318,845	10,066,540	855,655,900	346,747	(28,337,055)
Diamond	Carats	445,653	66,842,924	444,730	81,830,320	923	(14,987,396)
Gold	Kg	114	5,522,297	126	7,363,095	(13)	(1,840,798)
HMC	WMT	87,259	92,558,097	6,024	10,397,424	81,235	82,160,673
Bauxite	WMT	1,353,708	44,832,200	1,004,208	33,138,864	349,500	11,693,336
Rutile	DMT	112,241	159,306,707	112,241	159,269,979	-	36,728
Ilmenite	DMT	44,839	15,791,906	44,839	15,783,328	-	8,578
Zircon	DMT	27,776	7,960,509	27,776	29,498,112	-	(21,537,603)
Total		**12,484,877**	**1,220,133,485**	**11,706,484**	**1,192,937,022**	**778,392**	**27,196,463**

Recommendation:

In order to comply with EITI Requirement 3.2, we recommend the NMA to:

- maintain updated data on production including volumes and values and the methods for calculating figures.
- improve transparency in this area by publishing production data regularly on a timely basis on its website. For example, it could publish up to date data on the Online Repository for the mining sector.
- carry out periodic reconciliations of the production values and volumes disclosed by companies and other sources. These reconciliations should be done at least quarterly, and any significant discrepancies should be fully investigated and reported to the relevant agencies.

Recommendation n°6:	**Improving the accuracy of export data**
Type of finding: Requirement 3.3	
Relevant entity: NMA	

Description:

EITI Requirement 3.3 requires implementing countries to disclose:

- timely export data, including export volumes and the value by commodity and by exporting company.
- an estimate of exports resulting from artisanal and small-scale activities.
- the sources of and the methods for calculating export volumes and values.
- existing mechanisms to monitor and verify the accuracy of export data and document findings, including any weaknesses related to the comprehensiveness and reliability of publicly available export data.

During our review, we noted:

- discrepancies of export value and volumes between NMA and in-scope companies as shown in tables 83 and 85 in this report; and
- discrepancies of export value and volumes between the disaggregated data by commodity and the disaggregated data by company provided by the NMA for large-scale mining companies. The tables below summarise the differences noted:

2022

Commodity	Unit	1st version		2nd version		Difference	
		Volume	Value ($)	Volume	Value ($)	Volume	Value ($)
Iron ore	WMT	7,831,996	478,038,112	6,520,566	407,096,022	1,311,430	70,942,090
Diamonds	Carats	551,553	103,015,525	551,553	103,200,341	-	(184,816)
Gold	Kg	521,103	24,285,067	93	5,007,392	521,010	19,277,675
Gold Conc.	WMT	-	-	30	1,396,210	(30)	(1,396,210)
Bauxite	WMT	851,641	28,297,901	851,641	28,285,399	-	12,502
Rutile	DMT	134,771	194,423,004	117,349	168,828,176	17,422	25,594,828
Ilmenite	DMT	62,360	15,832,113	50,430	13,694,748	11,930	2,137,365
HMC	DMT	27,945	24,265,710	-	-	27,945	24,265,710
Zircon	DMT	41,564	67,669,767	20,269	14,168,052	21,295	53,501,715
Garnet	DMT	7,002	864,476	-	-	7,002	864,476
Total		**10,022,933**	**935,827,198**	**8,111,932**	**741,676,340**	**1,911,001**	**194,150,858**

2023

Commodity	Unit	1st version		2nd version		Difference	
		Volume	Value ($)	Volume	Value ($)	Volume	Value ($)
Iron Ore	WMT	10,203,854	834,563,882	10,203,854	755,122,136	-	79,441,746
Diamond	Carats	442,276	66,521,588	440,354	77,530,323	1,922	(11,008,735)
Gold	Kg	74	3,610,989	74	7,469,618	-	(3,858,629)
HMC	WMT	87,259	73,751,655	6,024	5,350,772	81,235	68,400,883
Bauxite	WMT	1,332,349	44,123,954	982,849	32,640,959	349,500	11,482,995
Rutile	DMT	108,349	153,782,685	108,349	138,528,870	-	15,253,815
Ilmenite	DMT	36,995	13,029,317	36,995	13,021,582	-	7,735
Garnet	DMT	7,000	1,435,350	7,000	1,435,346	-	4
Zircon	DMT	27,024	7,744,988	27,024	13,963,516	-	(6,218,528)
Total		**12,245,180**	**1,198,564,408**	**11,812,523**	**1,045,063,122**	**432,657**	**153,501,286**

Recommendation:

In order to comply with EITI Requirement 3.3, we recommend the NMA to:

- maintain updated data on exports including volumes and values and the methods for calculating figures.
- improve transparency in this area by publishing export data regularly on a timely basis on its website. For example, it could publish up to date data on the Online Repository for the mining sector.
- carry out periodic reconciliations of the export values and volumes disclosed by companies and other sources. These reconciliations should be done at least quarterly, and any significant discrepancies should be fully investigated and reported to the relevant agencies.

6.2. Follow up of the Previous IA Recommendations

The table below shows the progress made by the SLEITI MSG made towards the implementation of the previous recommendations from the 2019 and 2020-21 SLEITI reports.

TABLE 106: FOLLOW-UP OF THE PREVIOUS IA RECOMMENDATIONS

No.	Title	EITI Req.	Responsible entity	Description	Recommendation	Addressed (Yes / No / Partly)	IA comments
1	Future EITI scope	4	SLEITI MSG	EITI Requirement 4 warrants the comprehensive disclosure of company payments and government revenues from the extractive industries. Although most of the EITI member countries include only the oil and gas and mining sectors in their EITI Reports, others have extended their EITI scope to include agriculture (rubber), forestry (timber), fisheries, water extraction from boreholes, as well as the hydropower sector, etc. We note that Sierra Leone is among the 100 major exporters of sawn wood. However, the MSG has not considered including the forestry sector in its scope to date.	The SLEITI MSG is encouraged to discuss the possibility of extending the EITI scope by including all revenues collected from the forestry sector as well as any other relevant sector. This would help inter alia touch on the debate and planning around the issue of deforestation and illegal logging. Such measures have already been undertaken by several other EITI implementing countries, including countries from the African continent such as Liberia, the Republic of Congo and the Democratic Republic of Congo which have included the forestry sector in their EITI reporting.	Partly	In October 2024, the SLEITI announced plans to expand its transparency framework to include the fisheries and marine resources sector, alongside mining, oil, and gas. The SLEITI MSG engaged senior officials from the Ministry of Fisheries and Marine Resources, who pledged full support for the initiative.
2	EITI Systematic disclosure	1.5.c	SLEITI MSG	EITI Implementing countries are encouraged to systematically publish open data by embedding open data policies and strategies in reporting entities involved in EITI reporting to ensure timely and quality of data, accessibility and cost effectiveness of data delivery. The systematic disclosure or mainstreaming refers to the desired end-state, where the EITI's disclosure requirements are met through routine and publicly available company and government reporting. This could include public financial reporting, annual reports, information portals and other open data initiatives. Systematic disclosure is the expectation, with EITI Reports used to	The SLEITI MSG is encouraged to implement the recommendations suggested by the Feasibility Study, so that the concept of mainstreaming can gradually be embedded in the Sierra Leone context.	Partly	We note that Sierra Leone published a Feasibility Study for Mainstreaming EITI Reporting in December 2021. However, there has not been much progress made since the publication of that feasibility study.

No.	Title	EITI Req.	Responsible entity	Description	Recommendation	Addressed (Yes / No / Partly)	IA comments
				provide additional context, collate the sources where systematic disclosures can be found, and address any gaps and concerns about data quality. EITI disclosure requirements can be met by referencing publicly available information and/or data collected as part of EITI implementation. According to EITI Requirement 1.5.c, the work plan must address the scope of EITI implementation, including plans for strengthening systematic disclosures.			
3	Production and export data	3.2 and 3.3	BSL & NMA	We note that the BSL *data portal* includes monthly production and export data while NMA, despite being in possession of more comprehensive data, does not publish any data outside the EITI Reporting exercise. The following observations were made when we compared the production between these two sources: • BSL only disclose production volume but did not disclose the values. • NMA data (detailed above) which is the primary source, seem to be more comprehensive but not regularly published. For instance, BSL did not provide the production data for titanium, coltan and garnet. • apart from rutile, diamond, bauxite and iron ore, the remaining minerals showed material differences between BSL and NMA data. Similar findings were raised when we compared the export data between these two sources: • BSL did not disclose the exports volumes. • NMA data (detailed above) seem to be more comprehensive. For instance, BSL did not provide the exports data for titanium, coltan and garnet. • Apart from rutile, bauxite and diamond, the rest of minerals showed material differences with NMA data.	NMA and BSL are encouraged to harmonise their data on their sources of information to ensure data accuracy. This can only be achieved by setting up periodic task force meetings and agree on the data to be published. Any discrepancies should be fully investigated before the data is published by each government agency. Such exercise would also assist in the mainstreaming process.	No	No progress noted.

No.	Title	EITI Req.	Responsible entity	Description	Recommendation	Addressed (Yes / No / Partly)	IA comments
4	Contract Transparency	2.4	SLEITI MSG	Requirement 2.4 (b) stipulates that implementing countries are required to disclose any contracts and licenses that have been granted, entered into or amended from 1 January 2021 It is a requirement to document the government's policy on disclosure of contracts and licenses that govern the exploration and exploitation of oil, gas and minerals. Although all active mining agreements are publicly available on NMA's as well as Resource Contracts websites, we note that the SLEITI MSG did not: • document the government's policy on contract disclosure and licenses that govern the exploration and exploitation of oil, gas and minerals; • outline any barriers or gaps in timely, comprehensive and reliable disclosures face to implement contract transparency fully, as well as technical or financial support needs; • document all the obstacles and challenges of adopting full contract transparency as required by the EITI Standard; • identify whether there are any legal reforms underway or under discussion that could strengthen or threaten the availability of contract information; and • propose and develop a roadmap for strengthening the disclosures of extractive contracts which include actions, responsible parties, timelines, resource and technical assistance needs.	The SLEITI MSG should document its discussion on what constitutes government policy on contract disclosures by identifying on-going reforms or new measures under discussion that could strengthen or threaten the availability of contract information. The SLEITI MSG should then address" any obstacles and challenges in adopting full contract transparency. Finally, the SLEITI MSG should develop a roadmap for strengthening the disclosures of extractive contracts, which include actions, responsible parties, timelines, resource and technical assistance needs.	Partly	**Mining Sector:** The full text of the active Mineral Lease Agreements (MLAs) was published on NMA and Resource Contract website. However, the full text of mining licenses and the template for different license types are not publicly available. **Oil and Gas Sector:** Petroleum agreements have not been published on the Petroleum Directorate website or other websites. However, the models of the Petroleum Licence Agreement and Reconnaissance Permit Agreement to be used in case of agreement with petroleum companies are available on the Petroleum Directorate website.
5	Implementation of register of licences in oil and gas sector	2.3	Petroleum Directorate	In accordance with Requirement 2.3 (b) of the EITI Standard, implementing countries are required to maintain a publicly available register or cadastre system(s) with timely and comprehensive information. We noted that Sierra Leone does not maintain a publicly available register for oil and gas licences.	In order to comply with Requirement 2.3 (b), the GoSL should implement a publicly available register for oil & gas licenses including the following information: • licence holder(s); • coordinates of the licensed area; • dates of application. • dates of award and duration of the licences; and	No	There is currently no publicly available register or cadastre in the oil & gas sector as required by EITI requirement 2.3 (b).

No.	Title	EITI Req.	Responsible entity	Description	Recommendation	Addressed (Yes / No / Partly)	IA comments
					• In the case of production licences, the commodity being produced.		
6	Contribution of the extractive sector to the economy	6.3	Ministry of Finance, BSL and Ministry of Labour	In accordance with EITI Requirement 6.3, implementing countries must disclose, when available, information about the contribution of the extractive sector to the economy for the fiscal year covered by EITI implementation, especially contribution to GDP, to Government revenues, to Exports and to employment. We note that this information was not disclosed by relevant government agencies. For instance, the Ministry of Finance did not disclose the contribution of the extractive sector to GDP, or to government revenues. BSL was unable to disclose the contribution of the EITI sector to exports, while the Ministry of Labour could not provide statistics on employment in the extractive sector.	In order to comply with requirement 6.3, we recommend the Government agencies to disclose contribution of the extractive sector to the economy on annual basis. It is required that this information includes: • The size of the extractive industries in absolute terms and as a percentage of GDP; • Total government revenues generated by the extractive industries in absolute terms and as a percentage of total government revenues; • Exports from the extractive industries in absolute terms and as a percentage of total exports. • Employment in the extractive industries in absolute terms and as a percentage of the total employment. The information should be disaggregated by gender and, when available, further disaggregated by company and occupational level.	Yes	Please refer to section 5.7 of the report.
7	Non-compliance with EITI RTs deadlines	4.1	Reporting entities	We note that Government agencies as well as extractive companies did not honour the deadline set by the SLEITI MSG for the submission of RTs. Additionally, there was a complete lack of response to our queries, despite several chasers sent to these stakeholders. As result, the preparation of the Report took longer than anticipated and was significantly delayed.	We recommend for future exercises that the MSG engages with the reporting entities so they adhere to the agreed deadlines. These could be in the form of training workshops and emphasis should be laid upon the fact that late reporting could lead to SLEITI's suspension from the EITI Programme. Additionally, they should also be encouraged to reply promptly to the IA's queries so the report can be finalised on time.	Yes	Although most of the reporting entities did not meet the agreed deadline, we can confirm their full cooperation. The SLEITI Secretariat team's support was also appreciated.

No.	Title	EITI Req.	Responsible entity	Description	Recommendation	Addressed (Yes / No / Partly)	IA comments
8	Lack of financial support to SLEITI Secretariat	7	SLEITI MSG	We note that the SLEITI Secretariat does not have sufficient financial support to carry out the following tasks: • promotion of the EITI values across the country; • awareness workshops to improve the participation of SLEITI Stakeholders in EITI reporting process; and • capacity building of government agencies and extractive companies EITI focal points.	We recommend to the SLEITI MSG to seek a financial support to the SLEITI Secretariat from government or funding international institution in order to: • promote EITI values in Sierra Leone; • perform awareness workshops to improve the involvement of SLEITI Stakeholders in EITI reporting process; and • capacity building of government agencies and extractive companies EITI focal points.	Partly	Although GoSL supported the EITI report for fiscal years 2022 and 2023 as well as the validation activities, we understand that the SLEITI Secretariat does not have adequate financial support to improve its operations.

ANNEXES

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

See separate Annex

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

2022

in Le

Company / Revenue stream	NRA	EPA	NMA	Sub-national entities	Total
Koidu Ltd	**199,280,254**	**1,684,981**	**-**	**416,079**	**201,381,314**
EIA Licensing and monitoring fees	-	1,684,981	-	-	1,684,981
Import and Export duties	17,508,311	-	-	-	17,508,311
Mining license	7,472,988	-	-	-	7,472,988
PAYE	70,475,213	-	-	-	70,475,213
Royalty	89,803,542	-	-	-	89,803,542
Surface rent	-	-	-	416,079	416,079
W/H 5% Contract	14,020,200	-	-	-	14,020,200
Sierra Rutile Ltd	**84,619,552**	**2,719,481**	**-**	**1,927,637**	**89,266,670**
Corporate Tax	9,926,520	-	-	-	9,926,520
EIA Licensing and monitoring fees	-	2,719,481	-	-	2,719,481
Import and Export duties	1,176,055	-	-	-	1,176,055
Mining license	7,605,662	-	-	-	7,605,662
PAYE	45,942,945	-	-	-	45,942,945
Royalty	9,508,461	-	-	-	9,508,461
Surface rent	-	-	-	1,927,637	1,927,637
W/H 5% Contract	10,459,909	-	-	-	10,459,909
Marampa Mines Ltd	**75,093,943**	**3,123,666**	**-**	**-**	**78,217,609**
Corporate Tax	3,094,256	-	-	-	3,094,256
EIA Licensing and monitoring fees	-	3,123,666	-	-	3,123,666
Import and Export duties	916,775	-	-	-	916,775
Mining license	6,943,950	-	-	-	6,943,950
PAYE	10,253,928	-	-	-	10,253,928
Royalty	52,216,512	-	-	-	52,216,512
W/H 5% Contract	1,668,522	-	-	-	1,668,522
Kingho Mining Company Ltd	**55,277,146**	**2,106,646**	**-**	**37,596**	**57,421,388**
EIA Licensing and monitoring fees	-	2,106,646	-	-	2,106,646
Mining license	5,758,855	-	-	-	5,758,855
PAYE	736,281	-	-	-	736,281
Royalty	47,252,805	-	-	-	47,252,805
Surface rent	-	-	-	37,596	37,596
W/H 5% Contract	1,529,205	-	-	-	1,529,205
Newfield/Sierra Diamond Ltd	**25,408,263**	**-**	**-**	**109,887**	**25,518,150**
Mining license	19,964,850	-	-	-	19,964,850
PAYE	4,014,392	-	-	-	4,014,392
Surface rent	-	-	-	109,887	109,887
W/H 5% Contract	1,429,021	-	-	-	1,429,021
CTC MINING (SL) Ltd	**17,978,520**	**5,110,459**	**-**	**-**	**23,088,979**
EIA Licensing and monitoring fees	-	5,110,459	-	-	5,110,459
Mining license	17,978,520	-	-	-	17,978,520
Meya Mining	**14,798,109**	**2,498,944**	**-**	**1,483,814**	**18,780,867**

in Le

Company / Revenue stream	NRA	EPA	NMA	Sub-national entities	Total
EIA Licensing and monitoring fees	-	2,498,944	-	-	2,498,944
Mining license	6,943,950	-	-	-	6,943,950
PAYE	5,872,433	-	-	-	5,872,433
Royalty	268,516	-	-	-	268,516
Surface rent	-	-	-	1,483,814	1,483,814
W/H 5% Contract	1,713,210	-	-	-	1,713,210
Gold Lion Mining company SL Ltd	**13,205,806**	**-**	**-**	**-**	**13,205,806**
Import and Export duties	3,435,270	-	-	-	3,435,270
Mining license	6,453,145	-	-	-	6,453,145
Royalty	3,317,391	-	-	-	3,317,391
Seawright mining Co Ltd	**8,615,343**	**1,108,917**	**-**	**319,440**	**10,043,700**
EIA Licensing and monitoring fees	-	1,108,917	-	-	1,108,917
Mining license	6,118,625	-	-	-	6,118,625
PAYE	2,412,591	-	-	-	2,412,591
Surface rent	-	-	-	319,440	319,440
W/H 5% Contract	84,127	-	-	-	84,127
FG Gold Ltd	**7,525,760**	**2,105,620**	**-**	**56,509**	**9,687,889**
EIA Licensing and monitoring fees	-	2,105,620	-	-	2,105,620
Mining license	6,342,935	-	-	-	6,342,935
PAYE	326,253	-	-	-	326,253
Surface rent	-	-	-	56,509	56,509
W/H 5% Contract	856,572	-	-	-	856,572
Afro-Asia mining Corporation	**8,167,104**	**1,057,131**	**-**	**-**	**9,224,234**
EIA Licensing and monitoring fees	-	1,057,131	-	-	1,057,131
Mining license	3,596,563	-	-	-	3,596,563
PAYE	33,480	-	-	-	33,480
Royalty	4,537,061	-	-	-	4,537,061
Kingho/Northern Mining Co	**5,870,670**	**120,924**	**-**	**-**	**5,991,594**
EIA Licensing and monitoring fees	-	120,924	-	-	120,924
Mining license	5,870,670	-	-	-	5,870,670
Kingho/CKH Mining Company	**5,870,670**	**120,924**	**-**	**-**	**5,991,594**
EIA Licensing and monitoring fees	-	120,924	-	-	120,924
Mining license	5,870,670	-	-	-	5,870,670
kingho/Mass Energy Mining Co	**5,758,625**	**120,924**	**-**	**-**	**5,879,549**
EIA Licensing and monitoring fees	-	120,924	-	-	120,924
Mining license	5,758,625	-	-	-	5,758,625
Kasino Mining Company	**4,180,749**	**616,835**	**-**	**-**	**4,797,583**
EIA Licensing and monitoring fees	-	616,835	-	-	616,835
Mining license	1,349,409	-	-	-	1,349,409
PAYE	324,748	-	-	-	324,748
Royalty	2,506,591	-	-	-	2,506,591
TONGUMA Ltd	**1,924,552**	**1,388,244**	**-**	**-**	**3,312,796**
EIA Licensing and monitoring fees	-	1,388,244	-	-	1,388,244
Import and Export duties	592,475	-	-	-	592,475
Royalty	1,332,077	-	-	-	1,332,077
Kingho Rail and Port	**1,996,797**	**-**	**-**	**-**	**1,996,797**
PAYE	1,996,797	-	-	-	1,996,797

in Le

Company / Revenue stream	NRA	EPA	NMA	Sub-national entities	Total
Pan Africa Rare Metals Mining	**-**	**714,443**	**-**	**338,400**	**1,052,843**
EIA Licensing and monitoring fees	-	714,443	-	-	714,443
Surface rent	-	-	-	338,400	338,400
Cheng Li Trading Mining Comp. (SL) Ltd	**203,819**	**693,162**	**-**	**-**	**896,981**
EIA Licensing and monitoring fees	-	693,162	-	-	693,162
PAYE	203,819	-	-	-	203,819
Other Mining companies and Dimond and Gold exports	**58,146,450**	**23,916,281**	**-**	**539,166**	**82,601,897**
Corporate Tax	1,005,253	-	-	-	1,005,253
EIA Licensing and monitoring fees	-	23,916,281	-	-	23,916,281
Import and Export duties	4,084,357	-	-	-	4,084,357
Mining license	40,309,973	-	-	-	40,309,973
PAYE	1,180,663	-	-	-	1,180,663
Payroll Tax	25,625	-	-	-	25,625
Royalty	10,257,771	-	-	-	10,257,771
Surface rent	-	-	-	539,166	539,166
W/H 5% Contract	835,834	-	-	-	835,834
WH Income Tax	446,974	-	-	-	446,974
Total	**593,922,131**	**49,207,582**	**-**	**5,228,528**	**648,358,240**

2023

in Le

Company / Revenue stream	NRA	EPA	NMA	Sub-national entities	Total
Marampa Mines Ltd	**185,518,738**	**4,799,370**	**-**	**-**	**190,318,108**
Corporate Tax	20,000	-	-	-	20,000
EIA Licensing and monitoring fees	-	4,799,370	-	-	4,799,370
Import and Export duties	1,510,902	-	-	-	1,510,902
Mining license	10,526,700	-	-	-	10,526,700
PAYE	34,726,329	-	-	-	34,726,329
Royalty	137,180,519	-	-	-	137,180,519
W/H 5% Contract	1,554,288	-	-	-	1,554,288
Koidu Ltd	**164,561,014**	**-**	**-**	**1,168,826**	**165,729,840**
Corporate Tax	9,284,689	-	-	-	9,284,689
Import and Export duties	11,353,895	-	-	-	11,353,895
Mining license	5,723,176	-	-	-	5,723,176
PAYE	42,609,377	-	-	-	42,609,377
Royalty	80,630,086	-	-	-	80,630,086
Surface Rent	-	-	-	1,168,826	1,168,826
W/H 5% Contract	14,959,791	-	-	-	14,959,791
Kingho Mining Company Ltd	**156,774,611**	**3,079,868**	**-**	**-**	**159,854,479**
EIA Licensing and monitoring fees	-	3,079,868	-	-	3,079,868
Mining license	9,654,900	-	-	-	9,654,900
PAYE	2,212,996	-	-	-	2,212,996
Royalty	144,906,715	-	-	-	144,906,715
Sierra Rutile Ltd	**81,350,222**	**3,743,249**	**-**	**1,746,970**	**86,840,441**
Corporate Tax	6,317,420	-	-	-	6,317,420
EIA Licensing and monitoring fees	-	3,743,249	-	-	3,743,249
Import and Export duties	1,697,667	-	-	-	1,697,667
Mining license	10,356,409	-	-	-	10,356,409
PAYE	42,917,513	-	-	-	42,917,513
Royalty	18,399,495	-	-	-	18,399,495
Surface Rent	-	-	-	1,746,970	1,746,970
W/H 5% Contract	1,661,718	-	-	-	1,661,718
FG Gold Ltd	**29,568,280**	**3,681,315**	**-**	**-**	**33,249,595**
EIA Licensing and monitoring fees	-	3,681,315	-	-	3,681,315
Mining license	11,239,700	-	-	-	11,239,700
PAYE	5,356,917	-	-	-	5,356,917
W/H 5% Contract	12,971,663	-	-	-	12,971,663
CTC MINING (SL) Ltd	**26,770,100**	**3,995,530**	**-**	**-**	**30,765,631**
EIA Licensing and monitoring fees	-	3,995,530	-	-	3,995,530
Mining license	22,210,600	-	-	-	22,210,600
Royalty	4,559,500	-	-	-	4,559,500
Seawright mining Co Ltd	**21,215,402**	**3,485,921**	**-**	**419,251**	**25,120,574**
EIA Licensing and monitoring fees	-	3,485,921	-	-	3,485,921
Mining license	10,935,050	-	-	-	10,935,050
PAYE	9,278,655	-	-	-	9,278,655
Surface Rent	-	-	-	419,251	419,251
W/H 5% Contract	1,001,697	-	-	-	1,001,697

in Le

Company / Revenue stream	NRA	EPA	NMA	Sub-national entities	Total
Meya Mining	**19,049,994**	**-**	**-**	**2,442,023**	**21,492,017**
Mining license	10,823,300	-	-	-	10,823,300
PAYE	1,418,142	-	-	-	1,418,142
Royalty	1,798,920	-	-	-	1,798,920
Surface Rent	-	-	-	2,442,023	2,442,023
W/H 5% Contract	5,009,631	-	-	-	5,009,631
Jong Minerals Company Ltd	**19,846,836**	**1,518,824**	**-**	**-**	**21,365,660**
EIA Licensing and monitoring fees	-	1,518,824	-	-	1,518,824
Mining license	11,037,100	-	-	-	11,037,100
PAYE	2,146,477	-	-	-	2,146,477
Royalty	6,169,219	-	-	-	6,169,219
W/H 5% Contract	494,040	-	-	-	494,040
Foison Resources Ltd	**13,403,652**	**871,702**	**-**	**-**	**14,275,355**
EIA Licensing and monitoring fees	-	871,702	-	-	871,702
Mining license	4,211,776	-	-	-	4,211,776
Royalty	9,191,877	-	-	-	9,191,877
Leone Afric Metals	**10,409,032**	**3,828,253**	**-**	**-**	**14,237,285**
EIA Licensing and monitoring fees	-	3,828,253	-	-	3,828,253
Mining license	10,040,350	-	-	-	10,040,350
Royalty	368,682	-	-	-	368,682
Cheng Li Trading Mining Comp. (SL) Ltd	**11,787,780**	**1,270,857**	**-**	**-**	**13,058,636**
EIA Licensing and monitoring fees	-	1,270,857	-	-	1,270,857
Mining license	11,076,250	-	-	-	11,076,250
PAYE	20,659	-	-	-	20,659
Royalty	690,870	-	-	-	690,870
Metals & Minerals/Pan-African Rare Metal	**11,715,980**	**935,418**	**-**	**-**	**12,651,398**
EIA Licensing and monitoring fees	-	935,418	-	-	935,418
Mining license	11,715,980	-	-	-	11,715,980
Afro-Asia mining Corporation	**11,193,964**	**739,958**	**-**	**-**	**11,933,921**
EIA Licensing and monitoring fees	-	739,958	-	-	739,958
Mining license	2,625,747	-	-	-	2,625,747
PAYE	27,086	-	-	-	27,086
Royalty	8,541,131	-	-	-	8,541,131
Kingho/CKH Mining Company	**9,654,900**	**203,210**	**-**	**-**	**9,858,110**
EIA Licensing and monitoring fees	-	203,210	-	-	203,210
Mining license	9,654,900	-	-	-	9,654,900
kingho/Mass Energy Mining Co	**9,648,400**	**203,210**	**-**	**-**	**9,851,610**
EIA Licensing and monitoring fees	-	203,210	-	-	203,210
Mining license	9,648,400	-	-	-	9,648,400
Kingho/Northern Mining Co	**9,648,400**	**203,210**	**-**	**-**	**9,851,610**
EIA Licensing and monitoring fees	-	203,210	-	-	203,210
Mining license	9,648,400	-	-	-	9,648,400
Kasino Mining Company	**9,186,400**	**-**	**-**	**-**	**9,186,400**
Mining license	1,505,475	-	-	-	1,505,475
PAYE	1,364,303	-	-	-	1,364,303
Royalty	6,316,622	-	-	-	6,316,622

in Le

Company / Revenue stream	NRA	EPA	NMA	Sub-national entities	Total
Sunshine Resources (SL) Ltd	**3,400,234**	**3,520,793**	**-**	**-**	**6,921,027**
EIA Licensing and monitoring fees	-	3,520,793	-	-	3,520,793
Mining license	3,400,234	-	-	-	3,400,234
F.S. Mining (SL) Ltd	**5,210,278**	**810,585**	**-**	**-**	**6,020,864**
EIA Licensing and monitoring fees	-	810,585	-	-	810,585
Royalty	5,210,278	-	-	-	5,210,278
Gold Lion Mining Company	**1,999,441**	**2,529,256**	**-**	**-**	**4,528,697**
EIA Licensing and monitoring fees	-	2,529,256	-	-	2,529,256
PAYE	431,343	-	-	-	431,343
Royalty	1,568,098	-	-	-	1,568,098
Other Mining companies and Dimond and Gold exports	**51,303,185**	**25,591,580**	**167,388**	**983,253**	**78,045,406**
Corporate Tax	613,538	-	-	-	613,538
Diamond & Gold Export duties	-	-	167,388	-	167,388
EIA Licensing and monitoring fees	-	25,591,580	-	-	25,591,580
Import and Export duties	1,350,225	-	-	-	1,350,225
Mining license	35,486,142	-	-	-	35,486,142
PAYE	3,833,295	-	-	-	3,833,295
Payroll Tax	81,520	-	-	-	81,520
Royalty	7,587,330	-	-	-	7,587,330
Surface Rent	-	-	-	983,253	983,253
W/H 5% Contract	1,920,860	-	-	-	1,920,860
WH Income Tax	430,276	-	-	-	430,276
Total	**863,216,841**	**65,012,112**	**167,388**	**6,760,323**	**935,156,664**

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

2022

in Le

Revenue stream	NRA	EPA	NMA	Sub-national entities	Total
Royalty	221,000,728	-	-	-	221,000,728
Mining license	154,339,389	-	-	-	154,339,389
PAYE	143,773,543	-	-	-	143,773,543
EIA Licensing and monitoring fees	-	49,207,582	-	-	49,207,582
W/H 5% Contract	32,596,599	-	-	-	32,596,599
Import and Export duties	27,713,243	-	-	-	27,713,243
Corporate Tax	14,026,029	-	-	-	14,026,029
Surface rent	-	-	-	5,228,528	5,228,528
WH Income Tax	446,974	-	-	-	446,974
Payroll Tax	25,625	-	-	-	25,625
Total	**593,922,131**	**49,207,582**	**-**	**5,228,528**	**648,358,240**

2023

in Le

Revenue stream	EPA	NRA	NMA	Sub-national entities	Total
Royalty	433,119,341	-	-	-	433,119,341
Mining license	211,520,588	-	-	-	211,520,588
PAYE	146,343,091	-	-	-	146,343,091
EIA Licensing and monitoring fees	-	65,012,112	-	-	65,012,112
W/H 5% Contract	39,573,688	-	-	-	39,573,688
Corporate Tax	16,235,647	-	-	-	16,235,647
Import and Export duties	15,912,689	-	-	-	15,912,689
Surface Rent	-	-	-	6,760,323	6,760,323
WH Income Tax	430,276	-	-	-	430,276
Diamond & Gold Export duties	-	-	167,388	-	167,388
Payroll Tax	81,520	-	-	-	81,520
Total	**863,216,841**	**65,012,112**	**167,388**	**6,760,323**	**935,156,664**

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

2022

in Le

Project / revenue stream	NRA	EPA	NMA	Sub-national entities	Total
ML 06/95 (Diamonds)	**199,280,254**	**1,684,981**	**1,684,981**	**416,079**	**201,381,314**
EIA Licensing and monitoring fees	-	1,684,981	1,684,981	-	1,684,981
Import and Export duties	17,508,311	-	-	-	17,508,311
Mining license	7,472,988	-	-	-	7,472,988
PAYE	70,475,213	-	-	-	70,475,213
Royalty	89,803,542	-	-	-	89,803,542
Surface rent	-	-	-	416,079	416,079
W/H 5% Contract	14,020,200	-	-	-	14,020,200
ML 2134 (Rutile)	**84,619,552**	**2,719,481**	**2,719,481**	**1,927,637**	**89,266,670**
Corporate Tax	9,926,520	-	-	-	9,926,520
EIA Licensing and monitoring fees	-	2,719,481	2,719,481	-	2,719,481
Import and Export duties	1,176,055	-	-	-	1,176,055
Mining license	7,605,662	-	-	-	7,605,662
PAYE	45,942,945	-	-	-	45,942,945
Royalty	9,508,461	-	-	-	9,508,461
Surface rent	-	-	-	1,927,637	1,927,637
W/H 5% Contract	10,459,909	-	-	-	10,459,909
ML 4/2021 (Iron Ore)	**75,093,943**	**3,123,666**	**3,123,666**	**-**	**78,217,609**
Corporate Tax	3,094,256	-	-	-	3,094,256
EIA Licensing and monitoring fees	-	3,123,666	3,123,666	-	3,123,666
Import and Export duties	916,775	-	-	-	916,775
Mining license	6,943,950	-	-	-	6,943,950
PAYE	10,253,928	-	-	-	10,253,928
Royalty	52,216,512	-	-	-	52,216,512
W/H 5% Contract	1,668,522	-	-	-	1,668,522
ML 1/2020 (Iron Ore)	**55,277,146**	**2,106,646**	**2,106,646**	**37,596**	**57,421,388**
EIA Licensing and monitoring fees	-	2,106,646	2,106,646	-	2,106,646
Mining license	5,758,855	-	-	-	5,758,855
PAYE	736,281	-	-	-	736,281
Royalty	47,252,805	-	-	-	47,252,805
Surface rent	-	-	-	37,596	37,596
W/H 5% Contract	1,529,205	-	-	-	1,529,205
ML 2/2018 (Diamonds)	**25,408,263**	**-**	**-**	**109,887**	**25,518,150**
Mining license	19,964,850	-	-	-	19,964,850
PAYE	4,014,392	-	-	-	4,014,392
Surface rent	-	-	-	109,887	109,887
W/H 5% Contract	1,429,021	-	-	-	1,429,021
ML 2&3/2022 (Bauxite)	**17,978,520**	**5,110,459**	**5,110,459**	**-**	**23,088,979**
EIA Licensing and monitoring fees	-	5,110,459	5,110,459	-	5,110,459
Mining license	17,978,520	-	-	-	17,978,520
ML 2/2019 (Diamonds)	**14,798,109**	**2,498,944**	**2,498,944**	**1,483,814**	**18,780,867**

in Le

Project / revenue stream	NRA	EPA	NMA	Sub-national entities	Total
EIA Licensing and monitoring fees	-	2,498,944	2,498,944	-	2,498,944
Mining license	6,943,950	-	-	-	6,943,950
PAYE	5,872,433	-	-	-	5,872,433
Royalty	268,516	-	-	-	268,516
Surface rent	-	-	-	1,483,814	1,483,814
W/H 5% Contract	1,713,210	-	-	-	1,713,210
ML 1/2019 (Gold)	**13,205,806**	**-**	**-**	**-**	**13,205,806**
Import and Export duties	3,435,270	-	-	-	3,435,270
Mining license	6,453,145	-	-	-	6,453,145
Royalty	3,317,391	-	-	-	3,317,391
ML 1/2021 (Diamonds)	**8,615,343**	**1,108,917**	**1,108,917**	**319,440**	**10,043,700**
EIA Licensing and monitoring fees	-	1,108,917	1,108,917	-	1,108,917
Mining license	6,118,625	-	-	-	6,118,625
PAYE	2,412,591	-	-	-	2,412,591
Surface rent	-	-	-	319,440	319,440
W/H 5% Contract	84,127	-	-	-	84,127
ML 2/2021 (Gold)	**7,525,760**	**2,105,620**	**2,105,620**	**56,509**	**9,687,889**
EIA Licensing and monitoring fees	-	2,105,620	2,105,620	-	2,105,620
Mining license	6,342,935	-	-	-	6,342,935
PAYE	326,253	-	-	-	326,253
Surface rent	-	-	-	56,509	56,509
W/H 5% Contract	856,572	-	-	-	856,572
SML 1/2019 & 17/2022 (Ilmenite, Rutile, Zircon)	**8,167,104**	**1,057,131**	**1,057,131**	**-**	**9,224,234**
EIA Licensing and monitoring fees	-	1,057,131	1,057,131	-	1,057,131
Mining license	3,596,563	-	-	-	3,596,563
PAYE	33,480	-	-	-	33,480
Royalty	4,537,061	-	-	-	4,537,061
ML 3/2014 (Iron Ore)	**5,758,625**	**120,924**	**120,924**	**-**	**5,879,549**
EIA Licensing and monitoring fees	-	120,924	120,924	-	120,924
Mining license	5,758,625	-	-	-	5,758,625
ML 4/2014 (Iron Ore)	**5,870,670**	**120,924**	**120,924**	**-**	**5,991,594**
EIA Licensing and monitoring fees	-	120,924	120,924	-	120,924
Mining license	5,870,670	-	-	-	5,870,670
ML 1/2014 (Iron Ore)	**5,870,670**	**120,924**	**120,924**	**-**	**5,991,594**
EIA Licensing and monitoring fees	-	120,924	120,924	-	120,924
Mining license	5,870,670	-	-	-	5,870,670
SML 10/2019 (Ilmenite,Rutile,Zircon)	**4,180,749**	**616,835**	**616,835**	**-**	**4,797,583**
EIA Licensing and monitoring fees	-	616,835	616,835	-	616,835
Mining license	1,349,409	-	-	-	1,349,409
PAYE	324,748	-	-	-	324,748
Royalty	2,506,591	-	-	-	2,506,591
ML 02/2012 (Diamonds)	**1,924,552**	**1,388,244**	**1,388,244**	**-**	**3,312,796**
EIA Licensing and monitoring fees	-	1,388,244	1,388,244	-	1,388,244
Import and Export duties	592,475	-	-	-	592,475

in Le

Project / revenue stream	NRA	EPA	NMA	Sub-national entities	Total
Royalty	1,332,077	-	-	-	1,332,077
ML 5/2021 (Columbite, Tantalite)	**-**	**714,443**	**714,443**	**338,400**	**1,052,843**
EIA Licensing and monitoring fees	-	714,443	714,443	-	714,443
Surface rent	-	-	-	338,400	338,400
ML 2/2020 (Gold)	**203,819**	**693,162**	**693,162**	**-**	**896,981**
EIA Licensing and monitoring fees	-	693,162	693,162	-	693,162
PAYE	203,819	-	-	-	203,819
Other projects	**60,143,247**	**23,916,281**	**23,916,281**	**539,166**	**84,598,694**
Corporate Tax	1,005,253	-	-	-	1,005,253
EIA Licensing and monitoring fees	-	23,916,281	23,916,281	-	23,916,281
Import and Export duties	4,084,357	-	-	-	4,084,357
Mining license	40,309,973	-	-	-	40,309,973
PAYE	3,177,460	-	-	-	3,177,460
Payroll Tax	25,625	-	-	-	25,625
Royalty	10,257,771	-	-	-	10,257,771
Surface rent	-	-	-	539,166	539,166
W/H 5% Contract	835,834	-	-	-	835,834
WH Income Tax	446,974	-	-	-	446,974
Total	**593,922,131**	**49,207,582**	**49,207,582**	**5,228,528**	**648,358,240**

2023

in Le

Project / revenue stream	NRA	EPA	NMA	Sub-national entities	Total
ML 4/2021 (Iron Ore)	**185,518,738**	**4,799,370**	**-**	**-**	**190,318,108**
Royalty	137,180,519	-	-	-	137,180,519
PAYE	34,726,329	-	-	-	34,726,329
Mining license	10,526,700	-	-	-	10,526,700
EIA Licensing and monitoring fees	-	4,799,370	-	-	4,799,370
W/H 5% Contract	1,554,288	-	-	-	1,554,288
Import and Export duties	1,510,902	-	-	-	1,510,902
Corporate Tax	20,000	-	-	-	20,000
ML 06/95 (Diamonds)	**164,561,014**	**-**	**-**	**1,168,826**	**165,729,840**
Royalty	80,630,086	-	-	-	80,630,086
PAYE	42,609,377	-	-	-	42,609,377
W/H 5% Contract	14,959,791	-	-	-	14,959,791
Import and Export duties	11,353,895	-	-	-	11,353,895
Corporate Tax	9,284,689	-	-	-	9,284,689
Mining license	5,723,176	-	-	-	5,723,176
Surface Rent	-	-	-	1,168,826	1,168,826
ML 1/2020 (Iron Ore)	**156,774,611**	**3,079,868**	**-**	**-**	**159,854,479**
Royalty	144,906,715	-	-	-	144,906,715
Mining license	9,654,900	-	-	-	9,654,900
EIA Licensing and monitoring fees	-	3,079,868	-	-	3,079,868
PAYE	2,212,996	-	-	-	2,212,996
ML 2134 (Rutile)	**81,350,222**	**3,743,249**	**-**	**1,746,970**	**86,840,441**
PAYE	42,917,513	-	-	-	42,917,513
Royalty	18,399,495	-	-	-	18,399,495
Mining license	10,356,409	-	-	-	10,356,409
Corporate Tax	6,317,420	-	-	-	6,317,420
EIA Licensing and monitoring fees	-	3,743,249	-	-	3,743,249
Surface Rent	-	-	-	1,746,970	1,746,970
Import and Export duties	1,697,667	-	-	-	1,697,667
W/H 5% Contract	1,661,718	-	-	-	1,661,718
ML 2/2021 (Gold)	**29,568,280**	**3,681,315**	**-**	**-**	**33,249,595**
W/H 5% Contract	12,971,663	-	-	-	12,971,663
Mining license	11,239,700	-	-	-	11,239,700
PAYE	5,356,917	-	-	-	5,356,917
EIA Licensing and monitoring fees	-	3,681,315	-	-	3,681,315
ML 2&3/2022 (Bauxite)	**26,770,100**	**3,995,530**	**-**	**-**	**30,765,631**
Mining license	22,210,600	-	-	-	22,210,600
Royalty	4,559,500	-	-	-	4,559,500
EIA Licensing and monitoring fees	-	3,995,530	-	-	3,995,530
ML 1/2021 (Diamonds)	**21,215,402**	**3,485,921**	**-**	**419,251**	**25,120,574**
Mining license	10,935,050	-	-	-	10,935,050
PAYE	9,278,655	-	-	-	9,278,655
EIA Licensing and monitoring fees	-	3,485,921	-	-	3,485,921
W/H 5% Contract	1,001,697	-	-	-	1,001,697
Surface Rent	-	-	-	419,251	419,251

in Le

Project / revenue stream	NRA	EPA	NMA	Sub-national entities	Total
ML 2/2019 (Diamonds)	**19,049,994**	**-**	**-**	**2,442,023**	**21,492,017**
Mining license	10,823,300	-	-	-	10,823,300
W/H 5% Contract	5,009,631	-	-	-	5,009,631
Surface Rent	-	-	-	2,442,023	2,442,023
Royalty	1,798,920	-	-	-	1,798,920
PAYE	1,418,142	-	-	-	1,418,142
SML 11/2022 (Ilmenite, Rutile, Zircon)	**19,846,836**	**1,518,824**	**-**	**-**	**21,365,660**
Mining license	11,037,100	-	-	-	11,037,100
Royalty	6,169,219	-	-	-	6,169,219
PAYE	2,146,477	-	-	-	2,146,477
EIA Licensing and monitoring fees	-	1,518,824	-	-	1,518,824
W/H 5% Contract	494,040	-	-	-	494,040
SML 13/2022 (Rutile)	**13,403,652**	**871,702**	**-**	**-**	**14,275,355**
Royalty	9,191,877	-	-	-	9,191,877
Mining license	4,211,776	-	-	-	4,211,776
EIA Licensing and monitoring fees	-	871,702	-	-	871,702
ML 2/2023 (Titanium)	**10,409,032**	**3,828,253**	**-**	**-**	**14,237,285**
Mining license	10,040,350	-	-	-	10,040,350
EIA Licensing and monitoring fees	-	3,828,253	-	-	3,828,253
Royalty	368,682	-	-	-	368,682
ML 2/2020 (Gold)	**11,787,780**	**1,270,857**	**-**	**-**	**13,058,636**
Mining license	11,076,250	-	-	-	11,076,250
EIA Licensing and monitoring fees	-	1,270,857	-	-	1,270,857
Royalty	690,870	-	-	-	690,870
PAYE	20,659	-	-	-	20,659
ML 5/2021 (Columbite, Tantalite)	**11,715,980**	**935,418**	**-**	**-**	**12,651,398**
Mining license	11,715,980	-	-	-	11,715,980
EIA Licensing and monitoring fees	-	935,418	-	-	935,418
SML 1/2019 & 17/2022 (Ilmenite, Rutile, Zircon)	**11,193,964**	**739,958**	**-**	**-**	**11,933,921**
Royalty	8,541,131	-	-	-	8,541,131
Mining license	2,625,747	-	-	-	2,625,747
EIA Licensing and monitoring fees	-	739,958	-	-	739,958
PAYE	27,086	-	-	-	27,086
ML 4/2014 (Iron Ore)	**9,654,900**	**203,210**	**-**	**-**	**9,858,110**
Mining license	9,654,900	-	-	-	9,654,900
EIA Licensing and monitoring fees	-	203,210	-	-	203,210
ML 1/2014 (Iron Ore)	**9,648,400**	**203,210**	**-**	**-**	**9,851,610**
Mining license	9,648,400	-	-	-	9,648,400
EIA Licensing and monitoring fees	-	203,210	-	-	203,210
ML 3/2014 (Iron Ore)	**9,648,400**	**203,210**	**-**	**-**	**9,851,610**
Mining license	9,648,400	-	-	-	9,648,400
EIA Licensing and monitoring fees	-	203,210	-	-	203,210
SML 10/2019 (Ilmenite, Rutile, Zircon)	**9,186,400**	**-**	**-**	**-**	**9,186,400**
Royalty	6,316,622	-	-	-	6,316,622
Mining license	1,505,475	-	-	-	1,505,475
PAYE	1,364,303	-	-	-	1,364,303

in Le

Project / revenue stream	NRA	EPA	NMA	Sub-national entities	Total
SML 2/2023 (Rutile)	**3,400,234**	**3,520,793**	**-**	**-**	**6,921,027**
EIA Licensing and monitoring fees	-	3,520,793	-	-	3,520,793
Mining license	3,400,234	-	-	-	3,400,234
SML 1/2023 (Zircon)	**5,210,278**	**810,585**	**-**	**-**	**6,020,864**
Royalty	5,210,278	-	-	-	5,210,278
EIA Licensing and monitoring fees	-	810,585	-	-	810,585
ML 1/2019 (Gold)	**1,999,441**	**2,529,256**	**-**	**-**	**4,528,697**
EIA Licensing and monitoring fees	-	2,529,256	-	-	2,529,256
Royalty	1,568,098	-	-	-	1,568,098
PAYE	431,343	-	-	-	431,343
Other projects	**51,303,185**	**25,591,580**	**167,388**	**983,253**	**78,045,406**
Mining license	35,486,142	-	-	-	35,486,142
EIA Licensing and monitoring fees	-	25,591,580	-	-	25,591,580
Royalty	7,587,330	-	-	-	7,587,330
PAYE	3,833,295	-	-	-	3,833,295
W/H 5% Contract	1,920,860	-	-	-	1,920,860
Import and Export duties	1,350,225	-	-	-	1,350,225
Surface Rent	-	-	-	983,253	983,253
Corporate Tax	613,538	-	-	-	613,538
WH Income Tax	430,276	-	-	-	430,276
Diamond & Gold Export duties	-	-	167,388	-	167,388
Payroll Tax	81,520	-	-	-	81,520
Total	**863,216,841**	**65,012,112**	**167,388**	**6,760,323**	**935,156,664**

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

2022

In Le

Company/ Chiefdoms	Bo	Bonthe	Kenema	Kono	Moyamba	Tonkolili	Total
Dayu Mining Company	-	-	-	-	-	11,000	11,000
Simiria	-	-	-	-	-	11,000	11,000
F. G Gold	56,509	-	-	-	-	-	56,509
Bo District Council	56,509	-	-	-	-	-	56,509
Kingho Mining Company	-	-	-	-	-	37,596	37,596
Simiria	-	-	-	-	-	37,596	37,596
Koidu Limited	-	-	-	416,079	-	-	416,079
Koidu new sembehun city council	-	-	-	260,015	-	-	260,015
Kono District Council	-	-	-	52,021	-	-	52,021
Tankoro	-	-	-	104,042	-	-	104,042
Metals & Minerals/PAN African Rare Metal Mining Company	-	-	-	126,000	-	2,400	128,400
Nimiyama	-	-	-	14,000	-	-	14,000
Sandor	-	-	-	112,000	-	-	112,000
Simiria	-	-	-	-	-	2,400	2,400
Metals and Minerals Company	-	-	-	210,000	-	-	210,000
Kono District Council	-	-	-	210,000	-	-	210,000
Meya Mining Company	-	-	-	1,483,814	-	-	1,483,814
Kamara	-	-	-	568,075	-	-	568,075
Koidu new sembehun city council	-	-	-	40,000	-	-	40,000
Kono District Council	-	-	-	214,790	-	-	214,790
Nimikoro	-	-	-	568,075	-	-	568,075
Tankoro	-	-	-	92,874	-	-	92,874

In Le

Company/ Chiefdoms	Bo	Bonthe	Kenema	Kono	Moyamba	Tonkolili	Total
Seawright Mining Company	-	-	-	319,440	-	-	319,440
Kamara	-	-	-	58,080	-	-	58,080
Koidu new sembehun city council	-	-	-	72,600	-	-	72,600
Kono District Council	-	-	-	72,600	-	-	72,600
Nimikoro	-	-	-	58,080	-	-	58,080
Tankoro	-	-	-	58,080	-	-	58,080
Sierra Diamond Ltd	-	-	109,887	-	-	-	109,887
Kenema District Council	-	-	109,887	-	-	-	109,887
Sierra Mineral Holding	148,963	-	-	-	-	-	148,963
Bo District Council	89,378	-	-	-	-	-	89,378
Bumpeh Ngao	59,585	-	-	-	-	-	59,585
Sierra Mineral Holding Ltd	-	-	-	-	379,203	-	379,203
Lower Banta	-	-	-	-	47,642	-	47,642
Moyamba District Council	-	-	-	-	240,532	-	240,532
Upper Banta	-	-	-	-	91,029	-	91,029
Sierra Rutile Ltd	-	-	-	-	456,386	-	456,386
Moyamba District Council	-	-	-	-	456,386	-	456,386
Sierra Rutile Ltd	-	925,742	-	-	545,509	-	1,471,251
Bagruwa	-	-	-	-	304,258	-	304,258
Bonthe District Council	-	555,445	-	-	-	-	555,445
Imperri	-	353,632	-	-	-	-	353,632
Jong	-	16,665	-	-	-	-	16,665
Lower Banta	-	-	-	-	139,376	-	139,376
Upper Banta	-	-	-	-	101,875	-	101,875
Total	**205,472**	**925,742**	**109,887**	**2,555,333**	**1,381,098**	**50,996**	**5,228,528**

2023

in Le

Company/Chiefdoms	Bo	Bonthe	Kenema	Kono	Moyamba	Tonkolili	Total
Dayu Mining Company	-	-	-	-	-	5,000	5,000
Simiria	-	-	-	-	-	5,000	5,000
Koidu Limited	-	-	-	1,168,826	-	-	1,168,826
Koidu New Sembehun City Council	-	-	-	155,000	-	-	155,000
Kono District Council	-	-	-	77,987	-	-	77,987
Tankoro	-	-	-	935,839	-	-	935,839
Meya Mining	-	-	-	2,442,023	-	-	2,442,023
Kamara	-	-	-	1,009,000	-	-	1,009,000
Koidu New Sembehun City Council	-	-	-	40,000	-	-	40,000
Kono District Council	-	-	-	218,168	-	-	218,168
Nimikoro	-	-	-	1,009,768	-	-	1,009,768
Tankoro	-	-	-	165,087	-	-	165,087
Seawright mining Co Ltd	-	-	-	419,251	-	-	419,251
Kamara	-	-	-	18,229	-	-	18,229
Koidu New Sembehun City Council	-	-	-	136,714	-	-	136,714
Kono District Council	-	-	-	136,714	-	-	136,714
Nimikoro	-	-	-	18,229	-	-	18,229
Tankoro	-	-	-	109,365	-	-	109,365
Sierra Diamonds Ltd	-	-	116,245	-	-	-	116,245
Kenema District Council	-	-	116,245	-	-	-	116,245
Sierra Mineral Holding 1 Ltd (SLL)	166,687	-	-	-	695,321	-	862,008
Bo District Council	166,687	-	-	-	-	-	166,687
Lower Banta	-	-	-	-	87,478	-	87,478
Moyamba District Council	-	-	-	-	441,183	-	441,183
Upper Banta	-	-	-	-	166,660	-	166,660

in Le

Company/Chiefdoms	Bo	Bonthe	Kenema	Kono	Moyamba	Tonkolili	Total
Sierra Rutile Ltd	**-**	**647,143**	**-**	**-**	**1,099,826**	**-**	**1,746,970**
Bagruwa	-	-	-	-	529,159	-	529,159
Imperri	-	618,161	-	-	-	-	618,161
Jong	-	28,983	-	-	-	-	28,983
Lower Banta	-	-	-	-	330,050	-	330,050
Moyamba District Council	-	-	-	-	60,242	-	60,242
Upper Banta	-	-	-	-	180,375	-	180,375
Total	**166,687**	**647,143**	**116,245**	**4,030,100**	**1,795,147**	**5,000**	**6,760,323**

Annex 6: Infrastructure provisions and barter arrangements disclosed by the extractive companies

In Le

Company	Description of the project / infrastructure	Location of the project	Total budget	Cost incurred in 2022	Cost incurred in 2023	Cumulative cost of the project / infrastructure until 31 December 2023	Legal provision of the project / infrastructure
Jong Minerals Company Ltd	Construction of a new community barray	Macca Village	919,782	-	562,093	562,093	N/A
Jong Minerals Company Ltd	Construction, Rehabilitation and Monitoring of Community Water Wells	Jong Chiefdom	-	-	93,895	93,895	N/A
Jong Minerals Company Ltd	Road Network and Development Projects	Jong Chiefdom	204,404	-	204,404	204,404	N/A
Jong Minerals Company Ltd	Teachers Stipends	Jong Chiefdom	147,155	-	147,155	147,155	N/A
Marampa Mines Ltd	M375 Expansion	Lunsar	4,558,000,000	360,865,378	3,225,321,864	5,343,026,869	N/A
Marampa Mines Ltd	Sustaining Infrastructure	Lunsar	208,627,363	172,458,574	-	208,627,363	N/A
Marampa Mines Ltd	Sustaining Infrastructure	Lunsar	266,897,526	-	266,897,526	266,897,526	N/A
Total			**5,034,796,229**	**533,323,952**	**3,493,226,936**	**5,819,559,303**	

Annex 7: Details of subnational transfers made by the DADCF

Date	Chiefdom	Amount (Le)
24/01/2024	Bo District Council Administration	196,451
10/07/2024	Tikonko Chiefdom Administration	175,171
10/07/2024	Badjia Chiefdom Administration	59,799
10/07/2024	Baoma Chiefdom Administration	363,691
10/07/2024	Kakua Chiefdom Administration	42,515
10/07/2024	Bumpeh Ngao Chiefdom Administration	76,408
10/07/2024	Bongor Chiefdom Administration	102,407
10/07/2024	Valunia Chiefdom Development Committee	49,318
10/07/2024	Lugbu Chiefdom Administration	40,105
10/07/2024	Komboya Chiefdom Administration	17,142
10/07/2024	Bagbo Chiefdom Administration	16,073
10/07/2024	Jiaima Chiefdom Administration	8,035
	Sub-total Bo District	**1,147,115**
24/01/2024	Kpanda Kemo Chiefdom	25,515
	Sub-total Bonthe District	**25,515**
24/01/2024	Jawei Chiefdom Administration	74,935
24/01/2024	Njaluahun Chiefdom Administration	98,999
24/01/2024	Jahn Chiefdom Administration	11,726
24/01/2024	Kissi Tongi Chiefdom Administration	8,035
24/01/2024	Kissi Kama Chiefdom	8,035
24/01/2024	Malema Chiefdom Administration	11,699
24/01/2024	Kailahun District Council Revenue	50,428
	Sub-total Kailahun District	**263,858**
24/01/2024	Nongowa Chiefdom Administration	176,182
24/01/2024	Malegohun Chiefdom Administration	223,681
24/01/2024	Wandor Chiefdom Administration	206,921
24/01/2024	Gorama Mende Chiefdom Administration	248,436
24/01/2024	Simbaru Chiefdom Administration	174,535
24/01/2024	Property Rate Account	581,843
24/01/2024	Gaura Chiefdom Administration	4,756
24/01/2024	Lower -Bambara Chiefdom Administration	656,933
10/07/2024	Dama Chiefdom Administration	45,628
10/07/2024	Dodo Chiefdom Administration	39,540
10/07/2024	Small Bo Chiefdom Administration	72,687
10/07/2024	Koya Chiefdom Administration	55,635
12/07/2024	Nomo Chiefdom	13,909
12/07/2024	Kandu Leppiama Chiefdom	339,294
	Sub-total Kenema District	**2,839,979**
24/01/2024	Fiama Chiefdom Administration	28,805
24/01/2024	Koidu New Sembehun City Council Revenue Account	45,053
24/01/2024	Lei Chiefdom Administration	11,725
24/01/2024	Soa Chiefdom	21,972
24/01/2024	Gorama Kono Chiefdom Administration	49,455

Date	Chiefdom	Amount (Le)
24/01/2024	Gbense Chiefdom Administration	644,777
24/01/2024	Kamara Chiefdom Administration	562,810
24/01/2024	Nimiyama Chiefdom Administration	354,502
24/01/2024	Sandor Chiefdom Administration	494,544
24/01/2024	Gbane Chiefdom	44,821
24/01/2024	Nimikoro Chiefdom Administraion	632,116
24/01/2024	Tankoro Chiefdom Administration	320,425
24/01/2024	Kono District Council Administration	864,907
	Sub-total Kono District	**4,075,914**
24/01/2024	Dasse Chiefdom	4,756
	Sub-total Moyamba District	**4,756**
24/01/2024	Sorogbema Chiefdom Adminstration	78,090
24/01/2024	Kpanga Chiefdom Administration	11,726
24/01/2024	Perri Chiefdom Administration	47,739
24/01/2024	Makpele Chiefdom Council	151,897
24/01/2024	Barri Chiefdom Administration	74,570
24/01/2024	Sowa Chiefdom	19,762
24/01/2024	Gallinas Chiefdom Administration	44,705
24/01/2024	Malen Chiefdom Administration	68,704
	Sub-total Pujehun District	**497,194**
	Total	**8,854,330**

Source: MMMR

Annex 8: Details of Employment Data by company and gender[83]

2022

Company	Domestic employees				Foreign employees				Total per gender		Total
	Permanent		Non-permanent		Permanent		Non-permanent				
	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	
Cheng Li Trading Mining Company	65	5	-	-	38	2	-	-	103	7	**110**
FG Gold Ltd	1	3	150	33	-	-	17	1	168	37	**205**
Kasino Mining Company Ltd	120	6	-	-	9	1	-	-	129	7	**136**
Kingho Mining Company	2,260	251	-	-	14	1	-	-	2,274	252	**2,526**
Kingho Railway and Port Co. Ltd	2,126	236	-	-	18	2	-	-	2,144	238	**2,382**
Koidu Ltd	888	20	118	1	180	14	-	-	1,186	35	**1,221**
Marampa Mines Ltd	793	190	14	-	-	-	-	-	807	190	**997**
Meya Mining Ltd	282	24	-	-	37	2	-	-	319	26	**345**
Sierra Diamonds Ltd	34	5	21	3	-	-	11	-	66	8	**74**
Sierra Rutile Ltd	1,950	216	128	13	64	-	-	-	2,142	229	**2,371**
Tonguma Ltd	78	11	48	8	-	-	27	-	153	19	**172**
Total	**8,597**	**967**	**479**	**58**	**360**	**22**	**55**	**1**	**9,491**	**1,048**	**10,539**

[83] As at 31 December 2022 and 2023.

2023

Company	Domestic employees				Foreign employees				Total per gender		Total
	Permanent		Non-permanent		Permanent		Non-permanent				
	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	
Cheng Li Trading Mining Company	73	4	-	-	32	2	-	-	105	6	**111**
FG Gold Ltd	4	3	249	46	-	-	34	3	287	52	**339**
Jong Minerals Company Ltd	187	20	-	-	14	1	-	-	201	21	**222**
Kasino Mining Company Ltd	150	12	-	-	9	1	-	-	159	13	**172**
Kingho Mining Company	3,528	392	-	-	28	2	-	-	3,556	394	**3,950**
Kingho Railway and Port Co. Ltd	19,938	2,215	-	-	28	3	-	-	19,966	2,218	**22,184**
Pan-African Rare Metal Mining Company	13	5	-	-	5	-	-	-	18	5	**23**
Koidu Ltd	915	26	123	1	175	13	-	-	1,213	40	**1,253**
Marampa Mines Ltd	879	460	32	10	73	30	-	-	984	500	**1,484**
Meya Mining Ltd	368	29	-	-	48	2	-	-	416	31	**447**
Sierra Diamonds Ltd	6	6	2		-	11	-	-	8	17	**25**
Sierra Rutile Ltd	1,762	225	76	2	-	-	-	-	1,838	227	**2,065**
Tonguma Ltd	109	14	14	6	-	-	25	-	148	20	**168**
Total	27,932	3,411	496	65	412	65	59	3	28,899	3,544	32,443

Annex 9: Beneficial Ownership Information

Company	Listed company	Stock exchange	Full legal name of BO	Date of birth	Nationalities	Country of residence	Type of interest or control	Description of interest or control	Percentage interest (exact)	Directly or indirectly held?	If interest is indirectly held, Intermediate legal owner	Is this individual PEP?
Cheng Li Trading Mining	No	NA	Zengcai Li	NP	China	Sierra Leone	Shareholding	Direct interest	40.00%	Directly	N/A	No
			Meng Chengzhou	NP	China	Sierra Leone	Shareholding	Direct interest	40.00%	Directly	N/A	No
			Pan Hongxin	NP	China	Sierra Leone	Shareholding	Direct interest	20.00%	Directly	N/A	No
CTC Mining (SL) Ltd	No	NA	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP
FG Gold Ltd	No	NA	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP
Jong Minerals Company Ltd	No	No	Jianjun shao	NP	China	NP	Individual	Direct interest	25.60%	Directly	N/A	N/A
			Xiaohao Liang	NP	China	NP	Individual	Direct interest	14.70%	Directly	N/A	N/A
			Yizhen zheng	NP	China	NP	Individual	Direct interest	14.70%	Directly	N/A	N/A
Kasino Mining Ltd	No	NA	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP
Kingho Mining Company Ltd	No	NA	Wa Hing Fok	18/06/1961	China	Hong Kong	Shareholding	Direct interest	100.00%	N/A	N/A	No
Kingho Railway and Port company Ltd	No	NA	Wa Hing Fok	18/06/1961	China	Hong Kong	Shareholding	Direct interest	100.00%	N/A	N/A	No
Kingho/Northern Mining Co	No	NA	Wa Hing Fok	18/06/1961	China	Hong Kong	Shareholding	Direct interest	100.00%	N/A	N/A	No
Kingho/CKH Mining Company	No	NA	Wa Hing Fok	18/06/1961	China	Hong Kong	Shareholding	Direct interest	100.00%	N/A	N/A	No
kingho/Mass Energy Mining Co	No	NA	Wa Hing Fok	18/06/1961	China	Hong Kong	Shareholding	Direct interest	100.00%	N/A	N/A	No
Koidu Ltd	No	NA	Benjamin Steinmetz	02/04/1956	France / Israel	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No

Company	Listed company	Stock exchange	Full legal name of BO	Date of birth	Nationalities	Country of residence	Type of interest or control	Description of interest or control	Percentage interest (exact)	Directly or indirectly held?	If interest is indirectly held, Intermediate legal owner	Is this individual PEP?
			Agnes Steinmetz	05/03/1958	France / Israel	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Merav Steinmetz-Schwartz	01/10/1982	France / Israel	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Avner Steinmetz	02/08/1984	France / Israel	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Michal Steinmetz	25/11/1986	France / Israel	Israel	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
			Nadav Steinmetz	22/04/1993	France / Israel	United Kingdom	Shareholding	Indirect shareholding	16.67%	Indirectly	Balda Foundation	No
Marampa Mines	No	NA	Craig Fuad Dean	05/03/1973	USA / Switzerland	Puerto Rico	Shareholding	Indirect shareholding	90.00%	Indirectly	Marampa Mines Holding Limited FZE DMCC (Dubai)	No
Meya Mining Ltd	No	NA	Saurin Parikh	18/06/1970	Belgium	UAE	Shareholding	Indirect interest	70.00%	Inirectly	Sterling Global Trading Limited	No
			Ibrahim Sorie Kamara	02/01/1980	Sierra Leone	Sierra Leone	Shareholding	Indirect interest	10.50%	Inirectly	Germinate (SL) Limited	No
Sierra Rutile Ltd	No	NA	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP

NP: Not provided
NA: Not applicable

Annex 10: Legal Ownership Information

Company	TIN	Establish-ment date	Company's Capital (in US$)	Contact address	Legal owner's name	%	Company / individual	Country of registration	Type of company	Company identifier type	Company Identifier	Registration authority
Cheng Li Trading Mining	1106762-6	10/16/2018	10,000,000	10 Walpole Street, Freetown, SL	Zengcai Li	40.00%	Individual	N/A	N/A	N/A	N/A	N/A
					Meng Chengzhou	40.00%	Individual	N/A	N/A	N/A	N/A	N/A
					Pan Hongxin	20.00%	Individual	N/A	N/A	N/A	N/A	N/A
CTC Mining Ltd	1000533875	NP	50,000	10 Wallace Johnson Street	MM Mining Limited	48.00%	Company	NP	NP	NP	NP	NP
					CTC Enerji Madencilik Sanayi Ve Ticaret	43.00%	Company	NP	NP	NP	NP	NP
					Baometal Minerals International Trade Ltd	9.00%	Company	NP	NP	NP	NP	NP
FG Gold	1000109607	01/19/2021	1,010,000	3 Hill Cot Road; Freetown, SL	FG Gold HoldCo DMCC	100.00%	Company	United Arab Emirates	Private registered company	Company registration ID	DMCC189878	Dubai Multi Commodities Centre Authority
Jong Minerals Company Ltd	1000145492	11/26/2021	4,388	35 Liverpool Street, Freetown, SL	Leone Minerals (SL) Limited	45.00%	Company	Sierra Leone	Private registered company	Company registration ID	SL060220LEONE07282	Corporate Affairs Commission
					Jianjun shao	25.60%	Individual	N/A	N/A	N/A	N/A	N/A
					Xiaohao Liang	14.70%	Individual	N/A	N/A	N/A	N/A	N/A
					Yizhen zheng	14.70%	Individual	N/A	N/A	N/A	N/A	N/A
Kasino Mining Company	1000088502	11/28/2019	439	35 Liverpool Street, Freetown, SL	Kasila Mining & Engineering Services	50.00%	Company	Sierra Leone	Private registered company	Company registration ID	SL150318KASIL02785	Corporate Affairs Commission
					Hesino Minerals & Trade Company Ltd	50.00%	Company	China	Private registered company	NP	NP	NP

Company	TIN	Establish-ment date	Company's Capital (in US$)	Contact address	Legal owner's name	%	Company / individual	Country of registration	Type of company	Company identifier type	Company Identifier	Registration authority
Kingho Mining Company Ltd	1000001229	1/1/2021	NP	20 Signal Hill Road, Wilberforce, Freetown, SL	Wa Hing Fok	100.00%	Individual	N/A	N/A	N/A	N/A	N/A
Kingho Railway and Port company Ltd	1000535241	3/23/2021	NP	20 Signal Hill Road, Wilberforce, Freetown, SL	Wa Hing Fok	100.00%	Individual	N/A	N/A	N/A	N/A	N/A
Kingho / Northern Mining Co	1000535266	8/29/2013	NP	20 Signal Hill Road, Wilberforce, Freetown, SL	Wa Hing Fok	100.00%	Individual	N/A	N/A	N/A	N/A	N/A
Kingho/CKH Mining Company	1000535320	3/12/2013	NP	20 Signal Hill Road, Wilberforce, Freetown, SL	Wa Hing Fok	100.00%	Individual	N/A	N/A	N/A	N/A	N/A
Kingho/Mass Energy Mining Co	1000535241	3/12/2013	NP	20 Signal Hill Road, Wilberforce, Freetown, SL	Wa Hing Fok	100.00%	Individual	N/A	N/A	N/A	N/A	N/A
Koidu Ltd	1001358-5	9/6/2010	52,000,000	84 Wilkinson Road, Freetown, SL	Octea Mining Limited	100.00%	Company	Guernsey	Private registered company	Company registration ID	65910	Guernsey Registry
Marampa Mines	1000178031	5/20/2021	50,000,000	26 Main motor road Brookfields, Freetown, SL	Marampa Mines Holding FZE DMCC	90.00%	Company	UAE	Private registered company	Company registration ID	194668	Dubai Multi Commodities Centre Authority
					GoSL	10.00%	GoSL	NA	NA	NA	NA	NA
Meya Mining Ltd	1081040-2	7/26/2019	1,000	52 Wellington Street, Freetown, SL	Sterling Global Trading Limited	70.00%	Company	UAE	Private registered company	Company registration ID	157835	Government of Dubai - Jebel Ali Free Zone
					Trustco Resource (Pty) Ltd	19.50%	Company	Mauritius	Private registered company	Company registration ID	164192 GBC	Registrar of Companies - Mauritius

Company	TIN	Establish-ment date	Company's Capital (in US$)	Contact address	Legal owner's name	%	Company / individual	Country of registration	Type of company	Company identifier type	Company Identifier	Registration authority
					Germinate (SL) Ltd	10.50%	Company	Sierra Leone	Private registered company	Company registration ID	SLE180816GERMI1600404	Corporate Affairs Commission - Sierra Leone
Sierra Rutile Ltd	1000005453	6/27/1975	12,970,000	110 Wilkinson Road, Freetown Sierra Leone	Sierra Rutile Holdings Limited	99.00%	Company	British Virgin Island	Private registered company	Company registration ID	99548	Registrar of Company of the British Virgin Island
					SRL Acquisition No.3 Limited	1.00%	Company	British Virgin Island	Private registered company	Company registration ID	436691	Registrar of Company of the British Virgin Island

NP: Not provided
NA: Not applicable

Annex 11: Details of Social Expenditure

See separate Annex.

Annex 12: Environmental Expenditures

See separate Annex

Annex 13: Persons involved in the preparation of EITI Report

Independent Administrator (BDO LLP)	
Mark Henderson	Partner
Hédi Zaghouani	Director
Achraf Kanoun	Senior Manager
Wissem Zaazaa	Junior Manager
Nigel Roach (BDO SL)	Supervisor