

DRAFT INCEPTION REPORT

Development of an integrated financial accountability toolkit

That will focus on integrated annual financial reports

Analysis with special focus on gold, green energy transitional

Minerals and rare earth minerals.

*Submitted by*

|  |  |  |
| --- | --- | --- |
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1 JULY 2024

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# Acronyms

CSOs – Civil Society Organisations

FDGs – Focus Group Discussions

GFI – Global Financial Integrity

KIIs – Key Informant Interviews

NGOs – Non – Governmental Organisations

# 1.0 BACKGROUND INFORMATION

## 1.1 Introduction

1.1.1 About Global Financial Integrity

GFI is a Washington, DC-based think tank, producing high-caliber analyses of illicit financial flows, advising developing country governments on effective policy solutions, and promoting pragmatic transparency measures in the international financial system as a means to global development and security. GFI aims to address the harms inflicted by trade misinvoicing, transnational crime, tax evasion and kleptocracy. By working with partners to increase transparency in the global financial system and promote Trade Integrity, GFI seeks to create a safer and more equitable world.

GFI has been a leader in the policy debate surrounding illicit financial flows, and trade-related illicit financial flows. Our work is routinely cited at the highest levels: by international institutions such as the United Nations, the OECD and the African Development Bank. GFI is committed to constructively engaging with policymakers worldwide to develop effective, pragmatic policy solutions to address illicit financial flows. We take pride in basing our analysis on the highest quality research and expertise.

### 1.1.2 About the Project

Global Financial Integrity is implementing a project titled **“Improving revenue collection and reducing IFF risks from gold, green energy transition, and rare earth minerals”** under the Finland Grant which seeks to improve corporate and financial transparency in the mining sector. The specific objectives of the project are;

● Improved corporate and financial transparency in the mining sector (i.e. creation of beneficial ownership laws/ regulations/ registries).

● Increased revenue collection and supply chain integrity from the mining sector.

● Regional advocacy to ensure improved domestic resource mobilization and reduce illicit financial flows

● International advocacy to ensure improved domestic resource mobilization and reduce illicit financial flows

The Integrated Financial Accountability Toolkit aims to empower stakeholders with the knowledge and tools needed to promote responsible mining practices, mitigate financial risks, and maximize the positive impacts of mining on economic development and sustainable growth.

## 1.2 Overall Objective and Impact

The main objective of this consultancy is to develop a comprehensive toolkit that will enable stakeholders to effectively analyse financial statements of mining companies, identify potential red flags or gaps, and address issues related to tax evasion and tax avoidance, ultimately reducing illicit financial flows out of Kenya​.

### 1.2.1 Specific Objectives

1. To identify possible illicit financial flows in the mining sector.
2. To analyze financial statements of mining companies for anomalies and concerning trends.
3. To review mining companies’ financial policies and contracts with the government.
4. To assess the financial risks and red flags in the mining sector.

### 1.2.2 Expected Outcomes

1. A comprehensive toolkit that will enable stakeholders to effectively analyse financial statements of mining companies
2. Evidence of illicit financial flows
3. Mitigation strategies to curb illicit financial flows, tax evasion and avoidance.

## 1.3 Justification and Scope of work

### 1.3.1 Justification of the Assignment

Though there has been steady growth and development in the amount of foreign direct investments in Africa, the same has not translated into an equally steady growth in tax revenue. This unfortunate occurrence is as a result of illicit financial flows from African countries to other jurisdictions through tax evasion, aggressive tax avoidance schemes, money laundering and corruption.

In respect to the extractives sector, Africa as a continent is privileged to have abundant natural resources including minerals, precious stones as well as oil which form a substantial portion of their total exports. It goes without saying that mining and/or extraction of natural resources is a highly profitable activity that is more often than not carried out by foreign entities with holding companies in tax favorable jurisdictions. As a result of aggressive tax avoidance or planning structures, coupled with corruption and porous legal frameworks, these same entities pay minimal taxes in the African countries.

Kenya has substantial deposits of precious metals including gold, titanium, coal, nickel, cobalt, copper, manganese, niobium, lead, zinc, lithium, uranium, thorium, iron ore, coltan, chromite, soda-ash as well as precious stones including amethyst, Ruby, tsavorite and zircon. As is the case with its sister African countries, though Kenya exports a substantial portion of its extracted minerals, the revenue impact of such exports has not been felt in the country. It seems there is grave revenue leakages which have been as a result of tax avoidance, tax evasion, money laundering, corruption and lack of a robust legal framework governing the extractive sector.

In the result, the mining activities have had little or no tangible benefit to the local communities and to the wider population, there is a deficit in the resources needed by the Kenyan government to finance and achieve the sustainable development goals. This calls for urgent action, including the development of a robust legal and regulatory framework by Kenya as a country, and Africa as a whole, to mitigate the loss of revenue through illicit financial flows. In addition, there is need to have uniformity, transparency and accountability in the governance policies especially considering the fact that the mining sector has a number of players including public officials, community leaders, multinational corporations, national corporations.

The Global Financial Integrity ('GFI') has been instrumental in the fight against illicit financial flows in Africa. This has been achieved by providing support to the African governments with advice on policy formulations, encouraging transparency in international financial system. This is key to GFI as it aims at mitigating illicit financial 3 flows through tax evasion and trade mis-invoicing. It is against this backdrop that GFI has always undertaken studies and now intends to develop an integrated financial accountability toolkit which will aid stakeholders in their review of the annual financial reports of mining companies. It is this toolkit that will be our deliverable.

### 1.3.2 Scope of Work

The assignment is expected to be conducted in both Kenya and Tanzania within a period of six months.

The consultancy will cover the following key activities:

* Desk research and review of existing literature on IFFs and mining sector financial practices.
* Analysis of financial statements, focusing on cost of sales, cash-flow statements, and related party transactions.
* Comparative analysis of the impact of double taxation treaties.
* Review of contracts between mining companies and the government to assess terms related to revenue collection and mineral extraction.

# 2. 0 LITERATURE REVIEW

## 2.1 Mining Sector

### 2.1.1 The status of the Mining Sector

**Kenya**

Kenya boasts of abundant mineral resources. Vision 2030 identifies mining as a pivotal driver of economic development, expected to boost employment, income, and GDP. The 2010 constitution empowered Counties to develop and execute local strategies, prompting resource assessments and exploitation tailored to each County's topography, drainage, ecology, and climate.

The global demand for minerals is projected to grow at approximately 3% annually, likely prompting increased exploration and mining activities in Kenya's resource-rich regions. Historically, Kenya focused more on agriculture, resulting in less mineral prospecting. Currently, the mining industry is dominated by non-metallic products, with notable outputs including soda ash (ranked third globally) and fluorspar (seventh). Kenya confirmed discoveries of oil and minerals in April 2013, establishing itself as a new player in Africa's expanding extractive sector.

### Despite these efforts, low-income revenue remains prevalent. This situation necessitates a systematic approach to uncover the underlying causes, examine mining patterns, identify red flags, and detect illicit financial flows, as well as schemes for tax evasion and avoidance.

**Tanzania**

Tanzania’s mining sector has seen significant developments aimed at increasing revenue collection, improving transparency, and reducing illicit financial flows (IFFs). Gold mining has continued to be a major economic driver, with major operations at mines like Bulyanhulu, Geita, and North Mara contributing significantly to export revenues. During this period, the Tanzanian government has implemented several reforms to ensure that the country benefits more substantially from its mineral wealth. Key measures include the renegotiation of mining contracts, the imposition of higher taxes and royalties, and the introduction of stringent local content requirements. These reforms are part of broader efforts to enhance corporate and financial transparency within the sector, exemplified by Tanzania’s commitment to the Extractive Industries Transparency Initiative (EITI).

In addition to gold, Tanzania has recognized the growing importance of minerals critical to the green energy transition, such as nickel, cobalt, and lithium. These minerals are essential for manufacturing batteries and renewable energy technologies. The government has been active in promoting investment in the exploration and development of these resources, positioning Tanzania as a future supplier of key materials for sustainable energy solutions. The country’s potential in rare earth minerals has also garnered international interest, given their crucial role in advanced technologies like electric vehicles and wind turbines. However, this segment remains under-explored, calling for urgent action to attract more investment and leverage expertise to unlock its potential.

Additionally, there has been significant policy shifts and initiatives aimed at maximizing the economic benefits of Tanzania’s mineral resources while ensuring sustainable and transparent management of the sector. These efforts are crucial as the country navigates the challenges and opportunities presented by the global transition to green energy and the strategic importance of rare earth minerals.

### 2.1.2 Legal and Regulatory Instruments

**Kenya**

**The Kenya Constitution 2010**

The Kenyan Constitution 2010 is a comprehensive legal document that outlines the structure of government, the rights of citizens, and the principles guiding national governance. It was adopted to replace the independence constitution of 1963 and reflects significant reforms aimed at enhancing democracy, accountability, and devolution of power.

**The Public Finance Management Act, 2012**

The Public Finance Management (PFM) Act, 2012, is a comprehensive legal framework that governs the management of public finances in Kenya. Its primary objective is to ensure that public resources are managed efficiently, effectively, and transparently to enhance accountability and improve service delivery.

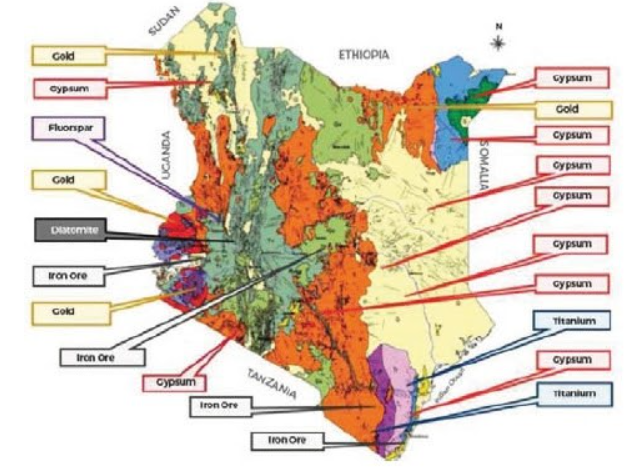
**Public Finance Management (County Government) Regulations, 2015**

The Public Finance Management (County Government) Regulations, 2015, are crucial for ensuring that county governments in Kenya manage their finances in a manner that promotes accountability, transparency, and fiscal responsibility. These regulations provide a detailed framework that offer guidance to county governments in budget preparation, revenue management, expenditure control, financial reporting, and public participation.

**Other Relevant Literatures**

* Financial Statements dating back 3 to 5 years
* Mining contracts with government
* Tax reports
* Double Tax Agreements between Kenya and other Countries

**The Distribution of Selected Minerals across the Republic of Kenya**



**Tanzania**

**Tanzanian Constitution**

The Constitution of the United Republic of Tanzania, 1977 (as amended) provides foundational principles relevant to the management and protection of natural resources, including minerals.

Key Provisions:

1. Article 9: This article outlines the general principles of the state policy, emphasizing the importance of ensuring that the wealth of the country is used to benefit all citizens.

2. Article 27: This article obligates every person to protect natural resources and property of the nation. It underscores the responsibility of the state to ensure the proper management of these resources.

**Mining Laws and Regulations**

**Key Legislation:**

**1. The Mining Act, 2010 (and subsequent amendments)**

The Act aims to regulate the prospecting for minerals, mining, processing, and dealing in minerals, and to provide for the proper management and protection of the environment in relation to mining activities.

**2. The Natural Wealth and Resources (Permanent Sovereignty) Act, 2017**

This act reaffirms Tanzania's sovereignty over its natural resources, including minerals, and seeks to ensure that the exploitation of these resources benefits the country and its people.

**3. The Natural Wealth and Resources (Review and Re-Negotiation of Unconscionable Terms) Act, 201**

Provides for the review and re-negotiation of terms in contracts and agreements related to natural resources that are deemed unconscionable or not in the best interests of the nation.

**4. Analysis of Key Institutional Frameworks such as**

* Ministry of Minerals: Responsible for the overall management of the mining sector, including policy formulation and implementation.
* Tanzania Mining Commission: Oversees the licensing process, ensures compliance with mining laws, and promotes sustainable mining practices.
* Tanzania Extractive Industries Transparency Initiative (TEITI): Promotes transparency and accountability in the extractive sector, including mining.

**Other Relevant Literatures**

1. African Development Bank Group (AfDB). "Tanzania’s Mineral Sector: Enhancing Transparency and Accountability" (2012).

2. Organisation for Economic Co-operation and Development (OECD). "Illicit Financial Flows from Developing Countries: Measuring OECD Responses" (2014).

3. Extractive Industries Transparency Initiative (EITI). Various EITI Reports on Tanzania.

4. World Bank. "The Growing Role of Minerals and Metals for a Low Carbon Future" (2017).

5. Global Financial Integrity (GFI). "Illicit Financial Flows from Developing Countries: 2004-2013" (2015).

6. Tanzania Chamber of Mines. Annual Mining Sector Reports.

# 3.0 Methodology

## 3.1 Evaluation Methodology

The project will utilize both qualitative and quantitative methods. The qualitative approach will involve Key Informant Interviews (KII) and Focus Group Discussions (FGDs) to gather data on financial practices and the sector's contribution to revenue flows. This will include examining the knowledge, attitudes, and norms that influence mining patterns, identifying key factors affecting mineral extraction volumes over the years, and understanding the verification process. The quantitative approach will explore these same objectives, complementing and enhancing the qualitative data.

### Desk Review Literature

This will be achieved by collecting, synthesizing, and organizing available information. The desk review aims to enable the team to begin addressing the evaluation questions. The evaluation team will review relevant project documents, including existing public policy documents and other related materials. These include, but are not limited to, the 2010 Constitution of Kenya, The Public Finance Management Act, 2012, Public Finance Management (County Government) Regulations, 2015, The County Government Act, 2012, Public Audit Act, 2015, and the Mining and Mineral Policy, 2016, as well as Financial statements (3 – 5 years), Mining contracts with the Government, Tax reports and Double Tax Agreements between Kenya and other Countries. The focus will be on the level and methods of integration, roles and responsibilities, and identifying gaps. This process will assist the team in developing data collection tools and informing data analysis.

## 3.2 Qualitative Data Analysis

### 3.2.1 Key Informant Interview (KIIs)

A set of Key Informant Interviews (KIIs) will be conducted with selected stakeholders. This will primarily involve qualitative questions directed at a range of external stakeholders, including representatives from the national and county governments (Ministry of Mining, Blue Economy and Maritime Affairs), Civil Society Organisations (CSOs), Non-Governmental Organizations (NGOs) in mining, key stakeholders in the mining sectors, local administration and a representatives of host communities (community leadership). The following key stakeholders have been identified for the Key Informant Interviews.

* Policy Makers (National and County Governments)
* National Mining Cooperation representatives
* Representatives from the 10 Mining companies identified
* CSOs within the mining sectors
* Key stakeholders in mining
* Community members

### Focus Group Discussions (FDGs)

The project aims to employ Focus Group Discussions (FGDs) with various stakeholders to gather insights on financial practices, attitudes, and mining patterns in Kenya and Tanzania. The FGDs will include selected men, women, boys, and girls of different ages and demographics to represent the diverse perspectives of the communities affected by mining. The project plans to conduct a total of four FGDs, with two sessions held in Kenya and two in Tanzania.

In conducting the FGDs, the following will be taken into consideration.

* The questionnaire is open-ended with deep probing questions that will allow the respondent to do most of the talking.
* Moderators will be thoroughly briefed on the research tools
* The moderators shall apply the *“build on”* approach to gather more information on the various issues arising. This will involve a feedbacking session after the pre-test session.
* GFI team shall approve the final research tool after ascertaining that all the objectives and issues arising have been addressed.
* The GFI Team will support with the Letter of Introduction to the potential respondents.

## Sampling and Selection of Respondents

Given the small and distinctive nature of this mining sector, there is already limited available information and a limited number of potential respondents for the project. Therefore, the consultant aims to engage all key stakeholders within the sector to gather valuable and pertinent information. This inclusive approach is crucial for informing the development of the financial analysis toolkit.

## The Quantitative Data

This method of data collection will heavily rely on existing data concerning the volumes of minerals extracted over the years. The data will be sourced from various literature sources including financial statements, tax reports, and mining contracts with the government.

## Data Analysis, Presentation and Reporting

### Data Analysis

The data collected through the Focus Group Discussions (FGDs) and Key Informant Interviews (KIIs) will be transcribed and analyzed using thematic analysis techniques. This analysis will be guided by the themes of interest identified in alignment with the study objectives, as well as any emerging themes and relevant literature. Participant quotes will be prominently featured throughout the results section of the final report to provide a narrative presentation of key findings. The Quantitative findings will be analyzed through the Scientific method to have a clear number of the volumes extracted over the years.

### Data Validity

The data will be evaluated through triangulation, which involves comparing and contrasting results and responses from different groups of respondents obtained through Focus Group Discussions (FGDs), Key Informant Interviews (KIIs) and Document review. Additionally, a mixed-method approach will be employed to compare findings from the desk review with those from primary data collection methods. This comprehensive approach aims to strengthen the validity and reliability of the study's findings across various sources and methods.

### Data Quality and Assurance

Ensuring data reliability is critical for the accuracy and credibility of the findings. We will use validated tools for data collection and assess the capability of these methods to accurately capture the desired information. Pilot testing of data collection tools and methods will be conducted to identify and address any issues or challenges before full-scale implementation. This process ensures clarity, feasibility, and reliability of the data collection process.

Furthermore, thorough data quality checks will be conducted to identify and address errors, inconsistencies, or missing data. We will review the completeness, accuracy, and reliability of the collected data and implement procedures for data cleaning and validation to ensure data integrity throughout the analysis process.

### Ethical Considerations

The survey team will strictly adhere to GFI Safeguarding protocols throughout the study. This includes maintaining independence and impartiality, using culturally appropriate approaches for informed consent, and providing detailed information on the risks and benefits of participation.

Additionally, the team will develop plans to manage any conflicts that may arise during the evaluation process. They will ensure voluntary participation without coercion and maintain the confidentiality of all data collected.

Respect for the cultural traditions of the study populations and communities will be paramount, with the team observing all requisite ethical standards. For instance, before each interview, the team will clearly explain the purpose and confidentiality of the study and seek the respondents' consent before proceeding with the sessions. This approach ensures that ethical considerations are upheld throughout the entire research process.

### Informed Consent

A Consent Form will be provided to each respondent and read aloud to them before the start of each interview, ensuring they fully understand and agree to participate. Photographs will only be taken with participants' explicit permission or consent.

Recording may be necessary for clarifications during notetaking, and the team will verbally request consent from participants before any recording is made. If consent for recording is not granted by the respondent, no recording will take place.

All photographs taken and recordings made during the study will be promptly destroyed immediately after the acceptance of the final report. This ensures the confidentiality and privacy of participants' data throughout and after the study.

## 3.5 Proposed Timelines and Deliverables

The project is expected to take six months, with key milestones including the preparation of an inception report, preliminary desk research, data analysis, and the presentation of the final toolkit.

|  |  |
| --- | --- |
| Activity | **Duration** |
| Inception Meeting | 1 |
| Preparation of Inception Report | 2 |
| Preparation of Inception Report | 1 |
| Preliminary Desk Research | 3 |
| Interviews | 3 |
| Focus Groups | 2 |
| Piloting Study | 2 |
| Data and Information Analysis | 6 |
| Final Assignment Report | 4 |
| Risk and Assessment Matrix | 7 |
| Toolkit Development | 8 |
| Presentation to GFI Coordinating Team | 1 |
| **Total** | **40** |

### 3.5. 1 Deliverables

#### Inception Report

A comprehensive report outlining the consultant’s understanding of the assignment, proposed methodology, work plan, and timelines​​.

#### Preliminary Report

A draft report highlighting identified red flags and gaps, with recommendations for legislative provisions

#### Final Report

A detailed final report that includes research findings, a risk and mitigation matrix, and the completed toolkit.

# 4.0 Team Composition

**Lena Onyango**

Lena is a distinguished expert in law and taxation with an extensive record spanning over twelve years' experience in both domestic and international tax advisory and tax dispute resolution. She has deep experience in negotiations with the Kenya Revenue Authority and advocacy before the Tax Appeals Tribunal. Lena was recognised as a ‘Leading Woman in Tax in Kenya’ during the commemoration of International Women’s Day in 2021 and 2022 by KRA as well as an "Up and Coming" figure by Chambers Global 2022,2023 and 2024.

Lena holds a LLM in International and European Tax law from University of Maastricht, The Netherlands, Diploma in law from the Kenya School of Law, Bachelor of Laws (LLB) from the Catholic University of East Africa and she is also a Certified Public Accountant. Lena started off her career in 20212 as a Tax Consultant at Viva Africa Consulting LLP. She later joined Oraro and Company Advocates as a Senior Associate in 2015 where she was promoted to Partner.

Lena also worked at ANL Law from 2020 as a Partner prior to joining Cliffe Decker Hofmeyr - Incorporating Kieti Law in 2024 as a Partner in the Tax and Exchange Control Practice. Lena is an avid researcher in tax matters and has written a number of research and academic papers including:

• “Tariff Revenue Implications of the AFCFTA: Tax Reform as a Remedy to Revenue Loss”, Africa Tax Administrators Forum, 7th ATRN Conference, 5th -7th September,2022 Accra, Ghana.

• “VAT Reforms in Kenya” Africa Tax Dialogue, 2015, Maputo, Mozambique.

• Analysis of the 2018 Budget, KNCCI- Post Budget Analysis, Grand Regency June 2018.

• On Taxation: The Common Reporting Standards and Automatic Exchange of Information

• A Tale of Two Countries: A Comparative Look at Trusts in Mauritius and New Zealand

• New in the Market: Share Buybacks Under the Companies Act, 2015

• Even More Changes: A Look at the New Tax Procedures Act, 2015

• Walking a Tight Rope: Thin Line Between Tax Planning and Tax Abuse

• ‘Tax-Acious’: When Tax Collection Becomes Rather Taxing

• “The Arm’s Length Principle, A blessing or Curse to Developing Countries?” Tax Justice Network Africa Tax Research Seminar, 25th -26th March 2013, Tunis, Tunisia.

**Stephen Osedo**

Stephen is a public sector expert with a wealth of experience in Public Finance Management, policy, research and advocacy, accountability and governance and gender mainstreaming. He has over eight years of experience working with different organizations including the Centre for Fiscal Affairs, the National Taxpayers Association, and currently serving as the head of county programs and SME Development at Kenya National Chamber of Commerce and Industry.

He holds a bachelor's degree in finance with Information Technology from Maseno University and pursuing master’s in economics and bachelor’s in law from University and Mount Kenya University respectively. He has a proven track record of producing high-quality, professionally written materials under tight deadlines, and he possesses strong communication and public speaking skills. Stephen has offered support to several organisations as highlighted below:

• Supported PAWA254 to develop advocacy and communication strategy 2023- 2024 to strengthen their work advocacy efforts around human rights, governance, artivism, social accountability among other areas.

• Successfully organized and participated in the Homa Bay International Investment Conference 2024 and the Kakamega International Investment Conference 2024 held between February and March 2024.

• I sit in the private sector technical team incorporated in collaboration with Ministry of Investment, Trade and Industry to review the business reforms and recommend policy changes for both ministerial and presidential consideration.

• Technical lead in the KNCCI-KCB Mining programme working to support and improve the lives of the artisanal miners in Kenya.

• Organized and hosted the discussion around the resourcing for health care during the Transform Health Conference 2023.

• In collaboration with Twaweza East Africa we conducted a survey on the citizens perception about the Finance Bill 2023.

• In collaboration with Twaweza East Africa we conducted and survey on the status of devolution. I hosted the panel discussion to evaluate the progress of devolutiongaps and opportunities to strengthen devolution in Kenya.

**Christine Kahema Muthui**

Is the Founder and Director at Alpha Tax and Business Advisory Services, has over 20 years of experience in the tax sphere. At Alpha, she has actively engaged in diverse tax policy initiatives, collaborating closely with esteemed organizations such as ICPAK and LSK. Notably, Christine has spearheaded advocacy efforts for excise tax modifications within the manufacturing sector and conducted thorough reviews of interest restriction clauses.

Before starting Alpha, Christine worked as a Tax Manager at Coca- Cola Central East and West Africa (CEWA) for the East, Central and West African Markets for 9 years. Tanzania and Mauritius were among the entities that she managed. Before CEWA, she worked as a Tax Manager at KPMG for 8 years and supported various clients from a tax structuring, optimization, compliance and on mergers and acquisitions.

She holds a degree in Bachelor of Law from the University of Nairobi and is an Advocate of the High Court of Kenya. She is a Certified Public Accountant of Kenya (CPA-K) and also a Certified Public Secretary (CPS). She has an MBA for Executives from Strathmore Business School. Christine also lectures on a part time basis at Strathmore University.

She is a member of the Public and Tax Committee of the Institute of Certified Public Accountants (ICPAK), a member of the Tax Committee of the Law Society of Kenya (LSK) and a member of Centre for Studies in African Taxation (CSAT) and works closely with stakeholders in review of Tax Legislation aimed at shaping future Tax Laws. She is 9 also an External Technical Committee Member of IBDF Centre for Studies in African Taxation (CSAT)

# 5.0 Appendices

## 5.1 The Study Tools

### 5.1.1 Consent Form

|  |  |
| --- | --- |
| Respondent’s Name |  |
| County of Residence |  |
| Sub-County |  |
| Respondent’s Telephone Number |  |
| Date of Interview |  |
| Interviewer’s Name |  |

Greetings!

My name is [**Name of Field Interviewer**] …………………………………. I am a consultant with Global Financial Integrity, working on the project **“Improving Revenue Collection and Reducing Illicit Financial Flow (IFF) Risks from Gold, Green Energy Transition, and Rare Earth Minerals,”** which is funded by the Finland Grant. This project aims to enhance corporate and financial transparency in the mining sector.

For this reason, we are interested in obtaining information from knowledgeable stakeholders, who are willing to share their views with us in an open and honest manner. If you agree to participate, you will be involved in a focus group discussion or an individual interview lasting about 1-2 hours. During this time, you will be asked questions related to the mining sector in your area. The session will be audio-recorded to ensure accurate data collection.

All the information you provide will be kept confidential. Your responses will be anonymized, and personal identifiers will not be included in the data. The recordings and transcripts will be securely stored and only accessible to the research team.

Your participation is completely voluntary, and you can choose to withdraw from the study at any time. You may also skip any questions you do not wish to answer. Your input will help improve transparency and reduce illicit financial flows in the mining sector, potentially benefiting your community and the country.

By signing below, you acknowledge that you understand the information provided and agree to participate in this study. You also acknowledge that you have had the chance to ask questions, and they have been answered to your satisfaction.

Participant’s Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Researcher’s Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Thank you for your participation and valuable contribution to this research.

### 5.1.2 Focus Group Discussion (FGD) Questionnaire

*Section a: Improved corporate and financial transparency in the mining sector*

1. How do you perceive the current level of corporate and financial transparency in the mining sector?

2. What are the key challenges in implementing beneficial ownership laws and regulations in the mining sector?

3. How effective do you think the creation of beneficial ownership registries would be in improving transparency?

*Section b: Increased revenue collection and supply chain integrity from the mining sector*

4. What are the major obstacles to maximizing revenue collection from the mining sector?

5. How can the integrity of the supply chain in the mining sector be improved?

6. What strategies can be implemented to ensure accurate reporting and compliance by mining companies?

*Section c: Regional advocacy to ensure improved domestic resource mobilization and reduce illicit financial flows*

7. What regional efforts or initiatives currently exist to improve domestic resource mobilization in the mining sector?

8. How can regional cooperation be strengthened to reduce illicit financial flows from the mining sector?

9. What role do regional organizations play in advocating for better policies and practices in the mining sector?

*Section d: International advocacy to ensure improved domestic resource mobilization and reduce illicit financial flows*

10. How effective have international advocacy efforts been in improving domestic resource mobilization in the mining sector?

11. What international best practices can be adopted to reduce illicit financial flows in the mining sector?

12. How can international organizations and stakeholders better support local efforts to improve transparency and reduce illicit financial flows?

### 5.1.3 Key Informant Interview (KII) Questionnaire

*Section a: Improved corporate and financial transparency in the mining sector*

1. Can you describe your experience with the current level of corporate and financial transparency in the mining sector?

2. What specific challenges do you face in implementing beneficial ownership laws and regulations?

3. How do you think beneficial ownership registries can impact transparency in the mining sector?

*Section b: Increased revenue collection and supply chain integrity from the mining sector*

4. What are the key factors hindering revenue collection from the mining sector?

5. How do you assess the current state of supply chain integrity in the mining sector?

6. What measures can be taken to enhance compliance and reporting accuracy among mining companies?

*Section c: Regional advocacy to ensure improved domestic resource mobilization and reduce illicit financial flows*

7. What regional advocacy efforts are you aware of that aim to improve domestic resource mobilization in the mining sector?

8. How can regional collaboration be improved to tackle illicit financial flows in the mining sector?

9. What are the most effective strategies for regional organizations to advocate for improved policies and practices?

*Section d: International advocacy to ensure improved domestic resource mobilization and reduce illicit financial flows*

10. How do you evaluate the impact of international advocacy efforts on domestic resource mobilization in the mining sector?

11. Can you provide examples of international best practices that have successfully reduced illicit financial flows?

12. How can international stakeholders enhance their support for local initiatives aimed at improving transparency and reducing illicit financial flows?