

UGANDA EXTRACTIVE INDUSTRIES TRANSPARENCY INITIATIVE (UGEITI)



Uganda Extractive Industries Transparency Initiative



Report for Fiscal Year 2019-20 Summary

MAY 2022



In January 2019, Cabinet made the decision for Uganda to join EITI, the global standard for the good governance of oil, gas and mineral resources. Uganda's candidacy application¹, which detailed the country's statement of intent for improving the governance of its extractive sector as documented in the Uganda EITI National Work-plan 2020 – 2022², was submitted in July 2020. Uganda³ was admitted to the EITI in August 2020 as its 54th member country.

EITI implementation in Uganda is overseen by a tripartite Multi-Stakeholder Group (MSG) comprising twenty-five members as follows: five representatives from civil society organisations, seven from extractive companies and thirteen from the Government. The MSG is supported by a Secretariat (UGEITI) which oversees EITI implementation on a day-to-day basis.

DT Global in consortium with BDO LLP and VJW Consulting Ltd was appointed as Independent Administrator to prepare the first UGEITI Report⁴ for the year ended 30 June 2020, which was finalised in May 2022. Uganda's validation will commence in April 2023. The first UGEITI report covers payments made by extractive entities and revenues received by Government Agencies and other material payments and benefits to Government Agencies as stated by Requirement 4.1 of the 2019 EITI Standard. It also includes contextual information about the extractive industries in accordance with EITI Requirements 2, 3, 4, 5 and 6.

REVENUE GENERATED FROM THE EXTRACTIVE INDUSTRIES

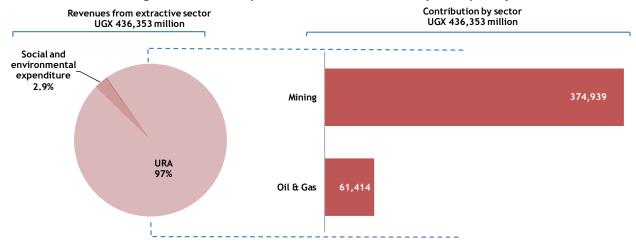
The receipts reported by the Government between 1 July 2019 and 30 June 2020 (FY 2019-20) are presented below.

Total revenues received from the extractive sector amounted to UGX 436,353 million in FY 2019-20. The breakdown of revenues is set out in the table below.

Table 1: Total extractive revenues by Government Agency for the fiscal year 2019-20

	Oil & Gas	Mining	Total (UGX million)	% of total
Uganda Revenue Authority (URA)	48,223	374,936	423,159	96.97%
Social and environmental expenditure by the extractive companies	11,987	-	11,987	2.75%
National Environment Management Authority (NEMA)	1,127	3	1,130	0.26%
Subnational Payments	78	-	78	0.02%
Total	61,414	374,939	436,353	100.00%

Figure 1: Structure of extractive sector's revenues for the fiscal year 2019-20



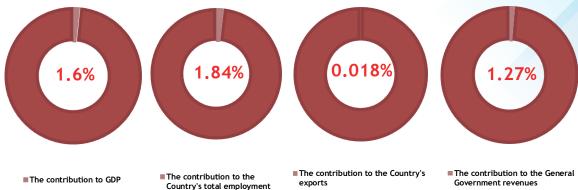
¹ https://eiti.org/documents/uganda-eiti-candidature-application

^{2 &}lt;a href="https://www.ugeiti.org/work-plan/">https://www.ugeiti.org/work-plan/

^{3 &}lt;a href="https://www.ugeiti.org/">https://www.ugeiti.org/

⁴ https://www.ugeiti.org/wp-content/uploads/2022/05/UGEITI-Report-FY-2019-20-V19-final.pdf

Figure 2: Contribution of the extractive sectors to the economy for the fiscal year 2019-20



Source: UGEITI Reporting templates

CONTRIBUTION TO UGANDA'S ECONOMY

The macro-economic data provided by the Uganda Bureau of Statistics (UBOS) indicates that the mining and quarrying sector accounted for UGX 2,266.31 billion in the FY19-20 which represents 1.63% of the national GDP on current basic prices, including 1.17% from formal sector activity and 0.46% related to informal sector activities. The contribution of the mining and quarrying sector to GDP has decreased compared to the prior year's contribution (1.72%).

The data from the Uganda Bureau of Statistics (UBOS) also indicates that the

oil and gas sector employs 178 persons directly while ASM's direct employment is estimated at approximately 300,000 jobs. All direct employments represent 1.84% of the country's total workforce of 16.3 million.

The contribution of the extractive sector to Government's revenue amounted to UGX 436.35 billion accounting for 1.27% of the total domestic revenues in the FY 2019-20.

The value of exports from the extractive sector amounted to UGX 2.598 billion accounting for 0.02% of the country's total exports in the FY 2019-20.

Details of the contribution to the economy are presented in Section 4.13 of the UGEITI report.

MINERAL PRODUCTION DATA

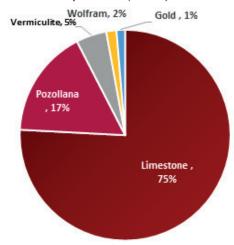
The table below presents the summary of the production quantities and values during FY 2019-20 by mineral type.

Table 2: Summary of production data reported for the fiscal year 2019-20 by mineral type

	Production data			
Mineral	Quantity (mt)	Value (in UGX 10³)		
Limestone	889,538.86	106,744,663		
Pozollana	1,113,789.28	23,389,575		
Vermiculite	11,395.10	6,597,763		
Wolfram	63.64	2,200,491		
Gold	0.01(*)	1,847,073		
Other		653,923		
Total 141,433,488 Source: Directorate of Geological Survey and Mines (DGSM).				

(*) Equivalent to Kg 14.09653**4**

Figure 1: Contribution to mining production by mineral product (value) in FY 19-20



The Directorate of Petroleum in the Ministry of Energy and Mineral Development (MEMD), and the Petroleum Authority of Uganda (PAU) confirmed that there was no oil and gas production during the fiscal year 2019-20.

BENEFICIAL OWNERSHIP DISCLOSURE

The terms 'beneficial owner' and 'politically exposed person' are defined in the AML Act 2013 and the Income Tax (Amendment) Act 2019 respectively. These definitions are detailed in Section 4.10.1 of the UGEITI report. Legal ownership information of a company can be accessed from Uganda Registration Services Bureau (URSB) at a search fee of UGX 25,000 as detailed at the following link:

Business Registration Forms (ursb.go.ug)

Extractive entities included in the reconciliation scope were requested to submit information on their beneficial owners. Details are contained in Annexes 4 and 5 of the UGEITI report. To date, there is no comprehensive register of beneficial owners for companies operating in the mining, oil and gas sectors.

However, a National Beneficial Ownership Committee was set up, through the EITI implementation process, to spearhead efforts towards achieving beneficial ownership transparency in Uganda.

CONTRACT DISCLOSURE

The model Production Sharing Agreement (PSA) is publicly available on UNOC's website5. However, the production sharing agreements signed with oil and gas companies are not currently publicly available.

The UGEITI MSG has set up a Contract Disclosure and Legal Affairs Committee to facilitate engagements with government institutions and companies on how to achieve contract disclosure.

EXPLORATION ACTIVITIES

Exploration in Mining Sector

The main exploration projects currently ongoing in the mining sector in Uganda as reported by the Directorate of Geological Survey and Mines (DGSM) include; a Copper-Cobalt-Nickel anomaly in Kitgum district identified by Sipa Exploration (U) Ltd, a gold deposit in Busia district discovered by Wagagai Mining (U) Limited; Copper-Cobalt-Nickel mineralisation in Kasese and

Bunyangabo districts being drilled by Jervois Mining Limited, a gold anomaly in Zombo district being followed up by Samta Mines and Minerals Uganda Limited, an underground gold mine in Ibanda district being developed by Simba Mines Ltd, deposits of graphite in Kitgum district discovered by Consolidated African Mineral Resources Ltd. underground geological model being drilled and developed by African Panther Resources Ltd at their Kikagati tin mine, over 50 metric tons of Marble discovered by Sunbelt Mining Co. Ltd in one of their Moroto concessions, and M/S Rwenzori Rare Metals Mukutu-Buwaya Aluminous clay project (REE, Alumina, silica, iron ore, magnesia, zirconia, rare metals) of 3,000,000,000 T.

Exploration in Oil and Gas Sector

Details on the history of petroleum exploration in Uganda are contained in Section 4.1.1 (a) of the EITI report. Following the first licensing round in 2017, three (3) exploration Licenses were issued. For these licenses, Armour Energy Uganda Limited operates an exploration license (PSA-01/2017) over the Kanywataba block; and Oranto Petroleum Ltd operates exploration licenses over the Ngassa-Deep block (PSA-02/2017) and Ngassa-Shallow block (PSA-03/2017). These exploration licenses cover an area of 754 km². There is still over 90% of acreage in the Albertine Graben that requires licensing for further exploration.

REGISTER OF MINING RIGHTS

Section 3 of the Mining (Licensing) Regulations (2019) stipulates that an Online Mining Cadastre is established for the management of all mineral rights and mineral dealer operations in Uganda including licensing, communication, reporting and payments. The Mining Cadastre Map Portal is publicly available on: https://portals.landfolio.com/uganda/

The Portal allows one to search by license code or by holder name, and to view for each title:

- the identity of the license holder;
- the status of the license;
- the date of application;
- the date of award;
- the expiry date;
- the commodity produced; and
- the area of the license.

^{5 &}lt;a href="https://www.unoc.co.ug/wp-content/uploads/2021/07/MPSA.pdf">https://www.unoc.co.ug/wp-content/uploads/2021/07/MPSA.pdf

NATIONAL LOCAL CONTENT

PAU reported the following utilisation of goods and services relating to local content.

Table 3: Utilization of goods and services reported by PAU

Category of supplier	2019	2020	Total (USD)
Ugandan Company with National ownership	15,484,722	9,700,124	25,184,846
Ugandan Company with foreign ownership	4,755,732	3,015,402	7,771,134
Foreign owned Company	860,780	243,018	1,103,798
Companies Not on National Supplier Database.	274,429	971,987	1,246,416
Total	21,375,663	13,930,531	35,306,194

Source: PAU

Table 4: Training data reported by PAU

Licensed Oil Companies	2019	2020
Tullow Uganda	30	25
TotalEnergies E&P Uganda	135	119
CNOOC Uganda	71	59
Armour Energy Ltd	4	4
Oranto Petroleum Ltd	7	9
Total	247	216

Source: PAU

TRANSPORT REVENUES

Transport of Oil and Gas

The East Africa Crude Oil Export Pipeline (EACOP) is a 1,443 km crude oil export pipeline that will transport Uganda's crude oil from Kabaale, Hoima District in Uganda to the Chongoleani Peninsula near Tanga port in Tanzania. In Uganda, the pipeline is 296 km long and crosses 10 districts and 25 subcounties. In Tanzania, it is 1,147km long and traverses 8 regions and 25 districts⁶.

The EACOP project will be implemented in accordance with the framework of the four (4) major agreements presented in the following table.

Table5: List of agreements signed in relation to the EACOP Project as reported by UNOC

Project	Agreement	Date of signature	Signatory Parties
East African Crude Oil Pipeline (EACOP)	Inter- Governmental Agreement (IGA)	25 May 2017	Government of UgandaGovernment of Tanzania
	Shareholders Agreement (SHA)	11 April 2021	TPDCNPCCNOOCShareholderTotalEnergies
	Host Government Agreements (HGA)	11 April 2021	TPDCNPCCNOOCTotalEnergies
	Transportation Tariff Agreement (TTA)	11 April 2021	TPDCNPCCNOOCTotalEnergies

Source: the Uganda National Oil Company (UNOC), and CNOOC Uganda Ltd.

Transportation of minerals

The transportation of minerals is subject to a movement permit⁷ issued by the Commissioner Mining Department in the Directorate of Geological Survey and Mines, which requires a valid Miner Dealer License (MDL) or a mineral right.

In practice, the minerals products are transported by mining companies' own means. Therefore, transportation costs are included as part of the operating expenses. The fiscal regime does not provide for specific payment streams generated by the transport of minerals.

In conclusion, there were no significant revenues from the transport of minerals for the FY 2019/20 as stipulated by Requirement 4.4 of the EITI Standard (2019).

^{6 &}lt;a href="https://eacop.com/about-us/overview/">https://eacop.com/about-us/overview/

Regulation 41 of the Mining (Licensing) regulations, 2019.

NOTES TOWARDS GENDER SENSITIVE UGEITI REPORTING AND IMPLEMENTATION

The Government of Uganda is signatory to various international and regional treaties on Gender Equality and Women's Empowerment. These include the Sustainable Development Goals (SDGs) and Africa's Agenda 2063, among others. There are several Constitutional Rights and Laws that provide for women's rights and gender equality in the legislative framework of Uganda.

The total population of Uganda in the FY 2019-2020 was estimated at 41.6 million. UBOS published sex disaggregated data on the total population in Uganda for the FY 2019-20 which showed an average parity of 51% women (20.8 million) and 49% men (20.1 million).

The Uganda Bureau of Statistics published data on total employment for the FY 2019/2020 by sex, which showed a ratio of 49.69% females (7.9 million) and 50.31% males (8 million) of the working population of 15.9 million people.

Uganda's Multi-Stakeholder Group (MSG), formed in March 2019, has a total of 23 members comprising government, extractive companies and civil society representatives. The overall ratio is 30.43% women and 69.56% men.

SCOPE OF THE DATA COLLECTION AND RECONCILIATION

EITI flexible reporting in response to the Covid-19 pandemic

In view of the ongoing challenges associated with the COVID-19 pandemic, the EITI Board agreed the extension of agreed measures to provide Uganda with 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.

Reconciliation scope

The UGEITI MSG decided to prepare the first UGEITI report covering FY2019-20 by adopting the flexible EITI reporting and to include in the reconciliation scope only the four (4) oil and gas companies present in the country, which held active licenses during the fiscal year 2019-20 without considering any materiality threshold.

PAU provided the list of active oil and gas companies which held licenses during the fiscal year 2019-20. It is presented in Annex 2 of the report.

Total reconciled revenues from the four (4) oil and gas companies included in the reconciliation scope amounted to UGX 42,244 million as set out in the table below.

Table 6: Reconciled revenues for the fiscal year 2019-20

	Revenues FY 2019-20		Revenues	by sector
Payments from	(UGX million) (a)+(b)	%	Mining (a)	Oil & Gas (b)
Reconciled revenue from the Oil & Gas sector (*)	42,244	10%	0	42,244
Total reconciled revenues (a)	42,244	10%	0	42,244
Unilateral disclosure by Government Agencies (**)	382,044	87%	374,939	7,105
Unilateral disclosure by companies (**)	12,065	3%		12,065
Total unilateral disclosure (b)	394,109	90%	374,939	19,170
Total revenues (a)+(b)	436,353	100%	374,939	61,414

(*) Reconciled revenues detailed by extractive entity in Section 6 of the UGEITI report

(**) Unilateral disclosure by Government Agencies and by companies are detailed by company in Section 7.2 of the UGEITI report

The UGEITI MSG agreed to include the two (2) main Government Agencies that collected revenues from the extractive entities, namely: URA and NEMA in the reconciliation scope as detailed in Section 5.3 of the UGEITI report.

The UGEITI MSG also agreed to include in the reconciliation scope the following payment flows without applying any materiality threshold:

Table 7: List of direct payments

Payme	nt flows	Ex- tractive compa- nies	Govern- ment Agencies
Uganda	a Revenue Authority (URA)		
1.1	PAYE	✓	✓
1.2	WITHHOLDING TAX	✓	✓
1.3	CUSTOMS PAYMENTS	✓	✓
1.4	VALUE ADDED TAX	✓	✓
1.5	INCOME TAX	✓	✓
1.6	Other payment flows	✓	✓
Nationa	al Environment Managemen	t Authority	(NEMA)
2.1	Environmental Impact Assessment (EIA)	✓	✓
2.2	Other payment flows	✓	✓
Social	expenditure		
3.1	Mandatory social expenditure	✓	
3.2	Discretionary (voluntary) social expenditure	✓	
Enviror	nmental expenditure		
4.1	Mandatory Environmen- tal expenditure	✓	
4.2	Discretionary Environ- mental expenditure	✓	
Infrastr	ructure provisions and Barte	er arrangen	nents
6.1	Value of the benefit stream during the fiscal year 2019-20	✓	✓
Subnat	ional payments		
7.1	Any significant pay- ment made to regional authorities	✓	
Transfe	ers of revenues		
8.1	Subnational Transfers		✓
Quasi-f	iscal expenditure		
9.1	Quasi-fiscal expendi- ture made by Uganda National Oil Company (UNOC)		✓

Unilateral disclosure for Mining Sector

As agreed by the UGEITI MSG, revenues collected from mining entities were included in the EITI Scope through unilateral disclosure by Government Agencies in accordance with EITI Requirement 4.1.d.

The UGEITI MSG also agreed that information be disaggregated for entities making payments above the threshold of UGX 500 million. Information relating to companies making payments below the threshold would be aggregated.

Table 8: List of mining entities making payments above the materiality threshold for the fiscal year 2019-20

N°	Mining company
1	TORORO CEMENT LTD
2	HIMA CEMENT LTD
3	NATIONAL CEMENT COMPANY UGANDA LIMITED
4	KAMPALA CEMENT CO. LIMITED
5	TEMBO STEELS (U) LIMITED
6	GOODWILL (UGANDA) CERAMIC CO. LIMITED
7	VIRAT ALLOYS LIMITED
8	KASESE COBALT COMPANY LIMITED
9	THE KAMPALA INDUSTRIES AND INFRASTRUCTURE DEVELOPMENT SMC LIMITED
10	TIAN TANG GROUP LIMITED
11	EURO MINERALS LIMITED
12	Q3 HOLDINGS LIMITED
13	KAKIRI STONE QUARRY LIMITED
14	NAMEKARA MINING COMPANY LIMITED
15	MHK GENERAL AGENCIES LIMITED
16	WOOD MACHINERY LIMITED
17	WAGAGAI MINING U LIMITED
18	SUN AND SAND MINES AND MINERALS LIMITED
19	SUBTERRA LTD
20	SAMTA MINES & MINERALS (U) LIMITED
21	AFRICAN CONMAT INDUSTRIES LIMITED
22	SIPA EXPLORATION UGANDA LIMITED
23	ABASI BALINDA TRANSPORTERS LIMITED

Based on the above, payments of UGX 374,939 million were included as unilateral disclosure by Government Agencies in the report. These unilateral disclosures represent 100% of the revenues of the mining sector.

Table 9: Unilateral disclosure for the mining sector for the fiscal year 2019-20

Payments from	Revenues FY 2019-20		
	(UGX million)	%	
Unilateral disclosure by Government Agencies for disaggregated revenues from the 23 mining entities	366,161	98%	
Unilateral disclosure by Government Agencies for disaggregated revenues from the remaining mining entities	8,778	2%	
Mining sector total revenue	374,939	100%	

Source: URA and NEMA

Details of the unilateral disclosure are presented in Section 7.2 of the UGEITI report.

Unilateral disclosure for Oil and Gas Sector

A combined amount of UGX 19,170 million was included as unilateral disclosures by Government Agencies and by oil and gas companies in the report. These unilateral disclosures represent 12% of total revenues of the Oil and Gas sector, which therefore means that 69% of the total revenue of the Oil and Gas sector was included in the reconciliation scope.

Table 10: Unilateral disclosure for the oil and gas sector for the fiscal year 2019-20

Payments from	Revenues FY 2019-20	
	(UGX million)	%
Oil and gas total revenue	61,414	100%
Reconciled revenue from the Oil & Gas sector	42,244	69%
Unilateral disclosure by Government Agencies (Tullow Uganda Ltd)	7,105	12%
Unilateral disclosure by oil and gas entities within the reconciliation scope (*)	12,065	19%
Total unilateral disclosure of oil and gas revenues	19,170	31%

Source: UGEITI Reporting Templates

(*) This corresponds to Social and environmental Contribution (SC) and Sub-national payments

Details of the unilateral disclosure are presented in Section 7.2 of the UGEITI report.

COMPLETENESS AND RELIABILITY OF DATA

Comprehensiveness of data

Government Agencies: All Government Agencies submitted their reporting templates.

Extractive entities: All oil and gas companies included in the reconciliation scope submitted their reporting templates.

Based on the above, we concluded that all significant contributions made by extractive entities to revenues had been comprehensively covered in the UGEITI report.

Data quality and assurance

Government Agencies

All Government Agencies submitted their reporting templates signed by a senior official as agreed by the UGEITI MSG.

The OAG annual report⁸ covers the Fiscal Year 2019-20 of the Government accounts⁹.

However, the Government audited accounts as presented in the OAG annual report could not be reconciled with the receipts reported by URA and NEMA in their reporting templates, given that the figures of the annual report were aggregated. Receipts reported by URA and NEMA amounted to UGX 42,244 million representing 100% of the total reconciled revenues.

Extractive entities

All four (4) oil and gas companies submitted reporting templates signed by an authorised officer at management level.

One (1) company namely Oranto Petroleum Ltd submitted reporting templates that were certified by an external auditor and its audited financial statements. Three (3) oil and gas companies submitted reporting templates that were not certified by an external auditor. They also did not submit their audited financial statements. The revenues reported (by Government Agencies) in respect of the latter three (3) companies amounted to UGX 40,525 million representing 96% of the total reconciled revenues, details of which can be found in the table below.

Table 11: Government revenues related to reporting templates extractive entities and not certified by external auditor for the fiscal year 2019-20

Company	Amount (UGX million)	% by com- pany
TOTALENERGIES E&P UGAN- DA B.V.	25,713	61%
CNOOC UGANDA LTD	13,450	32%
ARMOUR ENERGY LTD	1,362	3%
Total of uncertified report- ing templates	40,525	96%
Total reconciled revenues	42,244	100%

Source: UGEITI Reporting templates

Based on the above, it was not possible to conclude that the financial data submitted by reporting entities and included in this report was based on data subject to audits that were performed in accordance with international standards.

⁸ http://www.oag.go.ug/wp-content/uploads/2021/03/Consolidated-Audit-Report-Final-31st-Dec-2020-_web.pdf

 $[\]frac{9}{\text{https://www.finance.go.ug/sites/default/files/Publications/Annual\%20Consolidated\%20FS\%20for\%20the\%20FY\%20}}{\text{June\%202019\%202020.pdf}}$

RECONCILIATION OF CASH FLOWS

The purpose of reconciling payment flows was to identify any potential discrepancies in the declarations and to clarify them. The discrepancies initially identified were analysed and adjusted whenever the relevant supporting documents were made available by the reporting parties.

Based on the data collected from extractive entities and Government Agencies, revenues generated from the extractive industries amounted to UGX 436,353 million. The revenues included in the reconciliation scope amounted to UGX 42,244 million and represented 10% of the total extractive revenues during the fiscal year 2019-20. The remaining 90% of the extractive revenues amounting to UGX 394,109 million are subject to unilateral disclosure in accordance with the provisions for flexible reporting set out in Section 2.6 of the full report.

Following the adjustments resulting from the reconciliation exercise, a net difference of UGX 4 million remained unreconciled. This represents (0.01%) of total Government revenues of UGX 42,244 million included in the reconciliation scope, as set out in the table below.

Table 12: Cash flow reconciliation for the fiscal year 2019-20

N	Company	Extractive company	Governme Difference	
1	TOTALENERGIES E&P UGANDA B.V.	25,715	25,713	2
2	CNOOC UGANDA LTD	13,449	13,449	-
3	ORANTO PETROLEUM LTD	1,719	1,719	-
4	ARMOUR ENERGY LTD	1,355	1,361	(6)
	Total	42,239	42,244	(4)

Source: UGEITI Reporting Templates

Details of the reconciliation results and adjustments made by company and by tax are set out in Section 6 of the UGEITI report. The detailed Reconciliation sheets by extractive entity are set out in Annex 9 of the UGEITI report.

RECOMMENDATIONS

Mainstreaming and systematic disclosure of EITI data

The EITI data disclosed in this report was collected from different sources, including Government Agencies selected in the UGEITI reporting process. However, regarding the contextual information on the extractive sector, data on revenues collected and budget allocations are not systematically published

within a centralised platform.

Government Agencies should set up an open EITI database in their systems as detailed in Section 8.1 of the UGEITI report.

Public disclosure of the register of licenses

Details on licenses, including the full text are available from DGSM at a fee.

It is recommended to make publicly accessible the full text of the licenses, as detailed in Section 8.2.

Public disclosure of contracts and licenses in Petroleum and Mining sectors

The production sharing agreements signed with Oil and gas companies are not currently publicly available.

The UGEITI MSG should set out a clear roadmap for the publication of all agreements in the extractive sector as detailed in Section 8.3 of the UGEITI report.

Data quality and assurance

A number of reporting entities did not comply with the assurance process agreed upon by the UGEITI MSG as summarised in Section 8.4 of the UGEITI report.

The UGEITI MSG should engage with reporting entities and emphasize the importance of complying with this provision of proper signature and certification of templates by auditors for future reports, in order to meet EITI Requirement 4.9.

Accuracy of export data

Government Agencies' records on exports were different as detailed in Section 4.13.3 of the UGEITI report. The two agencies concerned, DGSM and URA, do not systematically crosscheck export data against each other's records to identify the inconsistencies.

DGSM and URA should implement automated controls to ensure the comprehensiveness of export data reported by extractive entities, and develop analytic tools to ensure better control of mineral trading as detailed in Section 8.5 of the UGEITI report.

Public disclosure of beneficial ownership information

To date, there is no comprehensive register of data on beneficial owners of all companies operating in the mining, oil and gas sectors.

We recommend that the UGEITI MSG and URSB put in place a roadmap relating to the disclosure of information on beneficial ownership as detailed in Section 8.6 of the UGEITI report.