



Uganda Extractive Industries Transparency Initiative



UGANDA EITI - Monograph

For Fiscal Year 2022/23



MOORE Insight

November 2025

Uganda EITI

1.1 EITI in Uganda

Uganda became a member of the EITI in August 2020, following the submission of its candidacy application demonstrating a strong commitment to improving governance in the extractive sector.

In Uganda, the UGEITI Multi-Stakeholder Group (MSG) remains responsible for overseeing the EITI implementation process. As of the 2022/2023 reporting period, the MSG is composed of twenty-five members: five representatives from civil society organizations, seven from extractive companies, and thirteen from Government institutions. Each principal member is supported by an alternate (proxy) who participates in MSG activities in cases of unavailability.

The MSG is supported by the UGEITI Secretariat, which is tasked with the day-to-day coordination and implementation of EITI activities in the country.

In July 2020, Uganda released its inaugural EITI National Work Plan for the fiscal years 2020-2022. A second Work Plan was subsequently issued in September 2023, setting forth several key objectives:

- To promote good governance and accountability in the management of extractive revenues by enhancing transparency within the extractive sector.
- To strengthen the management and accountability of revenues to ensure their effective collection, optimization, and equitable distribution.
- To build the operational and technical capacities of the Multi-Stakeholder Group (MSG) and the UGEITI Secretariat to ensure the effective implementation of the EITI.

Uganda published its first EITI Report in May 2022, covering the Fiscal Year 2019/2020. The second EITI Report, covering the Fiscal Year 2020/2021, was published in June 2023. The third EITI Report, covering the Fiscal Year 2021/2022, was published in October 2024. The country also underwent validation in May 2024, with the

country attaining a moderate overall score of 78.5 points under the 2019 EITI Standard.

1.2 Objective

The EITI Standard requires the disclosure of comprehensive reports that ensure full transparency regarding government revenues from the extractive sector, as well as disclosure of all significant payments made by oil, gas, and mining companies to the government.

This report seeks to highlight the role of the extractive sector in Uganda's economic and social development, while fostering transparency and promoting good governance throughout the entire value chain. The specific objectives for EITI implementation are clearly outlined in the EITI Standard.

1.3 Background

EITI is a multi-stakeholder initiative that brings together the governments of implementing and supporting countries, extractive companies, and civil society organizations. The International EITI Board acts as the main decision-making body and is supported by the EITI International Secretariat.

Member countries are required to implement the EITI Requirements as outlined in the EITI Standard.

The EITI Board agreed on revisions to the EITI Standard on 23 May 2023.

During the 56th EITI Board Meeting, held at the 2023 EITI Global Conference in Dakar on 12 June 2023, the [2023 EITI Standard](#) was officially launched.

From 1 January 2025, assessment of EITI implementing countries should be based on the new Standard. The 2023 Standard introduces updated and refined provisions aimed at helping countries address pressing challenges within the extractive sector. These amendments focus on the following thematic areas:

- Anti-Corruption: Strengthening opportunities for countries and companies to use the EITI platform to identify and mitigate corruption risks in the natural resources sector.
- Energy Transition: Enhancing transparency and fostering public dialogue on energy

transition by highlighting relevant policies and projecting expected revenues from oil, gas, and minerals under various market conditions;

- Gender, social and environmental issues: promoting greater diversity in decision-making and ensuring disclosures address gender, social, and environmental issues, helping to ensure natural resources are managed for the benefit of all citizens.; and
- Revenue Collection: Promoting more comprehensive and detailed disclosures to support countries in strengthening their tax base and increasing extractive sector revenues.

1.4 Scope of Work

Moore Insight was appointed as the Independent Administrator to compile the 4th UGEITI Report, which covers the period 1st July 2022 to 30th June 2023.

Overview

The Extractive Industries Transparency Initiative (EITI) is a voluntary mechanism aimed at strengthening the governance of public revenues derived from oil, gas, and mining resources in resource-rich countries. The EITI Standard requires the public disclosure of all significant payments made by extractive companies to governments, as well as the corresponding revenues received by governments.

In accordance with Requirement 4.1 of the 2023 EITI Standard, extractive companies and government entities, including public administrations and state-owned enterprises, are required to disclose their payments and revenues. Reporting entities are also required to provide contextual information, including production and export volumes, employment

data, social contributions, and other relevant information as stipulated in the Standard.

2.1 Production and Export Data

a. Production and export in the Oil and Gas Sector

In FY 2022-23, oil and gas activities were limited to exploration and pre-production phases, with no actual production or export taking place.

b. Production in the mining sector

Uganda's mineral production value rose to UGX 248.5 billion in FY2022/23, marking a 23% increase over the previous year and signaling continued development in the sector.

The growth was driven by significant increases in the production of Volcanic Ash (+137%), Syenitic Aggregate (+125%), and Marble (+1,769%), while declines were recorded for Gold (-80%), Wolfram (-33%), and Kaolin (-32%).

Five companies contribute 89% of the total production in the sector. These are Sino Minerals Investments Company Limited, Hima Cement Limited, Tororo Cement Limited, Namekara Mining Company Ltd, and Great Lakes Iron and Steel Company Limited, as presented in Section 4.1 of the UGEITI report.

Production was also concentrated by mineral type, with Limestone (39%) and Iron Ore (37%) accounting for over 75% of the total value, with five companies contributing 89% of the total production value. The following charts and tables, present some figures related to production in the mining sector. Further details on production are presented in Section 4.1 of the UGEITI report.

Table 1: Production variance for the last three years in UGX

Mineral	2020/21	2021/22	2022/23	Variation	
	Value of the production	Value of the production	Value (*) of the production	(2020/21)- (2021/22)	(2021/22)- (2022/23)
Limestone	-	93,343,667,050	97,528,939,000	100%	4%
Iron Ore	4,232,000,000	72,828,561,355	91,136,918,400	1621%	25%
Pozzolana	-	17,752,573,840	18,790,381,500	100%	6%
Wolfram	-	6,820,192,964	4,538,419,100	100%	-33%
Gold	196,000,000	3,428,090,368	702,102,300	1649%	-80%
Kaolin	-	3,301,084,715	2,260,829,100	100%	-32%
Syenitic Aggregate	-	2,483,940,425	5,580,493,300	100%	125%
Volcanic Ash	-	1,814,098,860	4,295,247,800	100%	137%
Marble	12,293,000,000	89,539,200	1,673,205,500	-99%	1,769%
Feldspar	-	24,291,600	173,420,600	100%	614%
Granite	-	12,144,000	7,129,500	100%	-41%
Diatomite	-	7,595,000	-	100%	-100%
Vermiculite	-	-	-	-100%	0%
Other	926,000,000	-	21,769,901,800	-100%	100%
Total	17,647,000,000	201,905,779,377	248,456,987,900	1044%	23%

Table 2: Production data by company for FY 2022-23

Company	%
Sino Minerals Investments Company Limited	32%
Hima Cement Limited	29%
Tororo Cement Limited	16%
Namekara Mining Company Ltd	9%
Great Lakes Iron and Steel Company Limited	3%
OSCAR CHRISPUS BAMUSEDE	2%
KI3R Minerals Limited	2%
Gems International Limited	2%
ASMs	2%
Abasi Balinda Transporters Limited	1%
National Cement Company Uganda Limited	1%
Other	2%
Total	100%

Chart 1: Contribution to mining production by company

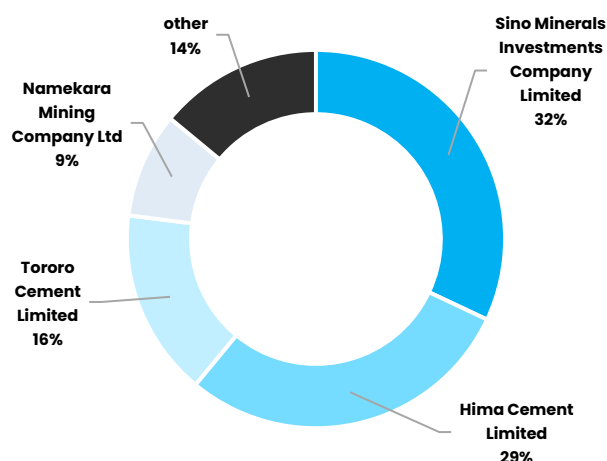
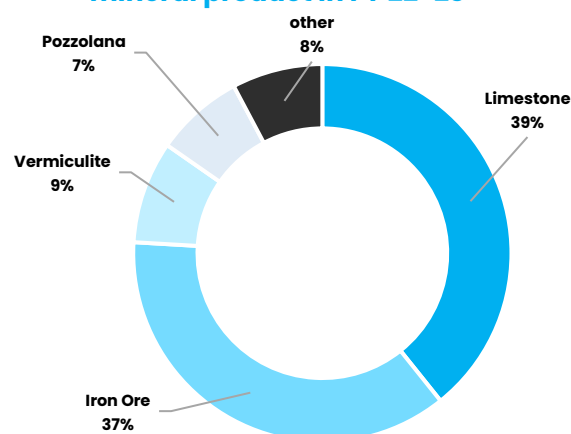


Table 3: Production data of minerals extracted for FY 2022-23

mineral	%
Limestone	39.25%
Iron Ore	36.68%
Vermiculite	8.75%
Pozzolana	7.56%
Syenitic Aggregate	2.25%
Wolfram	1.83%
Volcanic Ash	1.73%
Kaolin	0.91%
Marble	0.67%
Gold	0.28%
Feldspar	0.07%
Dimension Stone	0.01%
Other	-
Total	100.00%

Chart 2: Contribution to mining production by mineral product in FY 22-23



c. Exports in the mining sector

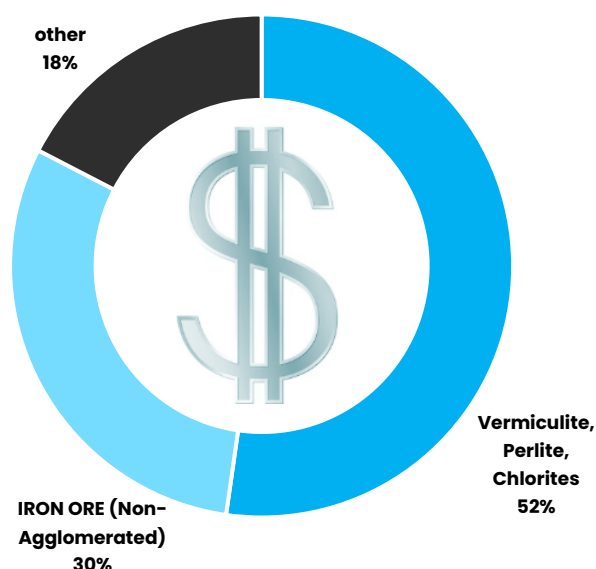
During the Fiscal Year 2022-23, the total value of exported minerals amounted to UGX 33,608,841,827, as detailed in the table below.

The analysis of the exported quantities by mineral, reported by URA, shows that Vermiculite and Iron Ore accounted for 83% of the total mineral export value for the Fiscal Year 2022-23. The detailed analysis is outlined in section 4.1.2 of the UGEITI report.

Table 4: Exportation of minerals data for FY 2022-23

Mineral Type	Quantity (Kg)	Value (in UGX)	%
Vermiculite, Perlite, Chlorites	19,551,630	17,562,848,709	52.26%
IRON ORE (Non-Agglomerated)	74,386,028	10,197,367,280	30.34%
Tungsten Ores and Concentrates	90,400	2,369,788,568	7.05%
Other Ores and Concentrates	1,231,000	1,944,527,081	5.79%
Marble Blocks (Rectangular Shape)	575,859	534,749,301	1.59%
Tantalum/ Vanadium/ Niobium Ores	21,890	444,337,007	1.32%
Raw Salt	238,205	208,062,741	0.62%
Sulphur	169,250	130,000,752	0.39%
Other	300,764	217,160,388	0.65%
Total	96,565,026	33,608,841,827	100%

Chart 3: Contribution by mining exports in FY 22-23



Further details on export data are presented in Section 4.1 of the UGEITI report.

2.2 Contribution to Uganda's Economy

In FY2022/23, Uganda's mining and quarrying sector contributed UGX 2,685.76 billion in revenues, accounting for 1.47% of national GDP. There was a slight increase of 0.04% from the previous year (1.43%). Of this, 0.46% came from the formal sector and 1.01% from informal activities. The oil and gas sector remained in the pre-production phase and made no significant GDP contribution, with first oil production expected in 2026.

Table 5: Contribution of the mining sector to the GDP at current prices

				2022/23 Vs. 2021/22		2021/22 Vs. 2020/21	
Description / Period	2022/23	2021/22	2020/21	Variance	Variance %	Variance	Variance %
Total Current GDP (in billion UGX)							
GDP Mining & quarrying	2,685.76	2,327.09	2,796.17	358.67	15.41%	-469.08	-16.78%
Formal mining & quarrying	846.26	857.39	622.27	-11.13	-1.30%	235.12	37.78%
Informal mining & quarrying	1,839.50	1,469.70	2,173.90	369.8	25.16%	-704.2	-32.39%
GDP at Current Price	183,004.39	162,749.95	148,310.25	20,254.44	12.45%	14,439.70	9.74%
Contribution to GDP (%)							
GDP Mining & quarrying	1.47%	1.43%	1.89%	-	0.04%	-	-0.46%
Formal mining & quarrying	0.46%	0.53%	0.42%	-	-0.07%	-	0.11%
Informal mining & quarrying	1.01%	0.90%	1.47%	-	0.11%	-	-0.56%

The contribution of the extractive sector to government revenues during FY 2022-23 was as follows:

Table 6: Contribution of the extractive sector to the Government revenues during the FY 22-23

Description	Amount (UGX billion)	Contribution in %
Mining & Quarrying revenues	230.228	0.49%
Oil & Gas revenues	299.946	0.64%
Extractive sector revenues	530.174	1.13%
Total Government Revenues	46,921.36	100%

The Value of mineral exports reduced by 99% from UGX.18,494,910,000 in FY2021/22 to UGX.143,043,750 in 2022/2023.

Table 7: Contribution of the mining sector to national exports for FY 2022-23

Mineral	Value	Value
	(million UGX)	(million USD)
Iron ore (unrefined mineral)	143.04	0.04
Total export out of the mining sector	143.04	0.04
Total export of Uganda	20,523,080.46	5,466.99
Contribution to total exports	0.001%	0.001%

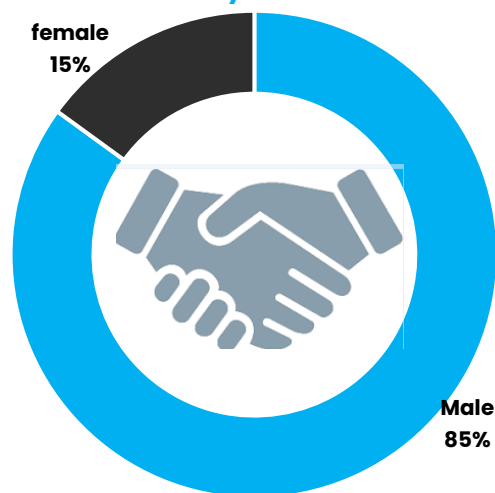
In 2021, Uganda had a population of approximately 43 million, with 20.5 million individuals engaged in work, according to UBOS. Of these, 51% were involved in own-use production, and 49% held formal or informal jobs.

In FY2022/23, the extractive sector accounted for just 0.026% of Uganda's total working population, employing 4,613 individuals in mining and 661 in oil and gas. Of the total workforce in the sector, 15% were women and 85% were men. This highlights the sector's limited direct impact on employment despite its growing economic significance.

Table 8: Extractive sector contribution to employment for FY 2022-23

Description	Total	Contribution
	Employment	in %
Mining sector	4,613	0.023%
Oil & Gas sector	661	0.003%
Extractive sector working population	5,274	0.026%
Total working population ¹	20,484,742	

Chart 4: employment details in the extractive sector by Gender for FY 2022-23



2.3 Revenue from the Extractive Industries

URA is a centralized government agency responsible for collecting all revenues due to the government, including those generated by extractive entities. Total extractive revenues for the last three years as reported by the URA are summarised in the table below, by government agency and by sector.

Table 9: Summary of revenues for the last three periods

Amounts in millions UGX

Government Agency	2020/21	2021/22	2022/23
	(a)	(b)	(c)
Government revenues	231,029	410,535	481,267
Social and environmental expenditure	9,324	778	48,450
Subnational Payments	997	65	457
Total	241,349	411,379	530,174
Sector			
Oil & Gas	180,268	160,898	230,228
Mining	61,081	250,481	299,946
Total	241,349	411,379	530,174

Source: UGEITI Declaration forms

In FY2022/23, revenues from the extractive sector rose by 29%, reaching UGX 530.17 billion. The URA is the main contributor of government revenue with steady growth noted, while social and environmental expenditures saw a sharp increase. Subnational payments also improved.



Chart 5: Structure of extractive sector's revenues for the fiscal year 2022-23 (in Million UGX)

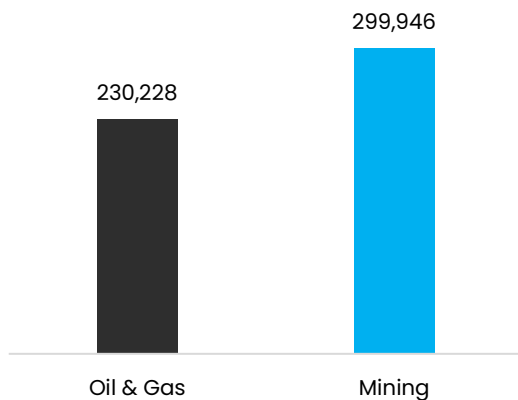
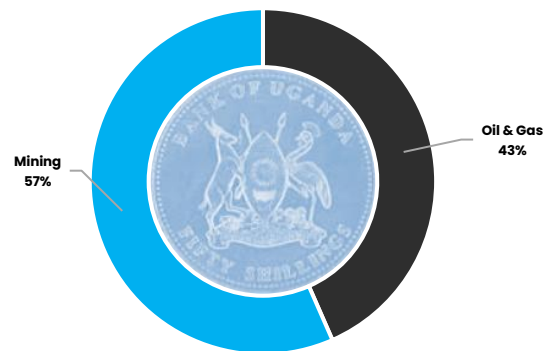


Chart 6: Structure of extractive sector's revenues for the fiscal year 2022-23 (in percentage)



2.4 Scope of the Data Collection and Reconciliation

Based on the reconciliation scope agreed by the UGEITI MSG, this reconciliation exercise covered the mining, oil and gas sectors. The UGEITI MSG agreed to include all six (6) oil and gas companies present in the country which held active licenses during the fiscal year 2022-23 as well as the fourteen (14) mining companies that made payments over the materiality threshold of UGX 750 million UGX.

Table 10: List of oil and gas entities retained in the reconciliation scope

N°	TIN	Name of Petroleum Company(ies)
1	1000171284	TOTALENERGIES EP UGANDA
2	1000491360	CNOOC UGANDA LTD
3	1008571187	UGANDA NATIONAL OIL COMPANY LIMITED
4	1013866034	ORANTO PETROLEUM LIMITED
5	1013813319	ARMOUR ENERGY (UGANDA) - SMC LIMITED
6	1028063230	DGR ENERGY TURACO UGANDA- SMC LIMITED

Table 11: List of mining entities retained in the reconciliation scope

N°	TIN	Taxpayer Name
1	1000024790	TORORO CEMENT LTD
2	1000028511	HIMA CEMENT LTD
3	1002647366	NATIONAL CEMENT COMPANY UGANDA LIMITED
4	1003538323	MOTA ENGIL ENGENHARIA E CONSTRUCAO AFRICA , SA
5	1014335942	HUA HUI INTERNATIONAL GROUP COMPANY LIMITED
6	1009753489	METRO CEMENT LIMITED
7	1000144942	DIAMOND STEEL UGANDA LIMITED
8	1010924286	WAGAGAI MINING U LIMITED
9	1000850391	SINO MINERALS INVESTMENTS COMPANY LIMITED
10	1009526744	GEMS INTERNATIONAL LIMITED
11	1001365592	KAMPALA CEMENT CO. LIMITED
12	1009615135	DIRECT REDUCED IRON (DRI) LIMITED
13	1013373236	RWENZORI RARE METALS LTD.
14	1000063355	AUC MINING (UGANDA) LIMITED

Revenues included in the reconciliation scope for the fiscal year 2022-23 represent 88% of the total adjusted revenues from the mining, oil and gas sectors as detailed below:

Table 12: Reconciled revenues for the fiscal year 2022-23

Payments from	Revenues FY 2022-23		Revenues by sector	
	(UGX million)	% Contribution	Oil & Gas	Mining
	(a)+(b)		(a)	(b)
Reconciled revenue (*)	467,298	88%	230,228	237,070
Unilateral disclosure by Government Agencies (**)	13,969	3%	0	13,969
Unilateral disclosure by companies (**)	48,907	9%	48,491	416
Total revenues (a)+(b)	530,174	100%	251,456	251,455

(*) Reconciled revenues detailed by extractive entity in Section 5 of the UGEITI report

(**) Unilateral disclosure by Government Agencies and by companies are detailed in Section 4.4.2 of the UGEITI report

The UGEITI MSG agreed to include the Uganda Revenue Authority (URA) within the scope of reconciliation. Government revenues received from companies whose payments fell below the materiality thresholds set by the UGEITI MSG were included through unilateral disclosures made by government agencies

Reconciliation results

The unresolved discrepancies after adjustments are detailed in Section 5 of the UGEITI report and are summarized as follows:

Table 13: Unresolved discrepancies for the fiscal year 2022-23

	Extractive companies (UGX)	Government (UGX)	Difference (UGX)	%
Total payments declared	323,824,023,131	467,297,551,219	(143,473,528,088)	(30.70%)

The discrepancy is primarily due to the submission of partially completed declaration forms of companies. Secondly, several of the companies have a large part of their activities not related to the extractive industry.

2.5 Completeness and Data Quality

Comprehensiveness

Out of the twenty companies included in the reconciliation scope, ten companies submitted declaration forms, while the remaining ten companies did not submit forms. Of the latter ten, two (2) companies namely, DGR ENERGY TURACO UGANDA- SMC LIMITED and ARMOUR ENERGY (UGANDA) had their licenses and PSAs expire in May 2025. Neither company sought renewal of their respective licenses, and their offices were not accessible during the reconciliation exercise. They therefore did not submit any declaration forms.

The revenues reported by the URA for the ten companies that did not submit declaration forms represent 27.5% of the extractive sector's revenues and are detailed as follows:

Table 14: Companies that did not meet the reporting deadline for the Fiscal year 2022-23

No.	Company	Revenue	Contribution %
1	HIMA CEMENT LTD	96,424,559,378	18.2%
2	HUA HUI INTERNATIONAL GROUP COMPANY LIMITED	15,896,550,452	3.0%
3	METRO CEMENT LIMITED	9,662,252,418	1.8%
4	DIAMOND STEEL UGANDA LIMITED	9,516,251,780	1.8%
5	GEMS INTERNATIONAL LIMITED	2,782,995,301	0.5%
6	DIRECT REDUCED IRON (DRI) LIMITED	2,244,171,800	0.4%
7	ARMOUR ENERGY	1,251,317,517	0.2%

No.	Company	Revenue	Contribution %
	(UGANDA) -SMC LIMITED		
8	DGR ENERGY TURACO UGANDA-SMC LIMITED	1,163,406,476	0.2%
9	RWENZORI RARE METALS LTD.	933,651,784	0.2%
10	AUC MINING (UGANDA) LIMITED	895,496,344	0.2%
Total		145,632,541,381	26.5%

All government agencies submitted the declaration forms. The detail of their data submission is presented in Annex 26 of the UGEITI report.

Conclusion:

Given the observations outlined above, we cannot conclude with reasonable assurance that the EITI data presented comprehensively covers all significant revenues and payments from the extractive sector in Uganda for the year 2022-2023.

Data quality and assurance

Out of the twenty companies included in the reconciliation scope, six (6) companies submitted signed declaration forms while fourteen (14) companies did not submit signed declaration forms by the deadline set for data collection. The revenues reported by the URA for these companies represent 65.3% of the extractive sector's revenues and are detailed as follows:

Table 15: Non signed declaration forms for extractive entities for the fiscal year 2022-23

No.	Company	Revenue	Contribution %
1	TOTALENERGIES EP UGANDA	30,296,802,333	24.6%
2	CNOOC UGANDA LTD	65,464,883,693	12.3%
3	ARMOUR ENERGY (UGANDA) -SMC LIMITED	1,251,317,517	0.2%
4	DGR ENERGY TURACO UGANDA-SMC LIMITED	1,163,406,476	0.2%
5	HIMA CEMENT LTD	96,424,559,378	18.2%

No.	Company	Revenue	Contribution %
6	NATIONAL CEMENT COMPANY UGANDA LIMITED	3,667,186,350	0.7%
7	HUA HUI INTERNATIONAL GROUP COMPANY LIMITED	15,896,550,452	3.0%
8	METRO CEMENT LIMITED	9,662,252,418	1.8%
9	DIAMOND STEEL UGANDA LIMITED	9,516,251,780	1.8%
10	SINO MINERALS INVESTMENTS COMPANY LIMITED	3,415,948,274	0.6%
11	GEMS INTERNATIONAL LIMITED	2,782,995,301	0.5%
12	KAMPALA CEMENT CO. LIMITED	50,937,443	0.0%
13	RWENZORI RARE METALS LTD.	933,651,784	0.2%
14	AUC MINING (UGANDA) LIMITED	895,496,344	0.2%
Total		6,284,127,674	65.3%

UGANDA NATIONAL OIL COMPANY LIMITED, TORORO CEMENT LTD both submitted signed reporting templates; however, these templates were not certified by an external auditor. Additionally, only two companies out of the twenty in the reconciliation scope submitted a complete set of financial statements covering the fiscal year 2022-2023, namely, SINO MINERALS INVESTMENTS COMPANY LIMITED and KAMPALA CEMENT CO. LIMITED. Four companies namely ORANTO PETROLEUM LIMITED, MOTA ENGIL., NATIONAL CEMENT COMPANY UGANDA LIMITED, DRI LIMITED submitted signed and certified templates. Finally, URA and DGSM submitted signed reporting templates but none of the government agencies had its declaration forms certified by the Auditor General (AG). The detail of their data submission is presented in Annex 26 of the UGEITI report.

Conclusion:

Based on the above, we cannot conclude that the revenues included in this report were subject to credible, independent audit, applying international auditing standards.

2.6 Recommendations

The following key recommendations and actions are proposed to strengthen the EITI process in Uganda:

Table 16: List of recommendations for the fiscal year 2022-23

N°	Recommendations
1	Strengthen the Legal and Institutional Basis for EITI Reporting (EITI Requirement 4.1)
2	Improve Beneficial Ownership and Contract Transparency (EITI Requirement 2.4 and 2.5)
3	Enhance Environmental and Social Expenditure Reporting (EITI Requirement 6.1)
4	Improve Public Disclosure of Financial Information by Reporting Entities (EITI Requirement 4.1(c))
5	Enhance Transparency of Project-Level Capital and Operating Expenditures (EITI Requirement 4.10)
6	Develop a Framework for measurement, reporting and verification of Greenhouse Gas Emissions in the Extractive Sector (EITI Requirement 3.4)



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