



ANNUAL PROGRESS REPORT
JULY 2024 – JUNE 2025

Prepared by: UGEITI Secretariat

December 2025

ACRONYMS

| | |
|--------|--|
| ASM | Artisanal and Small-scale Mining |
| APR | Annual Progress Report |
| BO | Beneficial Ownership |
| BOU | Bank of Uganda |
| CCE | Citizens' Convention on Extractives |
| DGSM | Department of Geological Survey and Mines |
| DOP | Department of Petroleum |
| EITI | Extractive Industries Transparency Initiative |
| EU | European Union |
| FY | Financial Year |
| GDP | Gross Domestic Product |
| GIZ | Deutsche Gesellschaft für Internationale Zusammenarbeit (German Agency for International Cooperation) |
| IA | Independent Administrator |
| ICGLR | International Conference on the Great Lakes Region |
| MEMD | Ministry of Energy and Mineral Development |
| MOFPED | Ministry of Finance, Planning & Economic Development |
| MSG | Multi-Stakeholder Group |
| NEMA | National Environment Management Authority |
| OAG | Office of the Auditor General |
| PAU | Petroleum Authority of Uganda |
| UGEITI | Uganda Extractive Industries Transparency Initiative |
| UN | United Nations |
| URA | Uganda Revenue Authority |
| URSB | Uganda Registration Services Bureau |

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1.0 INTRODUCTION

Transparency and accountability remain fundamental to ensuring that Uganda's extractive resources deliver lasting value for current and future generations. In order to enhance transparency in the extractive sector, Uganda joined the Extractive Industries Transparency Initiative (EITI) in August 2020, becoming the 54th global and 26th African member, following a Cabinet directive of 28th January 2019. The initiative is steered by a Multi-Stakeholder Group (MSG) bringing together Government, Industry, and Civil Society, with the UGEITI Secretariat providing technical and administrative support for day-to-day operations.

As part of the EITI process, Uganda is required to produce an Annual Progress Report (APR) to document progress, achievements, challenges, outcomes, and priority actions in EITI implementation. This APR covers the period July 2024 to June 2025 and assesses performance against the FY 2024/2025 Work Plan and the requirements of the 2023 EITI Standard.

The Annual Progress Report (APR) 2024/2025 demonstrates how Uganda EITI implementation directly supports the Fourth National Development Plan (NDP IV) 2025/26–2029/30 by strengthening domestic revenue mobilisation, promoting transparent and accountable management of oil, gas and mineral revenues, advancing responsible environmental stewardship and sustainable resource exploitation, enhancing secure and rights-based data governance, and fostering inclusive stakeholder engagement in natural resource governance. Through these actions, UGEITI contributes specifically to Programme 2: *Sustainable Extractives Industry Development* (under MEMD)¹ by improving revenue oversight, transparency and value addition in the extractives sector, and to Programme 18: *Development Plan Implementation* (under MoFPED)² by reinforcing monitoring, accountability and evidence-based planning, thereby advancing national priorities on industrialisation, fiscal sustainability, governance reforms, environmental sustainability and long-term economic transformation³.

During the reporting period, implementation focused on four priority areas:

¹ NDP IV (2025/26–2029/30), *Programme 2: Sustainable Extractives Industry Development*, Production and Value Addition Cluster

² NDP IV (2025/26–2029/30), *Programme 18: Development Plan Implementation*, Governance Cluster

³ NDP IV strategic objectives on Domestic Revenue Mobilisation, Governance & Anti-Corruption, Sustainable Natural Resource Management, and Structural Economic Transformation

- a) Dissemination of the Third UGEITI Report (FY 2021/2022) to expand public access to extractive sector information.
- b) Preparation of the Fourth EITI Report (FY 2022/2023) to uphold continuity in data disclosure.
- c) Formulation of a Five-Year Strategic Plan (2025/26–2029/30) and a Three-Year Work Plan (2024–2027) to guide medium- and long-term implementation.
- d) Advancement of governance reforms aimed at improving revenue administration, licensing systems, and community participation.⁴

All in line with NDP IV cross-cutting priorities on transparency, anti-corruption, gender equality, and youth inclusion

2.0 GENERAL ASSESSMENT OF YEAR'S PERFORMANCE

The reporting period reflected a phase of consolidation and strategic adjustment as UGEITI continued to strengthen its role in national extractive sector governance. Implementation remained broadly on track with the FY 2024/2025 Work Plan and aligned with the 2023 EITI Standard, with notable gains in three priority areas:

- a) **Timely Disclosures:** Completion and launch of the Third EITI Report (FY 2021/22), accompanied by progress on the preparation of the Fourth Report (FY 2022/23).
- b) **Strategic Planning:** Finalization of key planning instruments, including the Five-Year Strategic Plan (2025–2030), the Three-Year Work Plan (2024–2027), and updated MSG Terms of Reference.
- c) **Stakeholder Engagement:** Enhanced participation through national-level workshops, collaborative initiatives, and targeted outreach to artisanal and small-scale mining (ASM) communities.

Despite the progress made, several constraints affected implementation. Resource constraints affected regional dissemination activities; delayed submissions from reporting entities affected data completeness; and the absence of adequate enforcement mechanisms continued to affect compliance. Nonetheless, the Secretariat and MSG maintained momentum by leveraging Government backing and drawing on technical support where necessary. The subsequent sections present a

⁴ *NDP IV*: Cross-cutting priorities on gender equality, youth participation, anti-corruption, and institutional coordination.

quarter-by-quarter review of activities and results, highlighting UGEITI's ongoing efforts to strengthen transparency, accountability, and sound management of natural resources.

2.1 Quarter 1 (July – September 2024)

The activities of Quarter One included:

2.1.1 Visit by the EITI Executive Director, Mr. Mark Robinson

From 22nd to 24th August 2024, a high-level mission led by the EITI Executive Director, Mr. Mark Robinson, visited Uganda. The visit was significant in reinforcing Uganda's commitment to implementing the 2023 EITI Standard and strengthening stakeholder confidence following the recent validation outcome. During the mission, Mr. Robinson met with key EITI constituencies including senior Government officials, MSG members, development partners, and civil society representatives. The key stakeholders engaged included:

- a) **Hon. Minister of Finance, Planning and Economic Development** on 23rd August 2024 focusing on Uganda's political commitment to EITI.
- b) **The Permanent Secretary, Ministry of Energy and Mineral Development** on 23rd August 2024 focusing on Uganda's energy transition plans and validation outcomes.
- c) **The Auditor General** on 23rd August 2024 to discuss findings from the National Audit Report relevant to the extractive industries.
- d) **Members of the Civil Society** on 23rd August 2024 to discuss ongoing EITI processes of transparency and governance in Uganda's extractive Sector.
- e) **The Multi-Stakeholder Group of UGEITI** on 23th August 2024 to discuss the validation exercise results and outline strategies for addressing the recommendations provided.
- f) **Development Partners** on 24th August 2024 to discuss mineral traceability, contract disclosure, beneficial ownership with emphasis on aligning donor support with EITI objectives.
- g) **Uganda Chamber of Energy and Minerals and other industry players** on 24th August 2024 to discuss emerging issues in the extractive sector and how to enhance collaboration within the industry to meet EITI reporting standards.

- h) **Total Energies Uganda Managing Director** on 24th August 2024 to discuss industry engagement in the EITI validation process and the company's expectations regarding transparency.

The engagements provided an opportunity for key stakeholders to discuss Uganda's validation results, identify priority areas for improvement, and reaffirm the importance of collaboration in advancing transparency and accountability in the extractive sector. Pictures with different stakeholders below:



Meeting with Development Partners



Meeting with the Hon. Minister of Finance



Meeting with the OAG Officials.



Meeting with UCEM & CNOOC Officials.

2.1.2 Beneficial Ownership Capacity Building Workshop

On 17th July 2024, Members of the UGEITI Secretariat participated in an online Beneficial Ownership (BO) capacity-building workshop organized by the EITI International Secretariat, with the objective of increasing awareness and understanding of the importance of BO data in strengthening transparency, accountability, and governance of natural resources.

2.1.3 Engagement with Planet Gold on ASM Study Development

On 22nd July 2024, UGEITI engaged with the Planet Gold Project to seek technical and financial support for developing a study on ASM, in line with a recommendation from the FY 2020/2021 EITI Report and an activity in the FY 2023/2024 Work Plan.

2.1.4 34th MSG Meeting

On 25th July 2024, UGEITI held the 34th MSG Meeting which reviewed the draft Scoping Report for the Third EITI Report and a presentation on the flow of Subnational Payments.

2.1.5 Review of Draft Scoping Report for the Third EITI Report

On 25th July 2024, the Secretariat held a meeting with the IA to review the draft scoping report for the Third EITI Report (FY 2021/2022), aimed at assessing key findings, confirming the scope, and preparing informed input ahead of the subsequent MSG meeting.

2.1.6 Follow-up with the Attorney General on Contract Disclosure

During the same period, UGEITI followed up with the Attorney General to seek guidance on contract disclosure following differing positions between companies and Government. In his response dated 30th July 2024, the Attorney General advised that the Government could proceed with disclosure since one contracting party (the industry players) had consented, thereby providing clarity and legal basis for advancing contract transparency.

2.1.7 Coordination Meeting with DGSM on Third EITI Report Preparation

On 31st July 2024, UGEITI held an online meeting with the Directorate of Geological Survey and Mines (DGSM) to support the preparation of the Third EITI Report, with the objective of ensuring accurate, complete, and reliable data reporting for the mining sector.

2.1.8 Training Workshop on EITI Reporting Templates

On 6th August 2024, UGEITI supported a training workshop conducted by the Independent Administrator, aimed at building the capacity of companies and Government institutions to correctly complete reporting templates and improve data quality for Uganda's EITI Report.

2.1.9 Meeting with NRGi on Launch of the Third EITI Report

In the same quarter, the Secretariat held a planning meeting with the Natural Resource Governance Institute (NRGI) to prepare for the launch of the Third EITI Report, focusing on finalizing the budget and logistical arrangements for the launch.

2.1.10 Commencement Meeting for Development of the UGEITI Strategic Plan

During this quarter, UGEITI convened a commencement meeting to initiate the development of its Strategic Plan, with the objective of setting priorities, defining strategic direction, and guiding EITI implementation over the medium to long term.

2.1.11 Publication on the Visit of the EITI Executive Director

On 3rd September 2024, an article was published in the *New Vision* newspaper on the visit of the EITI Executive Director, aimed at documenting high-level engagement, enhancing public visibility of EITI implementation, and reinforcing Uganda's commitment to the global EITI process.

2.2 Quarter 2 (October – December 2024)

The activities of Quarter two include:

2.2.1 The 35th MSG meeting

On 8th October 2024, the Multi-Stakeholder Group held its 35th meeting, during which members reviewed and approved the Third EITI Report for the Financial Year 2021/2022, following deliberations on the report's findings, data quality, and compliance with the EITI Standard.

2.2.2 Launch of the Third EITI Report

On 8th October 2024, the Third EITI Report was reviewed and approved at the 35th MSG meeting, and was subsequently published and officially launched on Thursday, 28th November 2024, at the Sheraton Hotel Kampala. The event was officiated by senior Government officials, MSG members, development partners, and the media, marking the start of the report's public dissemination.



Delegates at the official launch of the 3rd EITI REPORT at the Sheraton Hotel

2.2.3 Dissemination of Key findings in the report

Following the launch, key findings in the report were published in national newspapers particularly the *New Vision*, including the following articles: ⁵

- a) 15th November 2024 - *“Government opens up three new areas for oil exploration”*.
- b) 3rd December 2024 - *“Uganda’s extractives report highlights the need to improve laws”*.
- c) 5th December 2024 - *“Shrinking civic space in extractive governance”*.
- d) 17th December 2024, *“Uganda advances transparency in the extractive sector through EITI”*.

2.2.4 Preparation of an Addendum of the Third EITI Report

Following the approval of the 3rd EITI report, the MSG initiated the preparation of an Addendum to address the 53% reconciliation gap identified in the Third EITI Report. The preparation of the FY 2021/22 Addendum resulted in a significant reduction in the reconciliation gap—from 53% in the original report to 15%—reflecting improved data completeness, strengthened assurance processes, and enhanced cooperation among reporting entities.⁶

⁵ <https://www.ugeiti.org/wp-content/uploads/2024/12/Uganda-advances-transparency-in-extractive-sector-through-EITI.pdf>
<https://www.ugeiti.org/wp-content/uploads/2024/12/Ugandas-extractives-report-highlights-need-to-improve-laws.pdf>

⁶ <https://www.ugeiti.org/wp-content/uploads/2025/02/2021-22-UGEITI-Addendum-Report.pdf>

The addendum incorporated additional verified information, including:

- a) Auditor General (OAG) certification of URA templates;
- b) Signed templates from DGSM;
- c) Clarification from Virat Alloys that it was not engaged in extractive activities;
- d) Submission of completed templates from Hima Cement and National Cement Company, two of the highest revenue-paying mining companies.

2.2.5 Important stakeholder engagements included:

a) **The Planet Gold Annual Stakeholders meeting**

On 4th October 2024, UGEITI participated in the PlanetGOLD Annual Stakeholders' Meeting, held at Mestil Hotel under the theme "*From Mines to Markets: Strengthening Artisanal and Small-Scale Gold Mining through Cooperative Networks and Renewed Commitment to Reducing Mercury,*" addressing challenges in the artisanal and small-scale mining (ASM) sector.

b) **13th Mineral Wealth Conference**

From 1st to 2nd October 2024, UGEITI took part in the 13th Mineral Wealth Conference, held under the theme "*Leveraging Critical Minerals for Sustainable Development and Economic Transformation,*" and organised by the Uganda Chamber of Mines and Petroleum in collaboration with the Ministry of Energy and Mineral Development (MEMD) and other stakeholders, with the objective of promoting dialogue on transparent and sustainable management of critical mineral resources to support national development.

c) **Uganda's Mining and Minerals Governance**

On 25th October 2024, UGEITI participated in the Uganda Mining and Minerals Governance dialogue held at Sheraton Hotel, organized by Advocates Coalition for Development and Environment (ACODE) in collaboration with Natural Resource Governance to discuss and share reflections on issues that shall inform the regulations for the Mining Act 2022.

d) **The 7th Citizens' Convention on Extractives**

From 23rd to 24th October 2024, UGEITI participated in the 7th Citizens' Convention on Extractives (CCE), organised by Global Rights Alert and development partners,

focusing on improving governance practices in the extractives sector to enhance transparency, accountability, and social equity.



Participants at the CCE 2024 (7th) Convention on 23-10-24

2.2.6 High-level engagements included:

a) Engagements with United Nations Secretary General for Great Lakes Region

On 15th October 2024, UGEITI engaged with the United Nations Secretary-General's Office for the Great Lakes Region, together with the International Conference on the Great Lakes Region (ICGLR) and the Great Lakes Judicial Cooperation Network (GLJCN), in a meeting with the Secretariat to seek feedback on the common policy framework on cross-border crime, with a focus on strengthening the effective fight against cross-border crime.

b) The Energy Transition Workshop

On 26th October 2024, UGEITI co-hosted the Energy Transition Workshop with Oxfam, aimed at operationalising Uganda's National Energy Transition Plan.

c) Engagements with the European Union

On 7th November 2024, UGEITI met with H.E. Ambassador Johan Borgstam, the European Union Special Representative for the Great Lakes Region, and his delegation, which brought together UGEITI stakeholders and staff to discuss illegal exploitation and trafficking of natural resources, and to reaffirm support for initiatives such as EITI in promoting an African-led model of natural resource management.

d) Engagement with World Bank

On 12th December 2024, UGEITI engaged with the World Bank in a meeting to

discuss a proposed study on enhancing revenue generation from Uganda’s extractive sector.

2.3 Quarter 3 (January – March 2025)

The activities of Quarter Three included:

2.3.1 Publication of the Annual Progress Report for FY 2023/2024

During the third quarter, the Annual Progress Report for FY 2023/2024 was published on the UGEITI website, outlining progress made in implementing the EITI Standard, key activities undertaken during the reporting period, achievements, challenges encountered, and lessons learned to inform future EITI implementation in Uganda.⁷

2.3.2 Engagement meeting with Hon. Phionah Nyamutoro

On 29th January 2025, UGEITI held an engagement with the Minister of State for Energy and Mineral Development (in charge of Minerals) to discuss the status of EITI implementation, progress achieved, and key priorities for strengthening transparency and accountability in Uganda’s extractives sector.



Secretariat staff with Hon. Phiona Nyamutoro and Eng. Malik at MEMD offices in Entebbe

2.3.3 The 36th MSG meeting⁸

⁷ <https://www.ugeiti.org/wp-content/uploads/2025/03/UGEITI-Annual-Progress-Report-July-2023-June-2024.pdf>

⁸ <https://www.ugeiti.org/wp-content/uploads/2025/09/36th-MSG-Meeting-20th-February-2025.pdf>

On 20th February 2025, the 36th MSG Meeting was held at the Imperial Royale Hotel and achieved several milestones:

- a) Adoption of the Addendum to the Third EITI Report (FY 2021/2022).
- b) Review of the draft Five-Year Strategic Plan (2025–2030) and the Three-Year Work Plan (2024–2027).
- c) Amendments to the MSG Terms of Reference, which also aligned member tenure with evolving implementation needs.

2.3.4 Strategic planning meetings

During this period, several strategic planning meetings were held with the consultant, the MSG strategic planning committee and the Secretariat in preparation for the final approval of the five-year Strategic plan by the MSG.

2.3.5 Launch of the sustainable development of the Mining Sector Project

On 13th March 2025, UGEITI participated in the launch of the Sustainable Development of the Mining Sector Project, officiated by Hon. Ruth Nankabirwa, the Minister of Energy and Mineral Development. The project, supported by GIZ and co-funded by the European Union and the German Federal Ministry for Economic Cooperation and Development, aims to enhance the attractiveness of Uganda's mining sector, promote sustainable socio-economic growth, and address challenges such as informality and limited value addition.



Hon. Nankabirwa & other delegates at the event at Speke Resort Hotel, Munyonyo.

2.3.6 Preparatory Meetings for the Fourth EITI Report

During this quarter, UGEITI held preparatory meetings for the production of the Fourth EITI Report following the approval of the Terms of Reference and the launch of the scoping study. The meetings focused on coordinating stakeholders, clarifying reporting requirements, and setting timelines to ensure a smooth and timely reporting process in line with the EITI Standard.

2.3.7 Meetings with World Bank

Within the reporting period, UGEITI held meetings with the World Bank to develop Terms of Reference for securing a consultant to undertake a proposed study on enhancing revenue generation in the extractives sector.

2.3.8 Completion of Data Collection for the Fourth EITI Report

During this period, the UGEITI Secretariat completed the data collection process to determine the scope of the Fourth EITI Report, providing the basis for defining reporting entities, revenue streams, and coverage in line with the EITI Standard.

2.3.9 Knowledge exchange and sharing activities:

a) The 7th CCE reflection meeting

In January 2025, UGEITI participated in the Online Study on Anti-Corruption in Extractives, organised by the EITI International Secretariat, with the objective of fostering collaboration among EITI network members and deepening understanding of tools to address corruption risks in licensing and contracting processes.

b) The Uganda Oil Regime & Revenue Forecast Workshop

From 6th to 7th February 2025, UGEITI participated in a capacity-building workshop held at Mestil Hotel, focused on Uganda's oil project, oil taxation, revenue modelling, and forecasting, with the objective of strengthening stakeholders' capacity to understand, apply, and use the Uganda FARI model for informed oil revenue forecasting and fiscal analysis.

d) National Dialogue on Unlocking Mineral Value Addition

On 26th March 2025, UGEITI participated in a stakeholder engagement held to promote dialogue on strategies to enhance mineral value addition in support of Uganda's 10-fold growth strategy. The engagement aimed to address regulatory barriers and propose policy actions to incentivise investment, close financing gaps, and safeguard citizens' rights in the minerals sector, while exploring innovative technical and financial solutions for equitable and sustainable mineral development and fostering cross-sectoral partnerships among government, the private sector, and civil society to drive inclusive growth along the mineral value chain.

2.4 Quarter 4 (April – June 2025)

The activities of Quarter four include:

2.4.1 MSG Annual Retreat

Between 7th and 11th April 2025, the MSG Annual Retreat was held in Hoima District. At the retreat, the MSG reviewed and approved the following:

1. The Five-Year Strategic Plan (2025–2030).
2. The Three-Year Work Plan (2024–2027).
3. The MSG Terms of Reference.



Picture of participants at the annual retreat in Hoima

During this retreat, the MSG conducted a field visit to various critical sites in the Albertine regions of Kingfisher oil development project, Kabaale International Airport, the hazardous Waste Management Facility of Luweero Industries Limited.



Participants at the Kingfisher oil development project

2.4.2 Training Workshop with the Office of the Auditor General

On Thursday, 3rd April 2025, UGEITI held a training workshop with the Office of the Auditor General (OAG), aimed at strengthening OAG's role in EITI implementation—particularly its transition into the position of Independent Administrator—and enhancing its capacity to manage EITI reporting, oversight functions, quality assurance, and data submission.



Participants at the training workshop with the OAG at Protea Hotel Kampala

2.4.3 Engagement with the Department of Geological Survey and Mines (DGSM) and Uganda Revenue Authority (URA)

On 7th May 2025, UGEITI organised a workshop at Imperial Botanical Beach Hotel, Entebbe to engage with DGSM and URA on the following:

- Strengthen collaboration between DGSM, URA and UGEITI in implementing EITI standards.
- Present findings and recommendations from Uganda’s previous EITI Reports.
- Clarify UGEITI’s expectations of DGSM in data disclosure, template certification, and sector reporting.
- Discuss the preliminary findings of the 4th EITI Report and outline next steps.
- Solicit feedback from stakeholders to ensure shared ownership and participation in the EITI process.



Participants at the engagement with DGSM & URA at Entebbe

2.4.4 Meetings to develop the Scoping Study of the 4th EITI report

During the quarter, UGEITI held numerous meetings to support the development of the Scoping Study for the Fourth EITI Report, with scoping and data collection activities continuing to define the report's scope, coverage, and reporting requirements in line with the EITI Standard.

2.4.5 The 37th MSG Meeting

On 22nd May 2025, the 37th MSG Meeting was held where members reviewed and approved the Scoping Report for the Fourth EITI Report.

2.4.6 DEA weekly meetings

During the quarter, members of the Secretariat participated in meetings organized by the Directorate of Economic Affairs in MoFPED to discuss and review the performance of the economy including the extractive sector.

2.4.7 Training workshop on the audit of extractive industries

From 5th to 9th May 2025, members of the Secretariat attended the international training workshop on the audit of extractive industries organized by OAG, which was conducted to build the capacity of participants to strengthen oversight in the sector.



Participants at the international training workshop on the audit of extractive industries

2.4.8 EITI Africa, the Middle East and North Africa (MENA) training workshop

On 13th May 2025, members of the UGEITI Secretariat participated in a virtual training workshop organised by the EITI International Secretariat for members from EITI Africa and the Middle East and North Africa (MENA) region. The workshop aimed at building the capacity of National Coordinators, MSG members, and Secretariat staff on Multi-Stakeholder Group governance and oversight of EITI implementation.

3.0 ASSESSMENT OF PERFORMANCE AGAINST TARGETS AND ACTIVITIES IN THE WORK PLAN

This section reviews the progress made against the objectives and activities outlined in the UGEITI Work Plan for FY 2024/25. It highlights achievements, gaps, and the overall contribution to transparency, accountability, and governance in Uganda's extractive industries.

3.1 Objective 1.0: Enhance Transparency in the Extractive Sector

3.1.1 Planned Outputs/Target

Under this objective, the Secretariat planned the dissemination of the Third EITI Report; engagement with Parliament, media, and citizens; regional outreach;

preparation of fact sheets; strategic meetings with Government agencies; regular progress reporting; website updates.

The objective also included undertaking studies to support revenue mobilisation, digitisation of EITI reporting, assessments of mining and ASM revenue potential, and finalisation of the UGEITI Strategic Plan and Theory of Change. Concluding with the preparation and launch of the Fourth UGEITI.

3.1.2 Achievements/Progress

The Secretariat documented the following achievements under this objective:

a) **The Third EITI Report (FY 2021/22)**

On 28th November 2024, the Third EITI report covering the period FY 2021/2022 was launched followed by media dissemination through press articles, a press conference, and radio/TV appearances.⁹



Panelists at the launch of the 3rd EITI report.

b) **Approved the five-year Strategic Plan**

In the course of the financial year, the MSG drafted and approved the Five-Year Strategic Plan (2025/26–2029/30) and Three-Year Work Plan (2024–2027) to guide medium-term implementation.

c) **Resource mobilization engagements with Development Partners**

High-level meetings with the European Union (7th November 2024), UN/ICGLR (15th October 2024), and World Bank (12th December 2024) were held to mobilise technical and financial support for EITI implementation.

⁹<https://www.ugeiti.org/wp-content/uploads/2024/12/Uganda-advances-transparency-in-extractive-sector-through-EITI.pdf>

d) High-level strategic meeting

Hon. Phiona Nyamuturo, Minister of State for Energy and Mineral Development, was confirmed as the new UGEITI Champion (March 2025), thereby strengthening political leadership.

e) Strategic meetings with Parliament and other leaders

High-level engagements were held with Parliament, the EU, the UN, the World Bank, MEMD, DGSM, and OAG, strengthening political buy-in.

f) Terms of Reference for the Production of the Fourth EITI report

Terms of Reference for the Fourth Report were approved, and a scoping study was launched in Quarter Four.

3.1.3 Unforeseen activities

The Mutli-Stakeholder Group (MSG) undertook additional engagements to develop the Addendum to the Third Report and had it approved on 20th February 2025 in order to address the reported 53% reconciliation gap. The Secretariat also invested more time in the follow-up of reporting templates so as to address the non-submission inconsistencies from the report. This required reallocation of time and resources from planned activities to support these engagements.

3.1.4 Outcomes/Impacts:

Under this objective:

- a) Enhanced public awareness on revenue information due to the strengthened public disclosure and visibility of extractive sector data.
- b) Improved institutional coordination was noted amongst the stakeholders.
- c) Enhanced disclosure of data in the extractive sector.
- d) Enhanced collaboration with the media.

3.2 Objective 2.0: Strengthen Revenue Management and Accountability

3.2.1 Planned Outputs/Target:

The objective aimed to enhance accountability by monitoring and tracking the implementation of recommendations from the EITI reports and the concluded validation process. The planned outputs included stakeholder meetings and workshops to follow up with the relevant institutions such as MEMD, URA, OAG.

3.2.2 Achievements/Progress

The Secretariat documented the following achievements under this objective:

a) **Stakeholder engagements**

Meetings between DGSM and URA to discuss and resolve the discrepancies in export data. ASMs and the relevant institutions of government including MEMD, URA, MoFPED, BoU also held discussions on gold production data and exports. At the 37th meeting held on 22nd May 2025, the MSG nominated a committee to engage the responsible MDAs to streamline mineral export data including gold.

b) **Partnerships**

UGEITI has partnered with the World Bank to conduct a study on gold production in the country to address the recommendation.

c) **Institutional coordination**

Follow-up meetings with reporting entities and Government agencies (i.e., DGSM, PAU, URA, and MEMD) were conducted throughout the year.

d) **Addendum to the Third EITI Report**

MSG reviewed and adopted an Addendum to the Third Report to address reconciliation gaps.

3.2.3 Unforeseen activities

The support to legal and policy influence contributed to reforms of the Mining Act 2022 regulations, including beneficial ownership disclosure provisions.

3. 2.4 Outcomes/Impacts:

Under this objective, outcomes/impacts included:

- Improved transparency and accountability from the continued submission of data to now include reconciliation of the mining sector.
- Increased awareness on quality assurance and compliance.
- Improved institutional coordination.
- Improved information sharing amongst stakeholders supporting EITI implementation.

3.3 Objective 3.0: Build the Operational and Technical Capacity of the MSG and Secretariat

3.3.1 Planned Outputs/Target:

This objective focused on strengthening the institutional capacity of the MSG and Secretariat through regular MSG meetings, the review of the MSG Terms of Reference, retreats, training, and international engagements.

3.3.2 Achievements/Progress

The Secretariat documented the following achievements under this objective:

a) Strategic plan and three-year work plan

During the MSG annual retreat held in April 2025, the new Strategic Plan and three-year Work Plan was approved.



Pictured above during deliberations at the Annual MSG Retreat in Hoima District

b) Training on Data Templates

On 6th August 2024, UGEITI conducted a training workshop on data templates for Government agencies and companies. Participants pictured below:



c) MSG meetings

Four MSG meetings were held; ToRs reviewed and updated to align with evolving EITI implementation needs.

d) Engagements to address gaps in the report.

Training workshops were conducted for OAG, DGSM, and technical officers.

e) Secretariat participation in local, regional and global events

The Secretariat actively participated in various local, regional, and global EITI-related engagements. These included participation in the 13th Mineral Wealth Conference held from 1st to 2nd October 2024, the PlanetGOLD Annual Stakeholders' Meeting on 4th October 2024, the 7th Citizens' Convention on Extractives (CCE) from 23rd to 24th October 2024, and the Energy Transition Workshop co-hosted with Oxfam on 26th October 2024. At the regional and global levels, the Secretariat took part in engagements with the European Union on 7th November 2024, the Online Study on Anti-Corruption in Extractives organised by the EITI International Secretariat in January 2025, and a virtual capacity-building workshop for EITI Africa and MENA members on 13th May 2025. Through these engagements, the Secretariat strengthened stakeholder collaboration, enhanced technical capacity, and promoted transparency, accountability, and inclusive governance in Uganda's extractives sector.

f) International Secretariat training for the ASM sector

In December 2024, the Artisanal and Small-Scale Mining (ASM) training enhanced stakeholders' understanding of artisanal mining challenges in line with the 2023 EITI Standard.

g) Training workshop on Energy Transition

In October 2024, a workshop organised by the Natural Resource Governance Institute (NRGI) on 26th October 2024 provided practical guidance for implementing Uganda's National Energy Transition Plan.

h) Publication of the Annual Progress Report

The Secretariat prepared and published the APR 2023/24 on its website and maintained an updated EITI website.¹⁰

3.3.3 Unforeseen activities:

During the financial year, participation in an online Anti-Corruption Training increased awareness of corruption risks in licensing and contracting, alongside engagement in the 14th Mineral Wealth Conference and the Citizens' Convention on Extractives (CCE) 2025, which strengthened dialogue on transparency, governance, and accountability in the extractives sector.

3.3.4 Outcomes/Impact

Under this objective, outcomes/impacts included:

- Improved operational stability and continuity of the MSG and its governance.
- Increased oversight and institutional capacity.
- Enhanced inter-institutional coordination.
- Increased institutional compliance with EITI data disclosure requirements across MDAs and extractive companies.
- Strengthen multi-stakeholder governance.

3.4 Overall Assessment & Cost of Implementation

Overall, UGEITI achieved important milestones in implementation of the work plan. UGEITI successfully delivered on the core EITI obligations including production of EITI report, Multi-stakeholder oversight, stakeholder engagement, public awareness, information-sharing and data accessibility.

The total cost of the budget for the work plan was UGX 4.347 billion. The Government of Uganda allocated UGX 3.282 billion under the national budget for EITI activities. There was a deficit of UGX 1.1 billion and this affected overall implementation of the activities set out in the work plan. Nonetheless, unforeseen support from Civil Society and other Development Partners which was mainly in-kind enabled the implementation of a number of activities including the launch of the third EITI report, newspaper publications and press conferences.

¹⁰ <https://www.ugeiti.org/wp-content/uploads/2025/03/UGEITI-Annual-Progress-Report-July-2023-June-2024.pdf>

Regional dissemination, critical sectoral studies and key capacity building activities were not covered as intended due to the funding constraints limiting the full attainment of some of the objectives. Going forward, emphasis will be placed on completing pending studies, strengthening compliance with reporting requirements, and expanding citizen-level engagement beyond Kampala. Attached as *Annex A* is the work plan with details of activities and costs.

4.0 ASSESSMENT OF PERFORMANCE AGAINST EITI REQUIREMENTS

In line with Requirement 7.4(a) (ii) of the EITI Standard, this section provides a self-assessment of Uganda's progress in meeting the EITI requirements. It highlights the advances made, identifies remaining gaps, and outlines steps being taken to strengthen alignment with the 2023 EITI Standard.

4.1 Requirement 1: MSG Oversight

The EITI requires effective multi-stakeholder oversight, including a functioning multi-stakeholder group that involves the full, active and effective engagement of government, companies and civil society.

The MSG consisting of Government, CSOs and Industry stakeholders met regularly during the year, convening four meetings, an annual retreat and numerous key stakeholder holder engagements to guide implementation. During this period, the MSG collectively updated its Terms of Reference and adopted both the Five-Year Strategic Plan (2025–2030) and the Three-Year Work Plan (2024–2027). The annual retreat was held to strengthen strategic oversight, monitor and review implementation as well as improve tenure arrangements to enhance accountability and continuity of membership. An updated MSG membership list, including alternates/proxies, gender balance, and sector representation, is provided in *Annex B*.

4.2 Requirement 2: Legal & Institutional Framework, Licensing and Beneficial Ownership

The EITI requires disclosures on how the extractive sector is managed, enabling stakeholders to understand the laws and procedures for the award of exploration and production rights; the legal, regulatory and contractual

frameworks that apply to the extractive sector; and the institutional responsibilities of the state in managing the sector

With regard to license allocation (Req. 2.2), licensing procedures are publicly disclosed, but the full list of awarded, transferred, and revoked licenses is not consistently published, limiting transparency. On contract disclosure (Req. 2.4), Uganda is partly compliant. The Third EITI Report disclosed the contract award procedures. While the MSG has held engagements to advance disclosure, legal reforms are still required to make publication mandatory. For beneficial ownership (Req. 2.5), the Uganda Registration Services Bureau (URSB) commenced collection and inclusion of BO information in the Companies Register following enactment of the Companies (Amendment) Act, 2022. Any member of the public can apply to URSB to access BO information of any duly registered company in Uganda.

4.3 Requirement 3: Exploration and Production

The EITI requires disclosures of information related to exploration and production, enabling stakeholders to understand the potential of the sector.

Uganda maintained compliance in disclosure of exploration data (Req. 3.1). The Third Report provided relevant contextual information on exploration activities, reserves, and major projects. Data on environmental impact disclosure (Req. 3.4) was shared more comprehensively in the fourth report. With a plan to intensify stakeholder engagements, more data is expected on greenhouse gas emissions and social/environmental expenditures in consequent reports. Improvements were noted through targeted capacity-building workshops conducted with the OAG and NEMA in the final quarter of the reporting year.

4.4 Requirement 4: Revenue Collection

The EITI requires comprehensive disclosure of company payments and government revenues from the extractive industries.

Uganda demonstrated compliance, with some weaknesses, in revenue reporting. The comprehensive disclosure of taxes and revenues (Req. 4.1) was achieved, as both company and Government disclosures were included in the Third Report. However, reconciliation gaps of up to 53% highlighted ongoing challenges with data timeliness and reliability. Regarding transportation revenues (Req. 4.4), this requirement was

not applicable since no material transportation revenues were reported during the period. On the level of disaggregation (Req. 4.7), Uganda is compliant, with data disaggregated by company, revenue stream, and government entity. For data quality and assurance (Req. 4.9), Uganda remains partly compliant. While the Independent Administrator applied the standard assurance procedures, incomplete submissions reduced overall reliability. Nonetheless, training workshops conducted in 2025 with DGSM, OAG, and reporting companies helped improve readiness for the Fourth Report.

4.5 Requirement 5: Revenue Allocation

The EITI requires disclosures of information related to revenue allocations, enabling stakeholders to understand how revenues are recorded in the national and, where applicable, subnational budgets, and to track social expenditures by companies.

Uganda continued to comply with the requirement on distribution of revenues (Req. 5.1), with all material revenues transferred to the Consolidated Fund as required by law. On sub-national transfers (Req. 5.2), statutory provisions for sharing revenues with sub-national Governments exist, disclosure of actual transfers was limited in the Third Report. Further stakeholder engagement will be conducted to work towards compliance Req 5.3 - revenue management and expenditures. Public finance information is available through MoFPED systems, extractives-linked budget execution and expenditure reporting remain inadequate.

4.6 Requirement 6: Social and Economic Spending

The EITI encourages disclosures of information related to revenue management and expenditures, helping stakeholders to assess whether the extractive sector is leading to the desirable social and economic and environmental impacts and outcomes.

With regards to social expenditures (Req. 6.1), mandatory social contributions were disclosed, while UGEITI continues to engage with companies to acquire voluntary contributions to the sector. Quasi-fiscal expenditures (Req. 6.2) were found not to be applicable, since no material quasi-fiscal expenditures were reported during the year. In terms of contribution to the economy (Req. 6.3), the Third Report provided

comprehensive information on the extractive sector's contribution to GDP, exports, and employment.

4.7 Requirement 7: Outcomes and Impact

The EITI Requirement related to outcomes and impact seek to ensure that stakeholders are engaged in dialogue about natural resource revenue management. EITI disclosures lead to the fulfilment of the EITI Principles by contributing to wider public debate.

Uganda made progress in demonstrating the impact of EITI. On public debate (Req. 7.1), compliance was achieved through dissemination activities, press coverage, and stakeholder workshops, which stimulated national discussion on extractive governance. For data accessibility (Req. 7.2), Uganda EITI reports are published online, with engagement ongoing towards implementation of systematic disclosure through government portals and full digital mainstreaming. On follow-up of recommendations (Req. 7.3), the MSG made considerable progress with details shared under Section 8.0 of this report. Finally, compliance with annual progress reporting (Req. 7.4) was achieved, as the APR for 2023/24 was prepared and published, demonstrating improvements in comprehensiveness and alignment with EITI standards.

5.0 ADDITIONAL COMMENTS ON UGEITI ACHIEVEMENTS

5.1 Contribution to Reforms

UGEITI contributed to extractive sector reforms by supporting dialogue and actions on key transparency issues, including contract disclosure, beneficial ownership, and revenue reconciliation. Notably, follow-up engagements with the Attorney General provided legal clarity to advance contract disclosure, reinforcing reform efforts in line with the EITI Standard.

5.2 Follow-up on Policy Implementation

UGEITI actively followed up on implementation of policy commitments arising from EITI findings and MSG decisions. This included tracking recommendations from the Third EITI Report, overseeing the preparation of an Addendum to

address reconciliation gaps, and aligning activities with the approved Strategic and Work Plans

5.3 Enhanced Coordination Beyond the MSG

Coordination has been strengthened with key stakeholder institutions outside the MSG through targeted engagements with the OAG, DGSM, URA, PAU, Planet Gold, CSO organisations and development partners. These engagements improved data quality, clarified institutional roles, and strengthened collaboration in EITI reporting and reform processes

5.4 Platform for Dialogue and Debate

EITI has provided a trusted platform for multi-stakeholder dialogue on extractives governance through MSG meetings, national dialogues, workshops, and annual events like the Citizens' Convention on Extractives. These forums enable open discussion on governance, equity, and sustainable management of natural resources in Uganda.

5.5 Improved Information Sharing

Through publication of EITI Reports, the Annual Progress Report, press briefings, articles, and online platforms, UGEITI enhanced access to credible information on the extractives sector. This supported informed decision-making by policymakers, civil society, media, and the general public.

5.6 Identification of Key Sector Challenges

The EITI process helped identify critical challenges affecting the extractives sector, including revenue reconciliation gaps, financing constraints for artisanal and small-scale miners, and limited mineral value addition due to inadequate refining capacity. These findings continue to inform policy discussions and follow-up actions.

5.7 Public Awareness and Accountability

UGEITI increased public awareness and accountability through dissemination of EITI findings via media engagements, stakeholder workshops, and national outreach activities. Public reporting exposed discrepancies and governance gaps, strengthening demand for accountability in the management of extractive resources.

5.8 Enhanced Stakeholder Engagement and Civic Space

As a result of EITI implementation, there is sustained and expanded civic space through enabling meaningful participation of civil society, communities, and other stakeholders in extractive governance. Engagements such as the CCE, ASM-focused events, and capacity-building workshops strengthened inclusive participation and reinforced trust in the EITI process and Government's intentions for the sector.

6.0 SPECIFIC STRENGTHS AND WEAKNESSES IDENTIFIED IN THE EITI PROCESS

Uganda's EITI implementation during FY 2024/2025 recorded notable gains in fiscal transparency, sector governance, and public engagement. While sustained disclosures and strengthened institutional frameworks reflect key strengths, persistent challenges underscore the need for deeper reforms to enhance enforcement, compliance, and long-term sustainability.

6.1 Strengths of Implementation

6.1.1 Diversity of the MSG Membership

- The MSG continues to reflect broad and balanced representation from Government, Industry, and Civil Society, ensuring inclusive decision-making.
- Membership includes key institutions such as MoFPED, MEMD, URA, DGSM, OAG, PAU, major extractive companies, and active civil society organisations, enabling comprehensive oversight of the extractive sector.
- Regular MSG meetings and the annual retreat in Hoima strengthened cross-constituency dialogue and collective ownership of EITI decisions

6.1.2 Strong Affiliation with the Global EITI Framework

- Uganda maintained active engagement with the EITI International Secretariat, including the high-level visit by the EITI Executive Director in August 2024, thereby reinforcing international credibility.
- Implementation during FY 2024/2025 remained aligned with the 2023 EITI Standard, including timely reporting, follow-up on validation issues, and preparation of the Fourth EITI Report.

- Participation in regional and international EITI training and workshops enhanced peer learning and adherence to global best practices.

6.1.3 Strong Commitment and Internal Capacity of the MSG and Secretariat

- The MSG demonstrated strong commitment through several MSG meetings, an annual retreat, and active engagement in strategic planning and oversight monitoring of activities.
- The Secretariat maintained full operational capacity, coordinating reporting, stakeholder engagements, and follow-up on recommendations despite resource constraints.
- Continuous capacity building was undertaken through training workshops with OAG, DGSM, URA, and participation in technical trainings on anti-corruption, extractive audits, and revenue forecasting

6.1.4 Effective Management and Leadership

- Strategic leadership was strengthened through the approval of the Five-Year Strategic Plan (2025–2030) and the Three-Year Work Plan (2024–2027).
- The adoption of an Addendum to the Third EITI Report to address the 53% reconciliation gap demonstrated proactive problem-solving and accountability.
- High-level political engagement, including meetings with the Minister of State for Energy and Mineral Development (Minerals) and confirmation of an EITI Champion, reinforced leadership and policy support.

6.1.5 Availability of Office Infrastructure and Operational Support

- The UGEITI Secretariat operated from a fully functional office, equipped with essential infrastructure to support coordination, reporting, and stakeholder engagement.
- Adequate administrative systems enabled regular meetings, virtual engagements, data management, and publication of reports, including the APR and EITI Reports.
- Stable operational support ensured continuity of implementation and effective servicing of the MSG throughout the reporting period.

6.1.6 Collaboration with Key Development Partners.

- High-level dialogues with development partners (EU, World Bank, UN) positioned UGEITI as a credible national platform for extractive governance.

6.2 Weaknesses and Challenges

6.2.1 Absence of a Legal Mandate

- EITI implementation in Uganda continues to rely on Cabinet directives and administrative arrangements, rather than a dedicated EITI law. This limits the Secretariat’s authority to compel timely and complete data submissions, as reflected in delayed and incomplete reporting by some entities during preparation of the Third and Fourth EITI Reports.

6.2.2 Limited Institutional Autonomy

- UGEITI is hosted within Government structures, which constrains its operational independence, particularly in enforcing compliance and follow-up on recommendations. Decisions related to funding, staffing, and enforcement often depend on broader Government processes, affecting responsiveness and implementation speed.

6.2.3 Inadequate Technical Capacity among Reporting Entities

- Persistent data quality and reconciliation challenges, including the 53% reconciliation gap in the Third EITI Report, point to weak technical capacity in some MDAs and companies. Despite training workshops reporting entities - particularly in template completion, certification, and audit readiness.

6.2.4 Inadequate and Unpredictable Funding.

- Funding constraints affected implementation during FY 2024/2025, leading to delayed regional dissemination activities, postponed studies, and limited outreach beyond Kampala. Dependence on development partners poses a risk to long-term sustainability if domestic financing is not strengthened.

6.2.5 Overlap of Institutional Mandates

- Multiple institutions—including DGSM, URA, MEMD, PAU, and URSB—play complementary roles across the extractives value chain. Variations in data generation, reporting timelines, and information systems have, at times, resulted in differences in mineral export and revenue data. While ongoing inter-agency coordination and information-sharing mechanisms

are yielding positive results, further strengthening institutional alignment and harmonisation remains essential to ensure consistent, comprehensive, and timely disclosures.

6.2.6 Limited Enforcement Mechanisms for Ensuring Compliance

- UGEITI lacks direct sanctions or enforcement tools to address non-reporting or late reporting by companies and MDAs. As noted in the APR, compliance largely depends on goodwill and engagement rather than enforceable penalties, affecting data completeness and reliability.

6.3 Overall Assessment

Despite ongoing challenges, UGEITI made meaningful progress in strengthening transparency and governance in the extractive sector. Institutional frameworks were reinforced, public dialogue expanded, and international credibility sustained. Going forward, improved enforcement, broader outreach, and stronger private-sector compliance remain key priorities for the MSG.

7.0 PROGRESS AGAINST THE RECOMMENDATIONS

7.1 Progress regarding the last three EITI reports

UGEITI recognizes that regular follow-up on past recommendations is essential for continuous improvement and for maintaining international validation. The table below consolidates overlapping recommendations from the First (2019/20), Second (2020/21), and Third (2021/22) EITI Reports, and summarizes progress as of June 2025 in the table below:

Table 1: Assessment of Progress on Recommendations

| Thematic Area & Recommendation (Grouped across Reports) | Originating Report(s) | Status/ Progress Reported (as of June 2025) |
|---|---|--|
| <p>1) Mainstreaming & Systematic Disclosure of EITI Data</p> <ul style="list-style-type: none"> • Publish EITI-related data (revenues, budget allocations) on a centralised/open-data platform. • Develop an open EITI database in the Government Agencies. • Create a roadmap for mainstreaming and open data (Req. 7.2). | <p>FY 2019/20 (Rec 1); FY 2020/21 (Rec 4)</p> | <p>The process is ongoing and UGEITI is engaging stakeholders including the World Bank to support the development of a roadmap and a platform for mainstreaming EITI data in line with its Open Data Policy.</p> <p>UGEITI website also hosts reports, MSG minutes and key datasets.</p> |
| <p>2) Public Disclosure of Mining License Register / Full Text of Licenses</p> <p>Make the mining cadastre and license texts freely accessible online (Req. 2.4).</p> | <p>FY 2019/20 (Rec 2); FY 2020/21 (Rec 5)</p> | <p>DGSM online cadastre now provides license details and coordinates. The full-text license documents are accessible at a reasonable fee of UGX 200,000 which is approximately USD \$56. Engagements are still ongoing on ensuring access of the full-text licenses at no cost.</p> |
| <p>3) Public Disclosure of Petroleum & Mining Contracts/PSAs</p> <p>Publish all Production Sharing Agreements and mining contracts (Req. 2.4a).</p> | <p>FY 2019/20 (Rec 3); FY 2020/21 (Rec 6)</p> | <p>Engagements have been held to discuss the mode and extent of disclosure and MEMD has committed to ensure disclosure once these are resolved. The companies remain committed to full disclosure of the PSAs.</p> |
| <p>4) Data Quality & Assurance</p> <p>Enforce template certification and audit for both company and Government data (Req. 4.9).</p> <ul style="list-style-type: none"> • Establish assurance processes for Government reporting templates. | <p>FY 2019/20 (Rec 4); FY 2020/21 (Rec 7)</p> | <p>UGEITI has been engaging stakeholders to sensitize them on the process of template certification and compliance. UGEITI has adopted awards to recognise compliant entities for purposes of incentivizing compliance.</p> |

| Thematic Area & Recommendation (Grouped across Reports) | Originating Report(s) | Status/ Progress Reported (as of June 2025) |
|---|--|--|
| | | In addition, various training sessions have been organised to build the capacity of the reporting entities. Including OAG and DSGM which was held on 3rd April and 7th May respectively. |
| <p>5) Accuracy of Export Data (Gold & Minerals)</p> <ul style="list-style-type: none"> • Cross-check and reconcile export records between DGSM and URA. • Undertake a study on gold production, refining and exports (Req. 3.2, 3.3). | FY 2019/20 (Rec 5); FY 2020/21 (Rec 2) | <p>Meetings between DGSM and URA have been held to discuss and resolve the discrepancies in export data. Furthermore, ASMs and the relevant institutions of government including MEMD, URA, MoFPED, BoU have been held to discuss and harmonise the gold production data and exports to reduce discrepancies.</p> <p>At their 37th meeting held on 22nd May 2025, the MSG nominated a committee to engage the responsible MDAs to streamline mineral export data including gold.</p> <p>UGEITI has partnered with the World Bank to conduct a study on gold production in the country to address the recommendation.</p> |
| <p>6) Beneficial Ownership (BO) Disclosure</p> <ul style="list-style-type: none"> • Establish and maintain a public BO register of extractive companies (Req. 2.5). • Introduce assurance and due diligence for BO data. | FY 2019/20 (Rec 6); FY 2020/21 (Rec 8) | <p>Uganda Registration Services Bureau (URSB) has launched an online BO register for all companies (2023).</p> <p>UGEITI is working with URSB to improve the scope of data, accessibility and procedures to ensure quality data.</p> |

| Thematic Area & Recommendation (Grouped across Reports) | Originating Report(s) | Status/ Progress Reported (as of June 2025) |
|--|---|--|
| 7) Informal/ASM Sector Data Conduct updated study on employment and economic contribution of Artisanal & Small-scale Mining (ASM) (Req. 6.3). | FY 2020/21 (Rec 1) | Refer to ToRs of WB study & UGEITI engagements are ongoing to conduct a follow up study on the economic contribution of ASMs. |
| 8) Awarding of Licenses Independent audit of mining license award process to reduce risk of awarding to weak applicants (Req. 2.2). | FY 2020/21 (Rec 3) | Under Uganda’s new Mining and Minerals Act, 2022, the power to award mining licences was shifted from the Commissioner (in the old law) to the Minister (Section 17). This change is meant to strengthen the awards process and reduce the chances of licences being given to weak or unqualified applicants. |
| 9) Environmental Transparency & Greenhouse Gas (GHG) Emissions – Disclose data on environmental impacts, social/environmental expenditures, and greenhouse-gas emissions from extractive activities (aligned with 2023 EITI Standard). | 2021/22 (Contextual recommendations; MSG/OAG updates) | UGEITI has engaged various stakeholders to sensitize and create public awareness (NGRI workshop), Planet Gold and Energy Transition workshops (Oct 2024) discussed mercury reduction and energy transition. UGEITI has engaged NEMA and MoW to provide this information for inclusion in the next report. |
| 10) Disclosure of Project Costs (EITI Requirement 4.10) | FY 2021/2022 | UGEITI undertook training on 11th June 2025 to build the capacity of reporting entities on reporting on project costs in the next report. |

Note: The UGEITI Report for FY 2022/23 was published in September 2025, immediately after the reporting cycle covered by this APR (July 2024 – June 2025). Follow-up on the recommendations from that report will be captured in the next Annual Progress Report (FY 2025/26).

7.2 Implementation of Beneficial Ownership (Bo) Disclosure Plans

Since joining EITI, Uganda has shown commitment in implementation of BO disclosure to the extent that UGEITI has contributed to reforms in the Company's Act to ensure that the data on beneficial owners is captured and disclosed by the relevant authority. In addition, a roadmap was developed to implement Beneficial Ownership (BO) disclosure in line with Requirement 2.5 of the EITI Standard. The purpose of this roadmap was to ensure that all companies holding or applying for extractive licenses disclose the natural persons who ultimately own or control them. Although the original target was 2020, the commitment remains ongoing, and this evaluation reviews progress and remaining gaps during FY 2024/25.

The Uganda Registration Services Bureau (URSB) operationalised the BO Register and began collecting information from companies across different sectors. Extractive companies are legally required to submit BO data under the Companies (Amendment) Act, 2022, which introduced explicit provisions on beneficial ownership. However, as of June 2025, coverage of extractive sector companies remained incomplete. While many mining and petroleum license holders submitted information, the quality and consistency of BO data varied, and many disclosures were either partial or lacked adequate verification. Recognising the strategic importance of the extractive sector, the MSG continued to advocate for prioritisation of extractive companies in the BO framework.

To address these gaps, the Secretariat engaged with URSB and MEMD to strengthen collection and verification procedures by organising a capacity-building workshop for stakeholders and MSG members to improve understanding of BO disclosure requirements in the previous reporting cycle.

In terms of accessibility, the URSB BO Register is accessible through a prescribed process where any member of the public can file an application to search BO information of any company. Civil society stakeholders have raised concerns about the accessibility and usability of this information, particularly for accountability and monitoring purposes.

The MSG is working with URSB to ensure higher-quality and more comprehensive BO information easily accessible to the public.

8.0 MULTI-STAKEHOLDER GROUP PARTICIPATION IN APR PREPARATION

In accordance with Requirement 7.4(b) of the EITI Standard, the preparation of this Annual Progress Report was carried out through a participatory and inclusive process that engaged all constituencies represented on the MSG. The Secretariat drafted the report under the guidance of the MSG, drawing on quarterly progress reports and activity briefs that had been shared throughout the year.

The Government constituency contributed with representatives from MoFPED, MEMD, PAU, DGSM, URSB, and the OAG, providing updates on data submissions, policy reforms, and follow-up on recommendations. The industry constituency, through its MSG representatives, shared feedback on company participation in reporting and reconciliation challenges. The Civil Society constituency also played a significant role. Through MSG discussions and participation in thematic workshops such as the Citizens' Convention on Extractives, CSOs raised perspectives on contract transparency, community engagement, and environmental concerns.

To ensure credibility and consensus, members of the MSG were involved in the activities leading to the preparation of the APR and overall, the preparation of this APR demonstrated inclusivity and transparency. By integrating the perspectives of Government, industry, and civil society, the process strengthened MSG ownership and enhanced the report's credibility as a balanced account of UGEITI's progress during FY 2024/25.

9.0 WAY FORWARD (FY 2025/2026)

Going forward, UGEITI intends to maintain momentum and ensure sustainability through the following:

- a) Finalizing and publishing the Fourth EITI Report (FY 2022/2023) by November 2025.
- b) Utilizing the Five-Year Strategic Plan (2025–2030) and Three-Year Work Plan to guide the next implementation cycle.
- c) Mobilizing additional support and funding to reduce the funding deficit regarding the work plan budget.

- d) Intensifying regional outreach and community sensitization in high-mineral regions to strengthen local demand for accountability.
- e) Enhancing capacity building for companies and Government agencies to ensure timely and accurate data reporting.
- f) Deepening international engagement with the EITI International Secretariat, the EU, the World Bank and other development partners for technical and financial support.

10.0 CONCLUSION

The FY 2024/2025 marked significant progress in advancing transparency and accountability within Uganda's extractive sector. The successful launch of the Third EITI Report, the initiation of the Fourth Report, the development of a Five-Year Strategic Plan and three-year work plan have laid a strong foundation for the next phase of implementation. UGEITI remains firmly committed to ensuring that Uganda's natural resources are managed transparently and sustainably for the benefit of all citizens.

Annexes

ANNEX A: Cost of Implementation

| NO. | Activities | Outputs/targets | Timeline | Planned Expenditure (UGX) | Approved Expenditure (UGX) |
|---|--|--|------------------------|---------------------------|----------------------------|
| OBJECTIVE 1.0: ENHANCE TRANSPARENCY IN THE EXTRACTIVE SECTOR | | | | | |
| 1.1 | Disseminate the EITI report findings and sensitise the public about the EITI implementation process | EITI report findings disseminated | Jul 24 - Jun 25 | 370,600,000 | 208,822,712 |
| | a) Engage with Members of Parliament to share report findings i.e. the relevant committee of Parliament preferably the Natural Resources Committee. | 1) One meeting held; and 2) Recorded Minutes. | Q4 | 87,300,000 | Unfunded |
| | b) Organize a press conference to publicize the EITI report and follow up with dissemination on radio stations, tv talk shows and newspaper articles. | 1) One press conference held; 2) Eight newspaper articles published; and 3) One radio and One TV show held. | Q2 | 79,600,000 | 5,800,000 |
| | c) Print copies of the EITI Report and Monograph/Summary for distribution to various stakeholders. | 1) 20 copies of the EITI Report printed; and 2) 500 copies of Monograph printed. | Q2 | 25,000,000 | 5,000,000 |
| | d) Undertake regional outreach engagements to disseminate the EITI report findings. i.e. Hold workshops in six regions of the country | 1) 6 regional workshops held; and 2) Reports prepared and published. | Q2-Q4 | 132,000,000 | 127,728,786 |
| | e) Prepare, print and disseminate fact sheets or briefs on developments in the extractive sector i.e. information to include contract and license allocation procedures etc. | 1) Two fact sheets prepared and published online; and 500 copies of each version printed. | Q3 | 3,000,000 | 21,500,000 |
| | f) Hold strategic meetings/workshop with key institutions of Government for high level buy-in and commitment including MEMD, DGSM and OAG etc; | 1) One high level meeting with top management officials; and 2) a follow up workshop with technical officers held. | Q3 | 28,950,000 | 14,836,623 |

| NO. | Activities | Outputs/targets | Timeline | Planned Expenditure (UGX) | Approved Expenditure (UGX) |
|------------|---|---|------------------------|---------------------------|----------------------------|
| | g) Prepare Quarterly EITI implementation progress reports for MOFPED, MEMD and the general public. i.e. for circulation to MOFPED leadership, Champions, PS/ST, PS MEMD, Ministry Newsletter. | 1) One quarterly progress report prepared for TPD/MOFPED; 2) one quarterly progress brief prepared for MEMD; and 3) one activity report prepared for MOFPED Times Newsletter. | Q1-Q4 | 8,000,000 | Secretariat) |
| | h) Maintain an updated EITI country website. | Website maintained and regularly updated. | Q1-Q4 | 6,750,000 | 2,000,000 |
| | i) Launch the EITI Report | EITI Report | Q4 | 60,000,000 | 31,957,303 |
| 1.2 | Undertake studies to support revenue mobilisation and management | Study reports prepared | Jul 24 - Jun 25 | 660,000,000 | 58,732,000 |
| | a) Conduct a study to inform the digitalisation and mainstreaming of EITI | 1) Feasibility study produced; and 2) Prototype of data mainstreaming system developed. | Q4 | 240,000,000 | Unfunded |
| | b) Conduct a study on the economic potential of Uganda's mining sector | 1) Report prepared; and 2) Findings disseminated. | Q4 | 180,000,000 | Unfunded |
| | c) Conduct a study on the revenue potential of Uganda's ASM in the gold sector | 1) Report produced; and 2) Findings disseminated. | Q4 | 180,000,000 | Unfunded |
| | d) Finalise the review and adoption of the EITI Strategic Plan for 2025/26 - 2029/30 | Strategic Plan prepared and published. | Q3 | 10,000,000 | 58,732,000 |
| | e) Develop a Theory of Change for UGEITI | Theory of Change developed. | Q3 | 50,000,000 | Secretariat |
| 1.3 | Prepare and publish the fourth UGEITI report covering FY 2022/2023. | Fourth UGEITI report prepared & published | Jul 24 - Jun 25 | 519,700,000 | 390,346,523 |
| | a) Develop and approve ToRs for the production of the fourth EITI report i.e. with the support of an Independent Administrator | Terms of Reference prepared and circulated. | Q2 | 13,000,000 | 8,320,000 |

| NO. | Activities | Outputs/targets | Timeline | Planned Expenditure (UGX) | Approved Expenditure (UGX) |
|--|--|---|------------------------|---------------------------|----------------------------|
| | b) Conduct a scoping study of Uganda's extractive sector to support the production of the EITI report i.e. facilitated by the Independent Administrator | 1) Various meetings held with stakeholders; and 2) Scoping report prepared. | Q3 | 200,000,000 | 184,559,960 |
| | c) Organise workshops to train the relevant companies and government agencies how to complete the data fillings and templates for purposes of reporting payments and receipts in FY 2022/23. | 1) Training workshop held; 2) Templates prepared; and 3) Training report prepared. | Q4 | 20,700,000 | 17,352,000 |
| | d) Conduct reconciliation exercise of the collected data to identify and address any discrepancies i.e. with the technical support of an Independent Administrator | 1) Data reconciliation meetings with stakeholders; and 2) Reconciliation report prepared. | Q4 | 200,000,000 | 162,650,563 |
| | e) Convene MSG meeting to review the draft EITI Report. | 1) MSG meeting held; and 2) Reviewed draft EITI Report | Q4 | 13,000,000 | 8,732,000 |
| | f) Convene MSG meeting to finalise and approve the EITI Report. | 1) MSG meeting held; and 2) Final draft of EITI Report | Q4 | 13,000,000 | 8,732,000 |
| | g) Launch the EITI Report | EITI Report | Q4 | 60,000,000 | FY 2025/2026 |
| OBJECTIVE 2.0: STRENGTHEN REVENUE MANAGEMENT AND ACCOUNTABILITY | | | | | |
| 2.1 | Monitor and track the progress made in addressing the recommendations of the previous UGEITI report and the Validation report | Report prepared | Jul 24 - Jun 25 | 52,000,000 | 8,320,000 |
| | a) Hold meetings with key stakeholders to discuss and address the recommendations of EITI reports i.e. meetings with CSOs, Industry players and Government. | 1) Meetings held; and 2) Minutes prepared. | Q1-Q4 | 30,000,000 | Secretariat |
| | b) Organize one on one follow-up meetings with each concerned institution in order to address recommendations i.e. These should include among others DGSM, PAU, | 1) Meetings held; and 2) Minutes Prepared. | Q1-Q4 | 2,000,000 | Secretariat |

| NO. | Activities | Outputs/targets | Timeline | Planned Expenditure (UGX) | Approved Expenditure (UGX) |
|---|---|--|------------------------|---------------------------|----------------------------|
| | DOP and URA. | | | | |
| | c) Organise a workshop with all relevant stakeholders to take stock of the progress on recommendations from the EITI Report and Validation Report | 1) Workshop held; and 2) Report prepared. | Q4 | 20,000,000 | 8,320,000 |
| OBJECTIVE 3.0: BUILD THE OPERATIONAL AND TECHNICAL CAPACITY OF THE MSG AND SECRETARIAT | | | | | |
| 3.1 | UGEITI engagements to support EITI implementation | Reports prepared | Jul 24 - Jun 25 | 387,000,000 | 210,589,990 |
| | a) Convene meetings for MSG members to review progress in implementing the workplan. | 1) Eight MSG meetings held; and 2) Meeting minutes prepared. | Q1-Q4 | 104,000,000 | 183,541,000 |
| | b) Review the Terms of Reference and membership status of the MSG. | 1) MSG workshop organised; and 2) Terms of Reference reviewed. | Q3 | 13,000,000 | FY 2025/2026 |
| | c) Convene a retreat for MSG members to review the Annual Progress Performance and finalise Annual Progress Report (APR). | 1) MSG Retreat convened; and 2) Report prepared. | Q3 | 120,000,000 | Unfunded |
| | d) Participate in EITI related conferences, international board meetings, regional meetings and other global engagements. | 1) Conferences attended; and 2) Reports prepared. | Q1-Q4 | 150,000,000 | 27,048,990 |
| 3.2 | Capacity development of MSG | Reports prepared & Stakeholders training conducted | Jul 24 - Jun 25 | 58,000,000 | 0 |
| | a) Conduct a refresher training for members of the MSG on EITI reporting | 1) Training undertaken; 2) Report prepared | Q3 | 15,000,000 | FY 2025/2026 |
| | b) Conduct a training on the EITI Standard requirements particularly for technical officers of Government Institutions under the MSG i.e. MEMD, DGSM, URA, PAU, MOFPED and NEMA etc | 1) Training conducted; and 2) Reports prepared. | Q3 | 15,000,000 | Unfunded |

| NO. | Activities | Outputs/targets | Timeline | Planned Expenditure (UGX) | Approved Expenditure (UGX) |
|------------|--|---|------------------------|----------------------------------|-----------------------------------|
| | c) Conduct a training on EITI topical issues in the extractive industries. Training specifically for industry MSG members and their technical officers to promote compliance and responsiveness. | 1) Training conducted; and 2) Report prepared. | Q3 | 13,000,000 | Unfunded |
| | d) Conduct a training on the current EITI Standard aimed to support implementation of provisions in the new Standard i.e. OAG, IGG, NFA to support reporting on recoverable costs, anti-corruption measures, energy transition efforts, etc. | 1) Training conducted; and 2) Report prepared. | Q3 | 15,000,000 | Unfunded |
| 3.3 | UGEITI Secretariat Operations | Support to MSG provided | Jul 24 - Jun 25 | 2,300,000,000 | 2,385,482,264 |
| | a) UGEITI Secretariat Operations - Including secretariat staff salaries and non-wage expenses including office equipment, stationery, sitting allowances, computers, fuel and transportation costs, internet subscription, zoom and other software tools, research funding and annual subscription fees for EITI membership. | 1) Staff enumerated; and 2) Secretariat activities undertaken; and 3) Membership cleared. | Q1-Q4 | 2,300,000,000 | 2,385,482,264 |
| | Grand Total (UGX) | | | 4,347,300,000 | 3,282,293,489 |

Annex B - List of Uganda EITI Multi-Stakeholder Group

| Gender | First name | Last name | Constituency | Organisation | Email |
|--------|----------------|-----------------------------|--------------|---|------------------------------|
| M | Moses | Kaggwa (Chairperson) | Government | Ministry of Finance, Planning and Economic Development | Moses.kaggwa@finance.go.ug |
| M | Anthony | Okello (proxy) | Government | | Anthony.Okello@finance.go.ug |
| M | Robert | Tugume | Government | Ministry of Energy and Mineral Development (Department of Petroleum) | r.tugume@petroleum.go.ug |
| M | Winston | Mugumya | Government | | w.mugumya@petroleum.go.ug |
| M | David | Sebagala | Government | Ministry of Energy and Mineral Development (Department Geological Survey and Mines) | sebdavds@gmail.com |
| M | Malik | Ntale | Government | | malik.ntale@minerals.go.ug |
| F | Allen | Bucyana | Government | Ministry of Justice and Constitutional Affairs | allenbucyana@gmail.com |
| F | Racheal | Rwomushana (Proxy) | Government | | rachealrt@yahoo.co.uk |
| F | Gloria | Akatuhurira | Government | Uganda Revenue Authority | gakatuhurira@ura.go.ug |
| M | Tracy | Basiima (Proxy) | Government | | tbasiima@ura.go.ug |
| F | Sandra | Kaitare | Government | Uganda Revenue Authority | skaitare@ura.go.ug |
| M | Lawrence | Muwonge (Proxy) | Government | | lmuwonge@ura.go.ug |
| M | Timothy | Tibesigwa | Government | Ministry of Works and Transport | Ttibesigwa2000@yahoo.co.uk |

| Gender | First name | Last name | Constituency | Organisation | Email |
|--------|---------------------------------|-----------------------------|-------------------|---|---------------------------------|
| M | Bright | Mutambuzi (Proxy) | Government | | brightmutambuzi@gmail.com |
| M | Jacob | Opolot | Government | Bank of Uganda | jopolot@bou.or.ug |
| M | Peter | Rumanzi (Proxy) | Government | | pirumanzi@bou.or.ug |
| M | Jonan | Kandwanaho | Government | National Planning Authority | jonan.kandwanaho@gmail.com |
| M | Abraham | Muwanguzi (Proxy) | Government | | abraham.muwanguzi@npa.go.ug |
| M | Clovice Bright | Irumba | Government | Petroleum Authority of Uganda | Clovice.irumba@pau.go.ug |
| M | James | Musherure (Proxy) | Government | | james.musherure@pau.go.ug |
| M | Isaac | Ntujju | Government | National Environment Management Authority | isaac.ntujju@nema.go.ug |
| F | Jane | Atwongyeire (Proxy) | Government | | jane.atwongyeire@nema.go.ug |
| M | Callist | Tindimugaya | Government | Ministry of Water and Environment | callist_tindimugaya@yahoo.co.uk |
| M | Albert | Orijabo | Government | | albert.orijabo@gmail.com |
| M | Onesmus | Mr. Onesmus Mugenyi | Civil Society | Advocates Coalition for Environment and Development | o.mugenyi2@gmail.com |
| F | Winfred | Ms. Winfred Ngabirwe | Civil Society | Global Rights Alert | winnie.ngabirwe@gmail.com |

| Gender | First name | Last name | Constituency | Organisation | Email |
|--------|-----------------|----------------------|---------------|--|------------------------------------|
| M | Siragi | Magara Luyima | Civil Society | Civil Society Budget Advocacy Group | magarasiragi2013@gmail.com |
| F | Margaret | Lomonyang | Civil Society | Karamoja Women Umbrella Organization | mlomonyang@gmail.com |
| M | Gard | Benda | Civil Society | World Voices Uganda | benda.worldvoices@gmail.com |
| M | Henry | Bazira (Proxy) | Civil Society | Water Governance Institute (WGI) | watergovinst@gmail.com |
| F | Regina | Navuga (Proxy) | Civil Society | Southern & Eastern Africa Trade Information and Negotiations Institute (SEATINI) | nregina@seatiniuganda.org |
| M | Paul | Twebaze (Proxy) | Civil Society | Pro-Biodiversity Conservationist of Uganda | twebbzo@yahoo.com |
| M | Paul | Mulindwa (Proxy) | Civil Society | Kitara Civil Society Organisations' Network | mulindwasenior@gmail.com |
| M | Sam | Mucunguzi (Proxy) | Civil Society | Citizens' Concern Africa | samzoo2014@gmail.com |
| M | Patrick | Oghittu | Industry | TotalEnergies | patrick.oghittu@totalenergies.com |
| M | Faustine | Mugisha (Proxy) | Industry | | faustine.mugisha@totalenergies.com |
| M | Noah | Obad | Industry | Oranto Petroleum Uganda | obadnoah10@gmail.com |
| F | Dorcus | Akidi (Proxy) | Industry | | akidi.dorcuswinnie@gmail.com |

| Gender | First name | Last name | Constituency | Organisation | Email |
|--------|-------------------|--------------------|--------------|---|-------------------------------|
| M | Tom | Buringuriza | Industry | Armour Energy Uganda | tburinguriza@dgrglobal.com.au |
| M | Emmanuel | Mugagga | Industry | Uganda National Oil Company | emmanuel.mugagga@unoc.co.ug |
| F | Emilly | Nakamya (Proxy) | Industry | | emilly.nakamya@unoc.co.ug |
| M | Ma | Jin | Industry | China National Offshore Oil Corporation Uganda | |
| F | Sandra | Mwesigye (Proxy) | Industry | | sandra.m@cnoocuganda.com |
| F | Ingrid | Muhanguzi (Proxy) | Industry | | ingrid.m@cnoocuganda.com |
| M | Elly | Karuhanga | Industry | Uganda Chamber of Mines and Petroleum | ellykaruhanga@gmail.com |
| M | Aggrey | Ashaba (Proxy) | Industry | | aashaba@gccservices.com |
| F | Jennifer | Hinton | Industry | Jervois Mining | jhinton@gmail.com |
| M | Humphrey | Asiimwe (Proxy) | Industry | Uganda Chamber of Mines and Petroleum | hasiimwe@ucem.ug |
| M | John Bosco | Bukya | Industry | Uganda Association of Artisanal & Small-Scale Miners Limited | johnboscobukya@gmail.com |
| M | Emmanuel | Kibirige (Proxy) | Industry | | Ekibirige20@gmail.com |