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NOT FOR SALE

CONGO'S FORESTS MUST BE PROTECTED FROM
THE FOSSIL FUELS INDUSTRY



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In Democratic Republic of Congo one of the world's largest protected forests, a UNESCO-designated World Heritage site, is at risk from oil exploration. The story is unfortunately a familiar one, featuring offshore companies run by hidden owners signing opaque deals to exploit Congo's resources, simultaneously putting its pristine natural habitats at risk. A politically connected individual, a convicted fraudster and a businessman embroiled in the Brazilian 'Car Wash' corruption scandal have all been in the mix. If even World Heritage status cannot protect fragile ecosystems from oil, it sends a message that the entire planet is up for sale to the fossil fuels industry, with devastating consequences for the fight against climate change.

On the 1st of February 2018, Congo's President Joseph Kabila signed ordinance 18/010, giving the Compagnies Minières Congolaise (COMICO) the go ahead to explore for oil in Congo's swampy and tropical Cuvette Central.¹

The terms of the deal remain unknown because the oil ministry has not published the contract inside the 60-day deadline stipulated by the country's oil law.² Some of COMICO's historic owners are controversial and its current ownership is unclear, but today it is held in part by a Guernsey-registered company owned by the South African diamond magnate Adonis Pouroulis. One of the three oil blocks assigned to COMICO encroaches on Salonga National Park, the largest protected tropical rainforest in Africa and a UNESCO World Heritage Site that is home to up to 40 percent of the world's bonobo population and several rare and endangered species.³

While COMICO's production sharing agreements (PSAs) were initially signed over 10 years ago, the company was not able to begin exploration until the president signed the ordinance in February.⁴ It remains unclear why the PSAs have been revived now. What is

undeniable, however, is that the terms of the contract between COMICO and the Congolese government, the identity of the real owners of COMICO, and the company's plans for operating in an area including a fragile UNESCO-protected World Heritage site all remain shrouded in secrecy.⁵

OPACITY IN A TIME OF CRISIS

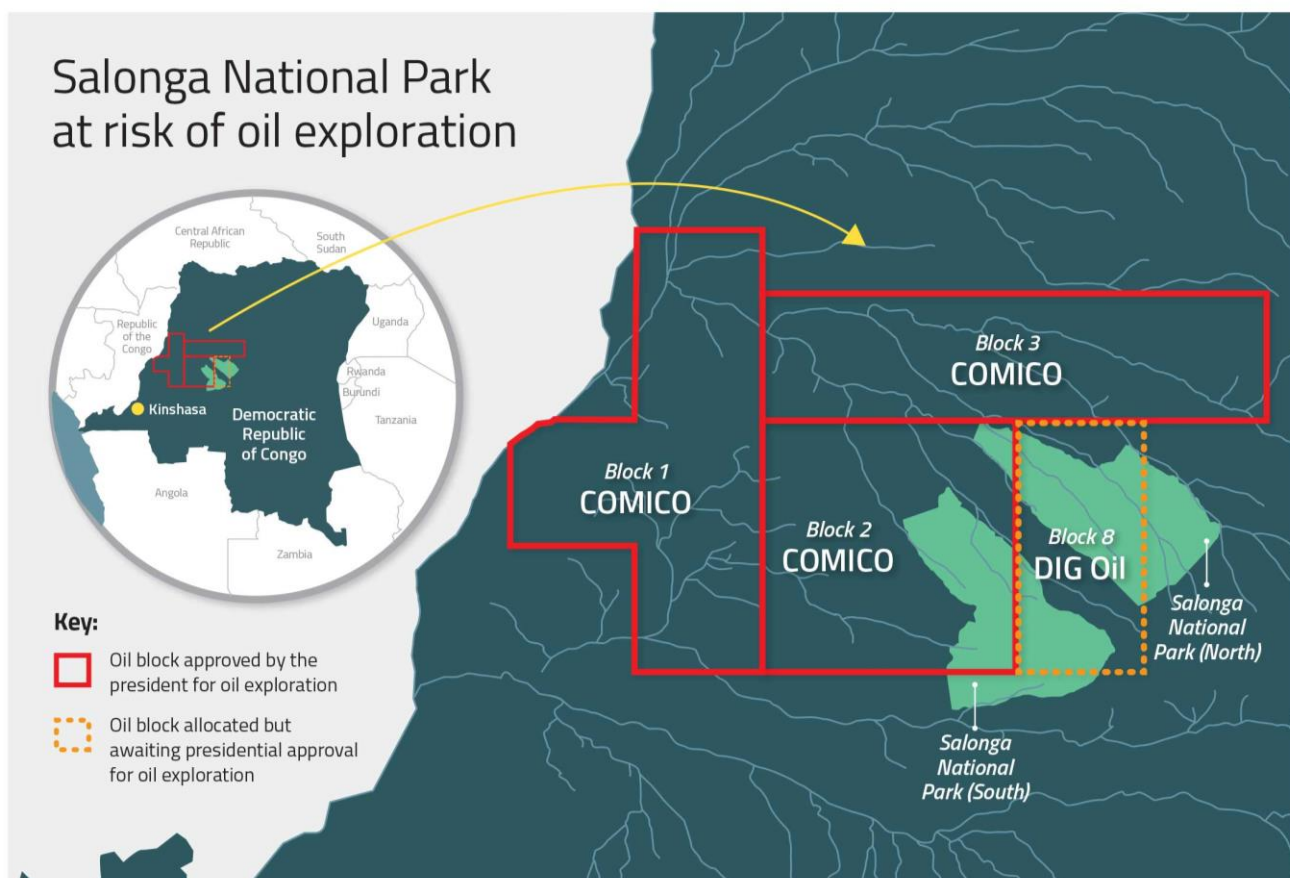
COMICO's full historic and present ownership is unclear, though Global Witness has been able to piece together some information about its owners from Congolese public records and corporate documentation. Today the company is 40 percent owned by Guernsey-registered Centrale Oil & Gas, an entity that forms part of South African Adonis Pouroulis' business empire.⁶ The other current shareholders and beneficiaries of COMICO remain a mystery. When contacted by Global Witness, lawyers representing Mr Pouroulis and Centrale Oil & Gas said confidentiality around the ownership of COMICO was for "legitimate commercial reasons unconnected with bribery and corruption or other financial crime", and they stated "none of the other beneficial

owners have been convicted of bribery, corruption, fraud or other financial crime.”

The opacity around the ownership of the company is matched by the lack of transparency surrounding COMICO’s contract. Congo’s oil law, passed in 2015, stipulates that new contracts should be published on the oil ministry website and in the country’s *Journal Officiel* within sixty days of being approved.⁷ Sixty days after President Kabila signed the ordinance authorising COMICO’s PSAs, however, there was – and, at the time of writing, still is – no sign of COMICO’s contract being made public. In its absence, it is impossible to assess the terms of this oil deal to understand whether it is beneficial for Congo, or to know whether potentially

significant payments to government, such as signature bonuses, have been paid.

The need for transparency in Congo’s natural resource deals is more urgent than ever. The political climate in Congo is currently very tense as presidential elections due to be held in November 2016 have been repeatedly delayed, sparking widespread protest.⁸ Conflicts have been re-erupting across the country and appearing even in a region that had historically been peaceful.⁹ President Kabila has overstayed his constitutionally allowed two terms in power and has not ruled out changing the constitution to remove term limits so that he could stand for election a third time.¹⁰ In this atmosphere, and with elections now due to be held in December 2018,¹¹ these activated PSAs raise the possibility that the Kabila regime is



Source: Letter from Phanar Legal representing COMICO shareholders and DRC Interactive Map, WRI and MEDD

seeking to extract more revenue from the country's natural resources during this precarious time – possibly to build up a financial war chest for elections.

Global Witness wrote to Centrale Oil & Gas and Adonis Pouroulis, among others, to ask about the publication of COMICO's contracts and any payments to government. A responding statement from a lawyer for Centrale Oil & Gas and Mr Pouroulis said that a \$3 million signature bonus had been paid in 2007, but that "no other payment, direct or indirect, have [sic] been made to the DRC government or its officials or its representatives."¹²



Salonga National Park © Thomas Nicolon

HISTORICAL OWNERSHIP RAISES QUESTIONS

At its formation in 2006 COMICO was controlled by two men, Montfort Konzi, a former Congolese politician and businessman, who was a cabinet member of Jean-Pierre Bemba's Congolese political party Mouvement de Libération du Congo,¹³ and Idalécio de Oliveira, a controversial Portuguese businessman linked to the Brazilian Car Wash scandal [see below].¹⁴ Konzi and Oliveira directly held 30 percent

and 25 percent respectively, with the remaining 45 percent held by Oliveira's British Virgin Islands company International Consultancy & Marketing S.A. (ICM).¹⁵ At this stage the company was presumably in search of an oil contract.

Over the course of the next year, however, as COMICO obtained its contract, a handful of opaque offshore companies would obtain shareholdings in the company [See box 1]. A few months before COMICO's PSAs were signed, official records show that Konzi's shareholding decreased from 30 to 25 percent and ICM's from 45 to 10 percent.¹⁶ The spare shares were picked up by four offshore companies: Sirius Resources Fund 1 Limited, Razario Resources Limited, Bellrope Limited and Shumba International Limited.¹⁷ These companies were all incorporated in notoriously secretive tax havens – in the Cayman Islands, British Virgin Islands or Mauritius.¹⁸

The adjustment of COMICO's structure in this way, involving offshore companies picking up shares carved out of Konzi and ICM's previous shareholdings just as COMICO was in the process of obtaining its contract, raises serious red flags, as does the presence of a former Congolese politician, Konzi, in the ownership structure. The case of Shumba is especially concerning, given that its ownership remains a mystery and that the company is now defunct.¹⁹ In response to questions from Global Witness, the lawyer for Centrale and Mr Pouroulis said that Shumba was not owned by a politically-exposed person, although he did not provide details of its actual owner.



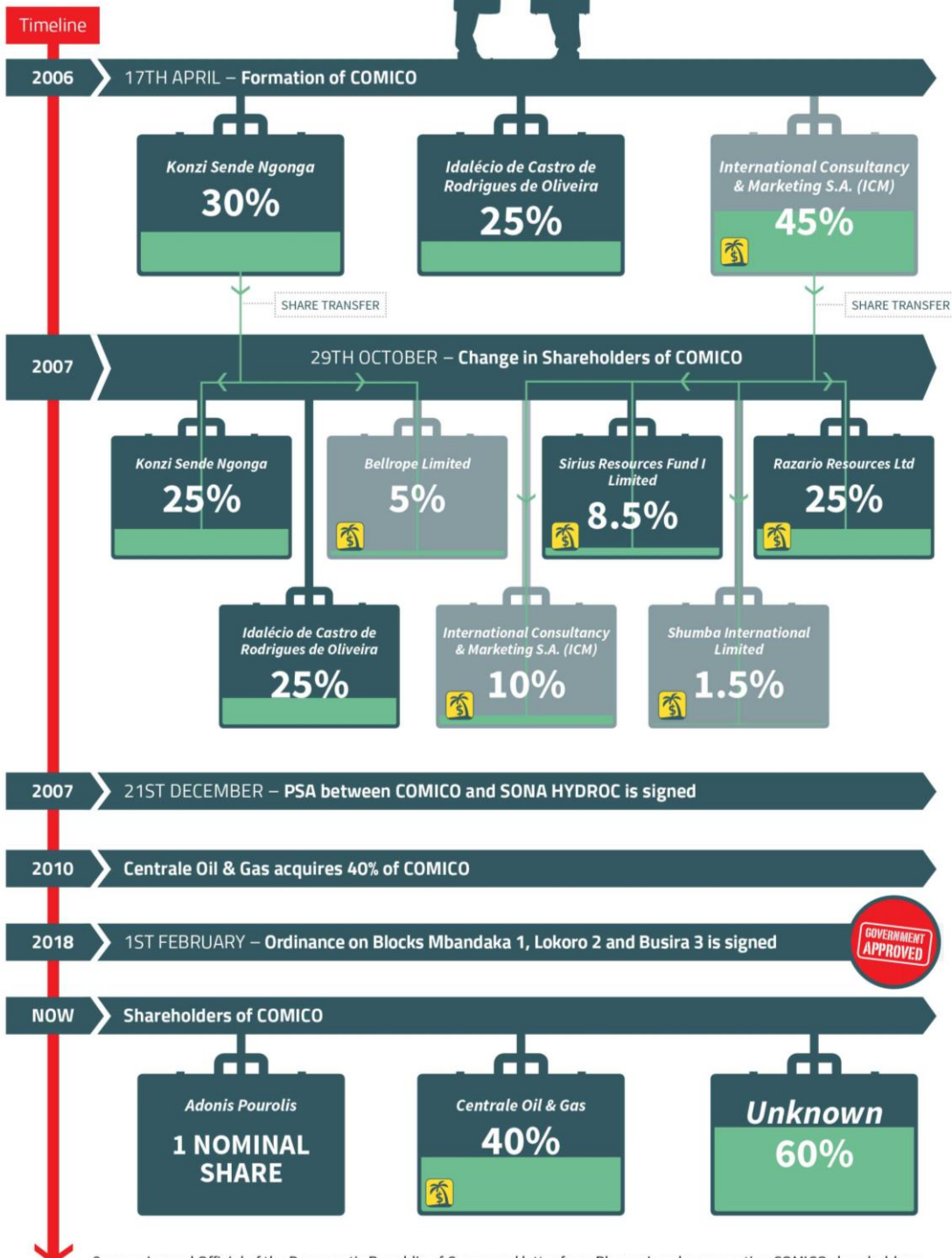
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THE CHANGING OWNERSHIP OF COMPAGNIE MINIÈRE CONGOLAISE – **COMICO**



Key:

- Company no longer listed
- Companies registered in a secrecy jurisdiction



Source: Journal Officiel of the Democratic Republic of Congo and letter from Phanar Legal representing COMICO shareholders

Konzi appears to have been pushed out of COMICO around 2010, around the same time as a court case in Congo between COMICO's shareholders.²⁰ A later 2016 entry in Congo's *Journal Officiel* details 70 percent of the shares held in the company; listing Adonis Pouroulis (0.01 percent) and Artemis Nominees Limited (69.9 percent) as shareholders in COMICO.²¹ Artemis Nominees is a corporate service company that shares a Guernsey address with Pella Resources Group, Centrale Oil & Gas and Sirius Investment Management LP,²² each of which is linked to Adonis Pouroulis.

The lawyer for Centrale and Adonis Pouroulis rejected any implication of corruption in how COMICO obtained its licence, stating that neither Centrale nor Pouroulis were the original promoters of the COMICO project. They explained that the 11-year delay between the signing of the PSAs and the ordinance showed that no undue payments had been made, adding that the delay reflected the time needed to give good title to the blocks. The lawyer did not comment on COMICO's shareholding or provide further details on the current ownership. No comment was received from representatives of Sirius, Razario or Oliveira.²³

BOX 1: WHO WERE THE NEW COMICO SHAREHOLDERS IN 2007?

The companies that held shares in COMICO in 2007 were Bellrope Limited, International Consultancy and Marketing S.A. (ICM), Razario Resources Limited, Shumba International Limited and Sirius Resources Fund 1 Limited.

- Bellrope Limited was incorporated in the British Virgin Islands on 3rd January 2006 and struck off on 31st October 2016.²⁴ According to information from the ICIJ offshore leaks database, shareholders include The Kathkay Trust and The Jarrich Trust, both of which are registered at the offices of Leighton & Leighton – a company run by Norman Leighton.²⁵
- International Consultancy and Marketing S.A. (ICM) was registered in the British Virgin Islands on the 3rd September 2003 and struck off on the 30th of April 2016.²⁶ ICM was a shareholder in Chariot Oil & Gas, according to a document produced by Chariot Oil and Gas in 2008: “ICM is ultimately beneficially owned and controlled by Mr Idalécio de Castro Rodrigues de Oliveira”.²⁷ According to the same document Norman Leighton was a director in Chariot, who “was appointed at the request of ICM, a major shareholder of Chariot”.²⁸
- Razario Resources Limited is incorporated in the British Virgin Islands.²⁹ Robert Archibald Gilchrist Sinclair, a director of Chariot Oil and Gas and Centrale Oil & Gas³⁰, listed Razario Resources Ltd as one of the companies in which he is a director in a prospectus as recently as February 2017. Sinclair is a Managing Director and a founding shareholder of Artemis Trustees Limited, now renamed Artemis Fiduciaries.³¹ Artemis Trustees Limited shares a Fiduciary Licence in Guernsey with joint licensees Artemis Corporate Services Limited, Artemis Nominees Limited and Artemis Secretaries Limited.³² Artemis Corporate Services Limited is a director in Centrale Oil & Gas.³³
- Shumba International Limited was registered in Mauritius on the 13th June 2007, it is currently listed as defunct.³⁴
- Sirius Resources Fund 1 Limited was registered in the Cayman Islands.³⁵ According to Petra Diamond's 2012 Annual Report Mr Pouroulis was “a director of Sirius Investment Management LP which provides investment advisory services to Sirius [Resources Fund 1 Limited]”.³⁶



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Global Witness has been able to trace links between three of these companies and either an accountant linked to Pouroulis, or Norman Leighton, a former business associate of Oliveira who was previously convicted of playing a part in a fraudulent investment scheme.³⁷ However, despite Global Witness' efforts we were unable to trace the ownership of Shumba International, which held a 1.5 percent share of COMICO. Shumba is now listed as 'defunct' on the Mauritius company register.³⁸



Guernsey Secret Jurisdiction. © Alamy

A FRAGILE ECOSYSTEM

At the heart of the Congo basin, Salonga National Park stretches over 36,000 square kilometres - an area larger than Belgium.³⁹

Declared a World Heritage Site in 1984, Salonga is the second largest tropical forest park in the world.⁴⁰ Its size means it plays a fundamental role in climate change mitigation and carbon sequestration.⁴¹ As an intact habitat, it harbours many endangered or vulnerable species such as bonobos, forest elephants, Congo peacocks, hippopotamuses and giant pangolins.⁴² Since 2015, the World Wildlife Foundation (WWF) has co-managed Salonga National

Park with the Congolese Institute for the Conservation of Nature (ICCN).⁴³

UNESCO's World Heritage Committee is clear that any form of mineral, oil and gas exploration or exploitation is incompatible with World Heritage Status.⁴⁴ When contacted by Global Witness, the lawyer representing Centrale Oil & Gas and Mr Pouroulis did not rule out exploring in the park, saying only that the company would "operate under the highest international standards" and claiming that COMICO's activities would not "adversely affect in any way the Salonga National Park".⁴⁵

A 2013 COMICO presentation seen by Global Witness indicates that the company envisaged operations in river environments and using barge based operations for logistics.⁴⁶ The presentation, given by a then manager of COMICO, suggests that once the blocks are developed oil could eventually be shipped by boat down the Congo River to the capital Kinshasa.⁴⁷ However, in response to our enquiries the lawyer representing two of COMICO's shareholders stated that, prior to oil being discovered, "[i]t is plainly incorrect to speculate about transport logistics".⁴⁸

Screenshot of COMICO Presentation September 2013 via Miningreview.com

... and the development plan?

- » CoMiCo's development plan is reliant on marine based operations
- » Export route will be by small pipeline to riverside terminal
- » From riverside terminal dual push-barge to Kinshasa - 35,000 bbl capacity
- » Riverside terminals in Block 1 and in Kinshasa - 10 day storage capacity
- » Twin existing pipeline from Kinshasa to Muanda

Oil drilling and exploration in the swampy and remote park presents a number of risks.⁴⁹ Spills in fresh water habitats can be particularly destructive to the environment. Marshes and swampy areas are especially severely impacted by spills, as oil stagnates and can remain there for a long period of time.⁵⁰

Transporting oil along the Congo River, as well as storing it in and out of the park, could potentially lead to a serious security risk in the area by creating the possibility for oil hijacking and bunkering to take place.



Bonobos in Salonga. © Alamy

Any oil exploration within Salonga's boundaries or its buffer zones would ruin the park's integrity and threaten the endemic species living in Salonga. It may also open the door to the allocation of other oil blocks in the park. A separate block allocated to South African company Dig Oil covers up to one third of Salonga.⁵¹ If Dig Oil also receives formal authorisation to explore, the majority of Salonga would be covered by oil permits.

A CONTROVERSIAL BUSINESSMAN

Idalécio de Oliveira has a controversial background, having been caught up in the massive Brazilian 'Car Wash' corruption scandal via an oil deal in Benin. Oliveira also

has been involved in the oil sector in Namibia, as well as with COMICO in Congo.

Oliveira went on trial in Brazil in 2016 as part of the 'Car Wash' scandal, a massive money laundering and political kickbacks operation that involved at least 28 corporations and 20 political parties, resulting in over 100 convictions.⁵² Oliveira was accused of paying bribes as part of a deal in which Brazilian national oil company Petrobras paid US\$34.5 million for a 50 percent share in a Benin oil block controlled by one of Oliveira's companies, *Companie Beninoise des Hydrocarbures* (CBH).⁵³

The court found that Oliveira wired \$10 million of the \$34.5 million Petrobras had paid to CBH to a Swiss bank account held by a Brazilian lobbyist, who had acted as an adviser to Oliveira on the deal with Petrobras.⁵⁴ The lobbyist then redistributed the money to a Brazilian official.⁵⁵ While the judge said he believed it was likely that Oliveira was aware the money he sent to the Swiss bank account would be passed on to public officials, the court ruled that the evidence was not sufficient to convict Oliveira who was acquitted.⁵⁶ This decision was appealed in 2017 by the Brazilian public prosecutor. The case is ongoing.⁵⁷

Oliveira was involved in a separate deal with Petrobras, this time in Namibia with Chariot Oil & Gas, a Guernsey registered AIM-listed company that is part of Pouroulis's Pella Resources group.⁵⁸ This deal also involved three current directors of Centrale Oil and Gas, including Adonis Pouroulis, who were all directors of Chariot Oil & Gas at the time, though Global Witness is not alleging any wrongdoing by these directors or by any other parties in this deal.⁵⁹

To enter the Namibian oil sector, Chariot purchased Enigma Oil, a Namibian company that owned oil blocks in the country.⁶⁰ Enigma was reportedly established by Heindrich Ndume, a former senior official in Namibia's mines ministry who is also the son-in-law of Hifikepunye Pohamba, the president of Namibia at the time of the deal with Chariot.⁶¹ When Chariot purchased Enigma, it paid entities of which Oliveira, Ndume and Pouroulis were beneficiaries or shareholders, as well as a company represented by Credit Suisse Nominees Limited, all of which were described by Chariot as shareholders in Enigma.⁶²

In 2009 Petrobras agreed a deal to buy in to 50 percent of one of Chariot's Namibian concessions for US\$16 million.⁶³ At the time Oliveira was a shareholder in Chariot and was reportedly central to encouraging Petrobras into its deal with Chariot.⁶⁴ This took place several years before Oliveira's Benin sale.



Idalécio de Oliveira. Photo via Youtube.

In summary, Oliveira has had ownership stakes in three companies in Africa that have acquired oil blocks in deals involving offshore companies. Two – COMICO and Enigma – involved politically connected individuals, Montfort Konzi and Heindrich Ndume respectively. One, CBH, sold an oil block to Petrobras in a deal which was later

found to be corrupt. Global Witness wrote to Oliveira and his companies requesting comment on these deals, but did not receive a response.

Mr Pouroulis' lawyer did not comment on the structure of any deals but stated that any implication that Mr Pouroulis was involved in corrupt or unethical deals is totally incorrect.⁶⁵

WADING OUT OF THE SWAMP: THE FUTURE OF SALONGA

Congo's political crisis is likely to worsen as it approaches the new December 2018 deadline for elections. The country's economy depends almost entirely on its natural resource sectors for export revenues, so it is vitally important that deals in these sectors are conducted transparently and that the revenues are used for the benefit of the Congolese people.⁶⁶

However, the COMICO deal is far from transparent: the presence of a politically connected individual, a convicted fraudster and mysterious offshore companies in COMICO's early ownership raises real concerns. The failure to publish the COMICO contract is also a red flag, as is the ongoing opacity over the company's current ownership and its failure to rule out oil exploration in a UNESCO World Heritage site.

COMICO needs to explain in full who its beneficial owners are today and who has had interests in the company in the past. Though Centrale Oil & Gas have said they hold 40 percent of COMICO, they have refused to disclose the other owners.

A lawyer representing Centrale told Global Witness the only payments made to the DRC government in relation to COMICO's blocks

was the US\$ 3 million signature bonus made in 2007. COMICO itself should publish full details of any and all payments made to the Congolese government or officials made by itself or by other entities or individuals on its behalf.

Congo's government must publish the PSA contract it has signed with COMICO and should also clarify what signature bonuses have been paid for the oil blocks.

Regardless of who owns COMICO, Global Witness' view is that no company should explore for oil in or around a UNESCO World Heritage Site. The huge risk to the environment and people is clear. Global Witness is calling for the cancellation of oil licences encroaching on Salonga or its buffer

zone, and for the Congolese government to refrain from issuing licences that cover any protected natural areas.

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Salonga National Park © Thomas Nicolon

¹ Journal Officiel DRC, première partie, issue 4, 15th February 2018 Ordonnance n 18/010

La Libre Afrique, *RDC: manœuvres pour pomper l'argent du pétrole*, available online at

<https://afrique.lalibre.be/13897/rdc-manoeuvres-pour-pomper-largent-du-petrole/>

² According to Art. 41. Loi n. 15/012 du 1er aout 2015 portant régime général des hydrocarbures, the contract must be published within 60 days. The contract had not been published online on the DRC at <http://hydrocarbures.gouv.cd/?-Contrats-> [accessed 25.05.18] or in the DRC Journal Officiel [according to email correspondence with Journal]

³ Map of COMICO Concessions overlaid with Salonga, Forest Atlas, DRC Government and WRI. Available online

<https://cod.forest-atlas.org/map>.

See also map in this 2013 presentation by COMICO showing blocks 1, 2 and 3. 'Compagnie Minière Congolaise, Presentation at the DRC Forum Pétrole et Gaz, 2013', pg 18. Available at <https://www.miningreview.com/wp-content/uploads/i/OilGas/Tom-Board.pdf>.

According to WWF website, Salonga National Park potentially holds 40% of the world Bonobo population. See WWF Salonga National Park page, available at http://www.wwf-congobasin.org/where_we_work/priority_places/salonga_national_park/.

Salonga UNESCO webpage available at: <http://whc.unesco.org/en/list/280>.

⁴ The Production Sharing Agreement was signed on 21st December 2007 between Comico and National Hydrocarbons Company of Congo (Sonahydro). See Journal Officiel DRC, première partie, issue 4, 15/02/18, Ordonnance n 18/010 La Libre Afrique, *RDC: manœuvres pour pomper l'argent du pétrole*, available online at <https://afrique.lalibre.be/13897/rdc-manoeuvres-pour-pomper-largent-du-petrole/>

⁵ Since 1994, Salonga has been classified as a World Heritage Site in Danger. See <https://whc.unesco.org/en/158/>

⁶ Letter from Phanar Legal representing Centrale Oil & Gas and Adonis Pouroulis, dated 19th April 2018, confirming that Centrale Oil & Gas has a 40% beneficial interest in COMICO. Daily Telegraph, *My worst error: I dug a hole for myself in Congo*, February 6th 2017, available at <https://www.pressreader.com/uk/the-daily-telegraph-business/20170206/281681139614601> Adonis Pouroulis is described as "founder and owner of Pella Resources".

⁷ Art. 41. Loi n. 15/012 du 1er aout 2015 portant régime général des hydrocarbures.

⁸ BBC, *Several dead in anti-Kabila protests*, 21st January 2018. Available online at <http://www.bbc.co.uk/news/world-africa-42766151>.

The Guardian, *'20 dead' in DRC protests after president's term expires*, 20th December 2016, available at <https://www.theguardian.com/world/2016/dec/20/drc-protests-grow-as-kabila-clings-to-power-despite-his-term-ending>.

Reuters, *Congo opposition leader says will return home by June*, 12th March 2018 available online at <https://uk.reuters.com/article/uk-congo-politics-katumbi/congo-opposition-leader-says-will-return-home-by-june-idUKKCN1GO202>.

⁹ Conference, *Is the Democratic Republic of Congo close to Breaking Point?* 15th March 2018. Melanie Gouby and Tom Wilson discuss the mounting conflicts in previously peaceful regions, e.g. Kasai. Podcast available at <https://www.frontlineclub.com/is-the-democratic-republic-of-congo-close-to-breaking-point/>.

Financial Mail, *Joseph Kabila: A smooth operator*, 5th May 2017. Available online at

<https://www.businesslive.co.za/fm/features/africa/2017-05-05-joseph-kabila-a-smooth-operator/>.

Foreign Policy, *Congo's crackdown is just a preview of violence to come*, 21st December 2016. Available online at <http://foreignpolicy.com/2016/12/21/congos-crackdown-is-just-a-preview-of-violence-to-come/>.

¹⁰ The Guardian, *'20 dead' in DRC protests after president's term expires*, 20th December 2016, available at <https://www.theguardian.com/world/2016/dec/20/drc-protests-grow-as-kabila-clings-to-power-despite-his-term-ending>

Reuters, *Congo opposition leader says will return home by June*, 12th March 2018 available at <https://uk.reuters.com/article/uk-congo-politics-katumbi/congo-opposition-leader-says-will-return-home-by-june-idUKKCN1GO202>

¹¹ BBC, *Several dead in anti-Kabila protests*, 21st January 2018. Available online at <http://www.bbc.co.uk/news/world-africa-42766151>.

¹² Letter from Phanar Legal representing Centrale Oil & Gas and Adonis Pouroulis, dated 4th April 2018.

¹³ Montfort Konzi Sende Ngomba, cabinet du president, structure du MLC. Available at <https://archive.is/5zvNy>. States that Konzi holds different roles in the private sector, especially in the import of hydrocarbons.

African Confidential, *Bonding in Brussels*, 24th November 2000. Available at https://www.africa-confidential.com/article-preview/id/1038/Bonding_in_Brussels

African Intelligence, *DRC Ministers pile up portfolios but lack influence*, 29th March 2012. Available at <https://archive.crossborderinformation.com/Article/DRC+ministers+pile+up+portfolios+but+lack+influence.aspx?date=20120329>

¹⁴ Journal Officiel DRC, Deuxième partie, issue 2, 15th January 2012, gives COMICO's ownership from 17th April 2006. It is 30% Konzi, 25% Oliveira and 45% to International Consultancy and Marketing S.A. (ICM) an entity of which Oliveira is the beneficiary, according to a Chariot Oil & Gas Press Release, 2th November 2018. Available online at http://www.chariotoilandgas.com/wp-content/uploads/2016/12/Alternate_Director-Addition.pdf.

The Journal Officiel refers to Montfort Konzi as Konzi Sende Ngomba and does not use his first name.

ICIJ Offshore Leaks Database, *Idalécio de Castro Rodrigues Oliveira*, available at <https://offshoreleaks.icij.org/stories/idalécio-de-oliveira>

¹⁵ ICIJ Offshore Leaks Database, *International Consultancy & Marketing S.A. (ICM)*. Available at <https://offshoreleaks.icij.org/nodes/10199465>.

¹⁶ DRC Journal Officiel, Première partie, numéro 4, 15th February 2018. States that COMICO's PSA's were signed on the 21st December 2007.

DRC Journal Officiel, deuxième partie, numéro 22, 15th November 2011. Gives details about a COMICO AGM held on

the 29th of October 2007 in which the change in shareholding was recorded.

¹⁷ Details published in DRC Journal Officiel, deuxième partie, numéro 22, 15th November 2011. Global Witness believes that “Sirius Found I Limited” was a spelling error and actually corresponds to “Sirius Fund I limited”.

¹⁸ Financial Secrecy Index, Tax Justice Network, 2018. Available at <https://www.financialsecrecyindex.com/introduction/fsi-2018-results>.

¹⁹ Mauritius Company register, Shumba International Limited, available at https://portalmns.mu/cbris-name-search/MASTActionServlet?do=FormEdit&id=ViewFormCBRIS.xml&key_1=C071869&key_count=1. The ownership of Mauritius companies is not public information. Global Witness was not able to obtain any public documents showing the ownership of Shumba. Questions sent to the contact address given on the Mauritius registry, as to the ownership of Shumba went unanswered.

²⁰ DRC Journal Officiel, deuxième partie, numéro 10, 15th May 2010. During the extraordinary assembly of the 6th March 2010, Konzi is voted out, both as a director and a shareholder of COMICO. His shares went to ICM. Cahiers Africains : Afrika Studies, *Conjonctures congolaises 2012 - Politique, secteur minier et gestion des ressources naturelles en RD Congo*, Stefaan Marysse and Jean Omasombo Tshonda. Pg 167 available at https://www.eca-creac.eu/sites/default/files/pdf/cahier_82_chroniques_congolaises_2012_08_03_2013_revu.pdf.

²¹ DRC Journal Officiel, deuxième partie, numéro 9, 1st May 2016. Global Witness checked Journal Officiel entries from 2010 to 2016 and found no entry that detailed the transfer of shares in COMICO to Artemis Nominees Limited.

²² Artemis Nominees Limited is part of Artemis Fiduciaries group. Its address is Trafalgar Court, 2nd Floor East Wing, Admiral Park, St Peter Port, Guernsey, GY1 3EL. This address is shared by Pella Resources Group, Centrale Oil & Gas and Sirius Investment Management LP.

²³ Letter from Phanar Legal representing Centrale Oil & Gas and Adonis Pouroulis, dated 4th April 2018.

²⁴ ICIJ Offshore Leaks Database, Bellrope Limited. Available at <https://offshoreleaks.icij.org/nodes/10117379>.

²⁵ ICIJ Offshore Leaks Database, Bellrope Limited. Available at <https://offshoreleaks.icij.org/nodes/12160919>.

²⁶ ICIJ Offshore Leaks Database, International Consultancy & Marketing S.A. (ICM). Available at <https://offshoreleaks.icij.org/nodes/10199465>.

²⁷ London Stock Exchange, AIM, Chariot Oil & Gas listed. Available at <http://www.londonstockexchange.com/exchange/prices-and-markets/stocks/summary/company-summary/GG00B2R9PM06GGGBXAMSM.html>.

²⁸ London Stock Exchange, AIM, Chariot Oil & Gas listed. Available at <http://www.londonstockexchange.com/exchange/prices-and-markets/stocks/summary/company-summary/GG00B2R9PM06GGGBXAMSM.html>.

²⁹ DRC Journal Officiel, deuxième partie, numéro 22, 15th November 2011. Gives details about a COMICO AGM held on the 29th of October 2007 in which the change in shareholding was recorded, as well as the address of Razario Resources Limited.

³⁰ Chariot Oil & Gas website, Board of Directors include Adonis Pouroulis, George Francis Canjar and Robert Archibald Gilchrist Sinclair. Available at <http://www.chariotoilandgas.com/about-chariot/board-of-dir>.

³¹ According to Fiduciaries website, Artemis Fiduciaries operates as Artemis Trustees Limited. Available at <http://www.artemis-ci.com/index.htm>.

³² Guernsey Financial Commission, Artemis Trustees Limited. Available at <https://www.gfsc.gg/industry-sectors/pensions/regulated-entities/134217>

³³ Records of Centrale Oil & Gas available at <https://www.greg.gg/webCompSearchDetails.aspx?id=Tq/wnBZlZLc=&r=1&crn=&cn=Centrale%20&rad=ContainsPhrase&ck=False?height=984>

³⁴ Mauritius Company register, Shumba International Limited, available at https://portalmns.mu/cbris-name-search/MASTActionServlet?do=FormEdit&id=ViewFormCBRIS.xml&key_1=C071869&key_count=1.

³⁵ DRC Journal Officiel, deuxième partie, numéro 22, 15th November 2011. Gives details about a COMICO AGM held on the 29th of October 2007 in which the change in shareholding was recorded, as well as the address Sirius Resources Limited.

³⁶ Petra Diamonds Limited Annual Report and Accounts 2012, o. 188. Available at <https://www.petradiamonds.com/wp-content/uploads/ar-2012.pdf>

³⁷ According to Farrar’s Building, *Four Sentenced for £100 Million Film Tax Avoidance Scheme*, 30th June 2016, Norman Leighton was found guilty of conspiracy to cheat the public revenue in the UK. He was given a two year suspended sentence due to ill health, foreign residency and lesser involvement. Available at <http://www.farrarsbuilding.co.uk/four-guilty-of-film-tax-avoidance-scheme-costing-taxpayers-100-million/>.

According to Chariot Oil & Gas, Admission to trading on AIM, 13th May 2008, p. 166, Norman Leighton is a director of International Consultancy and Marketing S.A. (ICM), of which Oliveira is the beneficiary. Available at http://www.chariotoilandgas.com/wp-content/uploads/2016/12/Final_version_of_Admission_Document.pdf.

³⁸ Mauritius Company register, Shumba International Limited, available at https://portalmns.mu/cbris-name-search/MASTActionServlet?do=FormEdit&id=ViewFormCBRIS.xml&key_1=C071869&key_count=1.

³⁹ UNESCO, World Heritage Convention, Salonga National Park Description available at <http://whc.unesco.org/en/list/280.a> Countries of the world by area, Belgium, available at http://www.nationsonline.org/oneworld/countries_by_area.htm.

⁴⁰ UNESCO, World Heritage Convention, Salonga National Park Description, available at <http://whc.unesco.org/en/list/280>.

⁴¹ UNESCO, World Heritage Convention, Salonga National Park Description, available at <http://whc.unesco.org/en/list/280>.

⁴² WWF, Salonga National Park, lists animals found in the park. Available at <http://www.wwf-congobasin.org/news/?uNewsID=310250>
IUCN Red List of Threatened Species lists Bonobos as endangered and the Congo Peacock, the Giant Pangolin, the African Elephant and the Hippocampus as vulnerable species. Available on the IUCN database at <http://www.iucnredlist.org/>

⁴³ WWF, Salonga Programme, available at http://www.wwf-congobasin.org/where_we_work/democratic_republic_of_congo/salonga_programme/.

⁴⁴ UNESCO, 'World Heritage and Extractive Industries', available at <http://whc.unesco.org/en/extractive-industries/>.

⁴⁵ Letter from Phanar Legal representing Centrale Oil & Gas and Adonis Pouroulis, dated 4th April 2018.

⁴⁶ Compagnie Minière Congolaise, Presentation RDC Forum Pétrole et Gaz, 17-18 September 2013. Available at <https://www.miningreview.com/wp-content/uploads/i/OilGas/Tom-Board.pdf>.

⁴⁷ Compagnie Minière Congolaise, Presentation RDC Forum Pétrole et Gaz, 17-18 September 2013. Available at <https://www.miningreview.com/wp-content/uploads/i/OilGas/Tom-Board.pdf>.

⁴⁸ Letter from Phanar Legal representing Centrale Oil & Gas and Adonis Pouroulis, dated 4th April 2018.

⁴⁹ According to WWF, Salonga Park Programme, the park is only accessible by water or air. Available at http://www.wwf-congobasin.org/where_we_work/democratic_republic_of_congo/salonga_programme/.

⁵⁰ US Environmental Protection Agency, Sensitivity of Freshwater Habitats. Available at <https://archive.epa.gov/emergencies/content/learning/web/html/freshwat.html>.

⁵¹ Dig Oil Website, Welcome to Dig Oil Exploration, lists blocks 8, 23 and 24 in the Cuvette Centrale. Available at <http://www.digoil.co.za/>.
Map of Dig Oil block 8 overlaying Salonga, Forest Atlas, DRC Government and WRI. Available online <https://cod.forest-atlas.org/map>.

⁵² Global Witness, *Global Witness Reveals Brazil's Car Wash Corruption Scandal May Have Cost The Country Eight Times More Than The £1.4 Billion Stolen*, 22nd March 2018. Available at <https://www.globalwitness.org/en/press-releases/global-witness-reveals-brazils-car-wash-corruption-scandal-may-have-cost-country-eight-times-more-14-billion-stolen/>.
See also Minister Público Federal website at <http://www.mpf.mp.br/para-o-cidadao/caso-lava-jato/atuacao-na-1a-instancia/parana/resultado>.
and MCN Investigativo, available at <http://meucongressonacional.com/lavajato/empresas>.

⁵³ Verdict of Car Wash case in which Oliveira was tried, para 1-29, '25/05/2017 16:49 - 504. Sentença com Resolução de Mérito – Condenatória.' available at <https://www.jfpr.jus.br/> with the Process number:50276853520164047000 and Electronic Key:194821988816.

⁵⁴ Verdict of Car Wash case in which Oliveira was tried para 500 -523, '25/05/2017 16:49 - 504. Sentença com Resolução de Mérito – Condenatória.' available at <https://www.jfpr.jus.br/> with the Process number:50276853520164047000 and Electronic Key:194821988816.
ICIJ Offshore Leaks Database, Idalécio de Castro Rodrigues Oliveira, available at <https://offshoreleaks.icij.org/stories/idadecio-de-oliveira>.

⁵⁵ Verdict of Car Wash case in which Oliveira was tried, '25/05/2017 16:49 - 504. Sentença com Resolução de Mérito – Condenatória.' available at <https://www.jfpr.jus.br/> with the Process number:50276853520164047000 and Electronic Key:194821988816.

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⁵⁷ Appeal lodged by prosecution against the verdict of the Car Wash case in which Oliveira was tried '03/07/2017 20:04 - 547. Petição Protocolada Juntada Refer. ao Evento: 533 - Razões De Apelação Criminal. Available at <https://www.jfpr.jus.br/> with the Process number:50276853520164047000 and Electronic Key:194821988816.
Under the Brazilian penal code it is possible to appeal both a conviction and an acquittal after the first instance. "Art.593: An appeal may be lodged within 5 days: I – against a conviction or acquittal decision rendered by a judge;" available online here http://www.planalto.gov.br/ccivil_03/decreto-lei/Del3689.htm

⁵⁸ Africa Intelligence, *Petrobras: a taste for empire-building*, 9th March 2011. Available at <https://www.africaintelligence.com/aem/spotlight/2011/03/09/petrobras-a-taste-for-empire-building,88525024-eve>.
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Pella Resources portfolio of companies, including Chariot Oil & Gas, available at <http://www.pella-resources.com/portfolio/>.

⁵⁹ Chariot Oil & Gas website, Board of Directors include Adonis Pouroulis, George Francis Canjar and Robert Archibald Gilchrist Sinclair all of whom are directors in Centrale Oil & Gas. Available at <http://www.charitoilandgas.com/about-chariot/board-of-dir>.
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⁶⁰ Africa Intelligence, *Local firms want share in potential bonanza*, 16th May 2012. Available at <https://www.africaintelligence.com/AEM/spotlight/2012/05/16/local-firms-want-share-in-potential-bonanza,101934503-EVE>.
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⁶¹ The Namibian, *Oil fields for friends*, 15/08/14. Available at <https://www.namibian.com.na/index.php?id=126861&page=archive-read>. Also see Chariot Oil & Gas is listed on AIM, available at <http://www.londonstockexchange.com/exchange/prices-and>

markets/stocks/summary/company-summary/GG00B2R9PM06GGGBXAMSM.html. Institute for Public Policy Research (IPPR) Namibia's New Frontiers, June 2013. Available online http://ippr.org.na/wp-content/uploads/2013/06/Extractive%20Industry_Mining_LOW.pdf.

⁶² Chariot Oil & Gas, AIM Listing document, 2008. "On 7 January 2008, the Group acquired the entire issued share capital of Enigma from ICM, Westward, Protech and Credit Suisse Nominees Limited in exchange for 52,234,653 Ordinary Shares [in Chariot Oil & Gas]" pg 23 Available at http://www.chariotoilandgas.com/wp-content/uploads/2016/12/Final_version_of_Admission_Document.pdf. According to the same document, ICM is ultimately owned by Oliveira; Westward is directed by Robert Sinclair and owned by a discretionary trust of which Adonis Pouroulis is within the class of beneficiaries; Heindrich Steven Ndume is the sole registered shareholder of Protech.

⁶³ Reuters, *UPDATE 1-Chariot Oil in \$16 mln farm-out deal with Petrobras*, 19th May 2009. Available at <https://www.reuters.com/article/chariotoil-idUSBNG42925920090519>.

⁶⁴ Africa Intelligence, *Petrobras: a taste for empire-building*, 9th March 2011. Available at <https://www.africaintelligence.com/aem/spotlight/2011/03/09/petrobras-a-taste-for-empire-building,88525024-eve>.

⁶⁵ Letter from Phanar Legal representing Centrale Oil & Gas and Adonis Pouroulis, dated 4th April 2018.

⁶⁶ World Bank, DRC Country Overview, states that Cobalt and Copper account for 80% of the DRC's export revenue. Available online at <http://www.worldbank.org/en/country/drc/overview>.