



12<sup>th</sup> March 2025

Executive Director,  
Tanzania Investment Centre (TIC),  
P.O. Box 938,  
Dar es Salaam,

Dear Sir,

**RE: Minara Tanzania Limited Project Progress Report**

Reference is made to the above subject matter.

Kindly find attached herein, the Project Progress Report for Minara Tanzania Limited in compliance with Section 2(d) of the TIC Act and Regulation 30(4) of the TIC Regulations of 2023.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Julia Kilala".

**Julia Kilala.**  
Director, Legal

12<sup>th</sup> March, 2025

Executive Director,  
Tanzania Investment Centre (TIC),  
P.O. Box 938,  
Dar es Salaam,

## PROGRESS REPORT

### 1. Planned activities for the period.

Our planned activities for the period from November 2024 to date hereof are in the following categories:

- i. Deployment of new towers (Built to suit/ BTS), BTS project covers:
  - a. Rural BTS and UCSAF project to increase coverage in rural areas.
  - b. Strategic BTS to improve network capacity in areas already covered.
- ii. Upgrade of the existing sites to improve efficiency. Site upgrade is mainly in the following areas:
  - a. Energy efficiency
    - Solarization of sites for more green energy.
    - Connecting more sites to the national grid to reduce the usage of diesel generators.
    - Use of more efficient and environmentally friendly diesel generators.
  - b. Tower strengthening to accommodate more tenants.

### 2. Achievements made on the project implementation to date.

From November 2024 to the date hereof, Minara has achieved the following:

- i. Constructed 53 new towers making a total of 1736 new towers to date.
- ii. Tower strengthening, Power upgrade, and Tower remediation at a total cost of **\$7,700,000.**

### 3. Provide updated information on the following aspects:

S/No.	Information	Description	Current Project Status
1	Shareholder's Information	Current Shareholder's names, nationality, and percentage of ownership	RTGF Holdings Limited 99.9990695250856% RTGF Midco Limited 0.0009304749144%

2	Company communication Information	Email address Mobile Number Land Line Telephone Number Physical Address (Plot No. Block No. Street, District and Region)	<a href="mailto:infotz@minara.co.tz">infotz@minara.co.tz</a>  0748 771 900  1 <sup>st</sup> Floor, Paloma Park, Ursino Estate, Plot No 23, Bagamoyo Rd, Kinondoni District, Dar es Salaam
3	Contact Person	Name Position Communication details (Email, Mobile and telephone)	Dangio Kaniki  Government and Regulatory Affairs Manager  <a href="mailto:dkaniki@minara.co.tz">dkaniki@minara.co.tz</a> 0699 082815
4	Incorporation	Certificate of Incorporation Number	149644199
5	TIN Information	TIN Certificate No.	149-644-199
6	Project Objective	Project Core Activity	Telecommunication Tower Infrastructure Service
7	Capacity	Project capacity per year	With the expertise and capital that the investor has injected in the project together with the support from TIC, Minara is capable of executing the project
8	Direct Employment	Foreign Men Foreign Women Local Men Local Women	1 0 47 19
9	Indirect employment	Type/areas of Indirect employment	13

#### 4. Project Financing Expenditure to date (USD)

	Foreign (USD)	Local (USD)	Total (USD)
Land and Buildings		N/A	N/A
Leasehold Improvements		942,587	942,587
Plant and machinery		N/A	N/A
Towers and Other Site Assets		135,050,349	135,050,349
Intangible Assets		75,481,143	75,481,143
Vehicles		569,290	569,290
Furniture and office equipment		300,876	300,876
Office equipment		N/A	N/A
Computer Hardware and Software		398,402	398,402
Tower Construction in Progress		7,512,324	7,512,324
Insurance Cover		70,026	70,026
Pre-operational expenses			
Working sub-total capital		(26,221,117)	(26,221,117)
<b>Grand Total</b>		<b>194,103,880</b>	<b>194,103,880</b>

#### 5. Project Financing

	Amount (USD)	Source Country
Local equity	N/A	N/A
Local loans	N/A	N/A
Foreign equity	71,024,603	United States and United Kingdom
Foreign Loans (Intercompany Loan)	144,377,063	United States and United Kingdom
<b>Total Investment</b>	<b>215,401,666</b>	

#### 6. Problems and Solutions

- i. Import duty exemption denial by TRA

Problem: Despite having a certificate of incentive from TIC which renders Minara eligible for tax exemptions as part of the investment incentives, Minara has faced exemption denials from TRA. Applications for tax exemptions on imported deemed capital goods have been denied, resulting in increased costs and financial strain on our projects.

Solution: Minara has approached TIC to request support and intervention regarding TRA's denial of approval for import duty exemption on deemed capital goods for Certificate of Incentives No. 20223717. After Minara's application for review of TRA's decision was denied, Minara appealed to the Tax Revenue Appeals Tribunal (TRAB), which ruled in Minara's favor.

TRA has filed an appeal with the Tax Appeal Tribunal (TRAT) challenging the TRAB's decision. At the same time, Minara has written to TRA asking them to comply with TRAB's order, which remains effective unless a higher authority overrules or stays the same. TRA's appeal at TRAT is pending ruling.

Minara is also calling for your continuous support on this matter.

ii. Delays in obtaining permits, approvals, and licenses.

Problem: The extensive permitting and decision-making processes have a significant impact on project timelines. Acquiring EIA, TCAA, and building permits is vital to ensure that our projects meet necessary standards and deadlines. However, these approval processes often exceed anticipated timelines due to administrative bottlenecks and rigorous review procedures.

Solution: We have enhanced our engagement with various authorities by providing comprehensive and high-quality documentation to expedite reviews. Regular follow-ups and consultations with different authorities are being conducted to address any concerns promptly and facilitate approvals.

iii. Scarcity of Foreign Currencies

Problem: There is a scarcity of foreign currency, specifically USD, in the country. As most of our capital goods are imported, the company is required to make payments in foreign currency.

Solution: Sourcing forex in advance and making local purchases for goods that are available in the country, while encouraging local vendors to be paid in local currency.

iv. OSHA Classification of Tower Sites as Workplaces

Problem: OSHA's classification of tower sites as workplaces introduces additional compliance fees and regulatory obligations, despite these sites being unmanned facilities. This classification leads to:

- Increased compliance costs, including mandatory workplace registration fees and inspections.

- Additional administrative burdens that do not align with the nature of tower sites, which do not require daily human presence.
- Unclear regulations regarding the frequency of inspections and required safety measures for unmanned sites.

Solution:

- We are engaging with OSHA to seek reconsideration of this classification and advocate for a separate regulatory framework for unmanned infrastructure.
- Exploring collaboration with industry stakeholders to present a unified position on the issue.
- Working on cost mitigation strategies to reduce the financial impact of these new compliance obligations

## **7. Future Plans**

Below are Minara's plans up to December 2025:

Upgrade of the existing sites to improve efficiency. This involves the purchase of various equipment at the total cost of \$1,515,611.94

## **8. Recommendations and any other comments**

In addition to our accomplished and upcoming projects, Minara remains committed to expanding our initiatives and providing quality infrastructure to support mobile network operators. We are dedicated to working closely with TIC and relying on its support to execute our projects and overcome challenges.