Global Witness

How a Canadian mining giant infiltrated Zambia's democracy

JULY 2026

A Global Witness investigation finds evidence that First Quantum Minerals and its associates have run a decades-long covert influence campaign over Zambia's democracy, bankrolling President Hichilema, with revenues diverted away from the copper-rich nation's indebted economy and its people.

Since August 2021, when businessman Hakainde Hichilema was elected Zambia's president, the copper-rich African nation has been championed for its mining-friendly reforms.

Zambia's self-titled "Chief Marketing Officer", Hichilema has travelled extensively overseas to promote copper exports and attract mining investment under an ambitious plan to quadruple domestic production to 3 million tons annually by 2031.

The Zambian economy is dependent on copper, which provides 74% of export earnings and 25% of government revenues. Copper underpins the green energy transition and, as the global scramble for critical minerals intensifies, the country appears to be well positioned to take advantage of soaring demand and record-high prices.

But hopes dating back to the colonial era that Zambia's vast mineral riches would improve living standards for its small population have never materialised. Instead, Zambia remains one of the world's largest exporters of raw copper. It has one of the highest levels of income inequality in the world, with more than 60% of its people living in poverty.

Since its copper mines were privatised in the 1990s under an International Monetary Fund (IMF)-led structural adjustment programme, the industry has been dominated by a handful of Western companies.

Today, one company alone controls more than half of Zambia's copper production. First Quantum Minerals (FQM), a Canadian mining giant with a major office in London, is Zambia's largest taxpayer.

"Mining is no longer simply an extractive industry," FQM states in its environmental, social and governance reporting. "First Quantum seeks to contribute in a fair, transparent and sustainable manner to our host governments and communities."

But a Global Witness investigation has found evidence suggesting that for the last two decades, FQM and its associates have run a covert influence campaign over Zambia's democracy, including allegedly bankrolling the president's party, and that since 2021 they have reaped significant benefits.

FQM has financially backed Hichilema's party through multiple election cycles, a variety of sources said, becoming its largest funder ahead of Zambia's upcoming election this August and pledging up to $50 million in support.

Bundles of newly produced copper sheets are inspected and labelled at First Quantum Minerals' Kansanshi copper mine in Zambia. Blaize Pascall / Alamy Stock Photo.

Global Witness has no evidence to suggest and does not allege that FQM has been involved in corruption. FQM's position is that it has neither funded Hichilema's party in the past, nor promised to fund the party's current 2026 election campaign.

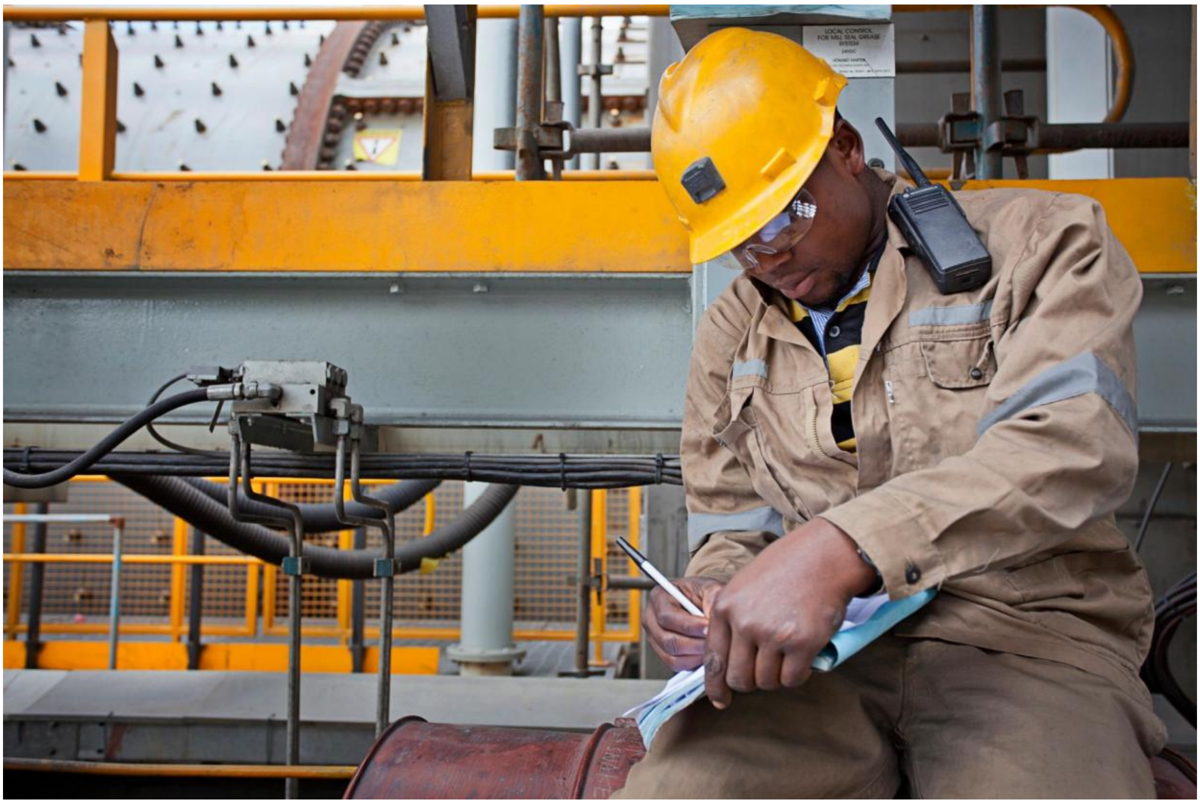
The mining firm has also worked closely with economic think tank the Brenthurst Foundation, set up by the South African billionaire Oppenheimer family.

Before it closed last June, Brenthurst also allegedly provided funding, along with extensive technical and logistical support, and wrote economic policies that Hichilema has implemented since taking office.

Brenthurst partner SABI Strategy Group, a British boutique corporate lobbying firm that worked on the Vote Leave campaign in Britain, has led Hichilema's social media campaigns since 2015, targeting Zambian voters with disinformation operations.

Since Hichilema won the 2021 election, FQM has gained enormous benefits. Major changes to Zambia's tax regime have saved the company an estimated $771 million between 2022 and 2025, independent analysis commissioned by Global Witness shows.

In 2022, FQM signed a wide-ranging, closed-door deal with state-owned mining investment firm ZCCM-IH, while multiple legal disputes have been dropped.



A First Quantum Minerals employee writes in his logbook at the company's Sentinel copper mine in Zambia. Blaize Pascall / Alamy Stock Photo.

Zambia's general election this August will be critical both for the country's democratic future and for FQM. The mining giant is allegedly backing Hichilema's party once again, as it seeks to entrench its gains.

Former Brenthurst head Greg Mills and SABI Strategy founder Henry Sands are again leading Hichilema's campaign team, sources said, this time at Zambia's State House, the President's official residence and office.

They are also working with a team set up by the Tony Blair Institute for Global Change (TBI), a think tank founded by the former British Prime Minister and backed by tech billionaire Larry Ellison.

To piece together this story of apparent corporate capture in Zambia, we interviewed dozens of insiders in Zambia's government, businessmen close to Hichilema, former officials, current and former employees of FQM, the Brenthurst Foundation and its associates, opposition politicians, mining industry experts, academics, diplomats, journalists and members of civil society.

Most of these interviews were held on condition of anonymity, reflecting Zambia's increasingly closed civic space. Testimony is supported by public documents and data, as well as documents shared by sources.

This is more than just a story about Zambia. It's a case study in how powerful extractive companies that generate huge profits can exploit weaknesses in democratic systems, working with consulting firms and billionaire influence networks that span the globe.

It's a warning, too. By relying on extractivism – the intensive extraction of mineral resources primarily for export – to fight climate change, we risk undermining a just energy transition. We also risk eroding the integrity of media ecosystems and democracies in resource-rich countries, and by extension threatening our collective climate future.

UPND underhand tactics at the Royal Zambezi Lodge

On Friday 12 December 2025, a group of Zambian opposition and independent MPs were allegedly flown in secret from Lusaka, the country's capital, to a private airstrip on the banks of the Zambezi River.

The airstrip serves the Royal Zambezi Lodge, a five-star safari camp owned by the Pascall family, corporate documents show. For three decades, the Pascalls have run Zambia's largest mining company, FQM.

The lodge is the ultimate in luxury escapes. Set in a 200-hectare private reserve, it features an infinity pool, private plunge pools and an award-winning restaurant that serves candlelit dinners on white linen tablecloths under the stars.

But the lawmakers were not there to take a break. A special session of parliament was scheduled the following Monday to vote on changes to Zambia's constitution. Several sources with knowledge of the matter told Global Witness the lawmakers had been taken to the lodge because Zambia's president Hichilema needed their votes.

The amendments, known as Bill No. 7, were highly controversial, seen by opponents as an illegal attempt by Hichilema to secure a majority for the ruling United Party for National Development (UPND) in the August 2026 general election.

The new provisions included increasing the size of the national assembly from 167 to 280 members by redrawing electoral boundaries, and increasing the number of MPs nominated by the president.

Hichilema needed a two-thirds majority, or 111 votes, to win the vote. But with just 89 UPND MPs, as well as eight that he had nominated, he also needed at least 14 votes from opposition and independent lawmakers.

This was likely to prove challenging amid strong public opposition to the amendments and a Constitutional Court ruling that declared Bill No. 7 unconstitutional and void.

As the MPs arrived at the exclusive Royal Zambezi Lodge, reports had already emerged in the Zambian media of underhand tactics.

Some lawmakers had allegedly been threatened with arrest over old cases and allegations.

Zambia's president Hakainde Hichilema signs Constitutional Amendment Bill No. 7 of 2025 into law. Chalo Chatu / Flickr.com

Some, including those taken to the lodge, were reportedly offered by Hichilema's party up to the equivalent of $150,000 in cash to vote in favour – allegations that were also made to Global Witness by several sources with knowledge of the payments.

On Monday 15 December, Bill No. 7 was approved by parliament. The next day, Emmanuel Mwamba, spokesperson for Zambia's main opposition party the Patriotic Front (PF), filed a complaint, seen by Global Witness, to Zambia's Anti-Corruption Commission calling for an investigation.

Within a week, the PF had announced it would expel all its lawmakers who voted for the amendments.

"This vote doesn't demonstrate consensus," Mwamba told Global Witness. "It demonstrates the extent of the fear that Hichilema has instilled."

Global Witness has no evidence to suggest that the Pascall family would have had any knowledge their safari lodge might be used as a venue to pay off the opposition legislators.

What is $50 million? FQM becomes Hichilema's largest funder

A view over First Quantum Minerals' copper mining operations in Zambia in 2016. The company has since invested heavily in expanding and upgrading both its Kansanshi and Sentinel mines. Blaize Pascall / Alamy Stock Photo

Interviews with members of Hichilema's inner circle and former FQM employees indicate that by early this year, FQM's resourcing of the UPND had put the company well on the way to becoming the most prominent funder of Hichilema's party.

The company was one of the UPND's major funders during the opposition years, according to six sources with knowledge of the matter, including a former FQM employee and a former key member of Hichilema's campaign team.

Four sources with inside knowledge told Global Witness how the Canadian-listed company has now become the largest funder of Hichilema's party ahead of the August election. This is despite the UPND claiming that the 2026 campaign would accept no foreign funding.

The UPND appears to be Zambia's best-funded party, with estimates by inside sources of its planned expenditure on the 2026 campaign ranging from $35 million to $50 million. Yet it has barely undertaken any public fundraising activity ahead of the August election.

A former FQM employee said the mining giant told Hichilema it was willing to spend up to $50 million to ensure he won the election.

"To you and me, $50 million sounds a lot of money," he said, but he pointed out that FQM Zambia's turnover is in the billions. "So what is $50 million?" he said. "It can easily be absorbed on the expenditure side and just be delivered as cash without affecting their reporting standards."

Global Witness does not allege that financial support of this magnitude from a foreign-registered business breaches Zambian domestic electoral or political donation laws, or is otherwise illegal. In addition, Global Witness has no evidence to suggest that FQM knew what any funding it provided to Hichilema's party would be used for.

FQM categorically rejected allegations that the company had bankrolled the UPND or President Hichilema and told us they are "entirely unfounded and appear to be based on unsubstantiated speculation rather than any verifiable facts."

The company said it was "deeply concerning ... to anyone who cares about democracy in Zambia, that Global Witness would attempt to disrupt the general election by publishing false, malicious and unsubstantiated allegations based on hearsay."

The company said it was subject to independent audit and that it was unclear how it would be able to absorb up to $50 million in expenditures without effecting its reporting standards, let alone to deliver such payments. There was no pay-off meeting at the Royal Zambezi Lodge, Global Witness was told.

FQM said it has robust anti-corruption and compliance controls in place everywhere it operates and "has never paid, offered, or authorised the payment of bribes to any politician, regulator, or government official in any country."

The players: The president, the company, the mining scions and the spin doctor

The Bill No. 7 vote is not the first time that the Pascall family's private lodge has caused controversy.

Nine months earlier, in March 2025, Hichilema flew there by presidential helicopter to attend an invitation-only mining forum organised by the Brenthurst Foundation, a think tank set up and funded by the Oppenheimer family that closed in mysterious circumstances last year.

Like the Pascalls, the Oppenheimers made their money in mining. They founded Anglo-American Corporation, which played a central role in establishing Zambia's copper mining industry when the country was under British rule. Today the Oppenheimers are Africa's fourth-richest family, with a net worth of $10.6 billion.

The 30-person guestlist at the forum featured the President and members of his inner circle including various members of his cabinet, his longtime business partner and political advisor Valentine Chitalu, and his lawyer and principal private secretary Bradford Machila.

It included foreign political figures and diplomats such as the US Ambassador, as well as representatives of several multinational mining companies, including Tristan Pascall, FQM's chief executive. Brenthurst's founding director Greg Mills was there too – an old friend of the Pascall family who is now leading Hichilema's 2026 election team.

There was Henry Sands, another key Hichilema 2026 election advisor and Brenthurst associate, who ran three previous election campaigns for the UPND and whose company SABI Strategy worked on the Vote Leave campaign in Britain.

And there was Chipo Mwanawasa, also a Brenthurst affiliate, who at the time was Hichilema's special policy advisor and the deputy head of Zambia's Presidential Delivery Unit (PDU), a government delivery and performance management mechanism. The PDU, which is supported by the Tony Blair Institute, is also working on Hichilema's 2026 campaign, sources said.

The purpose of the forum was to forge agreements between industry and the Zambian government on mining policy and to sign new deals, and it led to an agreement called the Zambezi Minute that guards against "resource nationalism." Conspicuously absent were representatives of state-owned mining investment firm ZCCM-IH and Zambian lawmakers.

"Are we safe with our mineral resources? Looks like State Capture on the horizon," one Facebook commentator wrote, when a photograph of attendees posing beside the Zambezi River was leaked and shared.

"Colonial league," wrote another. "Greg Mills and his foundation are not investors but invaders."

The truth, though, was that this alliance of mining interests was already deeply entrenched; the result of an influence campaign that began almost two decades earlier.

The mining scions: How the Brenthurst Foundation backed a president

The UPND's ties to the Oppenheimer family date back to at least 1998, when businessman Anderson Mazoka founded the political party. At the time, Mazoka headed up the Anglo-American Corporation in Zambia, which was then still part-owned by the Oppenheimers.

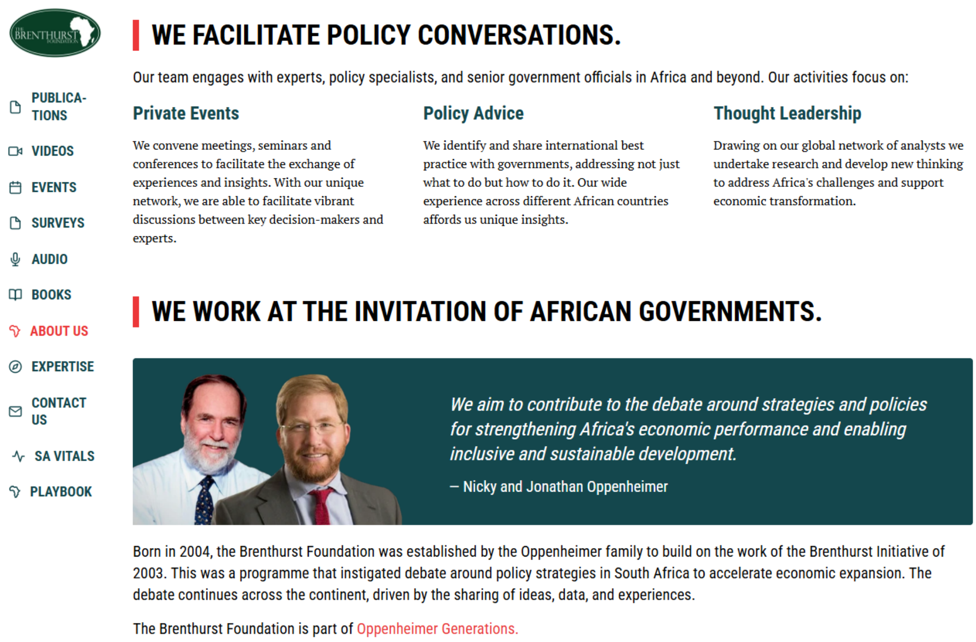
Wealthy and well-connected, Mazoka easily mobilised enough money to contest the 2001 Presidential election, according to a founding member of the UPND. When Mazoka died in 2006, Hichilema took over as leader of the UPND, making the first of five failed presidential bids that same year.

Hichilema is widely believed to have made his fortune in the 1990s, when Zambia's state-owned assets, including its copper mines, were privatised under a controversial IMF-led structural adjustment programme.

He served as the CEO of Grant Thornton in Zambia, and its predecessor Coopers & Lybrand, playing a key role in privatisation. Hichilema has denied profiting from the sale of state-owned assets.

He has since become one of Zambia's richest men, though he has never publicly declared his sources of wealth or his assets, which today are managed through an opaque network of proxies and front companies.

Hichilema is pictured during the G20 Compact With Africa conference in November 2023 in Berlin, Germany. Sean Gallup / Getty Images



A screenshot from the "About" section of the Brenthurst Foundation website

Since becoming the UPND's leader, he has received extensive support from the Oppenheimer family-funded Brenthurst Foundation. As one former employee told Global Witness: "We backed Hichilema from 2008/9 and stuck with him ever since."

Founded in 2004 and based in Johannesburg, the foundation presented itself as pro bono policy advisors. But at its core, it was designed as "an influence project, to have politics keeping commercial interests happy," a former Brenthurst employee told us, or as a second former employee put it, "to make the [African] continent safe for investment."

Multiple sources, including a former board member of Zambia's Anti-Corruption Commission, told Global Witness that Brenthurst provided long-term funding to Hichilema and the UPND in opposition.

Global Witness does not allege that its financial support breached Zambian domestic electoral laws, or was otherwise illegal.

By late 2014, the foundation was trying to broker political alliances for Hichilema, flying opposition leaders to the Oppenheimers' luxury Tswalu game reserve in South Africa for talks. The talks ultimately fell through, but Hichilema afterwards faced public pressure to declare deals that he had allegedly made in return for political support, in what became known as the Brenthurst conspiracy.

At the time, civil society group Zambian Voice claimed the deals would "mortgage" the future of Zambia.

Hichilema's subsequent campaign for the January 2015 presidential election was conspicuously better funded and more polished than in previous years. It was also supported by a London-based lobbying firm with deep connections to Britain's Conservative Party.

CT Group was founded by veteran Australian strategists Lynton Crosby and Mark Textor and is widely credited as having masterminded successful election campaigns for British Prime Ministers David Cameron, Theresa May and Boris Johnson.

The spin doctor: How Henry Sands brought Brexit to Zambia

Files leaked to *The Guardian* in 2022, and seen by Global Witness, appear to show that CT Group had been working in Africa since at least 2011 when it apparently agreed to help swing a presidential election in the Democratic Republic of the Congo (DRC) on behalf of FQM, who were in dispute with the DRC's government, for as much as £1.2 million in fees.

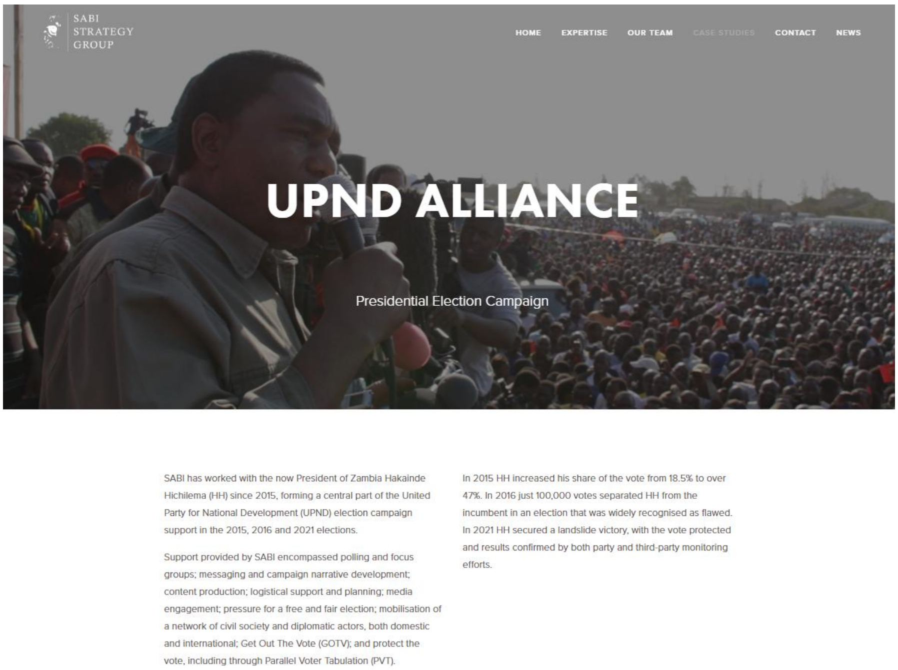
Three years later, it was working on a political project in Zambia for an unnamed mining company, the files appear to show, gathering intelligence and conducting polling and focus groups.

The CT Group account was run by Henry Sands, a former British Army officer and the son of Sarah Sands, then editor of London's *Evening Standard*.

Sands worked as a political advisor to Hichilema on the 2015 campaign, before leaving CT Group to set up his own company called SABI Strategy, taking two of his colleagues and his client Hichilema with him, former CT Group and SABI Strategy employees said.

By 2016, SABI was providing core support to Hichilema's fifth presidential bid, working "hand in glove" with the UPND's campaign manager Dipak Patel, said a source with close knowledge of the relationship. A page on SABI's website that has since been removed described the firm as forming a "central part" of Hichilema's campaign support.

In January 2016, Sands had become an associate of the Brenthurst Foundation, which also had ties to various echelons of the British conservative establishment, including the military. SABI took Brenthurst on as a client, providing full communications support to the foundation and conducting research and polling.



A page on SABI Strategy's website that has since been removed describes the firm as having formed a central part of Hichilema and the UPND's campaign support in the 2015, 2016 and 2021 elections

They would go on to work closely together not just in Zambia, but elsewhere in Africa, including in Zimbabwe and South Africa, with SABI handling polling and political communications for politicians that Brenthurst supported.

The Brenthurst Foundation was also heavily involved in Hichilema's 2016 campaign, with one former employee describing its role as a "regime change outfit" that pushed economic policies, while SABI's role was more specialist, focused specifically on winning elections and brokering relationships.

Brenthurst wrote an economic blueprint for Hichilema's first two years in office, said another former employee. Since taking office, he said, Hichilema has "done quite a bit of what we were suggesting."

Together Sands and Patel gave Hichilema an image makeover to make him appear more charismatic and approachable, according to several sources with knowledge of the campaign, swapping his collared shirts and ties for more relaxed attire and replacing his trademark complex economic jargon with catchy phrases.

Patel had the local knowledge and contacts, and he decided where and when each political figure would speak. SABI organised campaign schedules and logistics and arranged for a high-end British production team to follow Hichilema and produce content as he travelled by helicopter to attend rallies all over the country.

Henry Sands was an associate of the Brenthurst Foundation and its strategic communications advisor

At the same time, SABI helped to organise a branded double-decker bus and a fleet of pick-up trucks to drive across Zambia, holding screenings of campaign documentaries.

Behind the scenes, SABI managed media outreach, including ghostwriting articles under Hichilema's name and other pseudonyms, sources said.

It also did the polling, ran the numbers and managed social media messaging. At the time, the firm's data-driven, highly targeted method of online campaigning now widely used in elections was still new and it was considered very unusual in Zambia.

It was new in Britain too, where SABI at the time was also working on the Vote Leave campaign ahead of the EU referendum that June, a vote that was marred by allegations of foreign influence and breaches of electoral law. Vote Leave paid Sands' firm £38,404 for organising rallies and producing campaign materials, Electoral Commission records show.

Sands around this time appears to have introduced Hichilema to Cambridge Analytica, a British firm that would later find itself embroiled in a global scandal over the misuse of personal data to manipulate voter behaviour.

In an apparent letter to Hichilema dated March 2016 and leaked to Zambian media, the firm's former boss Alexander Nix described Sands as "our mutual friend".

Having met Hichilema the previous week, he claimed that his firm would "add powerful, decisive value" to the UPND's campaign. Touting his expertise in microtargeting and "certain third-party persuasion techniques," he offered a discounted rate of $150,000 a month, the letter appears to show.

Party spokesperson Charles Kakoma dismissed the letter at the time as "propaganda", claiming that Hichilema's campaign was run solely by Patel, who "did not receive any external support of any kind."

Asked about a photo showing Hichilema with Sands, Kakoma simply said that Hichilema "meets a lot of white people from all over the world."

When Hichilema narrowly lost the 2016 campaign, Brenthurst continued to support him. In 2017, when he was imprisoned on treason charges, accused of blocking then-President Lungu's motorcade, the foundation took care of his family and spearheaded an international lobbying campaign for his release.

Brenthurst's founding director Mills was a "rock" for Hichilema in opposition, one Brenthurst employee said. A former Brenthurst advisor described him as a "long-time personal friend" of Hichilema's, claiming the Zambian president often stayed with Mills and his family in South Africa during the opposition years.

It has never been disclosed who paid for SABI and Brenthurst's work supporting Hichilema and the UPND. High-end political consultancy services are expensive and sources say the party in opposition would never have been able to afford them.

What is clear is that the Brenthurst Foundation has an extremely close relationship with FQM, dating back to the early days of Hichilema's party.

Very good friends: The mining scions, the company and the president

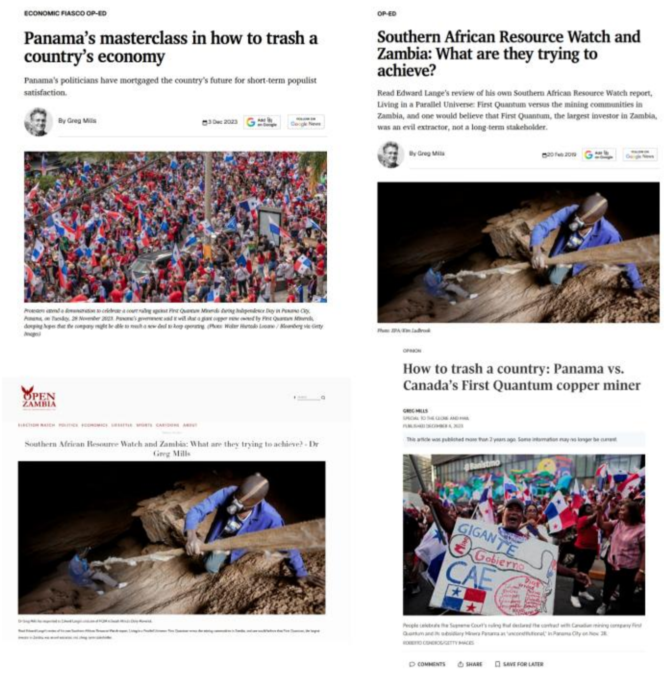
When Brenthurst representatives "started frequenting Zambia" in 2008 to negotiate the removal of a windfall tax on copper amid record-high prices, they did so as "agents" of FQM, a businessman close to then-president Rupiah Banda said. The Oppenheimers' mining company Anglo American by this time had already divested from Zambia.

At the foundation, there was always "a lot of interaction with the Pascall brothers," said one former employee who worked on a Brenthurst project in which FQM had vested interests.

FQM "were very good friends" of the Brenthurst Foundation, he said, and their interests were closely aligned. At a personal level, Mills was also a close friend of the Pascall family, a relationship that "goes back a long way," including through a shared love of rowing. As the energetic and divisive head of the foundation, Mills led its work from its inception until it closed last June.

Former Brenthurst Foundation founding director Greg Mills, centre, is pictured in Kyiv, Ukraine during a presentation of a book he co-authored entitled "The Art of War and Peace" on 15 August 2024. Oleg Palchyk / Global Images Ukraine via Getty Images

Mills has also represented FQM's interests in a series of articles over the past decade, including when the company's relationship



Op-eds by the Brenthurst Foundation's former founding director Greg Mills representing First Quantum Minerals' interests in South African, Zambian and Canadian media

with Zambia's government under Lungu became increasingly tense, with legal action taken on both sides.

When civil society group Southern Africa Resource Watch (SARW) published a report in 2019 that called out harms to communities living around FQM's Kansanshi mine – including toxic water, land and air pollution – Mills published a fierce rebuttal in the *Daily Maverick*, a South African publication.

SARW had highlighted the stark contrast between the wealth that FQM was extracting for export and poverty levels in the mine's surrounding communities, as well as the disconnect between the company's "shiny sustainability reports" and the bleak realities of life on the ground.

Mills accused the report's authors of a "shoddy piece of work ... a simple hatchet job riddled with factual inaccuracies and bogus assumptions."

FQM asked SARW to write a second report, and then initiated a strategic lawsuit against the group known as a SLAPP suit, seeking 1 million South African rand in damages and an unconditional apology. It has since withdrawn the case.

When FQM's $10 billion mine in Panama was forced to close in 2023, amid nationwide protests and a Supreme Court ruling declaring its operating contract unconstitutional, Mills wrote an article in defence of FQM entitled "Panama's Masterclass in How to Trash a Country's Economy."

Close up of the logo on a shirt of a First Quantum Minerals employee in Zambia in 2018. Blaize Pascall / Alamy Stock Photo

Behind the scenes, Mills has also played a key role supporting FQM and the Pascall family's relationship with Hichilema, according to three former Brenthurst Foundation employees.

One former Brenthurst advisor said Mills would always be present at meetings between Hichilema and FQM's leadership. Another described Mills as an "important cog" in the relationship, saying he had "always kept a very tight hold" on the Pascalls.

As the Zambian government under the PF repeatedly changed fiscal policy, raised taxes and sought to expand state control over Zambia's mines, the Pascalls were "determined to fight Lungu's administration at all costs," said a former senior civil servant at the Ministry of Mines. "And who could have been a better ally to them at the time than Hichilema?"

Hichilema's relationship with FQM became so close during the opposition years that he even met Tristan Pascall multiple times in the toilets at Johannesburg Airport to discuss Zambia's mining future, the President would later disclose.

In 2019, when the PF proposed a new, higher mining tax, Hichilema reportedly said on public radio: "The mining companies are saying 'HH [Hakainde Hichilema] we are waiting for you to come.'"

Mills told Global Witness he had been friends with Hichilema for a long time and that friendship comes with certain responsibilities. He said he was "appalled" for instance at Hichilema's arrest and did what he could to bring this to the attention of the public.

Mills said he had long provided advice to both government and opposition leaders across Africa, including in Zambia, and that this work had only ever been paid for by his employers, including the Brenthurst Foundation.

Helping a country to grow and reach its development potential "hardly amounts to a political or economic conspiracy," he added, noting that Hichilema is in the process of turning around a difficult economic inheritance.

He described the claims made in this report about his activities and those of the Brenthurst Foundation as "a compilation of every well-worn conspiracy theory that has been manufactured over the last decade and … filled with falsehoods."

FQM said that until the Brenthurst Foundation closed it had a professional relationship with the group, as it does with many other think tanks and non-governmental organisations.

The company denied that Brenthurst represented its interests during negotiations with Zambia over mining taxes, saying that it did so directly and on its own behalf. It also denied that Mills had represented its interests in any greater capacity than publishing articles that are supportive of FQM, and specifically that Mills is an "important cog" in its governmental relations team. FQM said it has always represented its own interests directly, or through official channels such as the Zambia Chamber of Mines.

FQM also denied the allegation that any members of the Pascall family employed by the company had been "determined to fight" Lungu's administration, but noted that repeatedly changing fiscal policy, raising taxes and seeking to expand state control over Zambia's mines did not promote investor confidence.

It also noted that during the Lungu administration, investor assets had been de facto appropriated and mining executives intimidated and detained.

The company said it does not align with or support any political party in Zambia or in any other country in which it operates. Its engagement is with the government of the day in its official capacity, it said, irrespective of political affiliation. It is, though, interested in government policy and in the tangible outcomes that can be delivered for Zambia, it said.

Support for responsible economic and resource management, good governance and efficient administration is not political partisanship, the company said, but instead reflects the legitimate interests of a major long-term investor in stronger institutions and a stable policy environment.

The company said it was aware that Hichilema claimed he had met Tristan Pascall in the toilets at Johannesburg Airport, but suggested Zambia's president may have been speaking metaphorically about a time when he was unable to hold official meetings in Zambia due to threats to his personal safety.

Neither Tristan Pascall nor any other member of FQM's senior management has met President Hichilema in the Johannesburg Airport toilets, the company said.

The president and the mining scions move into State House

In August 2021, Hichilema won the Zambian election by a landslide. It was a bitterly fought race, with the incumbent Lungu's government deploying a wide range of repressive tactics to try to win the vote.

During its decade in power, and particularly in the run-up to the election, Lungu's government had become increasingly authoritarian, cracking down on freedom of assembly and speech, including through police violence and arbitrary arrests.

Hichilema won despite these challenges. Mining companies including FQM had poured money into his campaign, sources said. Brenthurst provided funding to support the UPND and organised transport, including helicopters, according to several people with knowledge of the campaign. SABI ran the back end, including planning and executing the campaign schedule, coordinating media work, polling and messaging.

With many more Zambians now online, social media formed a central part of the strategy.

Before long, the Brenthurst Foundation was a well-established presence at State House. In an article, mining lawyer Hulme Scholes described how he travelled often to Lusaka to advise Hichilema on mining policy alongside Mills, who was now acting as strategic advisor to the President of Zambia.

Sources described Mills and his team as Hichilema's key policy advisors, focused on mining as well as the infrastructure needed to support the development of Zambia's mining industry, including power, roads and borders.

The Brenthurst Foundation also paid the salary of the Special Assistant to the President for Public Policy, according to multiple sources, a newly created and vaguely defined role based at State House that was filled by Chipo Mwanawasa.

A member of Hichilema's election campaign teams since 2015, Mwanawasa had previously worked with the Brenthurst Foundation. As Hichilema's policy advisor, but on the Brenthurst payroll, she became a "nexus," giving Mills greater access to the presidency, a former Brenthurst employee said.

A vendor sells carpets on the streets of Lusaka, Zambia's capital on 17 August 2021, the day after Hakainde Hichilema was declared president-elect. Tsvangirayi Mukwazhi / AP Photo via Alamy Stock Photo

Brenthurst continued working closely with SABI, whose team would ask for updates about Mwanawasa during their monthly meetings, a former employee who attended the meetings said.

SABI would also ask for updates about Bradford Machila, Hichilema's principal private secretary. Machila, who has been described as "the legal brain behind Hichilema's commercial rise," was listed on SABI's website as a member of its advisory committee on a page that has since been taken down.

Sands claims to also have been advising the British government at this time. In 2021, then-Prime Minister Johnson, who is a friend of Sands' mother, asked Sands to launch and chair a private sector advisory committee for UK African investment on behalf of the UK government's Department for International Trade, according to SABI's website.

In November 2021, three months after Hichilema was elected, the UK and Zambia signed a billion-pound Green Growth Compact. This was followed in 2023 by a further commitment to generate up to £2.5 billion of British private sector investment in Zambia's mining, minerals and renewable energy sectors, as well as a critical minerals Memorandum of Understanding between the two countries.

In his article about advising Hichilema alongside Mills, Scholes described arriving at State House and being met by Hichilema and officials from the finance ministry.

"We discuss the list of mining challenges; an action plan is drawn up with areas of responsibility and timelines," he wrote. "It is liberating to be part of this process and to see how governments should work."

One of the "juiciest low-hanging fruits" he wrote, "has been to reinvigorate mining investment in copper-rich Zambia." By removing obstacles to foreign investment, Hichilema's government was allowing mining companies to "do what they do best; mine."

He cited FQM's decision to invest $1.5 billion in expanding its Zambian operations as "a showcase reform process for this new administration."

He continued: "That is why the energetic Dr Mills and I are there, to complement this process and to make Zambia the primary investment destination for mining capital in the world."

The problem with focusing so heavily on new mining investment, though, is that Zambia's water systems cannot support such a major increase in extraction, a Zambian mining sector expert explained.

Copper coils for axial flux motors for electric vehicles lie in a tray at the Mercedes-Benz engine factory in Berlin, Germany. Sean Gallup / Getty Images

"Mining is not going to be sustainable in Zambia in the next 10 to 20 years, given analysis of the fragility of water systems," he said.

"Copper is infinitely recyclable and the conversation should instead be about how to induce a downstream copper sector in the country, not just production from primary extraction, but also building a circular economy."

Milking the cow: Hichilema drives mining policy

Meanwhile, at the Ministry of Mines, officials found their agenda was being overridden. A senior civil servant described his first meeting with Hichilema, in which he expected to be tasked with implementing the UPND's mining policies that he had helped to write.

He was excited, he said, believing this was a new opportunity to build a "new and robust mining sector, contributing to the economy through job creation, meeting our production targets and also [ensuring] the sector pays its fair share of taxes."

Instead, he said, Hichilema began running through the changes he expected to see. "The President specifically told us to start talking to the finance ministry about reducing the [taxes] for the mines," the official said.

Hichilema told him he had been talking to FQM before he became president, and the company had assured him they wanted to increase production at Sentinel, Zambia's largest mine, and to increase the lifespan of Kansanshi, its second-largest.

A group of First Quantum Minerals employees poses on site at the company's Sentinel copper mine in Zambia. Blaize Pascall / Alamy Stock Photo

"The President made it very clear that look, 'I am not a fan of heavy taxing of the mines because we need to allow the cow to grow healthy before we can talk about having more calves or even milking it,'" the official said.

A former senior member of Zambia's Chamber of Mines, a lobby group that is dominated by multinational mining companies and above all by its largest member FQM, expressed surprise that Hichilema's fiscal policy "literally comprised the demands we had publicised before."

"Someone understood that our policy was the correct prescription with regard to mining policy in the country," he said. "It was in the first budget word for word."

A review by Global Witness of the Chamber's annual proposals to the finance ministry in the years leading up to the 2022 budget and related documents found that Hichilema's administration has enacted the industry's key demands.

A former senior civil servant at the Ministry of Mines gave his view on how this might have happened. "What we have now is a mining fiscal law designed for us by FQM and imposed on the country through Mr Hichilema," he said.

FQM said that the changes to Zambia's fiscal regime arose from a broader policy process involving multiple stakeholders, including the Zambia Chamber of Mines, which represents the industry collectively and is required to make submissions on the national budget.

The company acknowledged that as the largest producer of copper in Zambia and a Class-A member of the Chamber of Mines, its input likely played a part in Zambia's current and past mining laws and regulations, but denied that it designed the mining fiscal laws on its own accord.

Tax breaks: As Hichilema slashes taxes, Zambia loses more than $1 billion in revenue

The two main revenue streams that Zambia receives from mining are a mineral royalty paid to the state and corporate income tax. Changes by Hichilema's government to Zambia's mineral royalty regime alone have saved FQM subsidiaries an average of $155 million each year since 2023, expert analysis commissioned by Global Witness found.

It's not just FQM that has benefitted from these changes. Across the mining sector, mining companies are saving an average of $305 million each year in tax.

The other major change Hichilema's government made in the 2022 budget is to allow companies to deduct mineral royalty payments from their corporate income tax.

From this, FQM subsidiaries have saved an estimated $69 million on average in payments every year, while the mining industry as a whole is saving an annual average of $124 million.

Together these two fiscal changes represent a 38% annual tax break, on average, for FQM in the three years from 2023-2025.

FQM's savings in taxes and royalties compared to what it would have paid under the previous fiscal regime totalled $771 million over the four years between 2022 and 2025. The savings across the sector for the three-year period from 2022 to 2024 totaled $1.05 billion. The full analysis is linked as an annex below.

FQM claims that Zambia's effective tax rate for mining companies prior to 2022 had become greater than that of comparable mining jurisdictions and that fiscal changes were needed to attract new investment into its mining sector.

Without these changes, FQM claims that it would not have made significant capital expenditures and its production would have steeply declined, as would its payments to government, which as the country's largest miner would have a significant impact. Evidencing or challenging the claim that FQM would not have made the investments if the fiscal regime had not changed is difficult and not in the scope of our analysis.

FQM noted that with the Kansanshi expansion now in full production, the company's economic footprint in Zambia grew by 30% from 2024 to 2025, to $3.46 billion. Some $902 million went to government in taxes, a year-on-year increase of 39% and $2.14 billion was spent on procurement through Zambian-registered businesses, equivalent to approximately 7% of national GDP.

Since the fiscal changes under Hichilema, there has been more significant investment, as compared to during Lungu's time in office. At least six major new Zambian mining investments have been announced since, including FQM's expansion plans.

This may have been due to changes to the fiscal regime; copper prices have also been higher since 2021 than they were for most of the prior decade, and the outlook remains positive, driven by demand from AI and defence industries.

But governments typically offer tax breaks to companies when their mining sectors are undeveloped, when there is political turmoil, or if mineral prices are low and they want to avoid mine closures.

In Zambia, any previous economic logic for having lower taxes has disappeared, said historian and researcher Duncan Money.

"The copper industry has boomed, prices are north of $13,000/ton, the industry doesn't need these kinds of sweeteners at all," he said. "Zambia's government should be taking

President Hichilema speaks on stage at the US-Africa Business Forum in Washington, DC on 14 December 2022. Tasos Katopodis / Getty Images for Prosper Africa

advantage of this moment – these moments come very rarely."

The tax breaks for mining companies also come at a time when people across Zambia have been hit hard by an IMF austerity programme introduced in 2022 to address the country's debt crisis.

Zambia under Hichilema has made significant progress in restructuring its external debt, after it became the first African nation to default during the COVID-19 pandemic. But wage tax hikes and dramatic cuts to public spending have also caused widespread public pain, with subsidies slashed along with Zambia's Farmer Input Support Programme that supports food sovereignty.

In 2024, the country faced a food crisis due to a severe drought, with over a quarter of the population – or 6 million people, including 1 million children – facing acute food shortages and malnutrition.

That May, the UN and partners launched an appeal for $228 million to help 4.6 million people in need of immediate humanitarian assistance over the second half of the year, but a lack of funding left more than 2 million of the people targeted without support.

FQM's savings from the two tax and royalty changes in that year alone could have funded the entire appeal.

But it wasn't just fiscal policy that FQM was apparently able to influence. The company under Hichilema has received multiple other benefits.

Lawsuits dropped and a closed-door deal

Hichilema's first major intervention in the mining sector in 2021, he would later tell parliament, was the resolution of longstanding disputes between FQM and the Zambian state, and it "led to FQM's restored confidence in Zambia."

By the end of 2022, FQM had also negotiated a wide-ranging deal behind closed doors with ZCCM-IH, its partner in the Kansanshi mine, documents for the deal, named "Project Markle", that were later published show. This included restructuring the state-owned mining investment firm's 20% equity stake in the mine, which is 80% owned by FQM, and replacing its dividend payments with a 3.1% royalty.

The Kansanshi royalty now represents the largest revenue flow to ZCCM-IH from its portfolio of mining interests and provides a more stable source of revenue. A 2025 PwC report found that the transition to a royalty-based revenue structure had "significantly enhanced ZCCM-IH's financial returns" while FQM's view is that the transaction provided mutual benefits to both parties.

But civil society and ZCCM-IH minority shareholders have criticised a lack of transparency in the negotiations.

A former senior official at ZCCM-IH who was involved in the negotiations said the state firm had initially proposed a much higher royalty rate of 7%, but Hichilema's team pressured them to settle around 3.5%, which was close to the rate proposed by FQM.

"We were wondering," he said, "was there collusion between the mine and State House?"

As part of the Kansanshi deal, ZCCM-IH also agreed to drop a criminal complaint against FQM directors, project documents show. This claim, lodged with Zambian police in 2019, alleged a $520 million unauthorised transfer between FQM subsidiaries.

Hundreds march through Lusaka, Zambia on 19 April 2024 as part of a global day of action demanding debt cancellation for climate justice. Angela Nandeka / AP Images for Glasgow Actions Team via Alamy Stock Photo

In parallel to the Kansanshi deal, in 2022 FQM also negotiated another key demand: an agreement with the Zambian government for the repayment of outstanding VAT claims based on offsets against future corporate income tax and mineral royalty tax payments. FQM noted that, as of the end of March this year, it was still owed $915 million from Zambia in unpaid refunds across its Kansanshi and Trident mines.

FQM has employed Hichilema's longtime business partner and political advisor Valentine Chitalu as its tax agent, multiple sources said. They said Chitalu's role is to liaise with the Zambia Revenue Authority and make sure that FQM receives its tax refunds as a priority. It's not clear whether or how Chitalu is remunerated for this alleged role.

A view over First Quantum Minerals' Kansanshi copper mine in Zambia. Google Earth / Airbus

Workers stand in front of a copper mine in Kitwe, Zambia. Lou Jones / ZUMA Wire via Alamy Stock Photo

Chitalu told Global Witness that he has never been appointed or employed as a tax agent by FQM. He also said the characterisation of his relationship with Hichilema was inaccurate, and that he conducted his professional affairs "independently and on their own merits." FQM said it had no professional relationship whatsoever with Chitalu.

Not just FQM: Other multinationals cash in on Zambia's mining-friendly president

It's not just FQM that has allegedly bought influence. Most of Hichilema's election campaign funding in 2021 came from foreign mining companies, sources said. One strategist who worked on the campaign estimated that mining money made up around 80% of the total.

Since he was elected, deal after mining deal has been marred by allegations of political influence and irregularities. Sources said Hichilema's wealth has increased dramatically at the same time.

In 2023, Hichilema and his business associates, including Chitalu, took control of the sale by ZCCM-IH of a majority stake in Mopani, another of the country's largest mines, according to sources involved in the deal.

ZCCM-IH had put forward a preferred bidder, but the $1.1 billion asset was instead sold to IRH, a little-known Abu Dhabi-based company that didn't participate in the original tender. Chitalu told Global Witness he had no role in and exercised no control or influence over the sale.

It was around this time that Dolika Banda, daughter of the late president Rupiah Banda, resigned from her position as chair of ZCCM-IH, later citing political interference.

"This country has massive opportunities with all the natural resources, critical minerals endowment, and its people," she wrote in her parting letter. "We have to work with global partners to maximise these resources, and Zambians have got to be part of the equation."

In late 2025, Hichilema blocked attempts in parliament to pass legislation that sought to increase Zambia's revenues from mining. A proposed Minerals Regulation Commission Bill led by the Ministry of Mines initially included provisions giving the state a minimum 15% free carry in any mine producing critical minerals.

Amid a private sector backlash, Hichilema rejected the bill. "From the view of the presidency, it's not something that will be brought to fruition, because we do not support it," Hichilema's special advisor on finance, Jito Kayumba, told *Bloomberg*.

"Mining companies have destroyed all controls," said the leader of an opposition party, who spoke on condition of anonymity due to the topic's sensitivity. "It's a free for all."

He described the amount of money leaving Zambia as "heartbreaking." The country has "no chance in hell" of escaping its economic woes, he said, while mining firms continue to buy elections and capture policymaking.

How Hichilema, FQM and Sands poisoned Zambia's information ecosystem

As Hichilema's relationship with multinational mining companies draws increasing attention, his pressure on accountability bodies including the Anti-Corruption Commission has intensified, along with his crackdown on free speech. He has also invested heavily in covert communication operations to try to control the narrative.

At State House, Hichilema's team has built out and funded a network of what are known informally in Zambia as "rogue" social media pages. Mostly on Facebook, these pages claim to be genuine news organisations but instead are used to spread propaganda and target critics.

With taglines like "If its not on Koswe then its FAKE News! [sic]" these sites mimic real news websites by publishing a stream of news-style content, including live reporting from events across Zambia, articles and press releases. Some have their own websites and profiles across Twitter, Instagram and YouTube.

In the run up to elections, an additional larger network of social media "news" sites has also appeared. While there is no evidence these sites have been funded by the UPND, they are run by party supporters and publish stories in favour of the party while claiming to be legitimate news operations.

These pages have mushroomed during the period that Sands has been running Hichilema's social media campaigns, Global Witness analysis found.

The rogue social pages now have a combined reach that rivals Zambia's real media sector, meaning that political messaging can drown out and effectively silence journalism, while still appearing to be genuine news. Such a large operation requires significant resources and sources say the funding comes from party donors.

Global Witness found no evidence of FQM directly funding these pages. However, a review of the pages revealed that many of those supportive of the UPND also publish pro-FQM content.

FQM acknowledged that covert media operations by the UPND and its supporters could require significant resources but denied having any involvement in or knowledge of such activities. Hichilema is considered pro-mining, the company said, and it is therefore not surprising if the same social media pages that support him would also support FQM.

At the same time, FQM runs its own covert media operations, paying for stories that appear to be independent but instead serve the company's goals.

Much of this work is managed through a Zambian consulting firm called Suma Systems, which runs two publications: *This is Zambia* and *Solwezi Today*. From its inception, FQM was *Solwezi Today*'s "major client," a senior reporter for the magazine told Global Witness, a claim that was supported by other sources.

FQM also previously provided seed funding to the now-closed *Bulletin & Record*.

A senior reporter for *Solwezi Today* described how the business model worked. FQM paid Suma Systems for content. The agency then hired journalists to write stories, including sending them into the field to cover FQM's activities.

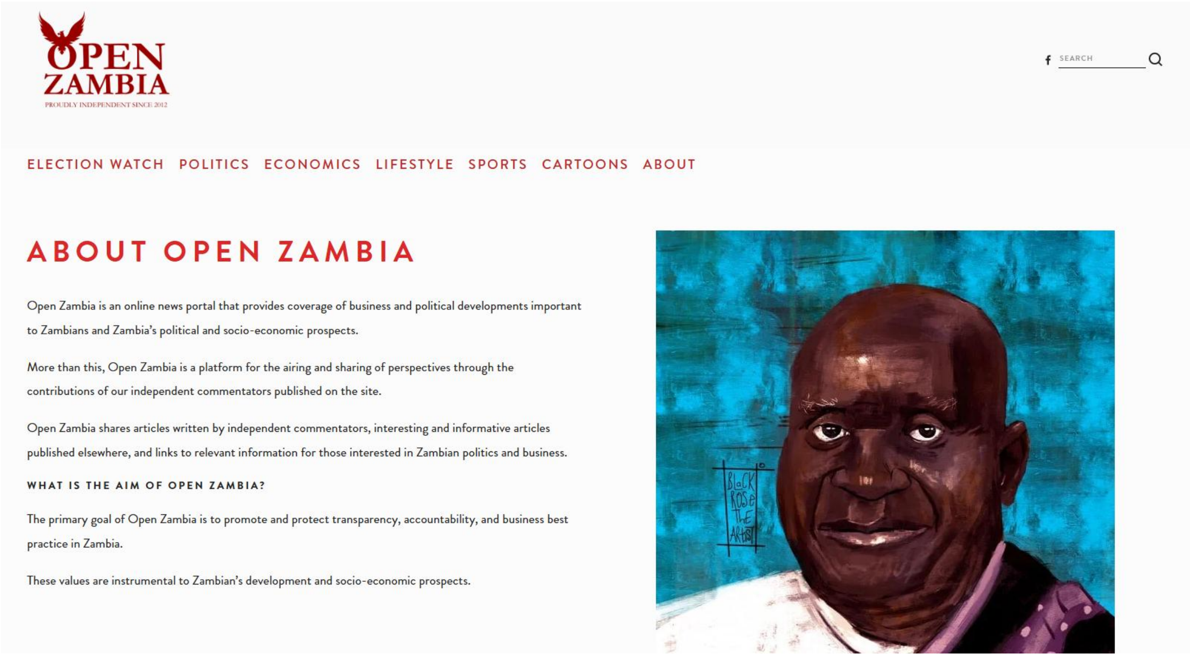
This content was published mostly without an advertorial disclaimer in outlets run by Suma Systems. It was also syndicated to other media outlets, including national Zambian newspapers, giving the appearance of widespread independent coverage.

FQM denied deploying a covert media operation in Zambia or anywhere else and noted that its communications activities are entirely legal in the countries in which it operates. The company confirmed that it worked with Suma Systems, to place articles largely in its Solwezi Today publication, noting that it is usual practice for companies to use paid-for media to communicate and publicise company messages.

It did not address the question of why much of this content is published without a disclaimer.

Suma Systems has also worked extensively with a news website called *Open Zambia* to promote FQM's interests, according to three journalists who have worked for Suma Systems.

With the tagline "Proudly independent since 2012", *Open Zambia*'s stated goal is "to promote and protect transparency, accountability, and business best practice in Zambia."



Nowhere on the Open Zambia site is it disclosed that this apparent homegrown Zambian media organisation is in fact set up on behalf of a presidential candidate by a British PR firm and funded by a mining client

In fact, the website has been run by Sands since he worked at CT Group. Files leaked to *The Guardian* and seen by Global Witness appear to show that the website was funded by an unnamed client in Zambia's mining industry.

Managing *Open Zambia* became a core part of SABI's work when it split from CT Group, a former SABI employee said.

He said the website's purpose was to support Hichilema's campaigns. It also ran negative stories about Zambia's opposition, as well as sports and cultural content to give the platform "a veneer of authenticity."

Journalists working for Suma Systems said they were commissioned to write stories for *Open Zambia* with two main goals: to paint the UPND and Hichilema in a good light and to promote FQM's operations.

A *Solwezi Today* reporter said that FQM executives proposed the collaboration to help reverse the negative narrative about the company, especially on social media. By 2026, the *Open Zambia* website had published almost 60 stories promoting FQM's activities, Global Witness analysis found, indicating an ongoing paid relationship.

FQM said that to its knowledge, Suma Systems' goals do not relate to President Hichilema or the UPND. It said that the *Open Zambia* platform publishes around 25-40 articles per month and it would therefore not be surprising if FQM, Zambia's largest taxpayer and employer, were the subject of 60 articles on the platform.

More recently, publications including the *Zambian Business Times* – which in the past has run adverts critical of FQM – as well as popular online news outlets, including *Mwebantu* and *Kalemba*, now also regularly publish content favourable to the company without a disclaimer.

FQM said that as part of its broader communications strategy in Zambia it pays for some content placement in the *Zambian Business Times* and other publications.

Global Witness does not allege that undertaking covert media operations or publishing election propaganda, fake news or disinformation contravenes Zambian law or is unusual in elections around the world.

The 2026 campaign: Key players back together, with help from the Tony Blair Institute

The UPND is now heading into the August election with a largely captive media and polling suggests it's likely to win.

The party is extremely well funded, including allegedly by FQM, while Hichilema has reassembled his core election-winning team, including Sands and Mills, along with the TBI-backed Presidential Delivery Unit (PDU).

Yet even so, Hichilema's party is worried, political analysts and sources close to the president said. Public anger has built over the party's unfulfilled promises, and the cost of living is rising.

The president has responded by taking further steps to close off civic and political space, introducing a contentious new cyber security law, allegedly paying lawmakers to push through the Bill No. 7 constitutional amendments and targeting political opponents.

Hichilema has long been paranoid and controlling, sources said, trusting only a small number of people, and his inner circle has now tightened even further.

A State House staffer and a journalist who works for UPND media described how Kayumba, Hichilema's special advisor on finance and investment – who was also a key member of his 2021 election team – had taken over key communications activities, cutting out official press and public relations staff and establishing his own team at State House.

Sources said Kayumba was working closely with Mills – who was heading up Hichilema's election campaign in a personal capacity after the Brenthurst Foundation closed last June – along with Sands and several other foreign consultants, all of whom were keeping a low profile.

Machila, Hichilema's right-hand man and one-time SABI advisor, was also working on the campaign, as was the president's business associate Chitalu, sources said.

Chitalu told Global Witness that he was not working on the campaign, adding that he lacked the "political acumen to participate in politics at any level." Having previously been Hichilema's business partner, he said he maintained a "collegiate" relationship with the President, who he has known for 30 years.

A UPND communications strategist said Machila arranged the contracts with Mills and Sands, who were paid by Hichilema with funds from party donors.

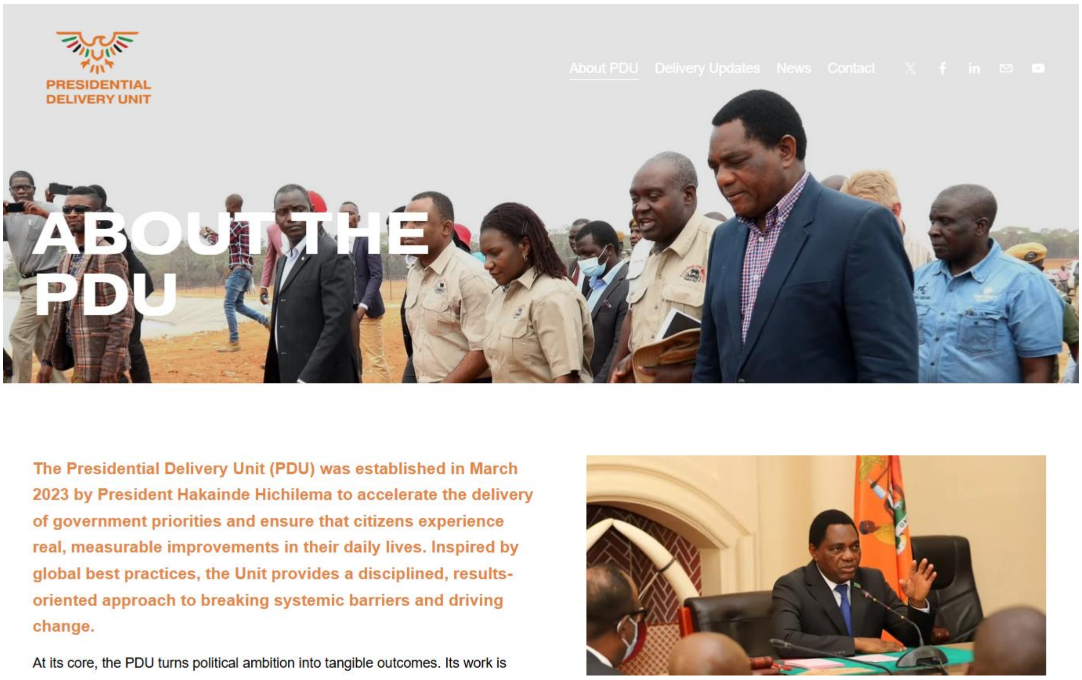
As money flowed in from FQM and other large corporations, Hichilema was keeping a tight hold on the funds and their distribution, sources said.

His 2026 campaign team was also now working closely with Zambia's PDU, which also reports to State House.

The PDU is supported by TBI. Funding within TBI is opaque, and two of its former employees who worked with the PDU said it wasn't clear who was ultimately paying the bill for this support.

The PDU has worked closely with the Brenthurst Foundation and Mills since its inception. Mwanawasa, the Brenthurst-paid advisor to Hichilema, was initially also appointed as its deputy head with a mandate to lead its work on mining – though last year she returned full time to State House.

Beyond its service delivery role, the PDU provides public relations support to Hichilema, including helping to drive the election campaign by highlighting the president's achievements in office. One of Hichilema's key advisors said the PDU was also working with Kayumba's team on analytics "to ensure our messaging hits the right code."



A screenshot from the "About the PDU" page of Zambia's Presidential Delivery Unit website

A TBI spokesperson told Global Witness that it does not fund the PDU, was not involved in the election campaign, and had no knowledge of voter-targeting work.

Analytics are at the core of the online 2026 campaign. The technology that can be used to target voters has improved significantly over the past decade, and it's now possible to see exactly "who is attending your rallies, who is likely to vote for you and for what reason," a special assistant to Hichilema explained.

The UPND was given advance access to the voter register before it was finalised by the Electoral Commission of Zambia, a senior party communications strategist said.

Based on this data, he said, the team had been creating detailed voter profiles and strategies, including for the 1.6 million new voters captured by the Electoral Commission of Zambia (ECZ) this year – around 18% of all Zambians registered to vote.

"Now the strategy is: how do we contain the current anger among the Zambian voters, while at the same time, ensuring the opposition remains in disarray," said a member of the PDU who is working on the campaign.

One of the team's key strategies – along with microtargeting and the use of rogue social media pages – was paying Zambian influencers with large social media followings to broadcast messaging favourable to the UPND.

"Knowing how desperate Hichilema is, I am sure he'll take over the whole social media space," said a journalist working for the UPND. "Because I can tell you, he's extremely sensitive to what is written about him."

Sources say State House staff were also working closely with Zambia's most popular online news organisations, such as *Mwebantu* and *Kalemba*, to run positive coverage.

"The white consultants are ensuring that this year's election is conducted using a scientific formula and methods," said the UPND communications strategist. "That's why the president has been saying he's employing imingalato" – a Bemba word used in football and politics to describe strategic manoeuvring, which has underhand connotations.

"Of course, the opposition have been crying that he is 'cooking' to manufacture the results by manipulating the election outcome, but that's not true," he continued. "This is a methodical approach whereby we know and fully understand the election terrain."

Recommendations

TO THE ZAMBIAN GOVERNMENT

STRENGTHEN REGULATION OF POLITICAL FINANCING AND ONLINE CAMPAIGNING

- Introduce mandatory disclosure requirements for all political donations, campaign spending and third-party political advertising, including digital campaigning and influencer payments.
- Establish clear rules prohibiting foreign states or enterprises as well as companies holding or seeking state concessions, licenses or contracts from directly or indirectly financing political campaigns or covert political communications.
- Establish a regulatory framework governing campaign finance including a robust enforcement mechanism, including:
    - Set limitations to donations from natural and legal persons for political campaigns.
    - Limit the amount political parties and candidates can spend during elections.
    - Political ads must be clearly labelled, identifying who paid for them, the cost and which election they pertain to.
    - Require political parties to submit income and expenditure statements as part of their annual returns.
- Mandate transparency for paid online political content, including sponsored Facebook pages, influencers and digital consultancies engaged in political messaging.
- Sponsorships of ads from outside the country should be prohibited preceding an election.
- Personal data for profiling in political ads should require explicit consent.
- Data analytics for targeting shouldn't be allowed to use sensitive data such as ethnicity, religion or sexual orientation data.

STRENGTHEN TRANSPARENCY AND CONFLICT-OF-INTEREST SAFEGUARDS

- Require public disclosure of meetings and communications between mining companies and senior public officials regarding licensing, taxation or regulatory reforms.
- Set up mandatory registers of lobbyists detailing activities, including client identities and targeted officials/bodies, lobbying topics and the resources used. These should be independently managed (e.g. by a Registrar of Political Parties Office).
- Set strict limits for gifts, entertainment and travel that lobbyists can offer to public officials to ensure decisions are not bought.
- Contingent fees for lobbyists should be banned. Election commissioners proposed by the President should be subjected to parliamentary scrutiny and approval.

- Enact legislation that provides a clear and comprehensive framework for asset, income, liabilities and beneficial ownership declarations by public officials. The law should clearly define categories of officials required to declare, frequency of declarations, reporting and disclosure requirements, verification procedures and sanctions for non-compliance or false declarations.

- Review and harmonise Zambia's asset declaration and lifestyle audit mechanisms with international best practices. The National Assembly should strengthen legal and institutional frameworks governing conflicts of interest involving Members of Parliament by enacting clear, enforceable provisions that require the timely disclosure and management of actual, potential and perceived conflicts of interests.

- Parliament should strengthen its Code of Conduct and Ethics oversight mechanism with clear provisions on lobbying, acceptances of gifts and engagement with private interests as well as disclosure and sanctions for non-compliance.

- Many of these recommendations could be included in the Political Parties Bill that is being negotiated by the Zambian Parliament.

PROTECT CIVIL SOCIETY AND ACCESS TO INFORMATION

- Ensure civil society organisations, journalists and researchers can safely investigate and report on political interference linked to extractive industries without intimidation or retaliation.

- Repeal or amend clauses in the Non-Governmental Organisations Act, Penal Code and cyber laws that allow for excessive state control, surveillance and suppression of dissent, ensuring they align with international human rights standards.

- Fully activate the Access to Information Act by closing loopholes that unduly limit information access. Any non-disclosure decision should pass a strict "harm test."

- Urgently cease intimidation, arbitrary arrests and harassment of journalists and activists.

- Rescind the mandatory five-year re-registration of civil society organisations and the requirement to join a government-aligned council.

- Ensure swift, impartial investigations if the safety of journalists and activists is compromised.

- Develop legal safeguards against coordinated disinformation campaigns linked to commercial interests.

IMPROVE MINING GOVERNANCE AND ACCOUNTABILITY

- Fully implement Extractive Industries Transparency Initiative (EITI) requirements in a timely manner.

- Make the existing beneficial ownership register publicly available free of charge.

- Undertake project-level financial modelling of government revenues and economic analysis to assess whether further changes to the mineral royalty rates are warranted to bring Zambia's expected fiscal take from mining projects closer to what it was prior to 2022, while maintaining the marginal variable mineral royalty approach and the company income tax deduction for royalties paid.

- Require mining companies to conduct and report on enhanced human rights and governance due diligence, including risks related to political influence and democratic integrity.

TO INTERNATIONAL BUYERS, AND DOWNSTREAM COMPANIES AND FINANCIERS

STRENGTHEN SUPPLY CHAIN DUE DILIGENCE AND TRANSPARENCY

- Treat political interference, covert lobbying and election-related manipulation as governance and human rights risks within responsible sourcing frameworks.

- Include contractual clauses prohibiting suppliers from engaging in undisclosed political influence operations or election interference.

- Conduct enhanced due diligence where suppliers operate in contexts with elevated corruption or democratic governance risks.

TO STANDARDS SETTERS AND MULTI-STAKEHOLDER INITIATIVES

RECOGNISE POLITICAL INTERFERENCE AS A RESPONSIBLE BUSINESS CONDUCT RISK

- Explicitly incorporate risks relating to democratic integrity, election interference, disinformation and covert political financing into responsible business conduct standards and guidance.

- Clarify that indirect financing of political campaigns through contractors, influencers or third parties may constitute corruption or unethical conduct.

- Strengthen disclosure expectations on political contributions especially from extractive industries.

IMPROVE GRIEVANCE AND ACCOUNTABILITY MECHANISMS

- Ensure affected stakeholders, journalists and civil society organizations can safely raise complaints regarding political interference linked to extractive operations.

- Strengthen monitoring and enforcement mechanisms for member companies alleged to have engaged in covert political influence operations.

EXPAND EITI GOVERNANCE DISCLOSURES

- Incorporate specific requirements dealing with extractive companies influence on governments and risks of corporate capture, such as disclosure requirements on direct or indirect payments for political campaigns and to parties and politicians.

- Make disclosure of beneficial ownership and PEP connections mandatory related to politically connected service providers.

- Support greater civil society access, usability and analysis of extractive governance data.
- Improve efforts to synthesize and reconcile payments-to-governments disclosures produced by companies under mandatory payment disclosures with disclosures at the country level through EITI.

TO FIRST QUANTUM MINERALS AND OTHER MINING COMPANIES OPERATING IN ZAMBIA

DO NOT ENGAGE IN POLITICAL INFLUENCE ACTIVITIES

- Do not engage in undisclosed direct or indirect financing of political campaigning.
- Do not engage in direct or indirect coordinated online influence operations or disinformation efforts.
- Conduct an independent investigation into payments made to third-party digital campaigners, consultants or intermediaries linked to political messaging.

STRENGTHEN PUBLIC DISCLOSURES

- Publish comprehensive disclosures on political spending, lobbying and public affairs contracts as well as relationships with political consultants and online communications firms.
- Strengthen tax transparency reporting by publishing country-by-country reporting of revenues, profits, tax expense (deferred and current), taxes paid (cash basis), employment and other information in line with the Global Reporting Initiative (GRI) Standard on Tax (GRI 207-4).
- Report comprehensively and in a timely fashion on taxes received, beneficial ownership, politically exposed persons and project-level payments and publish contracts according to EITI requirements.

STRENGTHEN INTERNAL GOVERNANCE AND OVERSIGHT

- Ensure compliance systems explicitly cover digital campaigning, election-related activities and third-party influence operations.
- Align practice with OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.
- Respect civic space for journalists, researchers and civil society organisations.

TO THE UK AND CANADIAN GOVERNMENTS

EXPAND DUE DILIGENCE OBLIGATIONS

- Introduce mandatory human rights and environmental due diligence legislation that includes governance, corruption and democratic integrity risks within corporate risk assessments.
- Investigate whether social media platforms are complying with Canadian and UK requirements to have systems in place to reduce the risks of illegal content on their services, and scrutinise how

personalisation in engagement-based design may be encouraging potentially harmful behaviour on these services.

INCREASE ENFORCEMENT AND INTERNATIONAL COOPERATION

- Strengthen coordination between UK enforcement agencies and regulators in mineral-producing countries on corruption and illicit financial flows linked to extractive industries.

- Increase support for investigative journalism, anti-corruption bodies and civil society organisations monitoring corporate influence and governance risks abroad.