IHC SECTOR INTELLIGENCE

Zimbabwe Mining Compliance Alert Factsheet

30 August 2026 Deadline To Regularize Outstanding Obligations

The Ministry of Mines & Mining Development has called on all holders of mining titles and mining operators. The Ministry has indicated that they should regularize outstanding obligations by 30 August 2026. The Ministry has warned that non-compliance may result in forfeiture of mining titles.

EXECUTIVE SUMMARY

A public notice was issued by the Ministry of Mines & Mining Development on 10 July 2026. It directs mining title holders & operators to settle or clarify outstanding obligations. Stakeholders have been advised to approach their respective Provincial Mining Offices. This is meant for them to obtain invoices & establish outstanding payments or compliance requirements. The immediate significance of this development is not merely the deadline. Rather, the notice drives mining title compliance into a near-term issue bent on preserving assets. Essentially, title is now more material to acquisitions, joint ventures, financing & operating plans. Its compliance status is now a priority due diligence focus.

Core Details Of The Notice

What Is Stipulated	What Is To Be Verified At A PMO
• The deadline is 30 August 2026	• The exact outstanding obligations attached to each title or operator
• It applies to holders of mining titles & mining operators	• Current invoices, arrears, inspection status & title-specific compliance gaps
• Stakeholders to engage their respective Provincial Mining Offices (PMOs)	• Whether submitted payments of filings have been correctly captured in Ministry records
• Failure to regularize may result in forfeiture of mining titles	• The remedial steps, documentary evidence & processing time required for each case

Legal & Regulatory Context

The Mines & Minerals Act [Chapter 21:05] provides a statutory framework for preserving mining rights & for forfeiture in specified circumstances. Part XI addresses inspection certificates for registered blocks & mining leases. Sections 197 to 199 link inspection certification to the protection of relevant mining rights from forfeiture. Other provisions in the Act address forfeiture of sites & mining locations in defined circumstances.

This notice should not be read as defining a single universal debt category. ‘Outstanding obligations’ may be title-specific or operator-specific. Thus, investors & opportunity owners should avoid assuming that payment of one known fee fully regularizes a title. Written reconciliation with the relevant Provincial Mining Office is the more prudent approach.

Why All Of This Matters

Title Validity Is A Transaction Risk

● A mining asset can appear geologically attractive whilst carrying a regulatory weakness. Such a weakness may potentially delay or even undermine a transaction. Investors should test & confirm title standing before solely relying on project valuation.

The Deadline May Expose Dormant Or Weakly Maintained Mineral Assets

● This tighter compliance drive can pressure holders of undercapitalized or inactive assets to regularize, recapitalize, seek partners or reconsider their portfolios. This can likely create deal flow. Opportunities with distressed title require enhanced verification.

Compliance Quality Increasingly Affects Bankability

● For investors, clean title records, current inspection documentation & traceable regulatory payments are crucial. They strengthen the evidence base for due diligence, security structuring & investment approvals.

Record Reconciliation Should Precede Capital Deployment

● There may be scenarios where Ministry records are incomplete, outdated or disputed. Investors should resolve discrepancies before acquisitions payments, major CAPEX or financing drawdown. Documentary proof held by a seller should be checked against the regulator’s record.

The Notice Signals A Broader Governance Direction

● The Ministry has framed sector transformation around several dimensions. These are geological knowledge, beneficiation, modernized governance, formalization, sustainability & revenue maximization. The compliance deadline is consistent with an apparent policy direction. As in, government now places greater weight on accountable & current mining administration.

IHC Due Diligence Lens

🟡 **For deals involving Zimbabwean mining rights, we recommend that the 30 August 2026 deadline must be treated as a trigger for focused title compliance reviews. Here is a due diligence framework to employ:**

Due Diligence Focus	Evidence To Request	Core Question
Title Identity & Ownership	Certificate or registration documents; holder details; title schedule	Does the legal title match the asset & counterparty presented?
Inspection Status	Current & historical inspection certificates where applicable	Is the right protected & are inspection requirements current?
Outstanding Obligations	Provincial Mining Office invoice or reconciliation; payment receipts	What remains unpaid or unresolved as at the review date?
Regulatory Correspondence	Notices, directives, queries & responses	Is there any pending compliance matter or forfeiture exposure?
Record Consistency	Regulator confirmation compared with seller or operator records	Do Ministry records reconcile with the transaction paper trail?
Remediation Plan	Payment plan; submissions; responsible person & evidence of closure	Can all gaps be closed before the deadline or transaction milestone?

Immediate Action Focuses

- **Mining Title Holders** must request title reconciliations from relevant Provincial Mining Office. Obtain invoices, settle or formally resolve outstanding items, retain proof of payment & updated compliance records.
- **Mining Operators** must confirm whether operational obligations are outstanding in addition to title-related matters. Track compliance closure before 30 August 2026.
- **Investors or Buyers** must add compliance confirmation to legal due diligence. Require evidence of regularization as a precondition.
- **Prospective Partners** must review warranties, covenants & default provisions dealing with maintenance of mining rights. Verify that registered holder is actively preserving the title.
- **Lenders & Financiers** must retest title standing where mining rights underpin project value, security or repayment assumptions. Monitor remediation of identified gaps.

Strategic Outlook & Core Takeaways

The 30 August 2026 deadline is a short window compliance development. It has far-reaching investment consequences. In the near term, it raises the cost of inaction for title holders. Over the medium term, stronger enforcement could improve the quality of title records. This could reduce the number of nominally held but poorly maintained mining assets. This will of course happen only if enforcement & record administration are consistent and transparent.

For the investment market, the key distinction will increasingly be between a mineral prospect & an investable mining asset. Geological potential is no doubt fundamental. However, title integrity, regulatory standing & documented compliance are core aspects of bankability. Investors evaluating Zimbabwean mining opportunities should flag unresolved title risk explicitly. They must avoid treating regularization as a post-closing housekeeping issue.

The deadline creates an immediate compliance imperative for opportunity owners. Investors must verify, not assume, title standing. A current Provincial Mining Office reconciliation, supported by payment & inspection records where applicable is now imperative. It should become a core part of mining deals due diligence.