GUINEA

LEGAL & TAX FRAMEWORK FOR INVESTMENT — AUGUST 2026 EDITION

A West African mining power and an **OHADA** member, the Republic of Guinea (Conakry) holds the **world's largest bauxite reserves** and is entering a new era with first production from the giant **Simandou** iron-ore deposit (first shipments in late 2025, ramping towards 60 Mt/year). Outside the franc zone, it keeps its national currency (the **Guinean franc, GNF**) and its own central bank (BCRG). The France-Guinea tax treaty is in force. This factsheet summarises the macroeconomic, tax and legal data relevant to an entry decision.

POPULATION
~17.5 M
RGPH-4 census (INS, Feb 2026)

CURRENCY
GUINEAN FRANC
GNF — managed floating regime (BCRG)

GDP GROWTH
~7.1%
2025 · >10% expected medium-term (Simandou)

INFLATION
~3.5%
2025 (DG Trésor FR / IMF, Aug 2025)

NOMINAL GDP
≈ $25.6 BN
2024 (IMF)

HEAD OF STATE
M. DOUMBOUYA
General Mamadi Doumbouya — inaugurated 17 Jan 2026 (7-year term)

CAPITAL
CONAKRY
Economic and administrative hub

BUSINESS FRAMEWORK
OHADA
17 OHADA states · outside the franc zone (GNF/BCRG)

MINING ASSETS
BAUXITE & IRON ORE
World's 1st bauxite reserves · Simandou iron ore

SIMANDOU: A NEW GROWTH ENGINE

Guinea holds the **world's largest bauxite reserves** (~25%) and is among the top global producers — the historic backbone of exports. The giant **Simandou** iron-ore deposit entered production in late 2025 (2.3 Mt shipped in 2025), ramping up towards **60 Mt/year by 2028**: a trans-Guinean railway, a deep-water port and a supporting supply-chain ecosystem are changing the scale of the economy — a project that has, however, seen several halts linked to workplace accidents (August 2025, February 2026). The **France-Guinea tax treaty**, in force since 1999, offers a structuring advantage (royalties reduced to 10%) for flows with France.

A HARMONISED BUSINESS-LAW FRAMEWORK

- **OHADA** — Guinea applies the 9 OHADA Uniform Acts (companies, security interests, debt recovery, insolvency, arbitration, etc.). Disputes may be brought before the **CCJA** (Common Court of Justice and Arbitration, seated in Abidjan), whose awards are enforceable across the 17 member states.
- **National monetary framework** — outside the franc zone: currency = **Guinean franc (GNF)**, managed floating regime, administered by the **Central Bank of the Republic of Guinea (BCRG)**; national foreign-exchange regulation (see below).
- **Revised SYSCOHADA accounting** — the mandatory accounting framework, readable across the 17 OHADA member states.
- Also a member of the **African Union**, the **AfCFTA**, **ECOWAS** and **OAPI** (intellectual property).

COMMON OHADA COMPANY FORMS

FORM	MIN. CAPITAL
SA	FCFA 10,000,000 (OHADA baseline, GNF equivalent)
SAS	Set freely by the by-laws
SARL	Set freely by the by-laws
Branch	Attached to the foreign company (OHADA time limit)

Registration with the RCCM; one-stop shop: APIP — Private Investment Promotion Agency (apip.gov.gn).

TAX REGIME — THE ESSENTIALS

TAX	RATE	NOTES
Corporate income tax (CIT)	**25-35%**	Tiered rate (Art. 229 GTC): 25% standard rate · **30% for holders of a mining permit** (bauxite, Simandou) · 35% for telecoms, banks/insurance, petroleum import/distribution.
Minimum lump-sum tax	**0.5%**	0.5% of prior-year turnover (Art. 244 GTC), creditable against CIT. Floor GNF 10M (medium enterprise) / GNF 40M (large enterprise); ceiling GNF 100M / 500M.
VAT	**18%**	Registration mandatory above GNF 500 million turnover (optional from GNF 150 million). GTC (2026).
Withholding taxes (non-residents)	**15%**	Uniform rate: dividends and investment income (Art. 187 GTC) · royalties and services (Art. 198 GTC). Reduced by the applicable treaty.
Tax treaties	**FRANCE**	France-Guinea treaty **in force** (signed 15 Feb 1999, French decree 2004-1008 of 17 Sep 2004: dividends 15%, interest 15%, royalties 10%). Network beyond this very limited.

Source: Guinea General Tax Code (Law L/2021/032/AN, Articles 187, 198, 229, 244) · DG Trésor FR (04/08/2025) · APIP / invest.gov.gn (2024-2026).

ATTRACTIVE SECTORS

- **Bauxite** — Guinea holds the **world's largest reserves** (~25%) and is among the top global producers; the backbone of exports.
- **Iron ore — Simandou** — a giant deposit; first shipments in late 2025, ramping up towards 60 Mt/year by 2028. The site has seen several production halts linked to workplace accidents (August 2025, February 2026): safety diligence to factor in.
- **Gold** — significant gold output.
- **Hydroelectricity** — strong potential (Souapiti dam), an asset for local processing (alumina).

INVESTMENT INCENTIVES

- **Investment Code** — tax and customs exemptions for approved projects (jobs and amount conditions).
- **APIP** (apip.gov.gn) — one-stop shop for incorporation and support.
- **Mining and base conventions (Simandou)** — a specific framework to combine with OHADA law and local content.

FOREIGN-EXCHANGE REGULATION

- **National framework (BCRG).** Outside the franc zone, cross-border financial transactions fall under the national foreign-exchange regulation administered by the Central Bank of the Republic of Guinea; the Guinean franc is under a managed floating regime, transactions channelled through licensed banks.
- **Repatriation of export proceeds.** A requirement strengthened in recent years (higher threshold for the mining sector); transfer of dividends and capital permitted subject to documenting the flows and paying the taxes due.
- **Good practice.** Funding in foreign currency and keeping documentary traceability of each flow secures the later transfer of funds.

SECURING THE INVESTMENT

Beyond the figures, a successful entry rests on command of the legal framework. In a world-class mining country ramping up fast (Simandou), contractual structuring and compliance with the mining and exchange frameworks are decisive.

THE UGGC ANGLE — OHADA LEVERS

§ **CCJA arbitration** (Abidjan) — awards enforceable across the 17 OHADA member states.

§ **Security interests (Uniform Act)** — mortgage, pledge, autonomous guarantee, security agent; useful for mining and infrastructure financings.

§ **FX & repatriation** — national BCRG regulation (repatriation of export proceeds): structure dividend and capital repatriation upfront.

§ **Governance & compliance** — OHADA company law, SYSCOHADA, mining conventions/local content.

UGGC Africa supports you in Guinea through its pan-African platform — africa@uggc.com.

Disclaimer. This country factsheet is provided for general information, as at August 2026; it does not constitute legal or tax advice and cannot bind UGGC Africa. Any investment decision should be the subject of a tailored analysis.

Sources: Guinea General Tax Code, Law L/2021/032/AN (Art. 187, 198, 229, 244) — dgi.gov.gn / itie-guinee.org · DG Trésor FR (economic situation, 04/08/2025) · INS Guinea — RGPH-4 census (Feb 2026) · IMF (WEO) · Légifrance (France-Guinea tax treaty, decree 2004-1008) · APIP / invest.gov.gn · Rio Tinto (FY2025) & S&P Global (Simandou, Sep 2025-Mar 2026, incl. safety suspensions Aug 2025 and Feb 2026) · BCRG — bcrg-guinee.org (foreign-exchange regulation) · Guinéenews / Supreme Court (inauguration, Jan 2026) · OHADA — ohada.org. uggcafrica.com.