

RioTinto

Country-by-Country Report 2021



In 2021, we paid \$13.3 billion in taxes and royalties globally, including \$11.1 billion in Australia.

For over a decade, we have voluntarily published our taxes and payments to governments.

In this report, we supplement the comprehensive disclosures in *Taxes Paid: Our Economic Contribution 2021 (2021 Taxes Paid Report)* to disclose associated financial information on a country-by-country basis for all countries where we had a taxable presence in 2021. We disclose country-by-country information, including total revenue, related-party revenue, income tax paid, income tax accrued, effective tax rates, number of employees and tangible assets. We also provide information about our activities in each country. We make these additional disclosures annually.

For ease of reference, we have provided the country-by-country disclosures on a regional basis with associated commentary and in a table at the end of this report.

Detailed information on our global payments to governments, our Tax Policy and approach to tax and transparency can be found in our *2021 Taxes Paid Report*.

This report, together with our *2021 Taxes Paid Report*, meets the requirements of the “GRI 207: Tax standard” of the Global Sustainability Standards Board of the Global Reporting Initiative (GRI).

Please refer to the Basis of preparation section for further information.

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Our operations are located on land and waters that have belonged to Indigenous peoples for tens of thousands of years. We respect their ongoing deep connection to Country and recognise the vast knowledge Indigenous peoples have of the land, water and environment. We pay respects to Elders, both past and present, and further acknowledge the important role that Indigenous peoples continue to play within our business and our communities.

Asia Pacific

Key countries

Tax jurisdiction	Unrelated-party revenue	Related-party revenue	Total revenue	Profit/(loss) before income tax	Income tax paid (on cash basis)	Income tax accrued – current year	CBC effective tax rate	Statutory corporate tax rate	Number of employees	Tangible assets other than cash or cash equivalents
Australia	36,878,365,050	6,847,769,677	43,726,134,727	23,506,450,063	7,717,134,654	7,215,946,009	31%	30%	21,196	32,451,334,087
China	2,000,923,708	36,183,117	2,037,106,825	(172,997,343)	26,676,992	3,820,420	*	25%	206	1,227,315,387
Mongolia	1,975,570,727	8,028,576	1,983,599,303	472,485,727	203,711	267,271	0%	25%	3,513	11,204,085,734
New Zealand	2,509,730	707,816,747	710,326,477	182,427,828	7,059	35,298,368	19%	28%	665	229,802,380
Singapore	8,323,608,100	5,004,985,760	13,328,593,860	2,240,950,375	28,411,242	70,766,400	3%	17%	450	1,001,922,405

* Refer to explanation below.

Australia

Australia is home to the largest part of our business and is the location where we pay the most tax and royalties. We produce and export a range of commodities, including iron ore, bauxite, alumina, aluminium and salt. We also produced diamonds until the closure of Argyle in November 2020 and uranium until the closure of Energy Resources of Australia in January 2021.

Of the \$13.3 billion in taxes and royalties paid globally during 2021, \$11.1 billion was paid in Australia, including \$7.7 billion in corporate tax.

The country-by-country effective tax rate (CBC ETR) is in line with the statutory corporate tax rate.

China

Our business activities in China include exploration, administration and sales and marketing support services, the blending and distribution of iron ore steel powder materials, and the purchase and sale of iron ore.

Our activities in China resulted in an accounting loss overall.

Notwithstanding the overall accounting loss position, tax was accrued in respect of some entities which are in a taxable profit position in absence of the ability to offset tax losses from other entities.

Mongolia

Our activities in Mongolia mainly relate to the Oyu Tolgoi project which is owned by the Government of Mongolia (34%) and Turquoise Hill Resources (TRQ) (66%). We own 50.8% of TRQ (as at 31 December 2021). The Oyu Tolgoi copper and gold mine is a major contributor to the Mongolian economy. Other activities in Mongolia include exploration, information and technology services, administration, and support services.

In 2021 the Oyu Tolgoi underground mine was still under construction, however the open pit mine was operational and overall Oyu Tolgoi generated an accounting profit for the year. Oyu Tolgoi has tax losses available from previous years to offset its taxable profits, resulting in no corporate tax paid or accrued for the year and a 0% CBC ETR. Notwithstanding this, Oyu Tolgoi paid \$544 million in other taxes, royalties and charges to Mongolian governments as disclosed in our *2021 Taxes Paid Report*. The income tax accrued disclosed in the table above relates to withholding tax on interest paid by customers on receivables and withholding tax on interest received on deposits with Mongolian banks.

New Zealand

New Zealand's Aluminium Smelter (NZAS) is a joint venture owned by Rio Tinto (79.36%) and Japan's Sumitomo Chemical Company (20.64%). NZAS converts alumina into aluminium using renewable hydroelectricity. The New Zealand operations generated a profit for accounting and tax purposes in 2021. The CBC ETR was lower than the statutory rate primarily as a result of tax losses available from prior years to offset some of the taxable profits.

Singapore

Singapore is home to our commercial centre and brings together our global sales and marketing, procurement and marine and logistics businesses, supported by functions including market analysis, economics, commercial treasury, insurance, human resources, legal, corporate relations and finance. The related-party revenue for Singapore relates to activities undertaken by our commercial centre, including sales of commodities and fees for services, as well as interest earned on intragroup financing.

The primary difference between the Singapore statutory tax rate and the CBC ETR is due to the application of tax incentives available to our activities. More information in relation to our Singapore commercial centre can be found in our *2021 Taxes Paid Report* on our website.

Other countries

Tax jurisdiction	Unrelated-party revenue	Related-party revenue	Total revenue	Profit/(loss) before income tax	Income tax paid (on cash basis)	Income tax accrued – current year	CBC effective tax rate	Statutory corporate tax rate	Number of employees	Tangible assets other than cash or cash equivalents
Hong Kong	–	33,852	33,852	1,237,525	7,830	7,830	1%	17%	2	–
India	2,521,205	20,103,566	22,624,771	3,759,003	1,062,712	951,483	25%	25%	354	2,093,597
Indonesia	27,296	–	27,296	(13,300,633)	–	–	0%	25%	–	–
Japan	1,596	9,423,362	9,424,958	1,546,715	1,044,287	396,694	26%	31%	22	930,566
Kazakhstan	62,373	–	62,373	(17,054,268)	–	–	0%	20%	39	1,228,454
Korea, Republic of	3,439	2,279,126	2,282,565	413,458	(641)	127,802	31%	25%	9	434,997
Lao People's Democratic Republic	160,076	–	160,076	(580,218)	–	–	0%	21%	3	–
Malaysia	12,792,587	6,379,231	19,171,818	1,448,064	446,728	449,720	31%	24%	1	2,906,800
Papua New Guinea	20,344	–	20,344	(223,034)	–	–	0%	30%	–	–
Philippines	–	–	–	–	–	–	0%	30%	–	–
Taiwan, Province of China	58	327,904	327,962	18,000	3,295	4,481	25%	20%	1	–

Hong Kong

We undertake minor regional administrative services in Hong Kong and earned a small amount of interest on foreign bank accounts. The profit included some accounting adjustments as a result of winding up a company. This income is offset by brought forward tax losses resulting in a CBC ETR of 0%. The income tax accrued relates to withholding tax on interest income.

India

Our primary activities in India are Group services, administrative and marketing support services, and the trading of iron ore steel powder materials.

The CBC ETR is in line with the statutory corporate tax rate.

Indonesia

Our activities in Indonesia relate to closure. These activities resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%.

Japan

Our main activities in Japan are administration and sales and marketing support services. The difference between the CBC ETR and the statutory corporate tax rate is primarily due to timing differences between the treatment of provisions for tax and accounting purposes.

Kazakhstan

Our main activity in Kazakhstan is exploration. These activities resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%.

Korea

Our activities in Korea are administration and sales and marketing support services. The difference between the CBC ETR and the statutory corporate tax rate relates to certain expenses being treated as non-deductible for tax purposes.

Laos

Our main activity in Laos is exploration. These activities resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%.

Malaysia

Our main activities in Malaysia are the trading and distribution of borates products. The difference between the CBC ETR and the statutory corporate tax rate relates to certain expenses being treated as non-deductible for tax purposes.

Papua New Guinea

Our main activity in Papua New Guinea is exploration. These activities resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%.

Philippines

Our entities in the Philippines were dormant in 2021.

Taiwan, Province of China

Our main activities in Taiwan are administration and sales and marketing support services. The difference between the CBC ETR and the statutory corporate tax rate relates to certain expenses being treated as non-deductible for tax purposes.

North and South America

Key countries

Tax jurisdiction	Unrelated-party revenue	Related-party revenue	Total revenue	Profit/(loss) before income tax	Income tax paid (on cash basis)	Income tax accrued – current year	CBC effective tax rate	Statutory corporate tax rate	Number of employees	Tangible assets other than cash or cash equivalents
Brazil	3,139,605	104,597,501	107,737,106	267,724	2,528,966	1,866,386	697%	34%	99	115,059,652
Canada	3,291,159,306	8,542,039,652	11,833,198,958	3,110,537,049	562,757,180	624,299,382	20%	31% ¹	12,270	15,055,303,606
Chile	47,461	–	47,461	(22,089,705)	150,638,505	89,956	*	27%	56	210,131
United States	6,825,087,129	451,249,180	7,276,336,309	375,569,379	(31,797,043)	29,062,199	8%	24% ¹	3,471	6,672,978,088

1. Rate is an approximate weighted average rate across our businesses.

* Refer to explanation below.

Brazil

Our main activity in Brazil relates to our 10% interest in the Alumar alumina refinery in São Luís, Maranhão, northeast Brazil – the largest alumina refinery in South America. Alumar is accounted for as a jointly controlled asset which is proportionately consolidated. We also have exploration activities in Brazil. Although the overall accounting profit in Brazil is quite small, this is made up of a mix of accounting profits and losses across our different activities. The income tax accrued is a consequence of the inability to offset losses from exploration activities against profits, resulting in a disproportionately high CBC ETR.

We also hold a 12% interest in the Mineração Rio do Norte (MRN) bauxite mine in Porto Trombetas, northern Brazil, one of the country's largest bauxite mines. MRN is an equity accounted unit which is not consolidated for accounting purposes and is therefore not reported in the above table. We paid \$0.4 million in tax in respect of MRN in 2021 as disclosed in our *2021 Taxes Paid Report*.

Canada

We are one of the largest mining and metals businesses operating in Canada, where we produce a range of commodities including iron ore, alumina, aluminium, diamonds and ilmenite ore. From ilmenite ore, we produce high-quality titanium dioxide feedstock and high-purity pig iron, steel billets and metal powders. The majority of the related-party revenue in the table above relates to the sale of aluminium, diamonds and iron ore products to related parties located in the US, UK and Singapore. Of these, the highest proportion relates to sales to a US-related party for sale to US customers.

The CBC ETR is lower than the statutory tax rate primarily due to the availability of tax losses incurred in previous years to offset some of the current year profits. This impact was partially offset by the impact of an impairment charge in respect of Kitimat for which a current tax deduction is not available.

Chile

GRI 207 requires disclosure on consolidated activities (excluding equity accounted units) which for Chile primarily involves exploration. These activities resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%. The income tax accrued relates to tax on employee benefits. The income tax paid relates primarily to withholding tax on dividends received from Escondida.

As disclosed in our *2021 Taxes Paid Report*, we paid \$554.5 million in corporate tax (including the withholding tax on dividends referred to in the preceding paragraph) in Chile in relation to our 30% interest in the Escondida copper mine, the world's largest copper producer, located in northern Chile. Escondida is an equity accounted unit which is not consolidated for accounting purposes and, with the exception of withholding tax paid on dividends, is therefore not reported in the table above.

US

We have a number of operating assets in the US. Our Kennecott mine is a world-class, integrated copper mining operation located just outside Salt Lake City, Utah. Our operation includes a concentrator, smelter and refinery. We also mine borates in Boron, California.

The Resolution Copper project in Arizona, one of the world's largest copper deposits, is progressing through the permitting process. We own 55% of Resolution Copper and BHP owns 45%.

The US consolidated group reported an overall profit for both accounting and Federal tax purposes. The CBC ETR is lower than the statutory tax rate primarily due to the availability of tax losses incurred in previous years to offset some of the current year profits, together with the availability of resource depletion tax allowances which reduce taxable profits. The income tax refund received in 2021 relates to the refund of Alternative Minimum Tax that was granted by the US Government when the Alternative Minimum Tax regime was repealed. This credit was reduced slightly by some state tax payments.

Other countries

Tax jurisdiction	Unrelated-party revenue	Related-party revenue	Total revenue	Profit/(loss) before income tax	Income tax paid (on cash basis)	Income tax accrued – current year	CBC effective tax rate	Statutory corporate tax rate	Number of employees	Tangible assets other than cash or cash equivalents
Argentina	540,735	–	540,735	(4,957,594)	14,336	14,336	*	30%	–	–
Aruba	–	–	–	–	–	–	0%	25%	–	–
Bermuda	–	–	–	(507,202)	–	–	0%	0%	–	–
Bolivia, Plurinational State of	–	–	–	(8,454)	–	–	0%	25%	–	–
British Virgin Islands	–	–	–	–	–	–	0%	0%	–	–
Colombia	194,142	–	194,142	(974,264)	–	–	0%	31%	–	–
Jamaica	–	–	–	(3,380,046)	–	–	0%	25%	–	–
Mexico	–	–	–	(46,034)	–	–	0%	30%	–	–
Peru	271,880	–	271,880	(27,569,355)	–	–	0%	30%	58	16,925,479

* Refer to explanation below.

Argentina

Our main activity in Argentina during 2021 was exploration. In 2022 we acquired the Rincon lithium project. Our activities in Argentina resulted in losses for both accounting and tax purposes. The income tax paid and tax accrued relate to withholding tax.

Aruba

The Rio Tinto entity in Aruba was dormant in 2021 and is targeted for liquidation.

Bermuda

The Rio Tinto entities in Bermuda are holding companies only and incurred a small loss for accounting purposes. No tax benefit is obtained from these entities.

Bolivia

Our main activity in Bolivia is exploration. Our activities in Bolivia resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%.

British Virgin Islands

The entity in British Virgin Islands is a dormant holding company.

Colombia

Our main activity in Colombia is exploration. Our activities in Colombia resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%.

Jamaica

Our main activity in Jamaica is environmental remediation. Our activities in Jamaica resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%.

Mexico

Our main activity in Mexico is exploration. Our activities in Mexico resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%.

Peru

Our main activity in Peru is exploration, in particular, the La Granja project. Our activities in Peru resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%.

Europe

Key countries

Tax jurisdiction	Unrelated-party revenue	Related-party revenue	Total revenue	Profit/(loss) before income tax	Income tax paid (on cash basis)	Income tax accrued – current year	CBC effective tax rate	Statutory corporate tax rate	Number of employees	Tangible assets other than cash or cash equivalents
Belgium	429,202,529	10,160,034	439,362,563	5,090,461	538,284	589,296	12%	25%	34	5,838,334
France	694,804,137	231,374,126	926,178,263	(119,802,743)	–	–	0%	31%	243	67,084,633
Iceland	1,441,367	714,146,964	715,588,331	163,381,617	–	–	0%	20%	380	210,520,695
Luxembourg	375,636	–	375,636	(464,554)	2,944,761	2,974,380	*	25%	–	–
Netherlands	151,586	577,009,006	577,160,592	(115,942,944)	419,981	32,013,132	*	25%	155	8,044,738
Serbia	2,133,279	200,894	2,334,173	(115,829,070)	–	–	0%	15%	140	16,390,984
United Kingdom	3,336,489,994	1,287,554,201	4,624,044,195	379,407,567	1,310,544	15,800,124	4%	19%	189	143,664,192

* Refer to explanation below.

Belgium

Our main business activities in Belgium are the sorting, selling and marketing of diamonds from our diamond mines in Australia and Canada, and a third-party mine in Zimbabwe. The primary difference between the CBC ETR and the statutory corporate tax rate is due to the application of the Carat Tax Regime, which is compulsory for diamond trading companies.

Under this tax regime, the standard corporate tax rate of 25% is applied to 2.1% of gross turnover less allowable deductions, however, taxable income cannot be lower than 0.55% of turnover.

France

Our activities in France are related to managing rehabilitation and environmental obligations for divested and closed businesses, sales and marketing services, and research and development. In addition, our operations team in Coudekerque refines borates and distributes specialty borates products.

Our activities in France resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%.

Iceland

Our main activity in Iceland is the ISAL aluminium smelter, which produces some of the highest-quality, lowest-carbon footprint aluminium in the world, with 100% of our electricity generated from clean, renewable hydropower, supplied by the power company Landsvirkjun.

Our activities in Iceland resulted in a profit for both accounting and tax purposes. The taxable profit was offset by tax losses available from previous years resulting in a CBC ETR of 0%.

Luxembourg

Our main activity in Luxembourg related to an insurance services company which was wound up during the year. Although the activities resulted in a loss, there were some statutory adjustments required that resulted in income tax being accrued and paid.

Netherlands

Our main business activities in the Netherlands are the manufacturing and production of anodes; the storage, packaging and distribution of borates; and other holding structure activities. In addition, the Netherlands is the location of the holding company for TRQ's investment in Oyu Tolgoi LLC (OT LLC), the owner of the Oyu Tolgoi project in Mongolia. The TRQ Netherlands entity provides both debt and equity funding to OT LLC.

Our activities in the Netherlands resulted in losses for both tax and accounting purposes. The income tax accrued for the year relates to withholding tax on accrued interest income from Oyu Tolgoi but where that tax will only be withheld and remitted on payment of the interest.

Serbia

Serbia is home to the Jadar lithium-borate project. We continue to explore all options following the Government of Serbia's cancellation of the Spatial Plan in January, requiring revocation of all related permits. We acknowledge the concerns from communities and are engaging meaningfully to explore ways to address them.

Our activities in Serbia in 2021 resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%.

UK

The UK is home to our corporate headquarters where we have corporate functions such as investor relations, treasury, finance and sales and marketing activities. The UK is the holding jurisdiction for the majority of the Group's non-Australian operations and provides funding to our operations globally.

Our activities in the UK in 2021 resulted in a profit for accounting purposes related to foreign exchange gains which are not subject to tax. Similarly in previous years, foreign exchange losses have not been deductible for tax purposes. The income tax accrued for the year relates to tax withheld on interest income received from non-UK Group entities along with taxes payable in respect of controlled foreign companies.

Other countries

Tax jurisdiction	Unrelated-party revenue	Related-party revenue	Total revenue	Profit/(loss) before income tax	Income tax paid (on cash basis)	Income tax accrued – current year	CBC effective tax rate	Statutory corporate tax rate	Number of employees	Tangible assets other than cash or cash equivalents
Finland	–	–	–	(8,025,283)	–	–	0%	20%	5	43,485
Germany	365,993	5,303,267	5,669,260	9,544,836	239,441	344,222	4%	30%	18	1,875,376
Italy	–	–	–	–	–	–	0%	24%	–	–
Jersey	–	–	–	–	–	–	0%	0%	–	–
Malta	–	–	–	–	–	–	0%	35%	–	–
Spain	521,170	3,033,722	3,554,892	(65,170)	8,305	196,889	*	25%	12	2,919,066
Switzerland	237,771	7,118,113	7,355,884	(19,322,937)	822,555	389,954	*	15%	1	65,069

* Refer to explanation below.

Finland

Our main activities in Finland relate to exploration. Our activities in Finland resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%.

Germany

Our main activities in Germany relate to administration and sales and marketing support services.

The difference between the CBC ETR and the statutory corporate tax rate relates to pension accounting adjustments which do not give rise to taxable income.

Italy

The Rio Tinto entity in Italy was dormant in 2021 and was liquidated during the year.

Jersey

As noted in our *2021 Taxes Paid Report*, the entities in Jersey were wound up in 2021.

Malta

The Rio Tinto entity in Malta was dormant in 2021 and was liquidated during the year.

Spain

Our main activities in Spain relate to administration and sales and marketing support services.

Our activities in Spain resulted in losses for both accounting and tax purposes. The income tax accrued relates to tax on profits which cannot be offset by branch losses.

Switzerland

Our main activities in Switzerland relate to insurance, administration and management activities, intragroup funding activities and distribution activities. The insurance business was sold in 2022.

Our activities in Switzerland resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%. A large part of the loss related to closure costs on legacy operations. The income tax accrued relates to tax on profits in one business which cannot be offset by other losses.

Africa

Key countries

Tax jurisdiction	Unrelated-party revenue	Related-party revenue	Total revenue	Profit/(loss) before income tax	Income tax paid (on cash basis)	Income tax accrued – current year	CBC effective tax rate	Statutory corporate tax rate	Number of employees	Tangible assets other than cash or cash equivalents
Guinea	–	–	–	(58,037,378)	–	–	0%	35%	101	–
Madagascar	133,023,731	79,685,588	212,709,319	48,987,558	727,699	4,156,129	8%	20%	450	696,449,627
South Africa	548,982,738	36,165,059	585,147,797	(8,448,183)	22,173,836	1,457,636	*	28%	1,925	1,422,935,650

* Refer to explanation below.

Guinea

Our main activities in Guinea (excluding equity accounted units) relate to our 45.05% interest in the Simandou project in partnership with the Government of Guinea (15%) and Chinalco (39.95%). Together we are exploring ways to optimise, develop and fund the world-class Simandou iron ore deposit and the trans-Guinean infrastructure needed to support the mine. These activities resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%.

In 2021, we also paid corporate income tax of \$22.7 million in Guinea in relation to our minority interest in the Sangaredi bauxite mine. Sangaredi is an equity accounted unit, which is not consolidated for accounting purposes and is therefore not included in the table above.

Madagascar

Our main activities in Madagascar relate to our interest in QIT Madagascar Minerals (QMM), near Fort Dauphin in the Anosy region of southeastern Madagascar. QMM produces ilmenite which is a major source of titanium dioxide, as well as monazite and zircon.

Our activities resulted in a profit for both accounting and tax purposes. The taxable profit was reduced by losses available from previous years, resulting in application of the local minimum tax of 0.5% on sales and a CBC ETR of 8%.

South Africa

Our main activity in South Africa relates to our 74% interest in the Richards Bay Minerals (RBM) operation. RBM is a world leader in heavy mineral sands extraction and refining and is South Africa's largest mineral sands producer. RBM mines the vast mineral-rich sands of the northern KwaZulu-Natal province and produces predominantly ilmenite, rutile, zircon and titanium dioxide.

Our activities in South Africa resulted in an accounting loss. The accrued income tax relates to tax on interest income which cannot be offset by losses on mining activity. The income tax paid was higher than the income tax charge due to instalment payments made during the year based on expected profits. These profits did not eventuate due to the declaration of force majeure on customer contracts announced on 30 June 2021 as a consequence of an escalation in security concerns at our operations.

Other countries

Tax jurisdiction	Unrelated-party revenue	Related-party revenue	Total revenue	Profit/(loss) before income tax	Income tax paid (on cash basis)	Income tax accrued – current year	CBC effective tax rate	Statutory corporate tax rate	Number of employees	Tangible assets other than cash or cash equivalents
Angola	–	–	–	(74,144)	–	–	0%	25%	–	–
Botswana	–	–	–	(14,374)	–	–	0%	22%	–	–
Mozambique	–	–	–	(9,506,627)	–	–	0%	32%	–	623,283
Namibia	–	–	–	(32,860)	–	–	0%	32%	–	–
Zambia	–	–	–	(11,163,606)	–	–	0%	35%	24	1,622,393

Angola

Our main activity in Angola is exploration. The activity resulted in losses for both tax and accounting purposes resulting in a CBC ETR of 0%.

Botswana

Our main activity in Botswana is exploration. The activity resulted in losses for both tax and accounting purposes resulting in a CBC ETR of 0%.

Mozambique

Our main activity in Mozambique is exploration related to the Mutamba mineral sands project. The activity resulted in losses for both tax and accounting purposes resulting in a CBC ETR of 0%.

Namibia

Our business activities in Namibia include minerals exploration. The activities resulted in losses for both tax and accounting purposes resulting in a CBC ETR of 0%.

Zambia

Our main activity in Zambia is exploration. The activity resulted in losses for both tax and accounting purposes resulting in a CBC ETR of 0%.

Middle East

Key countries

Tax jurisdiction	Unrelated-party revenue	Related-party revenue	Total revenue	Profit/(loss) before income tax	Income tax paid (on cash basis)	Income tax accrued – current year	CBC effective tax rate	Statutory corporate tax rate	Number of employees	Tangible assets other than cash or cash equivalents
Oman	–	–	–	(2,236)	–	–	0%	15%	–	–

Oman

Our main activity in Oman is support related to aluminium smelter technology services. The activity resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%.

We also hold a 20% ownership in the Sohar aluminium smelter. Sohar is an equity accounted unit which is not consolidated for accounting purposes and is therefore not reported in the above table. We paid \$3.9 million of tax in respect of Sohar in 2021 as disclosed in our *2021 Taxes Paid Report*.

Basis of preparation

Introduction: GRI 207 – Tax

This report coupled with our *2021 Taxes Paid Report* applies the requirements of the “Tax” standard (GRI 207) of the Global Sustainability Standards Board of the Global Reporting Initiative (GRI). GRI 207 applies to reports or other materials published on or after 1 January 2021. Our management approach to disclosures under GRI 207 can be found in our *2021 Taxes Paid Report* including disclosures in respect of:

- Disclosure 207-1 Approach to tax
- Disclosure 207-2 Tax governance, control, and risk management
- Disclosure 207-3 Stakeholder engagement and management of concerns related to tax

This report contains our topic-specific disclosures under GRI 207, namely:

- Disclosure 207-4 Country-by-country reporting

Country-by-country reporting under GRI 207-4 involves the reporting of financial, economic and tax-related information for each jurisdiction in which an organisation operates.

In addition to the disclosures required under GRI 207-4, we have provided details of our share of tax paid in relation to equity accounted units, consistent with our *2021 Taxes Paid Report*. Refer to Appendix 2 on page 14 for a summary of this information.

As required under GRI 207-4-b-x, we have provided an explanation for each jurisdiction for the difference between the corporate income tax accrued on the profit/loss and the tax due if the statutory tax rate is applied to the profit/loss before tax. In jurisdictions where there is an accounting profit for the year and positive income tax accrued, the explanation focuses on the difference between the effective tax rate and the statutory rate. In other situations, such as an accounting loss combined with either positive or negative accrued income tax, an asterisk is included in the table and a narrative explanation for the position is provided.

We note that taxes are payable on taxable income rather than the accounting profit or loss. Local tax laws commonly adjust the profit or loss in order to determine the taxable income on which tax is payable. There are many types of adjustments that are made to profit and loss in determining taxable income, including adjustments for tax depreciation, items of revenue which are exempt for tax purposes, differences in timing of deductions for expenses and utilisation of prior year losses. The profit/loss before tax shows the accounting result but not the level of income which is subject to tax after compliance with local tax laws.

The country-by-country data in this report has been prepared on the following basis:

- Rio Tinto includes Rio Tinto plc, Rio Tinto Limited and subsidiaries, associates and joint arrangements (hereafter and above – “Rio Tinto” or “the Group”). The scope of reporting is described further below.
- This report shows consolidated country data for entities that are consolidated or proportionately consolidated in the *2021 Annual Report*. This includes subsidiaries, joint arrangements, joint operations and permanent establishments.
- Data is prepared based on a 100% basis for all operations in which we have a controlling interest, and on our share where we do not have a controlling interest. Unless otherwise stated, the results of equity accounted units are not included.
- Amounts disclosed for a relevant jurisdiction relate to the activities of entities which are tax resident in that jurisdiction. Amounts relating to entities which are incorporated in one jurisdiction, but which have tax residency in another jurisdiction, are disclosed against the jurisdiction of tax residency.
- Amounts for permanent establishment are included in the jurisdiction in which the permanent establishment has a taxable presence.

- The nature of our business varies between countries. In many locations, we have more than one type of activity.
- This report uses consolidated data (as opposed to aggregated data) for related-party revenue, total revenue, profit/(loss) before income tax and tangible assets. This approach has been taken as a significant portion of our revenue and of our profits is generated in Australia where corporate groups use consolidated reporting for tax purposes. We consider that this method appropriately reflects our global revenue and profits.
- Due to this report being prepared using consolidated financial data, it is not possible to draw conclusions about a single entity, business or venture.
- We use International Financial Reporting Standards (IFRS) data and US dollars, using a consolidated financial reporting system, with additional reliance placed on data from local accounting systems and records, internal human resources data, and other sources as appropriate.
- The financial information taken from our consolidated Group reporting system has been prepared under our general financial controls. This report has not been subject to an external audit, statement or opinion.
- It is the responsibility of the management of our company to ensure that appropriate procedures are in place to prepare reporting in line with, in all material respects, this Basis of preparation.
- All data, unless otherwise stated, is prepared for the year from 1 January to 31 December 2021.
- Where an acquisition is completed in the year, or a company is newly consolidated in the year, the numbers relating to that business are included from the date of acquisition; where a disposal has been completed in the year, the numbers relating to that disposal have been included up to the point of disposal.
- Additionally, where full information for non-controlled and divested entities’ country-by-country data, consistent with the basis of preparation, has not been available, no information on the country-by-country data for that business is reported (none in 2021).
- The measuring and reporting of the data may in some circumstances involve a degree of estimation. In exceptional circumstances, restatements of prior year reported data may be required (none in 2021).

Treatment of withholding taxes:

- Frequently, when interest is paid between Group entities in different countries, withholding tax must be deducted. For example, if an entity in country A pays interest to a Group entity in country B, withholding tax is collected by the tax authority in country A but the tax cost is borne by the resident of country B which only receives the net (after tax) interest.
- In accordance with GRI 207 Guidance in respect of corporate income tax paid on a cash basis, we have included cash withholding tax paid in the country of the tax authority that collected the withholding tax (country A in above example). This is consistent with our *2021 Taxes Paid Report*. We believe this treatment discloses the full amount of cash tax collected by the relevant tax authorities in the year.
- The tax accrued in respect of future withholding tax is included as tax accrued in the country of the entity that will receive the income on which the withholding tax is made (country B above) which follows the accounting treatment.
- This report is consistent with the requirements under OECD CBCR, with the exceptions that OECD CBCR requires cash withholding tax paid to be reported in the jurisdiction of the entity where the tax cost is borne (country B above) instead of in the jurisdiction of the tax authority which collected the withholding tax, and OECD CBCR excludes withholding tax on dividends.

Definitions

Definitions of the key country-by-country reporting terms and the basis upon which the data has been prepared are as follows:

Statutory rate (or expected tax rate)

This is the standard corporate tax rate applicable under the laws of the relevant country including, where applicable, state/provincial taxes. Where different rates apply to our businesses in different states/provinces, the rate quoted is an approximate weighted average across that country.

Country-by-country effective tax rate (CBC ETR)

This is the effective tax rate computed under GRI 207-4-b-x calculated by reference to the corporate income tax accrued on the profit/loss for the period.

In some cases, the mathematical outcome of an ETR calculated this way results in a negative ETR. For example, where there is an accounting loss but a positive income tax accrued. In these instances, we have included an * in the ETR column and provided an explanation in the commentary.

OECD country-by-country reporting (OECD CBCR)

This is a form of reporting by multinational enterprises (MNEs) initiated by the Organisation for Economic Co-operation and Development (OECD) in the Base Erosion and Profit Shifting (BEPS) Action 13 Report. This report is submitted to tax authorities and is not a public report.

Equity accounted units

Equity accounted units (EAUs) are jointly controlled entities and associates. Under the equity accounting method, the investment is recorded initially at cost to the Group, including any goodwill on acquisition. In subsequent periods the carrying amount of the investment is adjusted to reflect the Group's share of the EAUs' retained post-acquisition profit or loss and other comprehensive income.

Tax jurisdiction

Tax jurisdiction is the country in which the constituent entities are resident for tax purposes or where they have a taxable presence which may be subject to taxation by the tax authority of that country.

Unrelated-party revenue

Unrelated-party revenue is the sum of net revenue categories in the Group accounts (income statement), being consolidated sales revenue, other operating income, finance income, and profit/(loss) related to interest in undeveloped projects. On a jurisdictional basis, where there is a net loss position on disposal of an interest in undeveloped projects, the loss has not been included in the reported revenue for that jurisdiction.

The term "unrelated party" includes non-consolidated joint ventures and associates for the purposes of our *2021 Annual Report*.

Unrelated-party revenue excludes external dividend income.

Related-party revenue

Related-party revenue is the total amount of revenue of all our entities in the relevant tax jurisdiction from transactions with associated enterprises outside that jurisdiction, including transactions between entities considered to be related parties for the purpose of transfer pricing rules. Dividends from related parties are excluded.

Total revenue

Total revenue is the aggregate of revenue from related parties and unrelated parties, which are also disclosed separately.

Permanent establishment

A permanent establishment is a taxable presence determined by reference to either the domestic legislation within a jurisdiction or under the relevant double tax agreement.

Profit/(loss) before tax

The profit or loss before tax is generally calculated using Group accounting policies. Local statutory accounts are required to comply with local accounting standards and therefore may be different from the disclosures in this report. The local statutory accounting profit or loss is the starting point for the calculation of taxable profits in individual countries or locations.

Income tax paid – current year

This is the jurisdictional share of corporate income tax paid on a cash basis by the Group during the year. In some cases, it may include payments made in relation to previous years under the relevant jurisdictions' tax instalment arrangements. Corporate income tax paid includes withholding tax paid to the tax authority in the relevant jurisdiction, including withholding taxes on dividends.

Income tax accrued – current year

This is the current tax charge on profit or loss for the year. This does not include deferred tax, adjustments to current tax in respect of prior periods, movements in uncertain tax positions or withholding taxes on dividends received.

Number of employees

This is the average number of employees in the year on a full-time equivalent basis, including permanent and temporary staff on a long-term contract. Some countries show no employees on average for the year. This is typically due to the entities in the relevant jurisdiction not having full-time employees located in the country due to the nature of the activities of the constituent entities.

Tangible assets

The data reported comprises the net accounting value of property, plant and equipment and inventories as at the closing balance sheet date on 31 December 2021. It does not include cash or cash equivalents, intangibles or financial assets. The data has been prepared on a consolidated basis.

Taxes Paid Report

Our annual reports titled *Taxes Paid: Our Economic Contribution*. These reports can be found on our website.

Reporting currency

All amounts reported are in US dollars unless otherwise stated.

Our 2021 Country-by-Country Report

Tax jurisdiction	Unrelated-party revenue	Related-party revenue	Total revenue	Profit/(loss) before income tax	Income tax paid (on cash basis)	Income tax accrued – current year	CBC effective tax rate	Statutory corporate tax rate	Number of employees	Tangible assets other than cash or cash equivalents
Australia	36,878,365,050	6,847,769,677	43,726,134,727	23,506,450,063	7,717,134,654	7,215,946,009	31%	30%	21,196	32,451,334,087
China	2,000,923,708	36,183,117	2,037,106,825	(172,997,343)	26,676,992	3,820,420	*	25%	206	1,227,315,387
Mongolia	1,975,570,727	8,028,576	1,983,599,303	472,485,727	203,711	267,271	0%	25%	3,513	11,204,085,734
New Zealand	2,509,730	707,816,747	710,326,477	182,427,828	7,059	35,298,368	19%	28%	665	229,802,380
Singapore	8,323,608,100	5,004,985,760	13,328,593,860	2,240,950,375	28,411,242	70,766,400	3%	17%	450	1,001,922,405
Hong Kong	–	33,852	33,852	1,237,525	7,830	7,830	1%	17%	2	–
India	2,521,205	20,103,566	22,624,771	3,759,003	1,062,712	951,483	25%	25%	354	2,093,597
Indonesia	27,296	–	27,296	(13,300,633)	–	–	0%	25%	–	–
Japan	1,596	9,423,362	9,424,958	1,546,715	1,044,287	396,694	26%	31%	22	930,566
Kazakhstan	62,373	–	62,373	(17,054,268)	–	–	0%	20%	39	1,228,454
Korea, Republic of	3,439	2,279,126	2,282,565	413,458	(641)	127,802	31%	25%	9	434,997
Lao People's Democratic Republic	160,076	–	160,076	(580,218)	–	–	0%	21%	3	–
Malaysia	12,792,587	6,379,231	19,171,818	1,448,064	446,728	449,720	31%	24%	1	2,906,800
Papua New Guinea	20,344	–	20,344	(223,034)	–	–	0%	30%	–	–
Philippines	–	–	–	–	–	–	0%	30%	–	–
Taiwan, Province of China	58	327,904	327,962	18,000	3,295	4,481	25%	20%	1	–
Brazil	3,139,605	104,597,501	107,737,106	267,724	2,528,966	1,866,386	697%	34%	99	115,059,652
Canada	3,291,159,306	8,542,039,652	11,833,198,958	3,110,537,049	562,757,180	624,299,382	20%	31% ¹	12,270	15,055,303,606
Chile	47,461	–	47,461	(22,089,705)	150,638,505	89,956	*	27%	56	210,131
United States	6,825,087,129	451,249,180	7,276,336,309	375,569,379	(31,797,043)	29,062,199	8%	24% ¹	3,471	6,672,978,088
Argentina	540,735	–	540,735	(4,957,594)	14,336	14,336	*	30%	–	–
Aruba	–	–	–	–	–	–	0%	25%	–	–
Bermuda	–	–	–	(507,202)	–	–	0%	0%	–	–
Bolivia, Plurinational State of	–	–	–	(8,454)	–	–	0%	25%	–	–
British Virgin Islands	–	–	–	–	–	–	0%	0%	–	–
Colombia	194,142	–	194,142	(974,264)	–	–	0%	31%	–	–
Jamaica	–	–	–	(3,380,046)	–	–	0%	25%	–	–
Mexico	–	–	–	(46,034)	–	–	0%	30%	–	–
Peru	271,880	–	271,880	(27,569,355)	–	–	0%	30%	58	16,925,479

1. Rate is an approximate weighted average rate across our businesses.

* Refer to explanation in country summaries.

Appendix 1 – Our 2021 Country-by-Country Report continued

Tax jurisdiction	Unrelated-party revenue	Related-party revenue	Total revenue	Profit/(loss) before income tax	Income tax paid (on cash basis)	Income tax accrued – current year	CBC effective tax rate	Statutory corporate tax rate	Number of employees	Tangible assets other than cash or cash equivalents
Belgium	429,202,529	10,160,034	439,362,563	5,090,461	538,284	589,296	12%	25%	34	5,838,334
France	694,804,137	231,374,126	926,178,263	(119,802,743)	–	–	0%	31%	243	67,084,633
Iceland	1,441,367	714,146,964	715,588,331	163,381,617	–	–	0%	20%	380	210,520,695
Luxembourg	375,636	–	375,636	(464,554)	2,944,761	2,974,380	*	25%	–	–
Netherlands	151,586	577,009,006	577,160,592	(115,942,944)	419,981	32,013,132	*	25%	155	8,044,738
Serbia	2,133,279	200,894	2,334,173	(115,829,070)	–	–	0%	15%	140	16,390,984
United Kingdom	3,336,489,994	1,287,554,201	4,624,044,195	379,407,567	1,310,544	15,800,124	4%	19%	189	143,664,192
Finland	–	–	–	(8,025,283)	–	–	0%	20%	5	43,485
Germany	365,993	5,303,267	5,669,260	9,544,836	239,441	344,222	4%	30%	18	1,875,376
Italy	–	–	–	–	–	–	0%	24%	–	–
Jersey	–	–	–	–	–	–	0%	0%	–	–
Malta	–	–	–	–	–	–	0%	35%	–	–
Spain	521,170	3,033,722	3,554,892	(65,170)	8,305	196,889	*	25%	12	2,919,066
Switzerland	237,771	7,118,113	7,355,884	(19,322,937)	822,555	389,954	*	15%	1	65,069
Guinea	–	–	–	(58,037,378)	–	–	0%	35%	101	–
Madagascar	133,023,731	79,685,588	212,709,319	48,987,558	727,699	4,156,129	8%	20%	450	696,449,627
South Africa	548,982,738	36,165,059	585,147,797	(8,448,183)	22,173,836	1,457,636	*	28%	1,925	1,422,935,650
Angola	–	–	–	(74,144)	–	–	0%	25%	–	–
Botswana	–	–	–	(14,374)	–	–	0%	22%	–	–
Mozambique	–	–	–	(9,506,627)	–	–	0%	32%	–	623,283
Namibia	–	–	–	(32,860)	–	–	0%	32%	–	–
Zambia	–	–	–	(11,163,606)	–	–	0%	35%	24	1,622,393
Oman	–	–	–	(2,236)	–	–	0%	15%	–	–
GRI-Country-by-Country Report Total	64,464,736,478			29,773,102,690	8,488,325,219					70,560,608,888

* Refer to explanation in country summaries.

Reconciliations to 2021 Annual Report and Taxes Paid Report

GRI 207 requires us to reconcile certain data included in the GRI Country-by-Country Report ("GRI CBCR") to our audited consolidated financial statements. In relation to the unrelated-party revenue, profit/(loss) before income tax, income tax paid (on cash basis) and tangible assets other than cash and cash equivalents, the relevant reconciliations are provided to our 2021 Annual Report which is available on our website. In addition, we have also provided a reconciliation between the income tax paid (on cash basis) to our 2021 Taxes Paid Report, also available on our website.

Unrelated-party revenue	\$bn
Sales revenue	63.5
Other income	0.9
Financial income	0.1
GRI CBCR total	64.5

Profit/(loss) before income tax	\$bn
Profit before tax	30.8
EAU profit elimination	(1.0)
GRI CBCR total	29.8

Income tax paid (on cash basis)	\$m
Tax paid	8,494
Adjustments/rounding	(6)
GRI CBCR total	8,488

Tangible assets other than cash or cash equivalents	\$bn
Property, plant and equipment	64.9
Inventories (non-current)	0.2
Inventories (current)	5.4
Adjustments/rounding	0.1
GRI CBCR total	70.6

Reconciliation to Taxes Paid Report	\$m
GRI CBCR tax paid	8,488
Tax paid by EAUs:	
Chile (Escondida – excluding dividend withholding)	404
Guinea (Sangaredi)	23
Oman (Sohar)	4
Adjustments/rounding	(5)
Taxes Paid Report total	8,914

Constituent entities resident in each tax jurisdiction

Angola

Rio Tinto Angola (SU), LDA.

Argentina

Rio Tinto Mining and Exploration Limited (P.E.)*

Aruba

THR Aruba Holdings LLC A.V.V.

Australia

Alcan Gove Development Pty Limited
 Alcan Holdings Australia Pty Limited
 Alcan Northern Territory Alumina Pty Limited
 Alcan Primary Metal Australia Pty Ltd
 Alcan South Pacific Pty Ltd
 AML Properties Pty Ltd
 Argyle Diamond Mines Pty Limited
 Argyle Diamonds Limited
 Ashton Mining Pty Ltd
 Ashton Nominees Pty Limited
 Australian Coal Holdings Pty. Limited
 Australian Mining & Smelting Pty Ltd
 Beasley River Management Pty Limited
 Beasley River Marketing Pty Ltd
 Beasley River Mining Pty Limited
 Canning Resources Pty Limited
 Capricorn Diamonds Investments Pty Limited
 Cathjoh Holdings Pty Limited
 Channar Management Services Pty Limited
 Channar Mining Pty Ltd
 CRA Investments Pty. Limited
 CRA Pty Ltd
 Dampier Salt Limited
 Energy Resources of Australia Ltd
 Foundation for Australia-Japan Studies
 Fundsprops Pty. Limited
 Gladstone Infrastructure Pty Ltd
 Gove Aluminium Ltd
 GPS Energy Pty Limited
 GPS Nominee Pty Limited
 GPS Power Pty. Limited
 Hamersley Exploration Pty Limited
 Hamersley HMS Pty Ltd
 Hamersley Holdings Limited
 Hamersley Iron – Yandi Pty Limited
 Hamersley Iron Pty. Limited
 Hamersley Resources Limited
 Hamersley WA Pty Ltd
 Hls melt Corporation Pty Limited
 Hope Downs Marketing Company Pty Ltd
 Hunter Valley Resources Pty Ltd
 Johcath Holdings Pty Limited
 Juna Station Pty Ltd
 Kalimantan Gold Pty Limited
 Kelian Pty. Limited
 Kembla Coal & Coke Pty. Limited
 Kutaibar Holdings Pty Ltd
 Mitchell Plateau Bauxite Co. Pty. Limited
 Mount Bruce Mining Pty Limited
 Mount Pleasant Pty Ltd
 NBH Pty Ltd
 Nhulunbuy Corporation Limited

Norgold Pty Limited
 North Gold (W.A.) Pty Ltd
 North Insurances Pty. Ltd.
 North IOC Holdings Pty Ltd
 North Limited
 North Mining Limited
 Pacific Aluminium Pty. Limited
 Pechiney Consolidated Australia Pty Limited
 Peko Exploration Pty Ltd.
 Peko-Wallsend Pty Ltd
 Pilbara Iron Company (Services) Pty Ltd
 Pilbara Iron Pty Ltd
 Project Generation Group Pty Ltd
 Queensland Alumina Limited
 Queensland Coal Pty. Limited
 Ranges Management Company Pty Ltd
 Ranges Mining Pty Ltd
 Rio Tinto (Commercial Paper) Limited
 Rio Tinto Advisory Services Pty Limited
 Rio Tinto Alcan Technology Pty Ltd
 Rio Tinto Aluminium (Bell Bay) Limited
 Rio Tinto Aluminium (Holdings) Limited
 Rio Tinto Aluminium Bell Bay Sales Pty Limited
 Rio Tinto Aluminium Limited
 Rio Tinto Aluminium Services Pty Limited
 Rio Tinto Asia Pty. Limited
 Rio Tinto Base Metals Pty Limited
 Rio Tinto Coal (Clermont) Pty Ltd
 Rio Tinto Coal Australia Pty Limited
 Rio Tinto Coal Investments Pty Limited
 Rio Tinto Coal NSW Holdings Limited
 Rio Tinto Exploration Pty Limited
 Rio Tinto Finance (USA) Limited
 Rio Tinto Finance Limited
 Rio Tinto Investments One Pty Limited
 Rio Tinto Investments Two Pty Limited
 Rio Tinto Limited
 Rio Tinto PACE Australia Pty Limited
 Rio Tinto Services Limited
 Rio Tinto Shared Services Pty Limited
 Rio Tinto Shipping Pty Limited
 Rio Tinto Staff Fund (Retired) Pty Limited
 Rio Tinto Winu Pty Limited
 Robe River Limited
 Robe River Mining Co. Pty. Ltd.
 Robe River Ore Sales Pty. Ltd.
 Rocklea Station Pty Ltd
 RTA AAL Australia Limited
 RTA Boyne Limited
 RTA Gove Pty Limited
 RTA Holdco Australia 1 Pty Ltd
 RTA Holdco Australia 3 Pty Ltd
 RTA Holdco Australia 5 Pty Ltd
 RTA Holdco Australia 6 Pty Ltd
 RTA Pacific Pty Limited
 RTA Sales Pty Ltd
 RTA Smelter Development Pty Limited
 RTA Weipa Pty Ltd
 RTA Yarwun Pty Ltd
 RTLDS Aus Pty Ltd

RTPDS Aus Pty Ltd
 Southern Copper Pty. Limited
 Swiss Aluminium Australia Limited
 Technological Resources Pty. Limited
 The Barrier Corporation (Vic.) Pty. Limited
 The Zinc Corporation Pty Ltd
 Tinto Holdings Australia Pty. Limited
 Tomago Aluminium Company Pty Limited
 Trans Territory Pipeline Pty Limited
 TRQ Australia Pty Ltd
 Wimmera Industrial Minerals Pty. Limited
 Winchester South Development Company Proprietary Limited
 Yarraloola Pastoral Co

Belgium

Rio Tinto Diamonds NV

Bermuda

North IOC (Bermuda) Holdings Limited
 North IOC (Bermuda) Limited
 QIT Madagascar Minerals Ltd

Bolivia, Plurinational State of

Rio Tinto Mining and Exploration Limited (P.E.)*

Botswana

Rio Tinto Mining and Exploration Limited (P.E.)*

Brazil

Alcan Alumina Ltda.
 Alcan Composites Brasil Ltda
 Empresa de Mineração Finesa Ltda.
 Mineração Tabuleiro Ltda
 Química e Metalúrgica Mequital Ltda.
 Rio de Contas Desenvolvimento Minerais Ltda
 Rio Santa Rita Empreendimentos e-Participações Ltda
 Rio Tinto Desenvolvimento Minerais Ltda.
 Rio Tinto Mineração do Brasil Ltda

British Virgin Islands

THR OYU TOLGOI LTD.

Canada

1043802 Ontario Ltd.
 10676276 Canada Inc.
 10676284 Canada Inc.
 1109723 B.C. Ltd.
 46106 YUKON INC.
 46117 YUKON INC.
 535630 YUKON INC.
 7999674 CANADA INC.
 Alcan Management Services Canada Limited /
 Societe de Services de Gestion Alcan Canada Limitee
 Alcan Realty Limited/Societe Immobiliere Alcan
 Limitee
 Aluminum Company of Canada Limited/Aluminium du
 Canada Limitee
 Carol Lake Company Ltd.
 Diavik Diamond Mines (2012) Inc.
 Element North 21 GP Inc. / Element Nord 21 GP Inc.
 Element North 21 Limited Partnership / Elément Nord
 21 Société en Commandite
 ELYSIS Limited Partnership / ELYSIS Société
 en Commandite
 Gulf Power Company / La Compagnie Gulf Power

Iron Ore Company of Canada (P.E.)*

Northern Land Company Ltd

Pechiney Reynolds Quebec, Inc. (P.E.)*

Quebec North Shore and Labrador Railway Company/
Compagnie de Chemin de Fer du Littoral Nord de
Quebec et du Labrador Inc.

Rio Tinto Alcan Fund Inc.

Rio Tinto Alcan Inc.

Rio Tinto Alcan International Ltd. / Rio Tinto Alcan
International Ltee

Rio Tinto Canada Inc.

Rio Tinto Canada Management Inc./ Rio Tinto Gestion
Canada Inc.

Rio Tinto Canada Uranium Corporation

Rio Tinto Diamonds and Minerals Canada Holding Inc.

Rio Tinto Exploration Canada Inc.

Rio Tinto FalCon Diamonds Inc.

Rio Tinto Fer et Titane inc.

Rio Tinto Iron and Titanium Canada Inc. / Rio Tinto Fer
et Titane Canada Inc.

Rio Tinto PACE Canada Inc. / Gestion Rio Tinto PACE
Canada Inc.

Rio Tinto Potash Management Inc. / Rio Tinto Potasse
Management Inc.

Rio Tinto Saskatchewan Management Inc.

Rio Tinto Saskatchewan Potash Holdings General
Partner Inc.

Rio Tinto Saskatchewan Potash Holdings Limited
Partnership

Rio Tinto Shipping (Asia) Pte. Ltd. (P.E.)*

The Roberval and Saguenay Railway Company / La
Compagnie du Chemin de Fer Roberval Saguenay
THR MINES (BC) LTD.

THR Mines Services Co. Ltd.

Turquoise Hill Resources Ltd.

Chile

Rio Tinto Mining and Exploration Limited (P.E.)*

China

Alcan Management Services (Shanghai) Co., Ltd.

Rio Tinto Iron & Titanium (Suzhou) Co., Ltd

Rio Tinto Limited Beijing Representative Office (P.E.)*

Rio Tinto Limited Shanghai Representative Office
(P.E.)*

Rio Tinto Minerals Exploration (Beijing) Co., Ltd

Rio Tinto Mining Commercial (Shanghai) Co. Ltd.

Rio Tinto Trading (Shanghai) Co., Ltd.

Rio Tinto Trading (Shanghai) Co., Ltd. Beijing Branch

Turquoise Hill (Beijing) Services Company Ltd

Colombia

Rio Tinto Mining and Exploration Limited (P.E.)*

Finland

Rio Tinto Exploration Finland OY

France

AP Service

Borax Français

France Aluminium Recyclage Sa

Pechiney Bâtiment

Rio Tinto Aluminium Pechiney

Rio Tinto France S.A.S.

Rio Tinto Iron Ore Europe S.A.S.

RTA Holdco France 1 S.A.S.

RTA Holdco France 2 S.A.S.

Germany

Alcan Betriebs- und Verwaltungsgesellschaft GmbH

Alcan Lebensmittelverpackungen GmbH

Alcan Packaging Mühlthal GmbH & Co. KG

Rio Tinto Commercial GmbH

Rio Tinto Iron & Titanium GmbH

Rio Tinto Iron & Titanium Holdings GmbH

Scheuch Unterstuetzungskasse GmbH

Guinea

Rio Tinto Guinée S.A.

SIMFER S.A.

Société Minière Et De Participations Guinée Alusuisse

Hong Kong

Alcan Asia Limited

Rio Tinto Asia Ltd*

Rio Tinto (Hong Kong) Ltd

Iceland

Rio Tinto Iceland Ltd.

India

Rio Tinto Exploration and Mining (India) Private Limited

Rio Tinto Exploration India Private Limited

Rio Tinto India Private Limited

Rio Tinto Orissa Mining Private Ltd

Indonesia

PT Hutan Lindung Kelian Lestari

PT Kelian Equatorial Mining

Italy

Itallumina Srl

Jamaica

Rio Tinto Alcan Inc. (P.E.)*

Japan

Rio Tinto Japan Ltd

Jersey

Simfer Jersey Finance 1 Ltd

Simfer Jersey Finance 2 Ltd

Kazakhstan

Balkhash Saryshagan LLP

Korgantas LLP

Rio Tinto Exploration Kazakhstan LLP

Rio Tinto Mining and Exploration Limited (P.E.)*

Korea, Republic of

Rio Tinto Korea Ltd

Lao People's Democratic Republic

Lao Sanxai Minerals Company Limited

Luxembourg

Société De Financement Des Risques Industriels

Madagascar

Port d'Ehoala S.A.

QIT Madagascar Minerals SA

Malaysia

Borax Malaysia Sdn Bhd

Malta

Falcon Insurance Ltd

Mexico

Kennecott Exploration Mexico, S.A. de C.V.

Mongolia

Asia Gold Mongolia LLC

Asia Naran Bulag LLC

Heruga Exploration LLC

Oyu Tolgoi LLC

Rio Tinto Holdings LLC

Rio Tinto Mongolia LLC

SGLS LLC

Mozambique

Mutamba Mineral Sands S.A.

Rio Tinto Mining and Exploration Limited (P.E.)*

Namibia

Rio Tinto Mining and Exploration Limited (P.E.)*

Netherlands

Alcan Holdings Europe B.V.

Alcan Holdings Nederland B.V.

Aluminium & Chemie Rotterdam B.V.

Bektau B.V.

Borax Rotterdam N.V.

Oyu Tolgoi Netherlands BV

Rio Tinto Diamonds Netherlands B.V.

Saryarka B.V.

Turquoise Hill Netherlands Cooperatief U.A.

New Zealand

Electric Power Generation Limited

New Zealand Aluminium Smelters Ltd

NZAS Retirement Fund Trustee Limited

Pacific Aluminium (New Zealand) Limited

Oman

Rio Tinto Sohar Logistics LLC

Papua New Guinea

Rio Tinto Exploration (PNG) Limited

Peru

CIA. Inmobiliaria e Inversiones Cosmos S.A.C.

Compania de Transmision Sierrariente S.A.C.

Rio Tinto Minera Peru Limitada SAC

Rio Tinto Mining and Exploration S.A.C.

Philippines

Pechiney Philippines Inc.

Turquoise Hill Resources Philippines Inc.

Serbia

Jadar Free Zone Management Company DOO

Beograd – Novi Beograd

Rio Sava Exploration DOO

Rio Tinto Exploration Dunav d.o.o. Beograd –

Novi Beograd

Singapore

AGM Holding Company Pte Ltd

Chlor Alkali Unit Pte Ltd

East Kalimantan Coal Pte. Ltd

IAL Holdings Singapore Pte Ltd

Metals & Minerals Insurance Pte. Limited

Rio Tinto Exploration (Asia) Holdings Pte. Ltd.
Rio Tinto Global Employment Company Pte. Ltd.
Rio Tinto Marketing Pte. Ltd.
Rio Tinto Minerals Asia Pte Ltd
Rio Tinto Procurement (Singapore) Pte Ltd
Rio Tinto Pte Ltd
Rio Tinto Shipping (Asia) Pte. Ltd.
Rio Tinto Singapore Holdings Pte Ltd
Rio Tinto Commercial Pte. Ltd.
Sharp Strategic Funding Pte. Ltd.
Singapore Metals Pte. Ltd.
The Kelian Community and Forest Protection Trust
THR Kharmagtai Pte Ltd
THR Ulaan Pte Ltd
Turquoise Hill Resources Singapore Pte Ltd.
West Kutai Foundation Limited
Wright Mgmt Services Pte. Ltd.

South Africa

Nozalela Mineral Sands (Pty) Ltd
Richards Bay Mining (Proprietary) Limited
Richards Bay Mining Holdings (Proprietary) Limited
Richards Bay Prefco (Pty) Ltd
Richards Bay Titanium (Proprietary) Limited
Richards Bay Titanium Holdings (Proprietary) Limited
Rio Tinto Management Services South Africa (Proprietary) Ltd
Rio Tinto Mining and Exploration Limited (P.E.)*
Riversdale Connections (Proprietary) Ltd
Tisand (Proprietary) Limited
Zululand Titanium (Pty) Ltd

Spain

Borax España, S.A.
Borax Europe Limited (P.E.)*
Industrias Metalicas Castello S.A.

Switzerland

Alcan Holdings Switzerland AG (SA/Ltd.)
Alcan Trading AG (SA/Ltd.)
Champlain Reinsurance Company Ltd.
Metallwerke Refonda AG

Taiwan, Province of China

Rio Tinto Asia Limited Taiwan Branch*

United Kingdom

Alcan Chemicals Limited
Alcan Farms Limited
Anglesey Aluminium Metal Limited
Borax Europe Limited
British Alcan Aluminium Limited
IEA Coal Research Limited
IEA Environmental Projects Limited
IOC Sales Limited
Lawson Mardon Flexible Limited
Lawson Mardon Smith Brothers Ltd.
Pechiney Aviatube Limited
Rio Tinto Australian Holdings Limited
Rio Tinto Bahia Holdings Limited
Rio Tinto Brazilian Holdings Limited
Rio Tinto Brazilian Investments Limited
Rio Tinto Canada Finance Limited

Rio Tinto Diamonds Limited
Rio Tinto Eastern Investments B.V. **
Rio Tinto Energy Limited
Rio Tinto Escondida Limited**
Rio Tinto European Holdings Limited
Rio Tinto Finance (USA) plc
Rio Tinto Finance plc
Rio Tinto Indonesian Holdings Limited
Rio Tinto International Holdings Limited
Rio Tinto Iron & Titanium Limited
Rio Tinto Iron Ore Atlantic Limited
Rio Tinto Iron Ore Trading China Limited
Rio Tinto Jersey Holdings 2010 Limited**
Rio Tinto London Limited
Rio Tinto Marketing Services Limited
Rio Tinto Medical Plan Trustees Limited
Rio Tinto Metals Limited
Rio Tinto Minerals Development Limited
Rio Tinto Minerals Limited
Rio Tinto Mining and Exploration Limited
Rio Tinto Nominees Limited
Rio Tinto OT Management Limited
Rio Tinto Overseas Holdings Limited
Rio Tinto Pension 2009 Trustees Limited
Rio Tinto Pension Fund Trustees Limited
Rio Tinto Peru Limited
Rio Tinto plc
Rio Tinto Secretariat Limited
Rio Tinto Simfer UK Limited
Rio Tinto South East Asia Limited
Rio Tinto Sulawesi Holdings Limited
Rio Tinto Technological Resources UK Limited
Rio Tinto Uranium Limited
Rio Tinto Western Holdings Limited
RTA Holdco 1 Limited
RTA Holdco 4 Limited
RTA Holdco 7 Limited
RTA Holdco 8 Limited
RTAlcan 2 LLC**
RTAlcan 3 LLC**
RTLDS UK Limited
Simfer Jersey Limited**
Simfer Jersey Nominee Limited
TBAC Limited
Thos. W. Ward Limited

United States

201 Logistics Center, LLC
Alcan Corporation
Alcan Finances USA LLC
Alcan International Network U.S.A. Inc.
Alcan Management Services Canada Limited/Societe de Services de Gestion Alcan Canada Limitee (P.E.)*
Alcan Primary Products Company LLC
Alcan Primary Products Corporation
Daybreak Development LLC
Daybreak Property Holdings LLC
Daybreak Secondary Water Distribution Company
Daybreak Water Holding LLC
DB Medical I LLC
DBVC1 LLC

Eastland Management Inc.
Flambeau Mining Company
Green Mountain Mining Venture
Henlopen Manufacturing Co., Inc.
High Purity Iron Inc.
Integrity Land and Cattle LLC
Iron Ore Company of Canada
Kennecott Barneys Canyon Mining Company
Kennecott Exploration Company
Kennecott Holdings Corporation
Kennecott Land Company
Kennecott Land Investment Company LLC
Kennecott Molybdenum Company
Kennecott Nevada Copper Company
Kennecott Ridgeway Mining Company
Kennecott Royalty Company
Kennecott Services Company
Kennecott Uranium Company
Kennecott Utah Copper LLC
Kennecott Water Distribution LLC
Magma Arizona Railroad Company
Minera Kennecott, S.A. de C.V. **
Pacific Coast Mines, Inc.
Pechiney Bécancour, Inc.
Pechiney Cast Plate, Inc.
Pechiney Holdings, Inc.
Pechiney Metals LLC
Pechiney Plastic Packaging, Inc.
Pechiney Reynolds Quebec, Inc.
Pechiney Sales Corporation
Resolution Copper Company
Resolution Copper Mining LLC
Rio Tinto America Holdings Inc.
Rio Tinto America Inc.
Rio Tinto AuM Company
Rio Tinto Commercial Americas Inc.
Rio Tinto Energy America Inc.
Rio Tinto Finance (USA) Inc.
Rio Tinto Hydrogen Energy LLC
Rio Tinto Minerals Inc.
Rio Tinto Mining and Exploration Inc.
Rio Tinto Services Inc.
Rio Tinto Technological Resources Inc.
RTAlcan 1 LLC
Skymont Corporation
Sohio Western Mining Company
Swift Current Land & Cattle LLC
The Pyrites Company, Inc.
THR Delaware Holdings, LLC
Three Crowns Insurance Company
U.S. Borax Inc.
Victoria Technology Inc.
Waste Solutions and Recycling LLC
Wyoming Coal Resources Company

Zambia

Rio Tinto Exploration Zambia Limited
Solwezi Metals Exploration Limited

Appendix 3 – Constituent entities resident in each tax jurisdiction *continued*

* The home country location of the companies that have permanent establishments in various jurisdictions in the table above is as follows:

Company	Home country location
Alcan Management Services Canada Limited	Canada
Borax Europe Limited	United Kingdom
Iron Ore Company of Canada	United States
Pechiney Reynolds Quebec, Inc.	United States
Rio Tinto Alcan Inc.	Canada
Rio Tinto Asia Ltd	Hong Kong
Rio Tinto Mining and Exploration Limited	United Kingdom
Rio Tinto Shipping (Asia) Pte. Ltd.	Singapore
Rio Tinto Limited Beijing Representative Office	Australia
Rio Tinto Limited Shanghai Representative Office	Australia

** The tax jurisdiction for the following entities is different from the country of incorporation:

Entities that are tax resident in a country other than their country of incorporation	Country of incorporation
Minera Kennecott, S.A. de C.V.	Mexico
Rio Tinto Eastern Investments B.V.	Netherlands
Rio Tinto Escondida Limited	Bermuda
Rio Tinto Jersey Holdings 2010 Limited	Jersey
Simfer Jersey Limited	Jersey
RTAlcan 2 LLC	United States
RTAlcan 3 LLC	United States



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