

# Country-by-Country Report 2022





In 2022, we paid \$10.8 billion in taxes and royalties globally, including \$8.5 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 our 2022 Taxes and Royalties Paid Report to disclose associated financial information on a country-by-country basis for all countries where we had a taxable presence in 2022. 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 our approach to tax and transparency can be found in our 2022 Taxes and Royalties Paid Report.

This report, together with our 2022 Taxes and Royalties 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 more information.

Contents

Asia Pacific	1
North and South America	3
Europe	5
Africa and Middle East	7
Basis of preparation	9
Our 2022 Country-by-Country Report	11
Reconciliations to 2022 Annual Report and 2022 Taxes and Royalties Paid Report	13
Constituent entities resident in each tax jurisdiction	14

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

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# 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	27,744,547,626	6,614,889,984	34,359,437,610	13,356,689,590	6,135,805,067	4,442,655,454	33%	30%	23,159	32,233,775,646
China	2,618,563,254	36,770,548	2,655,333,802	(5,320,882)	(14,707,212)	3,868,349	*	25%	218	509,404,871
Mongolia	1,430,388,833	11,282,560	1,441,671,393	(467,662,007)	635,817	196,769	*	25%	4,175	12,453,832,626
New Zealand	2,448,458	753,131,936	755,580,394	124,539,914	64,124,140	48,417,370	39%	28%	670	235,338,234
Singapore	8,833,314,092	5,311,675,481	14,144,989,573	2,379,310,943	48,499,996	39,079,484	2%	17%	454	978,969,428

\* 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 have a number of ongoing exploration projects.

Of the \$10.8 billion in taxes and royalties paid globally during 2022, \$8.5 billion was paid in Australia, including \$6.1 billion in corporate tax.

The country-by-country effective tax rate (CBC ETR) is higher than the statutory corporate tax rate due primarily to certain expenses being treated as non-deductible for tax purposes.

### China

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

Our activities in China resulted in an accounting loss overall. Notwithstanding the overall accounting loss position, we accrued tax in respect of some entities which are in a taxable profit position in absence of the ability to offset tax losses from other entities. We received tax refunds due to overpaying tax in prior years.

### Mongolia

Our activities in Mongolia mainly relate to the Oyu Tolgoi project. Following the completion of our acquisition of Turquoise Hill Resources in December 2022, Rio Tinto now holds a 66% direct interest in the Oyu Tolgoi project with the remaining 34% owned by the Government of Mongolia. The Oyu Tolgoi copper and gold mine is a major contributor to the Mongolian economy. During 2022 the open pit mine was operational, with underground production commencing in March 2023. Other activities in Mongolia include exploration, information and technology services, administration, and support services.

In 2022, our mining operations in Mongolia resulted in losses for both accounting and tax purposes, leading to a CBC ETR of 0%. Notwithstanding this, Oyu Tolgoi paid \$294 million in other taxes, royalties and charges to Mongolian governments as disclosed in our *2022 Taxes and Royalties Paid Report*. The income tax accrued disclosed in the table above relates to withholding tax on interest received on deposits with Mongolian banks and income tax on taxable profits from information and technology services which could not be offset by the mining losses.

### 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 2022. The CBC ETR was higher than the statutory rate primarily due to timing differences arising from accounting expenses that are included in the current year profit but are deductible for tax in future years.

### 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 and marketing 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 *2022 Taxes and Royalties 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	–	1,278,770	1,278,770	49,162	–	–	0%	17%	1	–
India	3,370,741	24,261,149	27,631,890	3,548,485	1,447,593	1,406,622	40%	25%	396	12,516,303
Indonesia	56,267	–	56,267	(6,975,382)	–	–	0%	22%	–	–
Japan	254,319	8,010,107	8,264,426	1,437,321	165,048	291,542	20%	31%	23	1,376,466
Kazakhstan	758,520	–	758,520	(7,503,541)	102,981	–	0%	20%	34	1,104,857
Korea, Republic of	3,465	1,801,689	1,805,154	276,922	166,462	67,149	24%	25%	8	272,488
Lao People's Democratic Republic	61,994	–	61,994	(852,765)	–	–	0%	20%	3	–
Malaysia	13,457,733	1,857,506	15,315,239	207,500	144,228	79,538	38%	24%	1	4,071,634
Papua New Guinea	4,267	–	4,267	(542,505)	–	–	0%	30%	–	–
Philippines	–	–	–	–	–	–	–	25%	–	–
Taiwan, Province of China	353	308,680	309,033	32,262	6,270	7,366	23%	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 income is offset by brought forward tax losses resulting in a CBC ETR of 0%.

### 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 higher than the statutory corporate tax rate due to timing differences arising from income being treated as taxable prior to recognition in the accounting profit.

### 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 related to 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, Republic of

Our activities in Korea are administration and sales and marketing support services. The CBC ETR is in line with the statutory corporate tax rate.

### Lao People's Democratic Republic

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 2022.

### 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
Argentina	14,178,428	–	14,178,428	(40,061,322)	688,655	3,389,488	*	30%	69	32,148,676
Brazil	3,882,276	145,146,674	149,028,950	(11,287,587)	(10,447,497)	423,409	*	34%	100	136,568,727
Canada	3,536,972,868	7,982,090,221	11,519,063,089	2,106,769,775	419,786,511	454,530,741	22%	31% <sup>1</sup>	13,345	14,927,078,557
Chile	–	–	–	(14,908,618)	89,307,979	256,397	*	27%	58	336,082
United States	7,617,458,290	622,056,125	8,239,514,415	202,776,611	5,992,228	6,826,962	3%	24% <sup>1</sup>	3,654	7,031,650,669

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

\* Refer to explanation below.

### Argentina

In 2022, we acquired the Rincon lithium project. Rincon is a large, undeveloped, lithium brine project located in the heart of the lithium triangle in the Salta Province of Argentina, an emerging hub for greenfield projects. We also have ongoing exploration activity in Argentina.

Our activities in Argentina resulted in an overall loss for accounting purposes and a profit for tax purposes due to timing differences between accounting recognition and tax deductibility for expenses. The income tax accrued in the current year is in respect of foreign exchange gains on funding balances.

### 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. Our activities in Brazil resulted in an overall loss for accounting purposes, 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. Agreement of prior year tax computations during 2022 gave rise to the repayment of tax which had been over paid on account in prior years.

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 \$1.2 million of income tax in respect of MRN in 2022, along with royalties and other payments as disclosed in our *2022 Taxes and Royalties Paid Report*.

### Canada

We are one of the largest mining and metals businesses operating in Canada, where we produce and export 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 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's profits.

### 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. 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 *2022 Taxes and Royalties Paid Report*, we paid \$670.2 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.

### United States

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 the current year profits for Federal tax purposes, together with the availability of resource depletion tax allowances which reduce taxable profits. The income tax accrued for the current year relates primarily to various state taxes.

## 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
Aruba	–	–	–	–	–	–	–	25%	–	–
Bermuda	832,786	–	832,786	325,604	–	–	0%	0%	–	–
Bolivia, Plurinational State of	–	–	–	(8,014)	–	–	0%	25%	–	–
British Virgin Islands	–	–	–	–	–	–	–	0%	–	–
Colombia	17,019	–	17,019	135,822	–	–	0%	35%	–	–
Jamaica	–	–	–	(2,649,412)	–	–	0%	25%	–	–
Mexico	–	–	–	–	–	–	–	30%	–	–
Peru	353,133	229,848	582,981	(28,540,635)	–	–	0%	30%	60	17,092,887

### Aruba

The Rio Tinto entity in Aruba was dormant in 2022 and is targeted for liquidation.

### Bermuda

The Rio Tinto entities in Bermuda are holding companies, earning incidental interest income (offset by expenses) which is not taxable in Bermuda, resulting in a CBC ETR of 0%. That interest income is however taxed at a rate of 30% under income attribution rules that apply in Australia. No tax benefit is obtained from these entities.

### Bolivia, Plurinational State of

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 a small accounting profit due to unrealised foreign exchange gains. The profit was offset by brought forward losses, 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 has been exploration, though there was no activity in 2022.

### Peru

Our main activity in Peru is exploration, particularly the La Granja project. During 2023, we announced the formation of a joint venture with First Quantum Minerals to unlock the development of 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	788,569,631	3,492,422	792,062,053	48,314,561	1,120,221	1,190,093	2%	25%	37	39,134,941
France	910,529,951	175,714,378	1,086,244,329	(261,870,072)	–	–	0%	26%	237	89,266,156
Iceland	739,466	873,879,338	874,618,804	192,573,631	19,755	12,296,697	6%	20%	387	267,048,083
Netherlands	709,933	667,620,583	668,330,516	(108,193,913)	1,089,414	44,195,436	*	26%	135	10,465,360
Serbia	2,620,914	–	2,620,914	(87,863,071)	–	–	0%	15%	158	17,433,897
United Kingdom	2,686,434,249	1,785,170,232	4,471,604,481	465,856,961	75,025,733	88,842,845	19%	19%	202	137,759,862

\* Refer to explanation below.

### Belgium

Our main business activities in Belgium are the sorting, selling and marketing of diamonds from our diamond mine in 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 a compulsory regime for diamond trading companies in Belgium.

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.

### 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 partially offset by tax losses available from previous years resulting in a CBC ETR lower than the statutory rate.

### Netherlands

Our main business activities in the Netherlands are the storage, packaging and distribution of borates, closure activities related to our now closed anodes business and other holding structure activities. In addition, throughout 2022, the Netherlands was 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 accrued 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 2022, 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 2022 resulted in losses for both accounting and tax purposes.

### United Kingdom

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 2022 resulted in a profit for accounting and tax purposes resulting in a CBC ETR in line with the statutory rate.

## 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	–	–	–	(5,136,108)	–	–	0%	20%	8	132,387
Germany	103,162	6,121,911	6,225,073	2,237,214	184,834	184,834	8%	30%	18	1,541,613
Spain	7,465,337	–	7,465,337	482,001	221,630	108,019	22%	25%	12	2,945,658
Switzerland	186,831	15,560,952	15,747,783	36,544,628	578,117	517,239	1%	15%	1	50,361

### 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 primarily to pension accounting adjustments which do not give rise to taxable income.

### Spain

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

Our activities in Spain resulted in profits for both accounting and tax purposes. The CBC ETR is marginally lower than the statutory rate due to timing differences arising from accounting expenses that are included in profit in other years but are deductible for tax in the current year.

### Switzerland

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

Our activities in Switzerland resulted in an accounting book profit due to the release of cost provisions which are no longer required. The release was not taxable as the provisions had not been tax deductible when originally recognised, leading to a CBC ETR lower than the statutory rate, offset in part by the impact of income tax accrued on profits in a business that cannot be offset by losses in other businesses.



# Africa and 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
Guinea	–	–	–	(80,472,865)	–	–	0%	35%	352	–
Madagascar	149,697,437	62,913,425	212,610,862	24,044,377	1,011,470	1,073,629	4%	20%	468	668,127,773
South Africa	938,847,972	141,981,764	1,080,829,736	291,241,334	75,509,820	91,309,365	31%	28%	1,923	1,339,645,339

### Guinea

Our main activities in Guinea (excluding equity accounted units) relate to our 45.05% interest in South Blocks 3 and 4 of the Simandou project in partnership with the Government of Guinea (15%) and Chinalco (39.95%). Together with Winning Consortium Simandou, which has an interest, along with the Government of Guinea, in Simandou North Blocks 1 and 2 all parties 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 2022, we also paid corporate income tax of \$46.5 million in Guinea in relation to our minority interest in the Sangaredi bauxite mine as disclosed in our *2022 Taxes and Royalties Paid Report*. 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 zircil. QMM includes the deep-water Port d'Ehoala.

Our activities resulted in a profit for both accounting and tax purposes. The taxable profit was reduced by losses available from previous years and by claiming tax depreciation allowances which had been deferred from prior years, resulting in accrued income tax in the current year in line with the local minimum tax of 0.5% on sales and a CBC ETR of 4%.

### 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 profit for accounting and tax purposes. The CBC ETR is marginally higher than the statutory rate due to some non-tax deductible expenditure.

## 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	–	–	–	(3,889,234)	–	–	0%	25%	4	1,390,282
Botswana	–	–	–	(1,025)	–	–	0%	22%	–	–
Mozambique	–	–	–	(3,026,389)	–	–	0%	32%	20	622,488
Namibia	–	–	–	(193,762)	–	–	0%	32%	–	51,661
Oman	–	–	–	–	–	–	–	15%	–	–
Zambia	30,230	–	30,230	(16,178,723)	–	–	0%	30%	29	910,441

### 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%.

### Oman

The Rio Tinto entity in Oman was dormant during 2022.

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 \$9.0 million of corporate income tax in respect of Sohar in 2022, as disclosed in our *2022 Taxes and Royalties Paid Report*.

### 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%.

# Basis of preparation

## Introduction: GRI 207 – Tax

This report together with our *2022 Taxes and Royalties Paid Report* fulfils 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 *2022 Taxes and Royalties 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 *2022 Taxes and Royalties Paid Report*. Refer to Appendix 2 on page 13 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 an 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 (in this report “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 *2022 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 2022.
- 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 2022).
- 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 2022).

## 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 *2022 Taxes and Royalties 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.

$$\text{CBC ETR} = \frac{\text{Income tax accrued current year}}{\text{Profit before income tax}}$$

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.

The CBC ETR does not take into account timing differences. These differences, which result in higher or lower taxable profits, arise due to the different timing of some items of income and expenditure used to calculate taxable profit compared to accounting profit. For example, when calculating taxable profits, a company may use prior year tax losses, which will result in a lower CBC ETR.

### 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 gains on sale of assets (reported as exclusions from underlying earnings in the *2022 Annual Report*).

The term "unrelated party" includes non-consolidated joint ventures and associates for the purposes of our *2022 Annual Report*.

### 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 2022. 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 report titled *2022 Taxes and Royalties Paid Report*. This report can be found on our website.

### Reporting currency

All amounts reported are in US dollars unless otherwise stated.

# Our 2022 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	27,744,547,626	6,614,889,984	34,359,437,610	13,356,689,590	6,135,805,067	4,442,655,454	33%	30%	23,159	32,233,775,646
China	2,618,563,254	36,770,548	2,655,333,802	(5,320,882)	(14,707,212)	3,868,349	*	25%	218	509,404,871
Mongolia	1,430,388,833	11,282,560	1,441,671,393	(467,662,007)	635,817	196,769	*	25%	4,175	12,453,832,626
New Zealand	2,448,458	753,131,936	755,580,394	124,539,914	64,124,140	48,417,370	39%	28%	670	235,338,234
Singapore	8,833,314,092	5,311,675,481	14,144,989,573	2,379,310,943	48,499,996	39,079,484	2%	17%	454	978,969,428
Hong Kong	–	1,278,770	1,278,770	49,162	–	–	0%	17%	1	–
India	3,370,741	24,261,149	27,631,890	3,548,485	1,447,593	1,406,622	40%	25%	396	12,516,303
Indonesia	56,267	–	56,267	(6,975,382)	–	–	0%	22%	–	–
Japan	254,319	8,010,107	8,264,426	1,437,321	165,048	291,542	20%	31%	23	1,376,466
Kazakhstan	758,520	–	758,520	(7,503,541)	102,981	–	0%	20%	34	1,104,857
Korea, Republic of	3,465	1,801,689	1,805,154	276,922	166,462	67,149	24%	25%	8	272,488
Lao People's Democratic Republic	61,994	–	61,994	(852,765)	–	–	0%	20%	3	–
Malaysia	13,457,733	1,857,506	15,315,239	207,500	144,228	79,538	38%	24%	1	4,071,634
Papua New Guinea	4,267	–	4,267	(542,505)	–	–	0%	30%	–	–
Philippines	–	–	–	–	–	–	–	25%	–	–
Taiwan, Province of China	353	308,680	309,033	32,262	6,270	7,366	23%	20%	1	–
Argentina	14,178,428	–	14,178,428	(40,061,322)	688,655	3,389,488	*	30%	69	32,148,676
Brazil	3,882,276	145,146,674	149,028,950	(11,287,587)	(10,447,497)	423,409	*	34%	100	136,568,727
Canada	3,536,972,868	7,982,090,221	11,519,063,089	2,106,769,775	419,786,511	454,530,741	22%	31% <sup>1</sup>	13,345	14,927,078,557
Chile	–	–	–	(14,908,618)	89,307,979	256,397	*	27%	58	336,082
United States	7,617,458,290	622,056,125	8,239,514,415	202,776,611	5,992,228	6,826,962	3%	24% <sup>1</sup>	3,654	7,031,650,669
Aruba	–	–	–	–	–	–	–	25%	–	–
Bermuda	832,786	–	832,786	325,604	–	–	0%	0%	–	–
Bolivia, Plurinational State of	–	–	–	(8,014)	–	–	0%	25%	–	–
British Virgin Islands	–	–	–	–	–	–	–	0%	–	–
Colombia	17,019	–	17,019	135,822	–	–	0%	35%	–	–
Jamaica	–	–	–	(2,649,412)	–	–	0%	25%	–	–
Mexico	–	–	–	–	–	–	–	30%	–	–
Peru	353,133	229,848	582,981	(28,540,635)	–	–	0%	30%	60	17,092,887

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

\* Refer to explanation in country summaries.

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	788,569,631	3,492,422	792,062,053	48,314,561	1,120,221	1,190,093	2%	25%	37	39,134,941
France	910,529,951	175,714,378	1,086,244,329	(261,870,072)	–	–	0%	26%	237	89,266,156
Iceland	739,466	873,879,338	874,618,804	192,573,631	19,755	12,296,697	6%	20%	387	267,048,083
Netherlands	709,933	667,620,583	668,330,516	(108,193,913)	1,089,414	44,195,436	*	26%	135	10,465,360
Serbia	2,620,914	–	2,620,914	(87,863,071)	–	–	0%	15%	158	17,433,897
United Kingdom	2,686,434,249	1,785,170,232	4,471,604,481	465,856,961	75,025,733	88,842,845	19%	19%	202	137,759,862
Finland	–	–	–	(5,136,108)	–	–	0%	20%	8	132,387
Germany	103,162	6,121,911	6,225,073	2,237,214	184,834	184,834	8%	30%	18	1,541,613
Spain	7,465,337	–	7,465,337	482,001	221,630	108,019	22%	25%	12	2,945,658
Switzerland	186,831	15,560,952	15,747,783	36,544,628	578,117	517,239	1%	15%	1	50,361
Guinea	–	–	–	(80,472,865)	–	–	0%	35%	352	–
Madagascar	149,697,437	62,913,425	212,610,862	24,044,377	1,011,470	1,073,629	4%	20%	468	668,127,773
South Africa	938,847,972	141,981,764	1,080,829,736	291,241,334	75,509,820	91,309,365	31%	28%	1,923	1,339,645,339
Angola	–	–	–	(3,889,234)	–	–	0%	25%	4	1,390,282
Botswana	–	–	–	(1,025)	–	–	0%	22%	–	–
Mozambique	–	–	–	(3,026,389)	–	–	0%	32%	20	622,488
Namibia	–	–	–	(193,762)	–	–	0%	32%	–	51,661
Oman	–	–	–	–	–	–	–	15%	–	–
Zambia	30,230	–	30,230	(16,178,723)	–	–	0%	30%	29	910,441
<b>GRI-Country-by-Country Report Total</b>	<b>57,306,859,835</b>			<b>18,084,256,786</b>	<b>6,896,479,260</b>					<b>71,152,064,453</b>

\* Refer to explanation in country summaries.



# Reconciliations to 2022 Annual Report and 2022 Taxes and Royalties 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 2022 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 2022 Taxes and Royalties Paid Report, also available on our website.

Unrelated-party revenue	\$bn	Profit/(loss) before income tax	\$bn
Sales revenue	55.6	Profit before tax	18.7
Other income (AR note 7)	1.0	EAU profit elimination	(0.8)
Financial income	0.2	EAU impairment elimination	0.2
Gains on sale of assets (AR note 7)	0.5	<b>GRI CBCR total</b>	<b>18.1</b>
<b>GRI CBCR total</b>	<b>57.3</b>		
		<b>Tangible assets other than cash or cash equivalents</b>	<b>\$bn</b>
<b>Income tax paid (on cash basis)</b>	<b>\$m</b>	Property, plant and equipment	64.7
Tax paid	6,909	Inventories (non-current)	0.2
Adjustments/rounding	(13)	Inventories (current)	6.2
<b>GRI CBCR total</b>	<b>6,896</b>	Adjustments/rounding	0.1
		<b>GRI CBCR total</b>	<b>71.2</b>
<b>Reconciliation to Taxes Paid Report</b>	<b>\$m</b>		
<b>GRI CBCR tax paid</b>	<b>6,896</b>		
Tax paid by EAU's:			
Chile (Escondida – excluding dividend withholding)	581		
Guinea (Sangaredi)	46		
Oman (Sohar)	9		
Others	4		
<b>Taxes Paid Report total</b>	<b>7,536</b>		

# Constituent entities resident in each tax jurisdiction

## Angola

Rio Tinto Angola (SU), LDA.

## Argentina

Rincon Mining Pty Ltd (P.E.)\*

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

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

Hismelt 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

Lithium Extraction Technologies (Australia) Pty Ltd

MineSmith Australasia 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

Rhodes Ridge Account Manager Pty Ltd

Rhodes Ridge Management Services Pty Ltd

Rincon Mining Pty Limited

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 Closure 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 (Rhodes Ridge) Pty Ltd

Rio Tinto Finance (USA) Limited

Rio Tinto Finance Limited

Rio Tinto Investments One Pty Limited

Rio Tinto Investments Two Pty Limited

Rio Tinto Iron Ore (Pilbara) Sales Pty Ltd

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 Composites Brasil Ltda

Empresa de Mineração Finesa Ltda.

Mineração Tabuleiro Ltda

Química e Metalúrgica Mequitall Ltda.

Rio de Contas Desenvolvimento Minerais Ltda

Rio Santa Rita Empreendimentos  
e-Participações Ltda

Rio Tinto Desenvolvimento Minerais Ltda.

Rio Tinto do Brasil Ltda.

Rio Tinto Mineração do Brasil Ltda

**British Virgin Islands**

THR OYU TOLGOI LTD.

**Canada**

1043802 Ontario Ltd.

10676276 Canada Inc.

1109723 B.C. Ltd.

46106 YUKON INC.

46117 YUKON INC.

535630 YUKON INC.

Alcan Management Services Canada Limited /  
Société de Services de Gestion Alcan Canada  
LimitéeAlcan Realty Limited/Société Immobilière Alcan  
Limitée

Diavik Diamond Mines (2012) Inc.

Element North 21 GP Inc. / Element Nord 21 GP  
Inc.Element North 21 Limited Partnership / Élément  
Nord 21 Société en CommanditeELYSIS Limited Partnership / ELYSIS Société en  
CommanditeGulf Power Company / La Compagnie  
Gulf Power

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

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

Quebec North Shore and Labrador Railway  
Company / Compagnie de Chemin de Fer du  
Littoral Nord de Québec 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 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.)\*

Rio Tinto THR Inc.

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 Chile SpA

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

**China**Alcan Management Services (Shanghai) Co.,  
Ltd.

Rio Tinto Iron &amp; 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

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 &amp; Co. KG

Rio Tinto Commercial GmbH

Rio Tinto Iron &amp; Titanium GmbH

Rio Tinto Iron &amp; Titanium Holdings GmbH

Scheuch Unterstützungskasse 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

**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

**Jamaica**

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

**Japan**

Rio Tinto Japan 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 Sole Company Limited

**Madagascar**

Port d'Ehoala S.A.

QIT Madagascar Minerals SA

**Malaysia**

Borax Malaysia Sdn Bhd

**Mexico**

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



**Mongolia**

Asia Gold Mongolia LLC  
 Asia Naran Bulag LLC  
 Heruga Exploration LLC  
 Oyu Tolgoi Catalyst Fund for Khanbogd Development  
 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 B.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  
 Rio Tinto Holding PNG Limited

**Peru**

CIA. Inmobiliaria e Inversiones Cosmos S.A.C.  
 Compañía de Transmisión Sierraoriente S.A.C.  
 Rio Tinto Minera Perú 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  
 Cuprum Metals 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

**South Africa**

Richards Bay Mining (Proprietary) Limited  
 Richards Bay Mining Holdings (Proprietary) Limited  
 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

**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.)  
 Metallwerke Refonda AG

**Taiwan, Province of China**

Rio Tinto Asia Limited Taiwan Branch (P.E.)\*

**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 Copper Holdings 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 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**	Pechiney Reynolds Quebec, Inc.
RTLDS UK Limited	Pechiney Sales Corporation
Simfer InfraCo Ltd	Resolution Copper Company
Simfer Jersey Limited**	Resolution Copper Mining LLC
Simfer Jersey Nominee Limited	Rio Tinto America Holdings Inc.
TBAC Limited	Rio Tinto America Inc.
Thos. W. Ward Limited	Rio Tinto AuM Company
<b>United States</b>	Rio Tinto Commercial Americas Inc.
Alcan Corporation	Rio Tinto Energy America Inc.
Alcan International Network U.S.A. Inc.	Rio Tinto Finance (USA) Inc.
Alcan Management Services Canada Limited/ Société de Services de Gestion Alcan Canada Limitée (P.E.)*	Rio Tinto Hydrogen Energy LLC
Alcan Primary Products Company LLC	Rio Tinto Minerals Inc.
Alcan Primary Products Corporation	Rio Tinto Mining and Exploration Inc.
Daybreak Development LLC	Rio Tinto Services Inc.
Daybreak Property Holdings LLC	Rio Tinto Technological Resources Inc.
Daybreak Secondary Water Distribution Company	Rio Tinto Technology Holdings Corporation
Daybreak Water Holding LLC	Skymont Corporation
DB Medical I LLC	Sohio Western Mining Company
DBVC1 LLC	Swift Current Land & Cattle LLC
Eastland Management Inc.	The Pyrites Company, Inc.
Flambeau Mining Company	THR Delaware Holdings, LLC
Green Mountain Mining Venture	Three Crowns Insurance Company
Henlopen Manufacturing Co., Inc.	U.S. Borax Inc.
High Purity Iron Inc.	Victoria Technology Inc.
Integrity Land and Cattle LLC	Waste Solutions and Recycling LLC
Iron Ore Company of Canada	Wyoming Coal Resources Company
Kennecott Barneys Canyon Mining Company	<b>Zambia</b>
Kennecott Exploration Company	Rio Tinto Exploration Zambia Limited
Kennecott Holdings Corporation	Solwezi Metals Exploration Limited
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.**	
Nuton LLC	
Pacific Coast Mines, Inc.	
Pechiney Bécancour, Inc.	
Pechiney Cast Plate, Inc.	
Pechiney Holdings, Inc.	
Pechiney Metals LLC	
Pechiney Plastic Packaging, Inc.	

\* The home country location of the companies that have permanent establishments in various jurisdictions in the table in Appendix 3 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
Rincon Mining Pty Ltd	Australia
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

**RioTinto**

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