

Country-by-Country Report 2023



In 2023, we paid \$8.5 billion in taxes and royalties globally, including \$6.6 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 2023 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 2023. We disclose 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 commitment to transparency and responsible tax principles can be found in our 2023 Taxes and Royalties Paid Report.

This report, together with our 2023 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 2023 Country-by-Country Report	11
Reconciliations to 2023 Annual Report and 2023 Taxes and Royalties Paid Report	13
Constituent entities resident in each tax jurisdiction	14

Many of our operations are located on land and water that have belonged to Indigenous and land-connected Peoples for thousands of years. We respect their ongoing deep connection to, and their vast knowledge of, the land, water and environment. We pay our respects to Elders, both past and present, and acknowledge the important role Indigenous Peoples play within communities and our business.

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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	28,590,467,405	6,977,566,249	35,568,033,654	12,797,804,164	4,122,037,823	4,640,846,776	36%	30%	24,369	31,979,143,059
China	2,618,061,345	123,888,186	2,741,949,531	92,230,197	8,064,738	2,275,679	2%	25%	214	843,365,453
India	3,212,575	38,955,719	42,168,294	4,555,289	1,328,168	1,501,305	33%	25%	611	20,084,541
Mongolia	1,637,859,863	28,710,540	1,666,570,403	(1,188,452,818)	1,766,119	538,991	*	25%	4,700	14,155,948,330
New Zealand	5,857,159	652,162,862	658,020,021	60,646,518	(7,131,090)	29,830,668	49%	28%	676	182,860,988
Singapore	8,082,874,674	5,520,539,504	13,603,414,178	2,241,461,551	32,963,317	64,235,709	3%	17%	469	1,111,489,866

* 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 \$8.5 billion in taxes and royalties paid globally during 2023, \$6.6 billion was paid in Australia, including \$4.1 billion in corporate tax.

The country-by-country effective tax rate (CBC ETR) is higher than the statutory corporate tax rate. This is primarily due to certain expenses being treated as non-deductible for tax purposes, together with timing differences arising from accounting expenses that are included in profit for the current year but are either deductible for tax when paid in future years or have already been deducted in a previous year.

China

Our business activities in China include administration, sales and marketing support services, procurement, the China Technology and Innovation Centre, partnerships focusing on decarbonisation, 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 profit that was largely offset by available brought-forward tax losses, leading to a CBC ETR lower than the statutory corporate tax rate. We accrued tax in respect of other entities that are in a taxable profit position but do not have available brought-forward tax losses.

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.

Mongolia

Our activities in Mongolia mainly relate to the Oyu Tolgoi mine. Following the completion of our acquisition of Turquoise Hill Resources in December 2022, Rio Tinto holds a 66% direct interest in Oyu Tolgoi 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. Underground production at the mine began in March 2023, adding to production from the open pit mine. Other activities in Mongolia include exploration, information and technology services, administration, and support services.

In 2023, our mining operations in Mongolia resulted in losses for both accounting and tax purposes, and a CBC ETR of 0%. Notwithstanding this, Oyu Tolgoi paid \$371 million in other taxes, royalties and charges to Mongolian governments as disclosed in our *2023 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 other services that 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%)¹ 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 2023. The CBC ETR was higher than the statutory corporate tax 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

Our commercial centre is located in Singapore and brings together our global sales and marketing, 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 CBC ETR is lower than the statutory corporate tax rate primarily due to the application of tax incentives available to our activities in Singapore. More information in relation to our business activities, related party transactions, and the tax incentives applied in Singapore in 2023 is available in our *2023 Taxes and Royalties Paid Report* on our website.

1. In 2024, Rio Tinto increased its ownership of NZAS to 100%.

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	–	1,258,448	1,258,448	1,141,261	–	–	0%	17%	1	–
Indonesia	405,172	–	405,172	(4,982,845)	–	–	0%	22%	–	–
Japan	33,466	8,525,275	8,558,741	1,510,532	310,663	465,170	31%	31%	25	897,522
Kazakhstan	46,122	–	46,122	(8,490,459)	–	–	0%	20%	48	902,645
Korea, Republic of	3,383	1,841,729	1,845,112	172,604	21,817	48,501	28%	27%	9	104,507
Lao People's Democratic Republic	196,248	137,321	333,569	(541,606)	–	–	0%	20%	4	573
Malaysia	15,641,159	2,716,604	18,357,763	6,731	90,833	26,169	389%	24%	1	1,045,380
Papua New Guinea	3,629	4,621	8,250	(1,794,749)	–	–	0%	30%	2	806,999
Philippines	–	–	–	–	–	–	–%	25%	–	–
Taiwan, Province of China	1,236	273,212	274,448	19,449	7,236	3,900	20%	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 interest income is not taxable in Hong Kong, resulting in a CBC ETR of 0%.

Indonesia

Our activity in Indonesia relates to closure. The activity resulted in losses for both accounting and tax purposes, and a CBC ETR of 0%.

Japan

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

Kazakhstan

Our main activity in Kazakhstan is exploration. The activity resulted in losses for both accounting and tax purposes, and 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. The activity resulted in losses for both accounting and tax purposes, and 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 activities in Papua New Guinea are exploration and support for the Panguna Mine Legacy Impact Assessment. These activities resulted in losses for both accounting and tax purposes and a CBC ETR of 0%.

Philippines

The Rio Tinto entity in the Philippines was dormant during 2023.

Taiwan, Province of China

During 2023, our main activities in Taiwan were administration and sales and marketing support services. The CBC ETR is in line with the statutory corporate tax rate.

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	5,582,544	–	5,582,544	(139,136,360)	5,167,718	13,545,069	*	35%	171	44,080,972
Brazil	14,134,984	121,271,946	135,406,930	(28,292,096)	199,019	55,766	*	34%	105	155,442,138
Canada	3,071,455,588	7,659,353,226	10,730,808,814	841,188,524	277,849,764	221,951,354	26%	31% ¹	13,864	15,247,090,604
Chile	4,937	–	4,937	(19,422,330)	63,287,676	–	0%	27%	56	928,914
United States	6,582,748,007	700,807,019	7,283,555,026	(736,246,001)	4,715,752	10,291,455	*	24% ¹	3,973	7,565,904,982

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, and will be a valuable source of high-quality lithium for the global energy transition. 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, north-east Brazil – the largest alumina refinery in South America. Alumar is accounted for as a jointly controlled asset that 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. Accrued income tax, disclosed in the table above, relates to activities that generate taxable profits and cannot be offset by exploration losses.

We also hold a 22% 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 that is not consolidated for accounting purposes and is therefore not reported in the above table. We paid \$0.6 million of income tax in respect of MRN in 2023, along with royalties and other payments, as disclosed in our *2023 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 prior-year tax losses to offset the current-year profits of some businesses. The impact of this is partially reduced by current-year losses incurred by other businesses and carried forward for use in future years.

Chile

GRI 207 requires disclosure on consolidated activities (excluding equity accounted units) which for Chile primarily involves exploration. Nuevo Cobre, our joint venture with Codelco, is progressing with geological field programs, environmental studies and community engagement. These activities resulted in losses for both accounting and tax purposes. The income tax paid relates primarily to withholding tax on dividends received from Escondida.

As disclosed in our *2023 Taxes and Royalties Paid Report*, we paid \$467 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 that 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 an integrated copper mining operation located just outside Salt Lake City, Utah. Our operation includes a concentrator, smelter and refinery.

Our U.S. Borax mine, in Boron, California, is a mine-to-market borates operation that supplies around 30% of the world's needs for refined borates. We also ship these products from our Wilmington refining facility in the Port of Los Angeles.

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%.

Nuton™, a Rio Tinto venture, has 8 strategic partnerships, including investments in copper projects in the US and Latin America.

We have a 50% equity stake in Matalco, a joint venture with the Giampaolo Group, which produces recycled aluminium billet and slab from 6 facilities in the US and one in Canada.

Our commercial office in Chicago focuses on the sales, marketing, trading and logistics of commodities.

The US consolidated group reported an overall loss for both accounting and Federal tax purposes, resulting in a CBC ETR of 0%. 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	–	–	–	–	–	–	–%	22%	–	–
Bermuda	170,608	–	170,608	170,608	–	–	0%	0%	–	–
Bolivia, Plurinational State of	–	–	–	(6,793)	–	–	0%	25%	–	–
British Virgin Islands	–	–	–	–	–	–	–%	0%	–	–
Colombia	494,296	–	494,296	(787,589)	–	–	0%	35%	–	–
Jamaica	–	–	–	(3,249,431)	–	–	0%	25%	–	–
Mexico	–	–	–	(59,491)	–	–	0%	30%	–	–
Peru	630,457	2,027,815	2,658,272	(43,132,940)	36,718	–	0%	30%	57	1,016,678

Aruba

The Rio Tinto entity in Aruba was dormant in 2023 and placed in liquidation during the year.

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%. The majority of this interest is taxable in Australia at the rate of 30% under Australia's controlled foreign corporation rules.

Bolivia, Plurinational State of

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

British Virgin Islands

The entity in British Virgin Islands is a holding company that did not derive any income in 2023.

Colombia

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

Jamaica

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

Mexico

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

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, and going forwards La Granja is reported as an equity accounted unit. The activity resulted in losses for both accounting and tax purposes, and 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	431,579,537	10,241,984	441,821,521	12,016,891	982,502	595,968	5%	25%	34	44,936,568
France	671,038,526	166,340,867	837,379,393	(226,880,529)	(5,035,458)	3,136,498	*	26%	246	91,178,028
Iceland	1,447,584	609,924,551	611,372,135	22,553,168	5,843,868	247,516	1%	20%	398	240,534,045
Netherlands	1,609,503	1,017,965,430	1,019,574,933	15,614,755	1,169,129	67,462,077	432%	26%	33	9,833,103
Serbia	160,155	641,730	801,885	(108,665,845)	11,554	11,554	*	15%	160	20,123,580
United Kingdom	2,944,536,723	1,305,162,951	4,249,699,674	(285,450,652)	29,327,384	83,536,929	*	24%	323	141,903,175

* 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 CBC ETR is lower than the statutory corporate tax rate, primarily 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. The income tax accrual relates to withholding taxes borne on technical assistance fees. The refunds received in the year related to refundable research and development tax credits.

Iceland

Our main activity in Iceland is aluminium smelting. The ISAL smelter 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 reduced by tax depreciation on fixed assets in excess of book depreciation, resulting in a CBC ETR lower than the statutory corporate tax 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, including our investment in Oyu Tolgoi LLC (OT LLC), the owner of the Oyu Tolgoi project in Mongolia. The Netherlands holding entity provides equity funding to OT LLC, and debt funding established in previous years continued in 2023.

Our activities in the Netherlands resulted in a profit for both accounting and tax 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. The CBC ETR is significantly higher than the statutory corporate tax rate due to withholding tax being chargeable on accrued interest income in the Netherlands without relief for withholding tax purposes for accrued interest expenses.

Serbia

Serbia is home to the Jadar lithium-borates project. We believe the Jadar project has the potential to be a world-class asset that could act as a catalyst for the development of other industries and tens of thousands of jobs for current and future generations in Serbia, while sustainably producing battery-grade lithium carbonate, a material critical to the energy transition. We acknowledge the concerns from communities and are focused on having a fact-based dialogue with all stakeholders about the project.

Our activity in Serbia in 2023 resulted in losses for both accounting and tax purposes, and a CBC ETR of 0%. The income tax accrued and paid relates to withholding taxes on services.

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 2023 resulted in a loss for accounting purposes. Similar to previous years, some foreign exchange losses are not deductible for tax purposes, which resulted in taxable profit in 2023. The income tax accrued for the year related to tax on these profits, along with taxes payable in respect of controlled foreign companies, in accordance with relevant legislation.

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	–	–	–	(4,435,665)	–	–	0%	20%	9	166,711
Germany	1,101,945	4,676,191	5,778,136	4,052,700	168,374	113,282	3%	30%	19	1,497,709
Spain	8,858,502	2,540,725	11,399,227	98,699	105,158	45,156	46%	25%	12	2,608,581
Switzerland	418,684	22,015,315	22,433,999	14,941,300	2,142,415	1,748,889	12%	15%	1	40,127

Finland

Our main activity in Finland is exploration. This activity resulted in losses for both accounting and tax purposes, and a CBC ETR of 0%.

Germany

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

The CBC ETR is lower than the statutory corporate tax rate, primarily due to pension accounting adjustments that do not give rise to taxable income.

Spain

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

These activities resulted in profits for both accounting and tax purposes. The CBC ETR is higher than the statutory corporate tax rate, due to timing differences arising from accounting expenses that are included in profit in the current year but are deductible for tax in future years.

Switzerland

Our main activities in Switzerland relate to administration and management activities, intragroup funding activities, management of legacy assets in closure, and distribution activities.

These activities resulted in an accounting profit due to the release of cost provisions that are no longer required. The release was not taxable as the provisions had not been tax deductible when originally recognised. Consequently, the CBC ETR is lower than the statutory corporate tax rate. This is 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	213,089	–	213,089	(325,430,777)	52,173	540,964	*	30%	613	36,885,570
Madagascar	152,880,959	96,762,879	249,643,838	35,634,342	990,713	1,236,107	3%	20%	489	646,528,525
South Africa	796,134,642	124,286,437	920,421,079	221,439,737	59,708,820	71,848,500	32%	27%	2,007	1,262,470,426

* Refer to explanation below.

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, we are investing in the world-class Simandou iron ore project and co-developing the trans-Guinean rail and port infrastructure needed to support the mine. These activities resulted in losses for both accounting and tax purposes, and a CBC ETR of 0%. The income tax accrued relates to withholding taxes on services.

In 2023, we also paid corporate income tax of \$35.5 million in Guinea in relation to our minority interest in the Sangaredi bauxite mine, as disclosed in our *2023 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 south-eastern Madagascar. QMM produces ilmenite which is a major source of titanium dioxide, as well as monazite and zirsill. 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 claiming tax depreciation allowances that 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 3%.

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 zircon, rutile, iron and titanium dioxide slag.

Our activities resulted in profit for accounting and tax purposes. The CBC ETR is higher than the statutory rate due to timing differences resulting from book depreciation in excess of tax depreciation.

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	–	–	–	(8,521,912)	–	–	0%	25%	9	2,802,440
Botswana	–	–	–	(21,328)	–	–	0%	22%	–	–
Mozambique	–	–	–	(12,467,766)	–	–	0%	32%	34	667,316
Namibia	–	–	–	(8,952)	–	–	0%	32%	–	47,256
Oman	–	–	–	–	–	–	–%	15%	–	–
Rwanda	–	–	–	(1,346,665)	–	–	0%	30%	–	–
Zambia	120,191	–	120,191	(35,861,042)	–	–	0%	30%	28	735,512

Angola

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

Botswana

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

Namibia

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

Oman

The Rio Tinto entity in Oman was dormant during 2023.

We also hold a 20% ownership in the Sohar aluminium smelter. Sohar is an equity accounted unit that is not consolidated for accounting purposes and is therefore not reported in the above table. We paid \$10.1 million of corporate income tax in respect of Sohar in 2023, as disclosed in our *2023 Taxes and Royalties Paid Report*.

Rwanda

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

Zambia

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

Basis of preparation

Introduction: GRI 207 – Tax

This report, together with our *2023 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 *2023 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 *2023 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 that 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 *2023 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, in accordance with OECD Country-by-Country Reporting (CBCR) requirements.
- Amounts disclosed for a relevant jurisdiction relate to the activities of entities that are tax resident in that jurisdiction. Amounts relating to entities that are incorporated in one jurisdiction, but that 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 2023.
- 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 2023).
- 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 2023).

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 *2023 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 Country-by-Country Reporting (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 corporate tax 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 that 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.

The term "unrelated party" includes non-consolidated joint ventures and associates for the purposes of our *2023 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 2023. 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 *2023 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 2023 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
Angola	–	–	–	(8,521,912)	–	–	0%	25%	9	2,802,440
Argentina	5,582,544	–	5,582,544	(139,136,360)	5,167,718	13,545,069	*	35%	171	44,080,972
Aruba	–	–	–	–	–	–	–%	22%	–	–
Australia	28,590,467,405	6,977,566,249	35,568,033,654	12,797,804,164	4,122,037,823	4,640,846,776	36%	30%	24,369	31,979,143,059
Belgium	431,579,537	10,241,984	441,821,521	12,016,891	982,502	595,968	5%	25%	34	44,936,568
Bermuda	170,608	–	170,608	170,608	–	–	0%	0%	–	–
Bolivia, Plurinational State of	–	–	–	(6,793)	–	–	0%	25%	–	–
Botswana	–	–	–	(21,328)	–	–	0%	22%	–	–
Brazil	14,134,984	121,271,946	135,406,930	(28,292,096)	199,019	55,766	*	34%	105	155,442,138
British Virgin Islands	–	–	–	–	–	–	–%	0%	–	–
Canada	3,071,455,588	7,659,353,226	10,730,808,814	841,188,524	277,849,764	221,951,354	26%	31% ¹	13,864	15,247,090,604
Chile	4,937	–	4,937	(19,422,330)	63,287,676	–	0%	27%	56	928,914
China	2,618,061,345	123,888,186	2,741,949,531	92,230,197	8,064,738	2,275,679	2%	25%	214	843,365,453
Colombia	494,296	–	494,296	(787,589)	–	–	0%	35%	–	–
Finland	–	–	–	(4,435,665)	–	–	0%	20%	9	166,711
France	671,038,526	166,340,867	837,379,393	(226,880,529)	(5,035,458)	3,136,498	*	26%	246	91,178,028
Germany	1,101,945	4,676,191	5,778,136	4,052,700	168,374	113,282	3%	30%	19	1,497,709
Guinea	213,089	–	213,089	(325,430,777)	52,173	540,964	*	30%	613	36,885,570
Hong Kong	–	1,258,448	1,258,448	1,141,261	–	–	0%	17%	1	–
Iceland	1,447,584	609,924,551	611,372,135	22,553,168	5,843,868	247,516	1%	20%	398	240,534,045
India	3,212,575	38,955,719	42,168,294	4,555,289	1,328,168	1,501,305	33%	25%	611	20,084,541
Indonesia	405,172	–	405,172	(4,982,845)	–	–	0%	22%	–	–
Jamaica	–	–	–	(3,249,431)	–	–	0%	25%	–	–
Japan	33,466	8,525,275	8,558,741	1,510,532	310,663	465,170	31%	31%	25	897,522
Kazakhstan	46,122	–	46,122	(8,490,459)	–	–	0%	20%	48	902,645
Korea, Republic of	3,383	1,841,729	1,845,112	172,604	21,817	48,501	28%	27%	9	104,507
Lao People's Democratic Republic	196,248	137,321	333,569	(541,606)	–	–	0%	20%	4	573

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
Madagascar	152,880,959	96,762,879	249,643,838	35,634,342	990,713	1,236,107	3%	20%	489	646,528,525
Malaysia	15,641,159	2,716,604	18,357,763	6,731	90,833	26,169	389%	24%	1	1,045,380
Mexico	–	–	–	(59,491)	–	–	0%	30%	–	–
Mongolia	1,637,859,863	28,710,540	1,666,570,403	(1,188,452,818)	1,766,119	538,991	*	25%	4,700	14,155,948,330
Mozambique	–	–	–	(12,467,766)	–	–	0%	32%	34	667,316
Namibia	–	–	–	(8,952)	–	–	0%	32%	–	47,256
Netherlands	1,609,503	1,017,965,430	1,019,574,933	15,614,755	1,169,129	67,462,077	432%	26%	33	9,833,103
New Zealand	5,857,159	652,162,862	658,020,021	60,646,518	(7,131,090)	29,830,668	49%	28%	676	182,860,988
Oman	–	–	–	–	–	–	–%	15%	–	–
Papua New Guinea	3,629	4,621	8,250	(1,794,749)	–	–	0%	30%	2	806,999
Peru	630,457	2,027,815	2,658,272	(43,132,940)	36,718	–	0%	30%	57	1,016,678
Philippines	–	–	–	–	–	–	–%	25%	–	–
Rwanda	–	–	–	(1,346,665)	–	–	0%	30%	–	–
Serbia	160,155	641,730	801,885	(108,665,845)	11,554	11,554	*	15%	160	20,123,580
Singapore	8,082,874,674	5,520,539,504	13,603,414,178	2,241,461,551	32,963,317	64,235,709	3%	17%	469	1,111,489,866
South Africa	796,134,642	124,286,437	920,421,079	221,439,737	59,708,820	71,848,500	32%	27%	2,007	1,262,470,426
Spain	8,858,502	2,540,725	11,399,227	98,699	105,158	45,156	46%	25%	12	2,608,581
Switzerland	418,684	22,015,315	22,433,999	14,941,300	2,142,415	1,748,889	12%	15%	1	40,127
Taiwan, Province of China	1,236	273,212	274,448	19,449	7,236	3,900	20%	20%	1	–
United Kingdom	2,944,536,723	1,305,162,951	4,249,699,674	(285,450,652)	29,327,384	83,536,929	*	24%	323	141,903,175
United States	6,582,748,007	700,807,019	7,283,555,026	(736,246,001)	4,715,752	10,291,455	*	24% ¹	3,973	7,565,904,982
Zambia	120,191	–	120,191	(35,861,042)	–	–	0%	30%	28	735,512
GRI-Country-by-Country Report total	55,639,984,897			13,183,572,379	4,606,182,903					73,814,072,823

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

* Refer to explanation in country summaries.

Constituent entities resident in each tax jurisdiction

Angola

Rio Tinto Angola (SU), LDA.
Rio Tinto Exploration Angola (SU), Limitada

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
Australia-Japan Innovation Fund
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
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
Hlsmelt 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
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 Biofuels Pty Ltd
Rio Tinto Closure Pty Limited
Rio Tinto Coal (Clermont) Pty Ltd
Rio Tinto Coal Australia Pty Limited
Rio Tinto Coal NSW Holdings Limited
Rio Tinto EN21 Australia Pty Ltd

Rio Tinto EN21 Op Co Pty Limited
Rio Tinto Energy and Climate Investments Australia Pty Ltd
Rio Tinto Energy Services Pty Ltd
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 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 Canada Management Inc./ Rio Tinto Gestion Canada Inc.	Rio Tinto Iron Ore Europe S.A.S.
Rio Tinto Diamonds NV		RTA Holdco France 1 S.A.S.
Bermuda	Rio Tinto Energy and Climate Investments Canada Inc.	RTA Holdco France 2 S.A.S.
North IOC (Bermuda) Holdings Limited	Rio Tinto Exploration Canada Inc.	Germany
North IOC (Bermuda) Limited	Rio Tinto FalCon Diamonds Inc.	Alcan Betriebs- und Verwaltungsgesellschaft GmbH
QIT Madagascar Minerals Ltd	Rio Tinto Fer et Titane Inc.	Alcan Lebensmittelverpackungen GmbH
Bolivia, Plurinational State of	Rio Tinto Iron and Titanium Canada Inc. / Rio Tinto Fer et Titane Canada Inc.	Alcan Packaging Mühltal GmbH & Co. KG
Rio Tinto Mining and Exploration Limited (P.E.)*	Rio Tinto PACE Canada Inc. / Gestion Rio Tinto PACE Canada Inc.	Rio Tinto Commercial GmbH
Botswana	Rio Tinto Potash Management Inc. / Rio Tinto Potasse Management Inc.	Rio Tinto Iron & Titanium GmbH
Rio Tinto Mining and Exploration Limited (P.E.)*	Rio Tinto Saskatchewan Management Inc.	Rio Tinto Iron & Titanium Holdings GmbH
Brazil	Rio Tinto Saskatchewan Potash Holdings General Partner Inc.	Scheuch Unterstuetzungskasse GmbH
Alcan Composites Brasil Ltda	Rio Tinto Saskatchewan Potash Holdings Limited Partnership	Guinea
Empresa de Mineração Finesa Ltda.	Rio Tinto Shipping (Asia) Pte. Ltd. (P.E.)*	Rio Tinto Guinée S.A.
Mineração Tabuleiro Ltda	Rio Tinto THR Inc.	Simfer InfraCo Guinée S.A.
Química e Metalúrgica Mequitall Ltda.	The Roberval and Saguenay Railway Company / La Compagnie du Chemin de Fer Roberval-Saguenay	SIMFER S.A.
Rio de Contas Desenvolvidos Mineraiis Ltda	THR MINES (BC) LTD.	Société Minière et de Participations Guinée Alusuisse
Rio Santa Rita Empreendimentos e-Participações Ltda	THR Mines Services Co. Ltd.	Hong Kong
Rio Tinto Desenvolvidos Mineraiis Ltda.	Turquoise Hill Resources Ltd.	Alcan Asia Limited
Rio Tinto do Brasil Ltda.	Chile	Rio Tinto Asia Ltd
Rio Tinto Mineração do Brasil Ltda	Nuevo Cobre S.A.	Iceland
British Virgin Islands	Rio Tinto Chile SpA	Rio Tinto Iceland Ltd.
THR OYU TOLGOI LTD.	Rio Tinto Mining and Exploration Limited (P.E.)*	India
Canada	China	Rio Tinto Exploration India Private Limited
1043802 Ontario Ltd.	Alcan Management Services (Shanghai) Co., Ltd.	Rio Tinto India Private Limited
10676276 Canada Inc.	Rio Tinto Iron & Titanium (Suzhou) Co., Ltd	Rio Tinto Orissa Mining Private Ltd
1109723 B.C. Ltd.	Rio Tinto Limited Beijing Representative Office (P.E.)*	Indonesia
15304644 Canada Inc.	Rio Tinto Limited Shanghai Representative Office (P.E.)*	PT Hutan Lindung Kelian Lestari
46106 YUKON INC.	Rio Tinto Minerals Exploration (Beijing) Co., Ltd	PT Kelian Equatorial Mining
Alcan Management Services Canada Limited / Société de Services de Gestion Alcan Canada Limitée	Rio Tinto Mining Commercial (Shanghai) Co., Ltd.	Jamaica
Alcan Realty Limited/Société Immobilière Alcan Limitée	Rio Tinto Trading (Shanghai) Co., Ltd.	Rio Tinto Alcan Inc. (P.E.)*
Diavik Diamond Mines (2012) Inc.	Rio Tinto Trading (Shanghai) Co., Ltd. Beijing Branch	Japan
Element North 21 GP Inc. / Element Nord 21 GP Inc.	Turquoise Hill (Beijing) Services Company Ltd	Rio Tinto Japan Ltd
Element North 21 Limited Partnership / Élément Nord 21 Société en Commandite	Colombia	Kazakhstan
Gulf Power Company / La Compagnie Gulf Power	Rio Tinto Mining and Exploration Limited (P.E.)*	Balkhash Saryshagan LLP
Iron Ore Company of Canada (P.E.)*	Finland	Korgantas LLP
Pechiney Reynolds Quebec, Inc. (P.E.)*	Rio Tinto Exploration Finland OY	Rio Tinto Exploration Kazakhstan LLP
Quebec North Shore and Labrador Railway Company / Compagnie de Chemin de Fer du Littoral Nord de Québec et du Labrador Inc.	France	Rio Tinto Mining and Exploration Limited (P.E.)*
Rio Tinto Alcan Fund Inc.	AP Service	Korea, Republic of
Rio Tinto Alcan Inc.	Borax Français	Rio Tinto Korea Ltd
Rio Tinto Alcan International Ltd. / Rio Tinto Alcan International Ltee	Pechiney Bâtiment	Lao People's Democratic Republic
Rio Tinto Canada Inc.	Rio Tinto Aluminium Pechiney	Lao Sanxai Minerals Sole Company Limited
	Rio Tinto France S.A.S.	Rio Tinto Minerals Development (Lao) Sole Co., Ltd.
		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.		
Minera La Granja S.A.C.		
Rio Tinto Mining and Exploration S.A.C.		
Philippines		
Pechiney Philippines Inc.		
Rwanda		
Rio Tinto Exploration Rwanda Limited		
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.)*		
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 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		
La Granja UK Holdings 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 InfraCo Ltd		
Simfer Jersey Limited**		
Simfer Jersey Nominee Limited		
TBAC Limited		
Thos. W. Ward Limited		
THR Copper Limited		

United States

Alcan Corporation
 Alcan International Network U.S.A. Inc.
 Alcan Management Services Canada Limited/
 Société de Services de Gestion Alcan Canada
 Limitée (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.**
 Nuton LLC
 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 Energy Services 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.
 Rio Tinto Technology Holdings Corporation
 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

* 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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