



Rio Tinto

Country-by-Country Report 2024

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Many of our operations are located on land and waters 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 and land-connected Peoples play within communities and our business.

In 2024, we paid \$8.4 billion in taxes and royalties globally, including \$6.3 billion in Australia.

We demonstrate our ongoing commitment to leadership in tax transparency by publishing comprehensive information about our taxes and payments to governments.

In this report, we supplement the disclosures in our 2024 Taxes and Royalties Paid Report with associated financial information on a country-by-country basis for all countries where we had a taxable presence in 2024. 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 2024 Taxes and Royalties Paid Report.

This report, together with our 2024 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.



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On the cover: Gudai-Darri, Western Australia.
On this page: Simandou, Guinea.



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	7,925,898,084	25,734,874,516	33,660,772,600	12,181,046,857	3,654,600,106	3,777,834,405	31%	30%	24,366	29,733,819,551
China	3,082,935,854	349,115,965	3,432,051,819	(209,020,359)	4,652,298	2,113,165	*	25%	207	730,836,934
India	3,329,779	47,664,125	50,993,904	10,278,734	2,557,646	2,213,666	22%	25%	1,183	20,771,079
Mongolia	2,197,219,514	28,756,931	2,225,976,445	(1,042,112,462)	14,075,742	883,715	*	25%	4,962	15,452,968,970
New Zealand	653,509,982	633,066,232	1,286,576,214	764,673,949	27,362,392	27,657,648	4%	28%	732	821,269,557
Singapore	26,553,295,190	8,020,010,240	34,573,305,430	2,648,149,137	42,671,988	87,903,805	3%	17%	486	1,140,502,830

* Refer to explanation below.

Australia

In 2024, we paid \$8.4 billion in taxes and royalties globally, of which \$6.3 billion was paid in Australia. We are proud to be one of Australia's largest taxpayers.

Our activities in Australia primarily relate to the production and export of iron ore, bauxite, alumina, aluminium and salt. We also have a number of ongoing exploration and closure projects.

In 2024, we announced a new partnership with Sumitomo Metal Mining to deliver the Winu copper-gold project in Western Australia, and we continued work to bring the Burra scandium project in New South Wales to life.

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

The related-party revenue primarily consists of sales of iron ore, bauxite, alumina and aluminium to our commercial centre in Singapore which markets and sells to customers. Transfer pricing for these transactions is covered under the agreement reached with the Australian and Singaporean tax authorities in 2022.

China

Our activities in China include administration, sales and marketing support services for mineral products, technology and innovation collaborations, partnerships focusing on decarbonisation, blending and distribution of steel powder materials, minerals exploration, and the purchase, blending and sale of iron ore at Chinese ports. We also undertake procurement and engineering services.

For Group reporting purposes, our activities in China resulted in an overall loss for accounting purposes, made up of a mix of accounting profits and losses across our different activities. This does not include a distribution fee from a subsidiary in Singapore invoiced post-year end which resulted in an overall profit for local statutory purposes in China. Accrued income tax disclosed in the table above related to activities that generate taxable profits that cannot be offset by losses in other areas of the business.

India

Our primary activities in India are Group services, and administrative and support services for human resources, systems, reporting and data management related to health, safety and environment, and sales and marketing support services.

Our activities in India 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.

Mongolia

Our activities in Mongolia mainly relate to the Oyu Tolgoi copper and gold mine. Oyu Tolgoi is jointly owned by the Government of Mongolia, which has 34% ownership, and Rio Tinto, which owns 66%. Rio Tinto manages the operation on behalf of the owners. The mine is a major contributor to the Mongolian economy. Underground production began in 2023, adding to production from the open pit mine. Other activities in Mongolia include project studies, information and technology services, procurement, administration, and support services.

In 2024, our mining operations in Mongolia resulted in losses for both accounting and tax purposes. Notwithstanding this, Oyu Tolgoi paid \$482 million in other taxes, royalties and charges to Mongolian governments as disclosed in our *2024 Taxes and Royalties Paid Report*. The income tax accrued as 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) converts alumina into aluminium using renewable hydroelectricity. Rio Tinto acquired an additional 20.64% share of NZAS from Japan's Sumitomo Chemical Company during 2024, increasing Rio Tinto's share to 100%. The profit in 2024 primarily relates to accounting revaluation on the acquisition of the additional 20.64% interest. This revaluation is not taxable, resulting in a CBC ETR lower than the statutory corporate tax rate.

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 CBC ETR is lower than the statutory corporate tax due to:

- tax exemption in respect of income from qualifying shipping activities;
- transfer pricing adjustments related to sales and marketing of commodities to give effect to agreement reached with the Australian and Singaporean tax authorities in 2022;
- timing differences related to accrued but unpaid interest income in respect of the financing of Oyu Tolgoi. Under the Singaporean territorial tax regime, interest earned from a foreign source is taxed only when the cash is received and remitted. This is aligned with the applicable tax regime in Mongolia where interest is deductible and tax is withheld when the interest is paid.

More information relating to our business activities, related-party transactions, and the tax incentives applied in Singapore in 2024 is available in our *2024 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 of other than cash or cash equivalents
Hong Kong	–	1,035,089	1,035,089	879,826	–	–	0%	17%	–	–
Indonesia	1,177,711	14,248	1,191,959	1,784,759	–	–	0%	22%	–	–
Japan	46,828	8,151,984	8,198,812	1,645,307	462,320	521,434	32%	31%	23	1,150,224
Kazakhstan	464,309	–	464,309	(7,064,905)	–	–	0%	20%	55	661,579
Korea, Republic of	23,229	2,066,929	2,090,158	250,117	14,006	12,922	5%	21%	9	155,987
Lao People's Democratic Republic	82,198	–	82,198	(1,202,091)	–	–	0%	20%	6	49,550
Malaysia	3,603,205	119,623	3,722,828	833,815	24,139	11,119	1%	24%	1	91,336
Papua New Guinea	30,573	–	30,573	(6,473,758)	–	–	0%	30%	4	355,920
Philippines	–	–	–	(2,634)	–	–	0%	25%	–	–
Taiwan, Province of China	419	–	419	(24,797)	–	–	0%	20%	–	–

Hong Kong

We undertake minor regional administrative services in Hong Kong and earned a small amount of interest on foreign bank accounts which 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 an accounting profit resulting from a reduction in accounting provisions which is not taxable, and a loss for tax purposes, resulting in 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. This 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 lower than the statutory corporate tax rate due to an under-provision for income tax in the current period.

Lao People's Democratic Republic

Our main activity in Laos is exploration. This 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 CBC ETR is lower than the statutory corporate tax rate due primarily to a foreign exchange gain in respect of the tax payable balance which is included in the accrued income tax for the year.

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 2024, with incidental administration costs resulting in losses for both accounting and tax purposes, and a CBC ETR of 0%.

Taiwan, Province of China

During 2024, our main activities in Taiwan were administration, and sales and marketing support services. Our activities in Taiwan resulted in losses for both accounting and tax purposes, and a CBC ETR of 0%.

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	61,244,433	–	61,244,433	(118,431,636)	16,880,594	21,423,340	*	35%	226	1,053,403,691
Brazil	3,598,064	160,729,303	164,327,367	(27,797,020)	1,674,201	2,954,918	*	34%	112	125,365,436
Canada	2,331,587,946	8,067,991,721	10,399,579,667	260,880,368	190,248,299	160,158,696	61%	32% ¹	14,157	14,350,915,028
Chile	3,317,372	–	3,317,372	(27,043,955)	113,585,274	162,554	*	27%	65	699,215
United States	9,092,062,980	704,316,570	9,796,379,550	(50,466,106)	(814,434)	11,692,680	*	24% ¹	4,113	7,177,402,525

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

* Refer to explanation below.

Argentina

Our Rincon Lithium Project is a large, lithium brine project in the heart of the lithium triangle in Salta Province, and will be a valuable source of high-quality lithium for the global energy transition. In 2024, we produced first lithium from the Rincon starter plant and received Board approval to further develop the project to its full potential.

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 and foreign exchange gains on funding balances. The income tax accrued in the current year is mostly 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. Alumar is accounted for as a jointly controlled asset that is proportionately consolidated. We also undertake exploration, and sales and marketing support services 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, the country's largest bauxite mine. MRN is an equity accounted unit that is not consolidated for accounting purposes and is therefore not reported in the above table. In 2024, we paid royalties and other payments in respect of MRN, as disclosed in our *2024 Taxes and Royalties Paid Report*.

Canada

We are the largest mining and metals company in Canada. We have world-class mines and processing capabilities spanning aluminium, iron ore, titanium dioxide, diamonds and scandium, and operate hydropower plants in Quebec and British Columbia. We also carry out mineral exploration, research and development, and we operate port and rail facilities.

The CBC ETR is higher than the statutory tax rate primarily due to the current-year tax losses incurred by some businesses and carried forward for use in future years as well as the impact of no tax benefit recognised in respect of some foreign exchange losses. This impact is partially offset by the availability of prior-year tax losses used to offset the current-year profits of some businesses.

Chile

We undertake exploration activity in Chile which includes activity in relation to Nuevo Cobre, our joint venture with Codelco. This project continues to make progress, with permitting advancing alongside ongoing geological field programs. These activities resulted in an overall loss for accounting and tax purposes. Accrued income tax, disclosed in the table above, primarily relates to withholding tax on non-resident services. The income tax paid relates primarily to withholding tax on dividends received from Escondida.

As disclosed in our *2024 Taxes and Royalties Paid Report*, we paid \$603 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 the withholding tax paid on dividends as referred to above, is therefore not reported in the table above.

United States

Rio Tinto Kennecott is an integrated copper mining operation located just outside Salt Lake City, Utah. Our operation includes a surface mine, concentrator, smelter and refinery.

Our U.S. Borax mine, in Boron, California, supplies around 30% of the world's needs for refined borates, which we also ship from our Wilmington refining facility in the Port of Los Angeles.

The Resolution Copper project is a proposed underground copper mine in Arizona that is progressing through the permitting process. Resolution Copper has the potential to become one of the biggest copper mines in North America, and create thousands of direct and indirect jobs. We own 55% of Resolution Copper and BHP owns 45%.

Nuton, our proprietary bioleaching venture, has investments in copper projects in the US and Latin America.

We also have a 50% equity stake in Matalco, a joint venture with the Giampaolo Group, which produces recycled aluminium billet and slab from facilities in the US and Canada. Our interest in Matalco is reported as an equity accounted unit and therefore not included in the above table.

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. 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	-	23,899	23,899	23,899	-	-	0%	0%	-	-
Bolivia, Plurinational State of	-	-	-	(7,406)	-	-	0%	25%	-	-
British Virgin Islands	-	-	-	-	-	-	-%	0%	-	-
Colombia	1,092,689	-	1,092,689	(502,059)	54,111	66,575	*	35%	3	-
Jamaica	-	-	-	(6,574,975)	-	-	0%	25%	-	-
Peru	166,332	61,150	227,482	(11,261,917)	45,374	-	0%	30%	43	721,820

* Refer to explanation below.

Aruba

The Rio Tinto entity in Aruba was dormant and in liquidation in 2024.

Bermuda

The Rio Tinto entities in Bermuda are holding companies earning incidental interest income 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

The Rio Tinto entity in Bolivia was largely dormant in 2024, with minimal expenses related to exploration undertaken in prior years. The activity resulted in losses for both accounting and tax purposes, and a CBC ETR of 0%.

British Virgin Islands

The only entity in British Virgin Islands was a holding company that did not derive any income in 2024. This entity became tax resident in the United Kingdom on 1 April 2024.

Colombia

Our main activity in Colombia is exploration. This activity resulted in losses for both accounting and tax purposes. The income tax accrued for the current year relates primarily to withholding taxes on services.

Jamaica

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

Peru

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

We also have a joint venture with First Quantum Minerals to develop La Granja, one of the largest undeveloped copper deposits in the world, with potential to be a large, long-life operation. Our 45% interest in La Granja is reported as an equity accounted unit and therefore not included in the above table.

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	270,148,430	7,809,498	277,957,928	10,156,187	838,491	853,836	8%	25%	32	14,368,012
France	668,447,004	195,269,300	863,716,304	2,584,716	(5,137,377)	1,687,126	65%	26%	257	98,971,877
Iceland	1,441,151	856,298,093	857,739,244	31,848,586	2,500,860	3,286,136	10%	20%	389	241,288,136
Netherlands	4,518,790	14,274,985	18,793,775	(1,388,973)	12,696,979	2,079,410	*	26%	29	9,119,748
Serbia	366,937	660,921	1,027,858	(91,571,687)	–	–	0%	15%	125	18,169,863
United Kingdom	2,750,843,092	2,920,907,447	5,671,750,539	534,381,045	15,169,458	90,345,950	17%	25%	366	224,939,886

* Refer to explanation below.

Belgium

Our main activities in Belgium are the sorting, selling and marketing of diamonds. 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 activities, and research and development. In addition, our operations team in Coudekerque refines borates and distributes specialty borates products.

Our activities in France resulted in a profit for accounting purposes but a loss for tax purposes, primarily due to a reduction in accounting provisions which is not taxable. The income tax accrued relates to withholding taxes borne on technical assistance fees, resulting in a CBC ETR higher than the statutory rate. Tax refunds were received in the year related to refundable research and development tax credits.

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 the electricity we use generated from 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 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.

Our activities in the Netherlands resulted in an accounting loss but a taxable profit position, primarily due to non-tax deductible defined benefit pension expenditure. Withholding tax of \$1 million was also incurred in respect of the cash distribution received as part of the Group's divestment of its 75% interest in Bektau B.V. Most of the income tax paid during the year related to prior years.

Serbia

Serbia is home to our Jadar lithium-borates project. We believe the Jadar project has the potential to be a world-class asset that could responsibly produce battery-grade lithium carbonate, a material critical to the energy transition.

Our activities in Serbia in 2024 resulted in losses for both accounting and tax purposes, and a CBC ETR of 0%.

United Kingdom

The UK is home to our corporate headquarters where we undertake corporate functions such as investor relations, treasury, finance, legal, human resources, 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 2024 resulted in a profit for accounting and tax purposes. The CBC ETR is lower than the statutory corporate tax rate, primarily due to foreign exchange gains which are not taxable, together with the availability of prior-year tax losses to partially offset current-year taxable profits. The income tax accrued related to tax on interest income which is not offset by brought-forward losses.

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	125	–	125	(3,662,418)	–	–	0%	20%	8	121,260
Germany	618,461	7,880,807	8,499,268	4,300,148	253,497	189,863	4%	30%	22	1,126,632
Spain	8,841,671	3,118,549	11,960,220	4,613,903	238,847	1,240,827	27%	25%	12	1,092,387
Switzerland	491,759	21,926,438	22,418,197	7,506,691	1,711,740	1,340,968	18%	18%	1	–

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 activities.

The CBC ETR is lower than the statutory corporate tax rate, primarily due to accounting profit related to pensions that is not taxable.

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 in line with the statutory rate.

Switzerland

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

Our activities in Switzerland resulted in profits for both accounting and tax purposes. The CBC ETR is in line with the statutory rate.

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	1,321,267	–	1,321,267	(99,575,968)	58,094	–	0%	30%	963	2,214,651,606
Madagascar	161,899,572	76,902,039	238,801,611	15,526,197	1,246,987	1,200,540	8%	20%	511	631,874,305
South Africa	778,147,432	90,829,318	868,976,750	131,798,411	65,701,355	43,048,552	33%	27%	2,019	1,253,284,074

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%). Simandou is one of the largest known high-grade iron ore deposits in the world, and Africa's largest mine and related infrastructure project.

Together with the Government of Guinea and Winning Consortium Simandou (WCS), which is developing Simandou blocks 1 and 2, we are 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%.

In 2024, we also paid corporate income tax of \$19.4 million in Guinea in relation to our minority interest in the Sangaredi bauxite mine, as disclosed in our *2024 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) in the Anosy region of Madagascar, a joint venture between Rio Tinto (80%) and the Government of Madagascar (20%). QMM produces ilmenite, a major source of titanium dioxide, as well as monazite and zirsill. QMM includes the deep-water public Port d'Ehoala, from which the products are shipped.

Our activities resulted in a profit for both accounting and tax purposes. The taxable profit was reduced by tax depreciation allowances carried forward from prior years. This resulted 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 8%.

South Africa

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

Our activities resulted in profits for both 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	866,996	–	866,996	(26,078,264)	892,601	–	0%	25%	13	16,016,277
Botswana	–	–	–	(3,637)	–	–	0%	22%	–	–
Mozambique	–	–	–	(13,297,269)	–	–	0%	32%	35	667,316
Namibia	–	–	–	(18,652)	–	–	0%	32%	–	28,270
Oman	–	–	–	(232,606)	–	–	0%	15%	–	–
Rwanda	386,568	–	386,568	(6,853,100)	–	–	0%	28%	1	872,154
Zambia	–	–	–	(11,753,746)	–	–	0%	30%	25	423,995

Angola

Our main activity in Angola is exploration. This activity resulted in losses for both tax and accounting purposes, and a CBC ETR of 0%. The income tax paid relates to withholding tax on services.

Botswana

The Rio Tinto entity in Botswana had minimal activity in 2024. The activity resulted in losses for both tax and accounting purposes, and a CBC ETR of 0%.

Mozambique

Mutamba Mineral Sands, a subsidiary of Rio Tinto, operates the Mutamba Project in Inhambane Province, which aims to explore for heavy minerals such as ilmenite, rutile, and zircon. The project was initiated in 2022 for small-scale production. 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 2024, with the loss before tax relating to liquidating the entity. The activity resulted in losses for both accounting and tax purposes, and a CBC ETR of 0%.

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 \$5.2 million of corporate income tax in respect of Sohar in 2024, as disclosed in our *2024 Taxes and Royalties Paid Report*.

Rwanda

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

Zambia

Our main activity in Zambia is exploration. This 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 *2024 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 *2024 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 *2024 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 *2024 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 2024.
- 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 2024).
- 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 2024).

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 the example above). This is consistent with our *2024 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 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 associates and joint ventures. 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. For further details of our basis of consolidation please refer to p 154 of our *2024 Annual Report*.

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, net foreign exchange gains, finance income, and profit/(loss) related to gains on sale of assets.

Unrelated party revenue includes revenue from equity accounted units.

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 2024. 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 *2024 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 2024 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	866,996	–	866,996	(26,078,264)	892,601	–	0%	25%	13	16,016,277
Argentina	61,244,433	–	61,244,433	(118,431,636)	16,880,594	21,423,340	*	35%	226	1,053,403,691
Aruba	–	–	–	–	–	–	–%	22%	–	–
Australia	7,925,898,084	25,734,874,516	33,660,772,600	12,181,046,857	3,654,600,106	3,777,834,405	31%	30%	24,366	29,733,819,551
Belgium	270,148,430	7,809,498	277,957,928	10,156,187	838,491	853,836	8%	25%	32	14,368,012
Bermuda	–	23,899	23,899	23,899	–	–	0%	0%	–	–
Bolivia, Plurinational State of	–	–	–	(7,406)	–	–	0%	25%	–	–
Botswana	–	–	–	(3,637)	–	–	0%	22%	–	–
Brazil	3,598,064	160,729,303	164,327,367	(27,797,020)	1,674,201	2,954,918	*	34%	112	125,365,436
British Virgin Islands	–	–	–	–	–	–	–%	0%	–	–
Canada	2,331,587,946	8,067,991,721	10,399,579,667	260,880,368	190,248,299	160,158,696	61%	32% ¹	14,157	14,350,915,028
Chile	3,317,372	–	3,317,372	(27,043,955)	113,585,274	162,554	*	27%	65	699,215
China	3,082,935,854	349,115,965	3,432,051,819	(209,020,359)	4,652,298	2,113,165	*	25%	207	730,836,934
Colombia	1,092,689	–	1,092,689	(502,059)	54,111	66,575	*	35%	3	–
Finland	125	–	125	(3,662,418)	–	–	0%	20%	8	121,260
France	668,447,004	195,269,300	863,716,304	2,584,716	(5,137,377)	1,687,126	65%	26%	257	98,971,877
Germany	618,461	7,880,807	8,499,268	4,300,148	253,497	189,863	4%	30%	22	1,126,632
Guinea	1,321,267	–	1,321,267	(99,575,968)	58,094	–	0%	30%	963	2,214,651,606
Hong Kong	–	1,035,089	1,035,089	879,826	–	–	0%	17%	–	–
Iceland	1,441,151	856,298,093	857,739,244	31,848,586	2,500,860	3,286,136	10%	20%	389	241,288,136
India	3,329,779	47,664,125	50,993,904	10,278,734	2,557,646	2,213,666	22%	25%	1,183	20,771,079
Indonesia	1,177,711	14,248	1,191,959	1,784,759	–	–	0%	22%	–	–
Jamaica	–	–	–	(6,574,975)	–	–	0%	25%	–	–
Japan	46,828	8,151,984	8,198,812	1,645,307	462,320	521,434	32%	31%	23	1,150,224
Kazakhstan	464,309	–	464,309	(7,064,905)	–	–	0%	20%	55	661,579
Korea, Republic of	23,229	2,066,929	2,090,158	250,117	14,006	12,922	5%	21%	9	155,987
Lao People's Democratic Republic	82,198	–	82,198	(1,202,091)	–	–	0%	20%	6	49,550

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	161,899,572	76,902,039	238,801,611	15,526,197	1,246,987	1,200,540	8%	20%	511	631,874,305
Malaysia	3,603,205	119,623	3,722,828	833,815	24,139	11,119	1%	24%	1	91,336
Mongolia	2,197,219,514	28,756,931	2,225,976,445	(1,042,112,462)	14,075,742	883,715	*	25%	4,962	15,452,968,970
Mozambique	–	–	–	(13,297,269)	–	–	0%	32%	35	667,316
Namibia	–	–	–	(18,652)	–	–	0%	32%	–	28,270
Netherlands	4,518,790	14,274,985	18,793,775	(1,388,973)	12,696,979	2,079,410	*	26%	29	9,119,748
New Zealand	653,509,982	633,066,232	1,286,576,214	764,673,949	27,362,392	27,657,648	4%	28%	732	821,269,557
Oman	–	–	–	(232,606)	–	–	0%	15%	–	–
Papua New Guinea	30,573	–	30,573	(6,473,758)	–	–	0%	30%	4	355,920
Peru	166,332	61,150	227,482	(11,261,917)	45,374	–	0%	30%	43	721,820
Philippines	–	–	–	(2,634)	–	–	0%	25%	–	–
Rwanda	386,568	–	386,568	(6,853,100)	–	–	0%	28%	1	872,154
Serbia	366,937	660,921	1,027,858	(91,571,687)	–	–	0%	15%	125	18,169,863
Singapore	26,553,295,190	8,020,010,240	34,573,305,430	2,648,149,137	42,671,988	87,903,805	3%	17%	486	1,140,502,830
South Africa	778,147,432	90,829,318	868,976,750	131,798,411	65,701,355	43,048,552	33%	27%	2,019	1,253,284,074
Spain	8,841,671	3,118,549	11,960,220	4,613,903	238,847	1,240,827	27%	25%	12	1,092,387
Switzerland	491,759	21,926,438	22,418,197	7,506,691	1,711,740	1,340,968	18%	18%	1	–
Taiwan, Province of China	419	–	419	(24,797)	–	–	0%	20%	–	–
United Kingdom	2,750,843,092	2,920,907,447	5,671,750,539	534,381,045	15,169,458	90,345,950	17%	25%	366	224,939,886
United States	9,092,062,980	704,316,570	9,796,379,550	(50,466,106)	(814,434)	11,692,680	*	24% ¹	4,113	7,177,402,525
Zambia	–	–	–	(11,753,746)	–	–	0%	30%	25	423,995
GRI Country-by-Country Report total	56,563,025,946			14,850,740,252	4,164,265,588					75,338,157,030

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

* Refer to explanation in country summaries.

Reconciliations to 2024 Annual Report and 2024 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 2024 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 2024 Taxes and Royalties Paid Report, also available on our website.

Unrelated-party revenue	\$bn	Profit/(loss) before income tax	\$bn
Sales revenue	53.7	Profit before taxation (Annual Report, Group income statement)	15.6
Net exchange gains on external net debt and intragroup balances	0.3	Elimination of profits from equity accounted units	(0.8)
Other income (Annual Report, note 7)	0.9	Other/rounding	0.1
Net foreign exchange gains (Annual Report, note 7)	0.2	GRI CBCR total	14.9
Financial income	0.5		
		Tangible assets other than cash or cash equivalents	\$bn
Gains on consolidation and disposal of interests in businesses	1.2	Property, plant and equipment	68.6
Other/rounding	(0.2)	Inventories (non-current)	0.2
GRI CBCR total	56.6	Inventories (current)	5.9
		Other/rounding	0.6
		GRI CBCR total	75.3
Income tax paid (on cash basis)	\$m		
Tax paid (Annual Report, Group cash flow statement)	4,165		
Other/rounding	(1)		
GRI CBCR total	4,164		
Reconciliation to Taxes Paid Report	\$m		
GRI CBCR tax paid	4,164		
Tax paid by equity accounted units:			
Chile (Escondida – excluding dividend withholding)	490		
Guinea (Sangaredi)	19		
Oman (Sohar)	5		
Other/rounding	1		
Taxes and Royalties Paid Report total	4,679		

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 Pty 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 Diamonds NV

Bermuda

North IOC (Bermuda) Holdings Limited

North IOC (Bermuda) Limited

QIT Madagascar Minerals Ltd¹**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 Mequital Ltda.

Rio de Contas Desenvolvimentos Mineraiis Ltda

Rio Santa Rita Empreendimentos e-Participações Ltda

Rio Tinto Desenvolvimentos Mineraiis Ltda.

Rio Tinto do Brasil Ltda.

Rio Tinto Mineração do Brasil Ltda

British Virgin IslandsTHR Oyu Tolgoi Ltd.²**Canada**

1043802 Ontario Ltd.

10676276 Canada Inc.

1109723 B.C. Ltd.

1508137 B.C. Ltd.

15304644 Canada Inc.

16140467 Canada Inc.

46106 YUKON INC.

9519-2845 Quebec inc.

Alcan Management Services Canada Limited / Société de Services de Gestion Alcan Canada Limitée

Alcan 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 Commandite

Évolys Québec inc.

Gulf 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 Energy and Climate Investments 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.)*

The Roberval and Saguenay Railway Company / La Compagnie du Chemin de Fer Roberval-Saguenay

THR Mines Services Co. Ltd.

Turquoise Hill Resources Ltd.

Usine de démonstration de la Technologie ELYSIS S.E.C / ELYSIS Technology Demonstration Plant L.P.

Chile

Nuevo Cobre S.A.

Rio Tinto Chile SpA

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

China

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

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 & Co. KG

Rio Tinto Commercial GmbH

Rio Tinto Iron & Titanium GmbH

Rio Tinto Iron & Titanium Holdings GmbH

Scheuch Unterstuetzungskasse GmbH

Guinea

Fondation Rio Tinto

Rio Tinto Guinée S.A.

SimFer InfraCo Guinée S.A.

SimFer Marine 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 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

Rio Tinto Minerals Development (Lao) Sole Co., Ltd.

Madagascar

Port d'Ehoala S.A.

QIT Madagascar Minerals SA

Malaysia

Borax Malaysia Sdn Bhd

Mongolia

Asia Gold Mongolia LLC

Asia Naran Bulag LLC

Gobi Oyu Development Support Fund

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.

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

Nyabarongo Mining and Exploration Limited
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.
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 Investment Holding Company Pte. Ltd.
SimFer TSV Holdco Pte. Ltd
Singapore Metals Pte. Ltd.
The Kelian Community and Forest Protection Trust
THR Kharmagtai 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

Rio Tinto 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.
Nuton Holdings Limited
Pechiney Aviatube Limited
QIT Madagascar Minerals Ltd**
Rio Tinto Australian Holdings Limited
Rio Tinto Bahia Holdings Limited
Rio Tinto BM Limited
Rio Tinto BM Subsidiary Limited
Rio Tinto Canada Finance Limited
Rio Tinto Copper Limited
Rio Tinto Copper Holdings 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 Medical Plan Trustees Limited
Rio Tinto Metals Limited
Rio Tinto Minerals Development Limited
Rio Tinto Minerals Investments Africa 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 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 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
THR Oyu Tolgoi Ltd.**

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
BetterIron - Texas Inc.
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 Company of Texas 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 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 Development LLC

Rio Tinto Energy Services Inc.
Rio Tinto Finance (USA) Inc.
Rio Tinto Hydrogen Energy LLC
Rio Tinto Leaching Technologies 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.
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

** 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
QIT Madagascar Minerals Ltd ¹	Bermuda
Rio Tinto Eastern Investments B.V.	Netherlands
Rio Tinto Escondida Limited	Bermuda
Rio Tinto Jersey Holdings 2010 Limited	Jersey
RTAlcan 2 LLC	United States
RTAlcan 3 LLC	United States
SimFer Jersey Limited	Jersey
THR Oyu Tolgoi Ltd. ²	British Virgin Islands

1. QIT Madagascar Minerals Ltd migrated tax residency from Bermuda to the United Kingdom on 10 October 2024.

2. THR Oyu Tolgoi Ltd. migrated tax residency from British Virgin Islands to the United Kingdom on 1 April 2024.

RioTinto

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