

Group Tax Policy

FIN-A-002

Group: Procedure	Function: Group Tax	No. of Pages: 3
Effective: October 2025	Supersedes: Tax Policy effective December 2024	Reviewable from: N/A
Owners: Global Head of Tax	Approved: October 2025	Approver: Rio Tinto Board
Target audience: Board, CEO, CFO, Executive Committee, Heads of product groups and functions Tax – mandatory Group-wide External stakeholders eg shareholders and investors		

Direct linkages to other relevant policies, standards, procedures or guidance notes:

- *The Way We Work*
- Business Integrity Standard

Document purpose:

The Group Tax Policy covers the fundamental principles that govern the Group's tax management practices and how they support Rio Tinto's strategy.

We have maintained our commitment to the B Team [Responsible Tax Principles](#) which provide a leadership standard to drive best practice in tax governance, reporting and interactions with tax authorities. These principles are embedded in the Group Tax Policy and we have made changes to our annual Taxes and Royalties Paid Report to better report our performance against these principles.

We also review our Tax Policy and our approach to tax governance to reflect feedback provided by tax administrations. For example, the UK HM Revenue & Customs and the Australian Taxation Office periodically review our tax policy and approach to governance.

Rio Tinto Tax Policy

The Rio Tinto Group has established a Group Tax Policy (“the Policy”) governing our tax strategy. The Board reviews and approves the Policy each year.

Our primary responsibility relating to taxation is to ensure we comply with the relevant law and statutory compliance obligations, and that we apply our internal policies and standards. Within the limits established by these requirements, and subject to the principles in this policy, we manage our tax affairs proactively. We seek to maximise shareholder value in accordance with our strategy and our commitment to transparency. We are committed to paying the right amount of tax, at the right time, in each country in which we operate.

Tax risk management and governance

- We are committed to strong governance, to identify, manage and report tax risks.
- The Board reviews and approves the Policy, and management’s adherence to it, each year.
- Management enforces the Policy and monitors that our tax risk management systems are appropriate, adequate and effective.
- The conduct of our tax affairs and the management of tax risk are delegated to a global team of tax professionals, with the Board and management providing oversight.
- We comply with documented tax risk management procedures and complete thorough risk assessments before entering into significant transactions.
- We adopt formal processes to identify and manage risks, and report material risks to the Audit and Risk Committee.

Principles of tax planning and tax risk management

- We comply with all applicable tax laws, respecting both the spirit and letter of the law, in each country in which we operate.
- We apply the arm’s length principle to related-party cross-border transactions. This is in line with guidelines issued by the Organisation for Economic Co-operation and Development (OECD).
- Where there is uncertainty regarding a tax position in relation to a major business transaction or initiative, we seek an opinion from an appropriately qualified external adviser to support the position.
- We actively consider the implications of tax planning and risk management activities for our corporate reputation.
- Our tax planning and management of tax risk aligns with our business strategy and conforms to *The Way We Work* – our Code of Conduct and our Business Integrity Standard.
- We pay tax on profits aligned with where business activity occurs, and where value is created.
- We use business structures driven by commercial considerations, aligned with business activity.

Dealings with tax authorities

- We value having good relations with tax authorities and are committed to engaging with them with integrity and transparency.
- We proactively engage with tax authorities in real time. This includes taking part in co-operative compliance arrangements.
- Where there is uncertainty or disagreement in the application of the law, we work with tax authorities to seek clarity or resolve disagreements in a timely way.

Tax incentives and concessions

- We avail ourselves of tax concessions and incentives aligned with our business objectives, if offered by countries to eligible taxpayers who undertake genuine business activity.
- We comply with the relevant statutory framework and meet all reporting requirements where we access tax incentives or concessions.

Supporting effective tax systems

- We support simple, stable and competitive tax systems and administration.
- We engage constructively in local and international tax reform dialogue, to contribute to the development of sustainable and effective tax systems.
- We actively promote transparent and responsible tax practices. This includes engaging with civil society organisations on initiatives to advance transparency over tax and payments to governments.

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Transparency

- We are committed to transparency with our stakeholders, including investors, policy makers, employees, civil society and the general public. We provide regular information about our approach to tax, taxes paid and payments to governments.
- We engage with governments and other stakeholders to share our experiences on disclosure and transparency. We also encourage the harmonisation of reporting obligations aligned with global best practice.

We will not:

- participate in tax evasion or undertake aggressive tax planning,
- take positions that do not have a reasonable basis, or that rely on non-disclosure, or
- artificially transfer profits from one business location to another to avoid taxation.

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