

**RioTinto**



**Country-by-Country  
Report 2020**



In 2020, we paid \$8.4 billion in taxes and royalties globally, including \$6.8 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 "Taxes Paid: Our economic contribution 2020" (2020 Taxes Paid Report) to disclose associated financial information on a country-by-country (CBC) basis for all countries in which we had a taxable presence in 2020. We disclose country-by-country information, including total revenue, related-party revenue, income tax paid, income tax accrued, effective tax rates, number of employees and tangible assets. We also provide information about our activities in each country.

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

Detailed information on our global payments to governments, our Tax Policy and approach to tax and transparency can be found in our 2020 Taxes Paid Report. This report complements and expands on those disclosures. We commit to making these additional disclosures annually.

This report, coupled with our 2020 Taxes Paid Report, applies the requirements of the "Tax" standard (GRI 207) of the Global Sustainability Standards Board of the Global Reporting Initiative (GRI).

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

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On the cover: Employee from Weipa operations in Far North Queensland, Australia

This page: Employee from Gudai-Darri iron ore mine in the Pilbara region of Western Australia



# 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
<b>Australia</b>	26,213,877,383	4,677,656,649	30,891,534,032	15,587,680,196	4,591,151,688	4,667,787,636	30%	30%	19,792	32,109,087,023
<b>China</b>	583,495,310	16,676,921	600,172,231	27,511,269	7,584,757	8,442,838	31%	25%	193	152,537,487
<b>Mongolia</b>	1,083,409,658	7,372,602	1,090,782,260	(372,884,284)	217,253	247,477	*	25%	3,465	10,096,454,154
<b>New Zealand</b>	30,654	480,909,159	480,939,813	(209,258,416)	(1,084,445)	(1,084,568)	*	28%	690	91,494,915
<b>Singapore</b>	6,986,913,062	3,429,959,180	10,416,872,242	1,191,126,230	26,298,604	44,749,705	4%	17%	456	1,045,337,658

\* Refer to explanation below

### Australia

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

Of the \$8.4 billion in taxes and royalties paid globally during 2020, \$6.8 billion was paid in Australia, including \$4.6 billion in corporate tax.

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

### China

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

The higher CBC ETR as compared with the statutory corporate tax rate is largely the consequence of a mix of tax outcomes between our Chinese entities. Some entities are in a taxable position whereas other entities are in a tax loss position with the absence of an ability to group the tax losses to offset the taxable profits resulting in the higher CBC ETR.

### Mongolia

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

The Oyu Tolgoi underground mine is still under construction, and this results in an operating loss position for both tax and accounting purposes in 2020. Notwithstanding this, Oyu Tolgoi paid \$277 million in taxes, royalties and other charges to Mongolian governments as disclosed in our 2020 Taxes Paid Report. The income tax accrued disclosed in the table above relates to withholding tax on interest paid by customers on receivables and withholding tax on interest received on deposits with Mongolian banks.

### New Zealand

New Zealand Aluminium Smelters (NZAS) is a joint venture owned by Rio Tinto (79.36%) and Japan's Sumitomo Chemical Company (20.64%). NZAS converts alumina into aluminium using renewable hydroelectricity. The New Zealand operations incurred losses for both accounting and tax purposes in 2020. Some of the loss was carried back generating a refund in respect of previous years.

### Singapore

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

The primary difference between the Singapore statutory tax rate and the CBC ETR arises due to the application of tax incentives available to our operations. More information in relation to our Singapore commercial centre can be found in our [2020 Taxes Paid Report](#) on our website.

# Asia Pacific

## continued

### 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
<b>Hong Kong</b>	–	316,421	316,421	172,471	–	–	0%	17%	1	252
<b>India</b>	3,537,623	17,789,227	21,326,850	4,730,707	1,076,080	683,756	14%	25%	324	2,756,056
<b>Indonesia</b>	7,256	–	7,256	125,220	–	–	0%	25%	–	–
<b>Japan</b>	51,262	8,044,380	8,095,642	239,287	(404,774)	239,382	100%	31%	24	1,781,578
<b>Kazakhstan</b>	1,693,906	–	1,693,906	(9,258,987)	–	–	0%	20%	42	1,383,491
<b>Korea, Republic of</b>	8,302	1,796,503	1,804,805	79,819	51,578	51,000	64%	25%	9	667,279
<b>Lao People's Democratic Republic</b>	5,691	–	5,691	(640,237)	–	–	0%	21%	3	1,227
<b>Malaysia</b>	9,854,928	2,481,201	12,336,129	765,954	152,719	247,462	32%	24%	1	8,584,165
<b>Papua New Guinea</b>	6,260	28,001	34,261	(443,717)	–	–	0%	30%	–	110,218
<b>Philippines</b>	–	–	–	–	–	–	0%	30%	–	–
<b>Taiwan, Province of China</b>	–	278,914	278,914	15,578	2,037	3,638	23%	20%	1	–

#### Hong Kong

We undertake minor regional administrative services in Hong Kong and earned a small amount of interest on foreign bank accounts. This income is offset by brought forward tax losses resulting in a CBC ETR of 0%.

#### India

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

The lower CBC ETR as compared to the statutory corporate tax rate is due to the utilisation of brought forward tax losses against current year profits along with permanent Long Term Incentive Plan deductions.

#### Indonesia

Rio Tinto no longer holds assets in Indonesia with the remaining activities related to closure.

The small accounting profit in this year was offset by tax losses from a prior period resulting in a CBC ETR of 0%.

#### Japan

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

#### Kazakhstan

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

#### Korea

The primary activities undertaken in Korea are administration and sales and marketing support services. The CBC ETR is higher than the statutory tax rate due to the income tax accrued and tax paid being based on prior year profits which were higher than the current year.

#### Laos

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

#### Malaysia

The primary activities undertaken in Malaysia are the trading and distribution of borates products. The minor 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

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

#### Philippines

Rio Tinto entities tax resident in the Philippines were dormant in 2020.

#### Taiwan

The primary activities undertaken in Taiwan are administration and sales and marketing support services. The higher CBC ETR as compared to the statutory corporate tax rate is the result of a small amount of non-deductible expenditure.

# 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
<b>Brazil</b>	805,310	97,216,963	98,022,273	(23,647,883)	1,933,141	2,033,634	*	34%	103	106,845,689
<b>Canada</b>	2,823,928,773	5,517,347,449	8,341,276,222	353,960,831	383,548,574	338,033,981	96%	31% <sup>1</sup>	11,814	14,193,659,745
<b>Chile</b>	–	15,186,320	15,186,320	1,218,386	64,265,964	37,840	3%	27%	58	425,591
<b>United States</b>	4,175,848,473	503,295,139	4,679,143,612	(220,899,559)	6,446,138	6,332,633	*	24% <sup>1</sup>	3,543	6,485,944,950

<sup>1</sup> Rate is an approximate weighted average rate across our businesses

\* Refer to explanation below

### Brazil

The primary activity we undertake in Brazil relates to our 10% interest in the Alumar alumina refinery in São Luís, Maranhão, northeast Brazil – the largest alumina refinery in South America. Alumar is accounted for as a jointly controlled asset which is proportionately consolidated. We also undertake exploration activity in Brazil. Whilst there is an overall accounting loss in Brazil, there is positive income tax accrued as a result of the inability to offset losses generated from exploration activity against profits from other activities.

We also hold a 12% interest in the Mineração Rio do Norte (MRN) bauxite mine in Porto Trombetas, northern Brazil, one of the country's largest bauxite mines. MRN is an equity accounted unit which is not consolidated for accounting purposes and is therefore not reported in the above table. We paid \$2.7 million in tax in respect of MRN in 2020 as disclosed in our 2020 Taxes Paid Report.

### Canada

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

The CBC ETR is significantly greater than the local tax rate as a consequence of the accounting impact of losses, including an impairment charge, in respect of the Diavik Diamond Mine. Excluding these losses, the CBC ETR for Canada would be approximately 37%. The primary difference between this adjusted ETR and the statutory corporate tax rate is due to income tax accrued on profit on intragroup sales where the profit is not yet recognised in the Group income statement because the Group still holds the goods in inventory at year-end.

### Chile

GRI 207 requires disclosure on consolidated activities (excluding equity accounted units) which for Chile primarily involves exploration. The CBC ETR is lower than the statutory tax rate due to non-taxable foreign exchange gains in the year. The income tax accrued relates to corporate income tax on employee benefits.

The income tax paid relates primarily to withholding tax on dividends received from Escondida.

As disclosed in our 2020 Taxes Paid Report, we paid \$236.9 million in corporate tax (including withholding tax on dividends) in Chile in relation to our 30% interest in the Escondida copper mine, the world's largest copper producer, located in northern Chile. Escondida is an equity accounted unit which is not consolidated for accounting purposes and, with the exception of withholding tax paid on dividends, is therefore not reported in the table above.

### US

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

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

The US consolidated group reported an overall loss for both accounting and Federal tax purposes. The income tax accrued relates to state income taxes.



# North and South America

## continued

### 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
<b>Argentina</b>	980,961	–	980,961	(16,286,350)	11,864	11,864	*	30%	–	–
<b>Aruba</b>	–	–	–	–	–	–	0%	25%	–	–
<b>Bermuda</b>	–	–	–	(73,839)	–	–	0%	0%	–	–
<b>Bolivia, Plurinational State of</b>	–	–	–	(6,911)	–	–	0%	25%	–	–
<b>British Virgin Islands</b>	–	–	–	–	–	–	0%	0%	–	–
<b>Colombia</b>	431,839	–	431,839	(1,032,039)	–	–	0%	32%	–	–
<b>Jamaica</b>	–	–	–	(4,390,840)	–	–	0%	25%	–	–
<b>Mexico</b>	–	–	–	(105,616)	–	–	0%	30%	–	–
<b>Peru</b>	308,389	8,776	317,165	(23,888,471)	1,379	–	0%	30%	58	16,957,171

\* Refer to explanation below.

#### Argentina

The primary activity we undertake in Argentina is exploration. Our activities in Argentina resulted in losses for both accounting and tax purposes. The income tax accrued relates to withholding tax.

#### Aruba

The Rio Tinto entity tax resident in Aruba was dormant in 2020 and is targeted for liquidation.

#### Bermuda

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

#### Bolivia

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

#### British Virgin Islands

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

#### Colombia

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

#### Jamaica

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

#### Mexico

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

#### Peru

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

# Europe

## Key countries

Tax jurisdiction	Unrelated-party revenue	Related-party revenue	Total revenue	Profit/(loss) before income tax	Income tax paid (on cash basis)	Income tax accrued – current year	CBC effective tax rate	Statutory corporate tax rate	Number of employees	Tangible assets other than cash or cash equivalents
<b>Belgium</b>	391,372,484	1,181,298	392,553,782	19,111,229	(160,722)	528,623	3%	29%	43	5,206,121
<b>France</b>	416,380,817	110,335,591	526,716,408	(194,385,484)	6,147,654	–	0%	31%	265	58,460,821
<b>Iceland</b>	488,053	378,752,595	379,240,648	(112,708,317)	(15,331)	–	0%	20%	384	162,780,916
<b>Luxembourg</b>	4,546,703	354,685,084	359,231,787	357,730,978	28,328,413	9,342,505	3%	25%	1	–
<b>Netherlands</b>	150,288	555,026,599	555,176,887	(115,161,477)	2,874,423	30,666,336	*	25%	195	25,950,071
<b>Serbia</b>	116,441	15,327	131,768	(60,119,274)	–	–	0%	15%	83	1,463,951
<b>United Kingdom</b>	2,334,242,675	680,382,109	3,014,624,784	(1,183,233,271)	112,648,753	10,321,500	*	19%	172	123,946,237

\* Refer to explanation below.

### Belgium

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

Under this tax regime, the standard corporate tax rate of 29% is applied to 2.1% of gross turnover less allowable deductions, however, taxable income cannot be lower than 0.55% of turnover.

### France

Most of the activities that remain 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 refine borates and distribute specialty borates products.

Our activities in France resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%. The tax paid in 2020 related to previous years.

### Iceland

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

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

### Luxembourg

The primary activity undertaken in Luxembourg related to financing. Historically, Turquoise Hill Resources (TRQ) provided mine development funding in relation to the Oyu Tolgoi project through a Luxembourg financing entity. This funding arrangement was transparent to the revenue authorities, underpinned by revenue authority rulings, and subject to international tax rules (specifically controlled foreign corporation rules) in the UK and Canada.

In 2020, the Luxembourg financing entity was wound up, and the financing arrangements were refinanced via Singapore. Refer to our 2020 Taxes Paid Report for further information.

The difference between the CBC ETR and the statutory corporate tax rate relates to the difference between the amount of interest deductible under the tax law compared with the level of interest expense recognised in the accounts.

### Netherlands

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

Our activities in the Netherlands resulted in losses for both tax and accounting purposes. The income tax accrued for the year relates to accrued withholding tax on interest income from Group entities that is recognised in the profit/(loss) where that tax will be withheld upon payment of the interest.

### Serbia

Serbia is home to our Jadar lithium-borate project. We have committed to invest \$2.4 billion in one of the world's largest greenfield lithium projects, subject to receiving all relevant approvals, permits and licences, and ongoing engagement with local communities, the Government of Serbia and civil society.

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

### UK

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

Our activities in the UK in 2020 resulted in losses for both tax and accounting purposes. The majority of the accounting loss arising in 2020 related to foreign exchange losses. The income tax accrued for the year relates primarily to tax withheld on interest income received from non-UK Group entities.

# Europe

## continued

### 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
<b>Finland</b>	–	–	–	(1,734,790)	–	–	0%	20%	–	9,335
<b>Germany</b>	501,710	6,164,264	6,665,974	5,359,356	453,414	925,457	17%	30%	18	2,131,623
<b>Italy</b>	–	–	–	–	–	–	0%	24%	–	–
<b>Jersey</b>	–	–	–	–	–	–	0%	0%	–	–
<b>Malta</b>	–	48,926	48,926	(3,205,925)	4,892	4,892	*	35%	–	–
<b>Spain</b>	9,995,048	2,437,861	12,432,909	(3,580,557)	72,061	69,603	*	25%	12	3,640,022
<b>Switzerland</b>	70,713	10,436,996	10,507,709	(2,967,332)	2,165,248	597,080	*	15%	2	81,961

\* Refer to explanation below.

#### Finland

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

#### Germany

The primary activities undertaken in Germany relate to administration and sales and marketing support services.

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

#### Italy

The Rio Tinto entity tax resident in Italy was dormant in 2020 and was liquidated in 2021.

#### Jersey

As noted in our 2020 Taxes Paid Report, the funding previously provided by Jersey entities was refinanced in 2020 and the entities were wound up in 2021.

#### Malta

The primary activity undertaken in Malta related to intragroup insurance activities. The company was liquidated in 2021.

Our activities in Malta resulted in losses for both accounting and tax purposes, with the income tax accrued predominantly representing the withholding tax on interest income received.

#### Spain

The primary activities undertaken in Spain relate to administration and sales and marketing support services.

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

#### Switzerland

The primary activities undertaken in Switzerland relate to insurance, administration and management activities, sales and marketing support services and distribution activities.

Our activities in Switzerland resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%. The income tax accrued relates to tax on profits in one business which cannot be offset by other losses.



# Africa

## Key countries

Tax jurisdiction	Unrelated-party revenue	Related-party revenue	Total revenue	Profit/(loss) before income tax	Income tax paid (on cash basis)	Income tax accrued – current year	CBC effective tax rate	Statutory corporate tax rate	Number of employees	Tangible assets other than cash or cash equivalents
<b>Guinea</b>	–	–	–	(13,890,088)	–	–	0%	35%	69	–
<b>Madagascar</b>	100,445,448	44,040,966	144,486,414	24,961,907	673,471	700,050	3%	20%	459	735,386,607
<b>South Africa</b>	623,427,221	53,651,141	677,078,362	103,229,305	54,061,767	51,992,916	50%	28%	2,005	1,543,696,081

### Guinea

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

In 2020, we also paid corporate income tax of \$13.4 million in Guinea in relation to our minority interest in the Sangaredi bauxite mine. Sangaredi is an equity accounted unit, which is not consolidated for accounting purposes and is therefore not included in the table above.

### Madagascar

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

Brought forward tax losses reduced the 2020 taxable income to nil, however, Madagascar applies a minimum tax of 0.5% computed on sales.

### South Africa

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

The higher CBC ETR compared with the statutory corporate tax rate is due to the non-deductibility of certain costs for tax purposes coupled with the impact of the inability for losses in some entities to be offset against the profits in others.

# Africa

## continued

### 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
<b>Botswana</b>	–	–	–	(314,228)	–	–	0%	22%	–	–
<b>Mozambique</b>	–	–	–	(3,977,819)	–	–	0%	32%	–	532,992
<b>Namibia</b>	–	–	–	(615,501)	–	–	0%	32%	–	–
<b>Zambia</b>	312,947	–	312,947	(25,191,124)	–	–	0%	35%	24	1,695,201

#### Botswana

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

#### Mozambique

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

#### Namibia

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

#### Zambia

Exploration activities undertaken in Zambia resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%.

# Middle East

## Key countries

Tax jurisdiction	Unrelated-party revenue	Related-party revenue	Total revenue	Profit/(loss) before income tax	Income tax paid (on cash basis)	Income tax accrued – current year	CBC effective tax rate	Statutory corporate tax rate	Number of employees	Tangible assets other than cash or cash equivalents
<b>Oman</b>	–	159,133	159,133	(4,464)	18,687	18,687	*	15%	–	–
<b>United Arab Emirates</b>	–	109,386	109,386	(76,751)	–	–	0%	0%	–	–

\* Refer to explanation below.

### Oman

Our primary activity in Oman is support related to aluminium smelter technology services. Tax is payable based on an imputed profit, resulting in income tax accrued despite an accounting loss.

We also have a 20% ownership in the Sohar aluminium smelter. Sohar is an equity accounted unit which is not consolidated for accounting purposes and is therefore not reported in the above table. We paid \$2.7 million of tax in respect of Sohar in 2020 as disclosed in our 2020 Taxes Paid Report.

### United Arab Emirates

Our activity in the United Arab Emirates related to owning and leasing a building to third-party tenants. This building was sold and the entity was liquidated in early 2020.

# Basis of preparation

## Introduction: GRI 207 – Tax

This report coupled with our 2020 Taxes Paid Report applies the requirements of the “Tax” standard (GRI 207) of the Global Sustainability Standards Board of the Global Reporting Initiative (GRI). GRI 207 applies to reports or other materials published on or after 1 January 2021. Rio Tinto’s management approach to disclosures under GRI 207 can be found in our 2020 Taxes Paid Report including disclosures in respect of:

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

This report contains Rio Tinto’s 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 Taxes Paid Report. Refer to Appendix 2 on page 14 for a summary of this information.

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

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

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

- Rio Tinto includes Rio Tinto plc, Rio Tinto Limited and subsidiaries, associates and joint arrangements (hereafter and above – “Rio Tinto” or “the Group”). The scope of reporting is described further below.
- This report shows consolidated country data for entities that are consolidated or proportionately consolidated in the 2020 Annual Report. This includes subsidiaries, joint arrangements, joint operations and permanent establishments.
- Data is prepared based on a 100% basis for all operations in which we have a controlling interest, and on our share where we do not have a controlling interest. Unless otherwise stated, the results of equity accounted units are not included.
- Amounts disclosed for a relevant jurisdiction relate to the activities of entities which are tax resident in that jurisdiction. Amounts relating to entities which are incorporated in one jurisdiction but which have tax residency in another jurisdiction are disclosed against the jurisdiction of tax residency.
- Amounts for permanent establishment are included in the jurisdiction in which the permanent establishment has a taxable presence.
- The nature of our business varies between countries. In many locations, we have more than one type of activity.
- This report uses consolidated data (as opposed to aggregated data) for related-party revenue, total revenue, profit/(loss) before income tax and tangible assets. This approach has been taken as a significant portion of our revenue and of our profits is generated in Australia where corporate groups use consolidated reporting for tax purposes. We consider that this method appropriately reflects our global revenue and profits.
- Due to this report being prepared using consolidated financial data, it is not possible to draw conclusions about a single entity, business or venture.
- We use International Financial Reporting Standards (IFRS) data and US dollars, using a consolidated financial reporting system, with additional reliance placed on data from local accounting systems and records, internal human resources data, and other sources as appropriate.
- The financial information taken from our consolidated Group reporting system has been prepared under our general financial controls. This report has not been subject to an external audit, statement or opinion.

- It is the responsibility of the management of our company to ensure that appropriate procedures are in place to prepare reporting in line with, in all material respects, this Basis of preparation.
- All data, unless otherwise stated, is prepared for the year from 1 January to 31 December 2020.
- 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 2020).
- 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 2020).

## 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 Taxes Paid Report. We believe this treatment discloses the full amount of cash tax collected by the relevant tax authorities in the year.
- The tax accrued in respect of future withholding tax is included as tax accrued in the country of the entity that will receive the income on which the withholding tax is made (country B above) which follows the accounting treatment.
- This report is consistent with the requirements under OECD CBCR, with the exceptions that OECD CBCR requires cash withholding tax paid to be reported in the jurisdiction of the entity where the tax cost is borne (country B above) instead of in the jurisdiction of the tax authority which collected the withholding tax, and OECD CBCR excludes withholding tax on dividends.



# Basis of preparation continued

## Definitions

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

### Statutory rate (or expected tax rate)

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

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

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

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

### OECD country-by-country reporting (OECD CBCR)

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

### Equity accounted units

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

## Tax jurisdiction

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

### Unrelated-party revenue

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

The term 'unrelated party' includes non-consolidated joint ventures and associates for the purposes of our 2020 Annual Report.

Unrelated-party revenue excludes external dividend income.

### Related-party revenue

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

### Total revenue

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

### Permanent establishment

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

### Profit/(loss) before tax

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

## Income tax paid – current year

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

### Income tax accrued – current year

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

### Number of employees

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

### Tangible assets

The data reported comprises the net accounting value of property, plant and equipment and inventories as at the closing balance sheet date on 31 December 2020. It does not include cash or cash equivalents, intangibles or financial assets. The data has been prepared on a consolidated basis.

### Taxes Paid Report

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

### Reporting currency

All amounts reported are in US dollars unless otherwise stated.

# Our 2020 Country-by-Country Report (page 1)

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
<b>Australia</b>	26,213,877,383	4,677,656,649	30,891,534,032	15,587,680,196	4,591,151,688	4,667,787,636	30%	30%	19,792	32,109,087,023
<b>China</b>	583,495,310	16,676,921	600,172,231	27,511,269	7,584,757	8,442,838	31%	25%	193	152,537,487
<b>Mongolia</b>	1,083,409,658	7,372,602	1,090,782,260	(372,884,284)	217,253	247,477	*	25%	3,465	10,096,454,154
<b>New Zealand</b>	30,654	480,909,159	480,939,813	(209,258,416)	(1,084,445)	(1,084,568)	*	28%	690	91,494,915
<b>Singapore</b>	6,986,913,062	3,429,959,180	10,416,872,242	1,191,126,230	26,298,604	44,749,705	4%	17%	456	1,045,337,658
<b>Hong Kong</b>	—	316,421	316,421	172,471	—	—	0%	17%	1	252
<b>India</b>	3,537,623	17,789,227	21,326,850	4,730,707	1,076,080	683,756	14%	25%	324	2,756,056
<b>Indonesia</b>	7,256	—	7,256	125,220	—	—	0%	25%	—	—
<b>Japan</b>	51,262	8,044,380	8,095,642	239,287	(404,774)	239,382	100%	31%	24	1,781,578
<b>Kazakhstan</b>	1,693,906	—	1,693,906	(9,258,987)	—	—	0%	20%	42	1,383,491
<b>Korea, Republic of</b>	8,302	1,796,503	1,804,805	79,819	51,578	51,000	64%	25%	9	667,279
<b>Lao People's Democratic Republic</b>	5,691	—	5,691	(640,237)	—	—	0%	21%	3	1,227
<b>Malaysia</b>	9,854,928	2,481,201	12,336,129	765,954	152,719	247,462	32%	24%	1	8,584,165
<b>Papua New Guinea</b>	6,260	28,001	34,261	(443,717)	—	—	0%	30%	—	110,218
<b>Philippines</b>	—	—	—	—	—	—	0%	30%	—	—
<b>Taiwan, Province of China</b>	—	278,914	278,914	15,578	2,037	3,638	23%	20%	1	—
<b>Brazil</b>	805,310	97,216,963	98,022,273	(23,647,883)	1,933,141	2,033,634	*	34%	103	106,845,689
<b>Canada</b>	2,823,928,773	5,517,347,449	8,341,276,222	353,960,831	383,548,574	338,033,981	96%	31% <sup>1</sup>	11,814	14,193,659,745
<b>Chile</b>	—	15,186,320	15,186,320	1,218,386	64,265,964	37,840	3%	27%	58	425,591
<b>United States</b>	4,175,848,473	503,295,139	4,679,143,612	(220,899,559)	6,446,138	6,332,633	*	24% <sup>1</sup>	3,543	6,485,944,950
<b>Argentina</b>	980,961	—	980,961	(16,286,350)	11,864	11,864	*	30%	—	—
<b>Aruba</b>	—	—	—	—	—	—	0%	25%	—	—
<b>Bermuda</b>	—	—	—	(73,839)	—	—	0%	0%	—	—
<b>Bolivia, Plurinational State of</b>	—	—	—	(6,911)	—	—	0%	25%	—	—
<b>British Virgin Islands</b>	—	—	—	—	—	—	0%	0%	—	—
<b>Colombia</b>	431,839	—	431,839	(1,032,039)	—	—	0%	32%	—	—
<b>Jamaica</b>	—	—	—	(4,390,840)	—	—	0%	25%	—	—
<b>Mexico</b>	—	—	—	(105,616)	—	—	0%	30%	—	—
<b>Peru</b>	308,389	8,776	317,165	(23,888,471)	1,379	—	0%	30%	58	16,957,171

<sup>1</sup> Rate is an approximate weighted average rate across our businesses

\* Refer to explanation in country summaries

## Our 2020 Country-by-Country Report (page 2)

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
<b>Belgium</b>	391,372,484	1,181,298	392,553,782	19,111,229	(160,722)	528,623	3%	29%	43	5,206,121
<b>France</b>	416,380,817	110,335,591	526,716,408	(194,385,484)	6,147,654	–	0%	31%	265	58,460,821
<b>Iceland</b>	488,053	378,752,595	379,240,648	(112,708,317)	(15,331)	–	0%	20%	384	162,780,916
<b>Luxembourg</b>	4,546,703	354,685,084	359,231,787	357,730,978	28,328,413	9,342,505	3%	25%	1	–
<b>Netherlands</b>	150,288	555,026,599	555,176,887	(115,161,477)	2,874,423	30,666,336	*	25%	195	25,950,071
<b>Serbia</b>	116,441	15,327	131,768	(60,119,274)	–	–	0%	15%	83	1,463,951
<b>United Kingdom</b>	2,334,242,675	680,382,109	3,014,624,784	(1,183,233,271)	112,648,753	10,321,500	*	19%	172	123,946,237
<b>Finland</b>	–	–	–	(1,734,790)	–	–	0%	20%	–	9,335
<b>Germany</b>	501,710	6,164,264	6,665,974	5,359,356	453,414	925,457	17%	30%	18	2,131,623
<b>Italy</b>	–	–	–	–	–	–	0%	24%	–	–
<b>Jersey</b>	–	–	–	–	–	–	0%	0%	–	–
<b>Malta</b>	–	48,926	48,926	(3,205,925)	4,892	4,892	*	35%	–	–
<b>Spain</b>	9,995,048	2,437,861	12,432,909	(3,580,557)	72,061	69,603	*	25%	12	3,640,022
<b>Switzerland</b>	70,713	10,436,996	10,507,709	(2,967,332)	2,165,248	597,080	*	15%	2	81,961
<b>Guinea</b>	–	–	–	(13,890,088)	–	–	0%	35%	69	–
<b>Madagascar</b>	100,445,448	44,040,966	144,486,414	24,961,907	673,471	700,050	3%	20%	459	735,386,607
<b>South Africa</b>	623,427,221	53,651,141	677,078,362	103,229,305	54,061,767	51,992,916	50%	28%	2,005	1,543,696,081
<b>Botswana</b>	–	–	–	(314,228)	–	–	0%	22%	–	–
<b>Mozambique</b>	–	–	–	(3,977,819)	–	–	0%	32%	–	532,992
<b>Namibia</b>	–	–	–	(615,501)	–	–	0%	32%	–	–
<b>Zambia</b>	312,947	–	312,947	(25,191,124)	–	–	0%	35%	24	1,695,201
<b>Oman</b>	–	159,133	159,133	(4,464)	18,687	18,687	*	15%	–	–
<b>United Arab Emirates</b>	–	109,386	109,386	(76,751)	–	–	0%	0%	–	–
<b>GRI-Country-by-Country Report Total</b>	45,767,245,588			15,074,035,172	5,288,525,287					66,979,010,588

\* Refer to explanation in country summaries

## Reconciliations to 2020 Annual Report and Taxes Paid Report

GRI 207 requires us to reconcile certain data included in the GRI Country-by-Country Report ("GRI CBCR") to our audited consolidated financial statements. In relation to the unrelated-party revenue, profit/(loss) before income tax, income tax paid (on cash basis) and tangible assets other than cash and cash equivalents, the relevant reconciliations are provided to our 2020 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 2020 Taxes Paid Report which is also available on our website.

<b>Unrelated-party revenue</b>	<b>\$bn</b>
Sales revenue	44.6
Other income	0.7
Financial income	0.1
Exchange gains on external debt	0.3
Adjustments	0.1
<b>GRI CBCR total</b>	<b>45.8</b>

<b>Income tax paid (on cash basis)</b>	<b>\$m</b>
Tax paid	5,289
Adjustments / rounding	-
<b>GRI CBCR total</b>	<b>5,289</b>

<b>Reconciliation to Taxes Paid Report</b>	<b>\$m</b>
<b>GRI CBCR tax paid</b>	<b>5,289</b>
Tax paid by EAUs:	
Chile (Escondida - excluding dividend withholding)	173
Guinea (Sangaredi)	13
Oman (Sohar)	3
Brazil (MRN)	3
<b>Taxes Paid Report total</b>	<b>5,481</b>

<b>Profit/(loss) before income tax</b>	<b>\$bn</b>
Profit before tax	15.4
EAU profit elimination	(0.6)
EAU impairment elimination	0.3
<b>GRI CBCR total</b>	<b>15.1</b>

<b>Tangible assets other than cash or cash equivalents</b>	<b>\$bn</b>
Property, plant and equipment	62.9
Inventories (non-current)	0.1
Inventories (current)	3.9
Adjustments / rounding	0.1
<b>GRI CBCR total</b>	<b>67.0</b>



# Constituent entities resident in each tax jurisdiction

## Argentina

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

## Aruba

THR Aruba Holdings LLC A.V.V.

## Australia

Alcan Gove Development Pty Limited

Alcan Holdings Australia Pty Limited

Alcan Northern Territory Alumina Pty Limited

Alcan Primary Metal Australia Pty Ltd

Alcan South Pacific Pty Ltd

AML Properties Pty Ltd

Argyle Diamond Mines Pty Limited

Argyle Diamonds Limited

Ashton Mining Pty Ltd

Ashton Nominees Pty Limited

Australian Coal Holdings Pty. Limited

Australian Mining & Smelting Pty Ltd

Beasley River Management Pty Limited

Beasley River Marketing Pty Ltd

Beasley River Mining Pty Limited

Canning Resources Pty Limited

Capricorn Diamonds Investments Pty Limited

Cathjoh Holdings Pty Limited

Channar Management Services Pty Limited

Channar Mining Pty Ltd

CRA Investments Pty. Limited

CRA Pty Ltd

Dampier Salt Limited

Energy Resources of Australia Ltd

Foundation for Australia-Japan Studies

Fundsprops Pty. Limited

Gladstone Infrastructure Pty Ltd

Gove Aluminium Ltd

GPS Energy Pty Limited

GPS Nominee Pty Limited

GPS Power Pty. Limited

Hamersley Exploration Pty Limited

Hamersley HMS Pty Ltd

Hamersley Holdings Limited

Hamersley Iron – Yandi Pty Limited

Hamersley Iron Pty. Limited

Hamersley Resources Limited

Hamersley WA Pty Ltd

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

Kalteng Pty. Ltd

Kelian Pty. Limited

Kembla Coal & Coke Pty. Limited

Kutaibar Holdings Pty Ltd

Mitchell Plateau Bauxite Co. Pty. Limited

Mount Bruce Mining Pty Limited

Mount Pleasant Pty Ltd

NBH Pty Ltd

Nhulunbuy Corporation Limited

Norgold Pty Limited

North Gold (W.A.) Pty Ltd

North Insurances Pty. Ltd

North IOC Holdings Pty Ltd

North Limited

North Mining Limited

Pacific Aluminium Pty. Limited

Pechiney Consolidated Australia Pty Limited

Peko Exploration Pty Ltd

Peko-Wallsend Pty Ltd

Pilbara Iron Company (Services) Pty Ltd

Pilbara Iron Pty Ltd

Project Generation Group Pty Ltd

Queensland Alumina Limited

Queensland Coal Pty. Limited

Ranges Management Company Pty Ltd

Ranges Mining Pty Ltd

Rio Tinto (Commercial Paper) Limited

Rio Tinto Advisory Services Pty Limited

Rio Tinto Alcan Technology Pty Ltd

Rio Tinto Aluminium (Bell Bay) Limited

Rio Tinto Aluminium (Holdings) Limited

Rio Tinto Aluminium Bell Bay Sales Pty Limited

Rio Tinto Aluminium Limited

Rio Tinto Aluminium Services Pty Limited

Rio Tinto Asia Pty. Limited

Rio Tinto Base Metals Pty. Limited

Rio Tinto Coal (Clermont) Pty Ltd

Rio Tinto Coal Australia Pty Limited

Rio Tinto Coal Investments Pty Limited

Rio Tinto Coal NSW Holdings Limited

Rio Tinto Exploration Pty Limited

Rio Tinto Finance (USA) Limited

Rio Tinto Finance Limited

Rio Tinto Investments One Pty Limited

Rio Tinto Investments Two Pty Limited

Rio Tinto Limited

Rio Tinto PACE Australia Pty Limited

Rio Tinto Services Limited

Rio Tinto Shared Services Pty Limited

Rio Tinto Shipping Pty. Limited

Rio Tinto Staff Fund (Retired) Pty Limited

Rio Tinto Winu Pty Limited

Robe River Limited

Robe River Mining Co. Pty. Ltd

Robe River Ore Sales Pty. Ltd

Rocklea Station Pty Ltd

RTA AAL Australia Limited

RTA Boyne Limited

RTA Gove Pty Limited

RTA Holdco Australia 1 Pty Ltd

RTA Holdco Australia 3 Pty Ltd

RTA Holdco Australia 5 Pty Ltd

RTA Holdco Australia 6 Pty Ltd

RTA Pacific Pty Limited

RTA Sales Pty Ltd

RTA Smelter Development Pty Limited

RTA Weipa Pty Ltd

RTA Yarwun Pty Ltd

RTLDS Aus Pty Ltd

RTPDS Aus Pty Ltd

Southern Copper Pty. Limited

Swiss Aluminium Australia Limited

Technological Resources Pty. Limited

The Barrier Corporation (Vic.) Pty. Limited

The Zinc Corporation Pty Ltd

Tinto Holdings Australia Pty. Limited

Tomago Aluminium Company Pty Limited

Trans Territory Pipeline Pty Limited

TRQ Australia Pty. Ltd

Wimmera Industrial Minerals Pty. Limited

Winchester South Development Company Proprietary Limited

Yarraloola Pastoral Co

## Belgium

Rio Tinto Diamonds NV

## Bermuda

North IOC (Bermuda) Holdings Limited

North IOC (Bermuda) Limited

QIT Madagascar Minerals Ltd

## Bolivia, Plurinational State of

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

## Botswana

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

## Brazil

Alcan Alumina Ltda.

Alcan Composites Brasil Ltda

Empresa de Mineração Finesa Ltda

Mineração Tabuleiro Ltda

Química e Metalúrgica Mequitall Ltda

Rio de Contas Desenvolvimento Minerais Ltda

Rio Santa Rita Empreendimentos e Participações Ltda

Rio Tinto Desenvolvimento Minerais Ltda

Rio Tinto Mineração do Brasil Ltda

## British Virgin Islands

THR OYU TOLGOI LTD

## Canada

10029734 Canada Inc

1043802 Ontario Ltd

10676276 Canada Inc

10676284 Canada Inc

11091905 Canada Inc

1109723 B.C. Ltd

46106 YUKON INC

46117 YUKON INC

535630 YUKON INC

7999674 CANADA INC

9539549 CANADA INC

Alcan Management Services Canada Limited/Societe de Services de Gestion Alcan Canada Limitee

Alcan Packaging Canada Limited

Alcan Realty Limited/Societe Immobiliere Alcan Limitee

# Constituent entities resident in each tax jurisdiction

## continued

Aluminum Company of Canada Limited/Aluminium du Canada Limitee  
 Carol Lake Company Ltd  
 Diavik Diamond Mines (2012) Inc  
 ELYSIS Limited Partnership/ELYSIS Société en Commandite  
 Gulf Power Company/La Compagnie Gulf Power  
 Iron Ore Company of Canada (P.E.)\*  
 Northern Land Company Ltd  
 Pechiney Reynolds Quebec, Inc. (P.E.)\*  
 Quebec North Shore and Labrador Railway Company/Compagnie de Chemin de Fer du Littoral Nord de Quebec et du Labrador Inc  
 Rio Tinto Alcan Fund Inc  
 Rio Tinto Alcan Inc  
 Rio Tinto Alcan International Ltd. / Rio Tinto Alcan International Ltee  
 Rio Tinto Canada Diamond Operation Management Inc  
 Rio Tinto Canada Inc  
 Rio Tinto Canada Management Inc./ Rio Tinto Gestion Canada Inc  
 Rio Tinto Canada Uranium Corporation  
 Rio Tinto Diamonds and Minerals Canada Holding Inc.  
 Rio Tinto Exploration Canada Inc  
 Rio Tinto FalCon Diamonds Inc  
 Rio Tinto Fer et Titane inc  
 Rio Tinto Iron and Titanium Canada Inc./Rio Tinto Fer et Titane Canada Inc  
 Rio Tinto PACE Canada Inc. / Gestion Rio Tinto PACE Canada Inc  
 Rio Tinto Potash Management Inc./Rio Tinto Potasse Management Inc  
 Rio Tinto Saskatchewan Management Inc  
 Rio Tinto Saskatchewan Potash Holdings General Partner Inc  
 Rio Tinto Saskatchewan Potash Holdings Limited Partnership  
 Rio Tinto Shipping (Asia) Pte. Ltd. (P.E.)\*  
 The Roberval and Saguenay Railway Company/La Compagnie du Chemin de Fer Roberval Saguenay  
 THR MINES (BC) LTD  
 THR Mines Services Co. Ltd  
 Turquoise Hill Resources Ltd

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

**China**  
 Alcan Management Services (Shanghai) Co., Ltd  
 Rio Tinto Iron & Titanium (Suzhou) Co., Ltd  
 Rio Tinto Limited Beijing Representative Office (P.E.)\*  
 Rio Tinto Limited Shanghai Representative Office (P.E.)\*  
 Rio Tinto Minerals Exploration (Beijing) Co., Ltd  
 Rio Tinto Mining Commercial (Shanghai) Co. Ltd  
 Rio Tinto Trading (Shanghai) Co., Ltd  
 Turquoise Hill (Beijing) Services Company Ltd

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

**France**  
 Aluminium Pechiney  
 AP Service  
 Borax Français

France Aluminium Recyclage Sa  
 Pechiney Bâtiment  
 Rio Tinto Aluminium Pechiney  
 Rio Tinto France S.A.S.  
 Rio Tinto Iron Ore Europe S.A.S.  
 RTA Holdco France 1 S.A.S  
 RTA Holdco France 2 S.A.S

**Finland**  
 Rio Tinto Exploration Finland OY

**Germany**  
 Alcan Betriebs- und Verwaltungsgesellschaft GmbH  
 Alcan Lebensmittelverpackungen GmbH  
 Alcan Packaging Mühlthal GmbH & Co. KG  
 Rio Tinto Commercial GmbH  
 Rio Tinto Iron & Titanium GmbH  
 Rio Tinto Iron & Titanium Holdings GmbH  
 Scheuch Unterstuetzungskasse GmbH

**Guinea**  
 Rio Tinto Guinée S.A.  
 SIMFER S.A.  
 Société Minière Et De Participations Guinée Alusuisse

**Hong Kong**  
 Alcan Asia Limited  
 Rio Tinto (Hong Kong) Ltd  
 Rio Tinto Asia Ltd

**Iceland**  
 Rio Tinto Iceland Ltd

**India**  
 Rio Tinto Exploration and Mining (India) Private Limited  
 Rio Tinto Exploration India Private Limited  
 Rio Tinto India Private Limited  
 Rio Tinto Orissa Mining Private Ltd

**Indonesia**  
 PT Hutan Lindung Kelian Lestari  
 PT Kelian Equatorial Mining

**Italy**  
 Itallumina Srl

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

**Japan**  
 Rio Tinto Japan Ltd

**Jersey**  
 Simfer Jersey Finance 1 Ltd  
 Simfer Jersey Finance 2 Ltd

**Kazakhstan**  
 Balkhash Saryshagan LLP  
 Korgantas LLP  
 Rio Tinto Exploration Kazakhstan LLP  
 Rio Tinto Mining and Exploration Limited (P.E.)\*

**Korea, Republic Of**  
 Rio Tinto Korea Ltd

**Lao People's Democratic Republic**  
 Lao Sanxai Minerals Company Limited

**Luxembourg**  
 Movele  
 Société De Financement Des Risques Industriels

**Madagascar**  
 Port d'Ehoala S.A.  
 QIT Madagascar Minerals SA

**Malaysia**  
 Borax Malaysia Sdn Bhd

**Malta**  
 Falcon Insurance Ltd

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

**Mongolia**  
 Asia Gold Mongolia LLC  
 Asia Naran Bulag LLC  
 Heruga Exploration LLC  
 Oyu Tolgoi LLC  
 Rio Tinto Holdings LLC  
 Rio Tinto Mongolia LLC  
 SGLS LLC

**Mozambique**  
 Mutamba Mineral Sands S.A.  
 Rio Tinto Mining and Exploration Limited (P.E.)\*

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

**Netherlands**  
 Alcan Holdings Europe B.V.  
 Alcan Holdings Nederland B.V.  
 Aluminium & Chemie Rotterdam B.V.  
 Bektou B.V.  
 Borax Rotterdam N.V.  
 Oyu Tolgoi Netherlands BV  
 Rio Tinto Diamonds Netherlands B.V.  
 Saryarka B.V.  
 Turquoise Hill Netherlands Cooperatief U.A.

**New Zealand**  
 Electric Power Generation Limited  
 New Zealand Aluminium Smelters Ltd  
 NZAS Retirement Fund Trustee Limited  
 Pacific Aluminium (New Zealand) Limited

**Oman**  
 Rio Tinto Sohar Logistics LLC

**Papua New Guinea**  
 Rio Tinto Exploration (PNG) Limited

**Peru**  
 CIA, Inmobiliaria e Inversiones Cosmos S.A.C.  
 Compania de Transmision Sierraoriente S.A.C.  
 Rio Tinto Minera Peru Limitada SAC  
 Rio Tinto Mining and Exploration S.A.C.

**Philippines**  
 Pechiney Philippines Inc.  
 Turquoise Hill Resources Philippines Inc

**Serbia**  
 Rio Sava Exploration DOO  
 Rio Tinto Exploration Dunav d.o.o. Beograd-Vracar

**Singapore**  
 AGM Holding Company Pte Ltd  
 Chlor Alkali Unit Pte Ltd  
 East Kalimantan Coal Pte. Ltd  
 IAL Holdings Singapore Pte Ltd

# Constituent entities resident in each tax jurisdiction

## continued

Metals & Minerals Insurance Pte. Limited	Rio Tinto Bahia Holdings Limited	Daybreak Development LLC
Rio Tinto Exploration (Asia) Holdings Pte. Ltd	Rio Tinto Brazilian Holdings Limited	Daybreak Property Holdings LLC
Rio Tinto Global Employment Company Pte. Ltd	Rio Tinto Brazilian Investments Limited	Daybreak Secondary Water Distribution Company
Rio Tinto Marketing Pte. Ltd	Rio Tinto Diamonds Limited	Daybreak Water Holding LLC
Rio Tinto Minerals Asia Pte Ltd	Rio Tinto Eastern Investments B.V.	DB Medical I LLC
Rio Tinto Procurement (Singapore) Pte Ltd	Rio Tinto Energy Limited	DBVC1 LLC
Rio Tinto Pte Ltd	Rio Tinto Escondida Limited**	Eastland Management Inc.
Rio Tinto Shipping (Asia) Pte. Ltd.	Rio Tinto European Holdings Limited	Flambeau Mining Company
Rio Tinto Singapore Holdings Pte Ltd	Rio Tinto Finance (USA) plc	Green Mountain Mining Venture
Rio Tinto Commercial Pte. Ltd	Rio Tinto Finance plc	Henlopen Manufacturing Co., Inc
Sharp Strategic Funding Pte. Ltd	Rio Tinto Indonesian Holdings Limited	High Purity Iron Inc.
Singapore Metals Pte. Ltd	Rio Tinto International Holdings Limited	Integrity Land and Cattle LLC
The Kelian Community and Forest Protection Trust	Rio Tinto Iron & Titanium Limited	Iron Ore Company of Canada
THR Kharmagtai Pte Ltd	Rio Tinto Iron Ore Atlantic Limited	Kennecott Barneys Canyon Mining Company
THR Ulaan Pte. Ltd	Rio Tinto Iron Ore Trading China Limited	Kennecott Exploration Company
Turquoise Hill Resources Singapore Pte Ltd	Rio Tinto Jersey Holdings 2010 Limited**	Kennecott Holdings Corporation
West Kutai Foundation Limited	Rio Tinto London Limited	Kennecott Land Company
Wright Mgmt Services Pte. Ltd	Rio Tinto Marketing Services Limited	Kennecott Land Investment Company LLC
<b>South Africa</b>	Rio Tinto Medical Plan Trustees Limited	Kennecott Molybdenum Company
Nozalela Mineral Sands (Pty) Ltd	Rio Tinto Metals Limited	Kennecott Nevada Copper Company
Richards Bay Mining (Proprietary) Limited	Rio Tinto Minerals Development Limited	Kennecott Ridgeway Mining Company
Richards Bay Mining Holdings (Proprietary) Limited	Rio Tinto Mining and Exploration Limited	Kennecott Royalty Company
Richards Bay Prefco (Pty) Ltd	Rio Tinto Nominees Limited	Kennecott Services Company
Richards Bay Titanium (Proprietary) Limited	Rio Tinto OT Management Limited	Kennecott Uranium Company
Richards Bay Titanium Holdings (Proprietary) Limited	Rio Tinto Overseas Holdings Limited	Kennecott Utah Copper LLC
Rio Tinto Management Services South Africa (Proprietary) Ltd	Rio Tinto Pension 2009 Trustees Limited	Kennecott Water Distribution LLC
Rio Tinto Mining and Exploration Limited (P.E.)*	Rio Tinto Pension Fund Trustees Limited	Magma Arizona Railroad Company
Riversdale Connections (Proprietary) Ltd	Rio Tinto Pension Investments Limited	Minera Kennecott, S.A. de C.V.
Tisand (Proprietary) Limited	Rio Tinto Peru Limited	Pacific Coast Mines, Inc.
Zululand Titanium (Pty) Ltd	Rio Tinto plc	Pechiney Bécancour, Inc
<b>Spain</b>	Rio Tinto Secretariat Limited	Pechiney Cast Plate, Inc
Borax España, S.A.	Rio Tinto Simfer UK Limited	Pechiney Holdings, Inc
Borax Europe Limited (P.E.)*	Rio Tinto South East Asia Limited	Pechiney Metals LLC
Industrias Metalicas Castello S.A.	Rio Tinto Sulawesi Holdings Limited	Pechiney Plastic Packaging, Inc
<b>Switzerland</b>	Rio Tinto Technological Resources UK Limited	Pechiney Reynolds Quebec, Inc
Alcan Holdings Switzerland AG (SA/Ltd.)	Rio Tinto Uranium Limited	Pechiney Sales Corporation
Alcan Trading AG (SA/Ltd.)	Rio Tinto Western Holdings Limited	Resolution Copper Company
Champlain Reinsurance Company Ltd.	RTA Holdco 1 Limited	Resolution Copper Mining LLC
Metallwerke Refonda AG	RTA Holdco 4 Limited	Rio Tinto America Holdings Inc
<b>Taiwan, Province of China</b>	RTA Holdco 7 Limited	Rio Tinto America Inc
Rio Tinto Asia Limited Taiwan Branch	RTA Holdco 8 Limited	Rio Tinto AuM Company
<b>United Arab Emirates</b>	RTAlcan 2 LLC**	Rio Tinto Commercial Americas Inc
Rio Tinto Alcan Middle East DMCC	RTAlcan 3 LLC**	Rio Tinto Energy America Inc
<b>United Kingdom</b>	RTLDS UK Limited	Rio Tinto Hydrogen Energy LLC
Alcan Chemicals Limited	Simfer Jersey Limited**	Rio Tinto Minerals Inc.
Alcan Farms Limited	Simfer Jersey Nominee Limited	Rio Tinto Mining and Exploration Inc
Anglesey Aluminium Metal Limited	TBAC Limited	Rio Tinto Services Inc
Borax Europe Limited	Thos. W. Ward Limited	Rio Tinto Technological Resources Inc
British Alcan Aluminium Limited	<b>United States</b>	RTAlcan 1 LLC
IEA Coal Research Limited	201 Logistics Center, LLC	Skymont Corporation
IEA Environmental Projects Limited	Alcan Corporation	Sohio Western Mining Company
IOC Sales Limited	Alcan Finances USA LLC	Solutions Strategiques Funding LLC
Lawson Mardon Flexible Limited	Alcan International Network U.S.A. Inc.	Swift Current Land & Cattle LLC
Lawson Mardon Smith Brothers Ltd.	Alcan Management Services Canada Limited/Societe de Services de Gestion Alcan Canada Limitee (P.E.)*	The Pyrites Company, Inc.
Pechiney Aviatube Limited	Alcan Primary Products Company LLC	THR Delaware Holdings, LLC
Rio Tinto Australian Holdings Limited	Alcan Primary Products Corporation	Three Crowns Insurance Company Limited**
		U.S. Borax Inc

## Constituent entities resident in each tax jurisdiction

### continued

Victoria Technology Inc.	Wyoming Coal Resources Company
Waste Solutions and Recycling LLC	<b>Zambia</b>
Wyoming Coal Resources Company	Rio Tinto Exploration Zambia Limited

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

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



Rio Tinto plc  
6 St James's Square  
London SW1Y 4AD  
United Kingdom

Rio Tinto Limited  
Level 7, 360 Collins Street  
Melbourne VIC 3000  
Australia