

RioTinto



Country-by-Country
Report 2019

In 2019, we paid \$7.6 billion in taxes and royalties globally, including \$6.2 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 2019' (2019 Taxes Paid Report) to disclose associated financial information on a country-by-country basis for all countries in which we had a taxable presence in 2019. We disclose country-by-country information including total revenues, related party revenues, 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 through 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 2019 Taxes Paid Report. This report complements and expands on those disclosures. We commit to making these additional disclosures on an annual basis.

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 Boyne Smelters Limited in Queensland, Australia

This page: Train hauling iron ore in the Dampier region of Western Australia

Asia Pacific

Key countries

Tax Jurisdiction	Unrelated-Party Revenues	Related Party Revenues	Total Revenues	Profit/(Loss) before Income Tax	Income Tax Paid (on Cash Basis)	Income Tax Accrued - Current Year	CBC Effective Corporate Tax Rates %	Statutory Corporate Tax Rate %	Number of Employees	Tangible Assets other than Cash or Cash Equivalents
Australia	23,480,516,475	4,735,635,805	28,216,152,280	12,295,959,341	4,244,522,207	3,982,294,058	32%	30%	18,554	27,537,269,661
China	69,840,148	25,663,560	95,503,708	3,704,406	1,798,076	2,143,039	58%	25%	175	145,866,760
Mongolia	1,174,097,441	4,252,214	1,178,349,655	(2,607,460,337)	586,338	504,660	0%	25%	3,215	9,003,283,667
New Zealand	57,390	550,070,305	550,127,695	(323,228,071)	(5,182,706)	–	0%	28%	641	269,618,943
Singapore	7,062,024,763	3,658,020,282	10,720,045,045	767,689,815	22,646,174	34,031,214	4%	17%	430	1,139,445,832

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, diamonds, salt and uranium.

Of the \$7.6 billion in taxes and royalties paid globally during 2019, \$6.2 billion was paid in Australia, including \$4.2 billion in corporate tax.

The higher CBC ETR as compared with the statutory corporate tax rate is largely the consequence of the difference in treatment for tax and accounting purposes of items such as closure, capital allowances, employee provisions and rehabilitation provisions.

China

Our business activities in China include administration and sales and marketing support services, 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. The absence of an ability to group the tax losses to offset the taxable profits results 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 (66%). We own 50.8% of Turquoise Hill Resources. The Oyu Tolgoi copper 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 copper mine is still under construction, and combined with the impairment charge recorded, this results in an operating loss position for both tax and accounting purposes in 2019 and a CBC ETR of 0%. Notwithstanding this, Oyu Tolgoi paid \$305 million in taxes, royalties and other charges to Mongolian governments as disclosed in our 2019 Taxes Paid Report. The tax accrued disclosed in the table above relates to withholding tax on interest received on deposits with Mongolian banks.

New Zealand

New Zealand's Aluminium Smelter (NZAS) is a joint venture owned by Rio Tinto (79.36%) and Japan's Sumitomo Chemical Company (20.64%). NZAS converts alumina into aluminium using renewable hydroelectricity. The New Zealand operations incurred losses for both accounting and tax purposes in 2019 resulting in a CBC ETR of 0%.

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 revenues for Singapore relate to activities undertaken by our commercial centre, including sales of commodities and fees for services.

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. Our Singapore sales, marketing and procurement businesses qualified for a 5% incentive tax rate and our activities related to shipping and insurance were tax exempt. More information in relation to our Singapore commercial centre can be found in our 2019 Taxes Paid Report on our website.

Asia Pacific

continued

Other countries

Tax Jurisdiction	Unrelated-Party Revenues	Related Party Revenues	Total Revenues	Profit/(Loss) before Income Tax	Income Tax Paid (on Cash Basis)	Income Tax Accrued - Current Year	CBC Effective Corporate Tax Rates %	Statutory Corporate Tax Rate %	Number of Employees	Tangible Assets other than Cash or Cash Equivalents
Hong Kong	–	483,532	483,532	216,351	–	–	0%	17%	1	528
India	2,982,815	18,310,729	21,293,544	7,400,945	876,964	1,713,775	23%	30%	272	3,761,875
Indonesia	26,540	–	26,540	36,905	–	–	0%	25%	3	–
Japan	301,998	15,560,477	15,862,475	9,173,546	1,264,497	1,868,509	20%	23%	25	2,340,114
Kazakhstan	–	–	–	(9,689,571)	–	–	0%	20%	31	1,175,412
Korea, Republic of	18,929	1,679,765	1,698,694	245,609	64,237	38,495	16%	25%	9	480,465
Lao People's Democratic Republic	19,968	45,931	65,899	(1,096,127)	–	–	0%	35%	5	13,413
Malaysia	11,061,841	11,314,403	22,376,244	1,097,867	284,080	276,131	25%	24%	2	7,365,981
Papua New Guinea	7,449	11,832	19,281	(3,902,296)	503	508	0%	30%	2	159,352
Philippines	–	–	–	–	–	–	0%	30%	–	–
Taiwan, Province of China	–	256,449	256,449	19,639	8,684	4,560	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 carry 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.

Indonesia:

All assets previously held in Indonesia have now been divested with the remaining activities related to the cessation of historic activity. 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 minor difference between the CBC ETR and the statutory corporate tax rate relates to accounting gains arising on the liquidation of a legacy aluminium entity which are not taxable under Japanese tax law.

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 lower than the statutory tax rate due to minor permanent deductions.

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 activity undertaken in Malaysia is trading and distribution of borates products. The minor differences 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 2019.

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 Revenues	Related Party Revenues	Total Revenues	Profit/(Loss) before Income Tax	Income Tax Paid (on Cash Basis)	Income Tax Accrued - Current Year	CBC Effective Corporate Tax Rates %	Statutory Corporate Tax Rate %	Number of Employees	Tangible Assets other than Cash or Cash Equivalents
Brazil	1,868,271	149,436,666	151,304,937	7,662,517	6,069,641	3,145,397	41%	34%	112	122,539,510
Canada	2,974,288,139	5,896,784,500	8,871,072,639	1,298,529,330	44,734,203	220,408,796	17%	30% ¹	11,576	14,148,091,996
Chile	22,507	604,168	626,675	(37,465,060)	87,460,569	123,235	0%	27%	56	695,767
United States	4,925,797,077	422,422,687	5,348,219,764	(147,083,153)	(19,240,047)	1,512,852	*	24% ¹	3,400	5,789,273,852

¹ 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, north east 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. The primary difference between the CBC ETR and the statutory corporate tax rate is caused by losses generated from exploration activity which cannot be offset 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 not therefore reported in the above table. We paid \$1.3 million in tax in respect of MRN in 2019 as disclosed in our 2019 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 revenues in the table above relate 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 relates to sales to a US related party, for sale to US customers.

The primary differences between the CBC ETR and the statutory corporate rate relates to permanent differences including foreign branch losses which reduce Canadian taxable income, and investment tax credits on Research and Development and fixed assets.

Chile

The primary activity we undertake in Chile is exploration. Our activities in Chile resulted in losses for both accounting and tax purposes resulting in a CBC ETR of 0%. The current year 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 2019 Taxes Paid Report, we paid \$297.3 million of 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.

United States

We have a number of operating assets in the United States. 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, a naturally occurring mineral, from our mine in Boron, California.

The Resolution Copper project in Arizona, one of the world's largest copper deposits, is progressing to the final stage of permitting.

The US consolidated group reported an overall loss for both accounting and tax purposes. The small current tax charge is for BEAT tax (Base erosion & Anti-Abuse Tax) and state income taxes. Current year tax losses will be carried forward for use in future years. In addition, the refunds shown in "Income Tax Paid (on Cash Basis)" relate to refunds received of Alternative Minimum Tax in respect of prior years.

North and South America

continued

Other countries

Tax Jurisdiction	Unrelated-Party Revenues	Related Party Revenues	Total Revenues	Profit/(Loss) before Income Tax	Income Tax Paid (on Cash Basis)	Income Tax Accrued - Current Year	CBC Effective Corporate Tax Rates %	Statutory Corporate Tax Rate %	Number of Employees	Tangible Assets other than Cash or Cash Equivalents
Argentina	1,439,705	–	1,439,705	(22,111,459)	5,809	5,809	0%	30%	–	–
Aruba	–	–	–	–	–	–	0%	25%	–	–
Bermuda	–	–	–	(23,977)	–	–	0%	0%	–	–
Bolivia, Plurinational State of	–	–	–	(7,007)	–	–	0%	25%	–	–
Virgin Islands, British	–	–	–	–	–	–	0%	0%	–	–
Colombia	–	4,508	4,508	(296,739)	–	–	0%	33%	–	–
Jamaica	–	–	–	(4,359,891)	–	–	0%	25%	–	–
Mexico	–	–	–	(118,225)	–	–	0%	30%	–	–
Peru	2,257,134	625,218	2,882,352	(27,745,170)	40,034	–	0%	30%	65	17,556,106

Argentina:

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

Aruba:

The Rio Tinto entity tax resident in Aruba was dormant in 2019 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 Revenues	Related Party Revenues	Total Revenues	Profit/(Loss) before Income Tax	Income Tax Paid (on Cash Basis)	Income Tax Accrued - Current Year	CBC Effective Corporate Tax Rates %	Statutory Corporate Tax Rate %	Number of Employees	Tangible Assets other than Cash or Cash Equivalents
Belgium	555,227,239	1,133,468	556,360,707	7,739,644	898,890	992,103	13%	29%	47	11,636,457
France	538,763,836	198,240,300	737,004,136	(32,859,540)	–	–	0%	31%	305	52,459,818
Iceland	1,337,305	444,858,630	446,195,935	(99,122,517)	–	–	0%	20%	408	471,089,905
Luxembourg	11,415,781	584,035,272	595,451,053	65,340,832	1,897,566	13,345,653	20%	25%	1	–
Netherlands	85,656	581,245,043	581,330,699	(104,088,129)	981,387	29,247,820	*	25%	155	43,955,823
Serbia	563,956	62,187	626,143	(52,209,323)	–	–	0%	15%	60	224,613
United Kingdom	2,446,702,287	527,907,428	2,974,609,715	(409,234,755)	92,856,923	27,597,103	*	19%	190	148,367,507

* 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

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.

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

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 we undertake in Luxembourg relates 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. The Singapore entity provides funding to the Netherlands shareholder of the Oyu Tolgoi Project in Mongolia – 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 include manufacturing and production of anode; 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. The deposit contains jadarite, a mineral we discovered in 2004.

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 2019 resulted in losses for both tax and accounting purposes. The majority of the accounting loss arising in 2019 related to a disposal of investments for which no tax loss is available. The accrued tax charge for the year relates primarily to tax withheld on interest income received from non-UK group entities as well as UK CFC tax applicable on certain overseas profits.

Europe

continued

Other countries

Tax Jurisdiction	Unrelated-Party Revenues	Related Party Revenues	Total Revenues	Profit/(Loss) before Income Tax	Income Tax Paid (on Cash Basis)	Income Tax Accrued - Current Year	CBC Effective Corporate Tax Rates %	Statutory Corporate Tax Rate %	Number of Employees	Tangible Assets other than Cash or Cash Equivalents
Germany	569,999	9,328,789	9,898,788	3,940,033	700,110	88,484	2%	30%	22	60,858
Italy	–	–	–	–	–	–	0%	24%	–	–
Jersey	–	–	–	–	–	–	0%	0%	–	–
Malta	–	189,538	189,538	123,815	18,954	18,954	15%	35%	–	–
Spain	10,741,743	3,322,478	14,064,221	884,015	150,361	182,144	21%	25%	15	3,362,981
Switzerland	517,821	42,962,134	43,479,955	13,168,325	786,095	789,835	6%	9%	4	88,201

Germany:

The primary activities undertaken in Germany relate to administration activities 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 is dormant.

Jersey:

We have two entities tax resident in Jersey which provides interest free loan funding to Group operating companies. The funding is in substance equity but is required to have the legal form of debt to avoid diluting the equity rights of host governments pursuant to mine development and investment agreements.

Malta:

The primary activity undertaken in Malta relates to intragroup insurance activities.

The difference between the CBC ETR and the statutory corporate tax rate arises as a consequence of the utilisation of brought forward tax losses with the tax accrued predominantly representing the withholding tax charge on interest income received.

Spain:

The primary activity undertaken in Spain relates to administration activities and sales and marketing support services. The difference between the CBC ETR and the statutory corporate tax rate relates to a classification of a portion of accrued tax as deferred tax, resulting in the relevant amount of tax being excluded from the table above.

Switzerland:

The primary activity undertaken in Switzerland relates to insurance, administration and management activities, sales and marketing support services and distribution activities. The difference between the CBC ETR and the statutory corporate tax rate is predominantly due to the utilisation of brought forward tax losses which were not recognised for accounting purposes in a prior period.

Africa

Key countries

Tax Jurisdiction	Unrelated-Party Revenues	Related Party Revenues	Total Revenues	Profit/(Loss) before Income Tax	Income Tax Paid (on Cash Basis)	Income Tax Accrued - Current Year	CBC Effective Corporate Tax Rates %	Statutory Corporate Tax Rate %	Number of Employees	Tangible Assets other than Cash or Cash Equivalents
Guinea	–	–	–	(11,750,075)	–	–	0%	35%	74	–
Madagascar	104,449,403	38,147,401	142,596,804	5,319,095	551,838	696,702	13%	20%	473	739,132,807
Namibia	3,889,781	30,927,620	34,817,401	8,106,364	–	–	0%	32%	496	44,969
South Africa	913,218,316	68,111,878	981,330,194	224,873,711	66,271,423	70,158,434	31%	28%	2,054	1,633,951,427

Guinea

Our primary activities in Guinea 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 2019, we also paid corporate income tax of \$31.7 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 south-eastern Madagascar. QMM produces ilmenite which is a major source of titanium dioxide. Brought forward tax losses reduced the 2019 taxable income to nil however Madagascar applies a minimum tax of 0.5% computed on sales.

Namibia

In 2019, our operations in Namibia included the Rossing Uranium mine which was sold in July 2019. Other business activities in Namibia include minerals exploration. The application of brought forward tax losses reduced the 2019 taxable income to nil, resulting in a 0% CBC ETR.

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 and zircon.

The minor difference between the CBC ETR and 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 Revenues	Related Party Revenues	Total Revenues	Profit/(Loss) before Income Tax	Income Tax Paid (on Cash Basis)	Income Tax Accrued - Current Year	CBC Effective Corporate Tax Rates %	Statutory Corporate Tax Rate %	Number of Employees	Tangible Assets other than Cash or Cash Equivalents
Botswana	–	177,979	177,979	139,895	–	–	0%	22%	1	3,762
Gabon	–	–	–	–	–	–	0%	30%	–	–
Morocco	–	–	–	66,445	–	–	0%	31%	–	–
Mozambique	–	–	–	(208,630)	–	–	0%	32%	–	638,000
Zambia	219,728	–	219,728	(15,265,052)	–	–	0%	35%	20	1,487,938

Botswana:

The primary activity undertaken in Botswana is exploration. The accounting profit for the year relates to accounting translation differences on intra-group balances which are not recognised for tax purposes, resulting in a 0% CBC ETR.

Gabon:

Our entity in Gabon is dormant.

Morocco:

Our entity in Morocco was sold during 2019. No tax arose on the accounting profit on disposal.

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%.

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 Revenues	Related Party Revenues	Total Revenues	Profit/(Loss) before Income Tax	Income Tax Paid (on Cash Basis)	Income Tax Accrued - Current Year	CBC Effective Corporate Tax Rates %	Statutory Corporate Tax Rate %	Number of Employees	Tangible Assets other than Cash or Cash Equivalents
Oman	–	275,079	275,079	18,695	27,202	27,202	146%	15%	2	–
United Arab Emirates	–	343,414	343,414	95,031	–	–	0%	0%	1	2,012,518

Oman

Our primary activity in Oman is support related to aluminium smelter technology services. Tax is payable based on an imputed profit, resulting in a CBC ETR which is materially higher than the statutory corporate tax rate.

We also have a 20% ownership in the Sohar Aluminium Smelter, which is not consolidated for accounting purposes and is therefore not included in the table above. Our share of tax paid by Sohar in 2019 was \$5.7 million as disclosed in our 2019 Taxes Paid Report.

United Arab Emirates

The activity of our entity in the United Arab Emirates was limited to owning and leasing a building to third party tenants. At the end of 2019, the sale of the building was near completion and the entity was liquidated early in 2020.

The business is located in a tax-free zone where a 0% rate applies however the small amount of income was taxable in Canada through the Controlled Foreign Company Rules.

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 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 also 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.

GRI 207 recognises that the information required under disclosure 207-4 may not be available for the time period covered by the most recent audited consolidated financial statements. The standard therefore provides that the organisation may report information for the time period covered by the audited consolidated financial statements immediately preceding the most recent period. This report is therefore prepared using data for the year ended 31 December 2019. Comprehensive information on the taxes and royalties paid for the 2020 year can be found in our 2020 Taxes Paid Report.

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. 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 2019 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 Revenues, Total Revenues, Profit/(loss) before Income Tax and Tangible Assets. This approach has been taken as a significant portion of our revenues and profits are generated in Australia where corporate groups use consolidated reporting for tax purposes. We consider that this method appropriately reflects our global revenues 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, are prepared for the year from 1 January to 31 December 2019.
- 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 2019).
- 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 2019).

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.

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.

Total Revenues

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

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

Related-Party Revenues

Related-party revenues 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.

Unrelated-Party Revenues

The term 'unrelated party' includes non-consolidated joint ventures and associates for the purposes of our 2019 Annual Report. Unrelated-party revenues exclude external dividend income.

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 program. 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 2019. 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 2019 Country-by-Country Report (page 1)

Tax Jurisdiction	Unrelated-Party Revenues	Related Party Revenues	Total Revenues	Profit/(Loss) before Income Tax	Income Tax Paid (on Cash Basis)	Income Tax Accrued - Current Year	CBC Effective Corporate Tax Rates %	Statutory Corporate Tax Rate %	Number of Employees	Tangible Assets other than Cash or Cash Equivalents
Australia	23,480,516,475	4,735,635,805	28,216,152,280	12,295,959,341	4,244,522,207	3,982,294,058	32%	30%	18,554	27,537,269,661
China	69,840,148	25,663,560	95,503,708	3,704,406	1,798,076	2,143,039	58%	25%	175	145,866,760
Mongolia	1,174,097,441	4,252,214	1,178,349,655	(2,607,460,337)	586,338	504,660	0%	25%	3,215	9,003,283,667
New Zealand	57,390	550,070,305	550,127,695	(323,228,071)	(5,182,706)	–	0%	28%	641	269,618,943
Singapore	7,062,024,763	3,658,020,282	10,720,045,045	767,689,815	22,646,174	34,031,214	4%	17%	430	1,139,445,832
Hong Kong	–	483,532	483,532	216,351	–	–	0%	17%	1	528
India	2,982,815	18,310,729	21,293,544	7,400,945	876,964	1,713,775	23%	30%	272	3,761,875
Indonesia	26,540	–	26,540	36,905	–	–	0%	25%	3	–
Japan	301,998	15,560,477	15,862,475	9,173,546	1,264,497	1,868,509	20%	23%	25	2,340,114
Kazakhstan	–	–	–	(9,689,571)	–	–	0%	20%	31	1,175,412
Korea, Republic of	18,929	1,679,765	1,698,694	245,609	64,237	38,495	16%	25%	9	480,465
Lao People's Democratic Republic	19,968	45,931	65,899	(1,096,127)	–	–	0%	35%	5	13,413
Malaysia	11,061,841	11,314,403	22,376,244	1,097,867	284,080	276,131	25%	24%	2	7,365,981
Papua New Guinea	7,449	11,832	19,281	(3,902,296)	503	508	0%	30%	2	159,352
Philippines	–	–	–	–	–	–	0%	30%	–	–
Taiwan, Province of China	–	256,449	256,449	19,639	8,684	4,560	23%	20%	1	–
Brazil	1,868,271	149,436,666	151,304,937	7,662,517	6,069,641	3,145,397	41%	34%	112	122,539,510
Canada	2,974,288,139	5,896,784,500	8,871,072,639	1,298,529,330	44,734,203	220,408,796	17%	30% ¹	11,576	14,148,091,996
Chile	22,507	604,168	626,675	(37,465,060)	87,460,569	123,235	0%	27%	56	695,767
United States	4,925,797,077	422,422,687	5,348,219,764	(147,083,153)	(19,240,047)	1,512,852	*	24% ¹	3,400	5,789,273,852
Argentina	1,439,705	–	1,439,705	(22,111,459)	5,809	5,809	0%	30%	–	–
Aruba	–	–	–	–	–	–	0%	25%	–	–
Bermuda	–	–	–	(23,977)	–	–	0%	0%	–	–
Bolivia, Plurinational State of	–	–	–	(7,007)	–	–	0%	25%	–	–
Virgin Islands, British	–	–	–	–	–	–	0%	0%	–	–
Colombia	–	4,508	4,508	(296,739)	–	–	0%	33%	–	–
Jamaica	–	–	–	(4,359,891)	–	–	0%	25%	–	–
Mexico	–	–	–	(118,225)	–	–	0%	30%	–	–
Peru	2,257,134	625,218	2,882,352	(27,745,170)	40,034	–	0%	30%	65	17,556,106

¹ Rate is an approximate weighted average rate across our businesses

* Refer to explanation in country summaries

Our 2019 Country-by-Country Report (page 2)

Tax Jurisdiction	Unrelated-Party Revenues	Related Party Revenues	Total Revenues	Profit/(Loss) before Income Tax	Income Tax Paid (on Cash Basis)	Income Tax Accrued - Current Year	CBC Effective Corporate Tax Rates %	Statutory Corporate Tax Rate %	Number of Employees	Tangible Assets other than Cash or Cash Equivalents
Belgium	555,227,239	1,133,468	556,360,707	7,739,644	898,890	992,103	13%	29%	47	11,636,457
France	538,763,836	198,240,300	737,004,136	(32,859,540)	–	–	0%	31%	305	52,459,818
Iceland	1,337,305	444,858,630	446,195,935	(99,122,517)	–	–	0%	20%	408	471,089,905
Luxembourg	11,415,781	584,035,272	595,451,053	65,340,832	1,897,566	13,345,653	20%	25%	1	–
Netherlands	85,656	581,245,043	581,330,699	(104,088,129)	981,387	29,247,820	*	25%	155	43,955,823
Serbia	563,956	62,187	626,143	(52,209,323)	–	–	0%	15%	60	224,613
United Kingdom	2,446,702,287	527,907,428	2,974,609,715	(409,234,755)	92,856,923	27,597,103	*	19%	190	148,367,507
Germany	569,999	9,328,789	9,898,788	3,940,033	700,110	88,484	2%	30%	22	60,858
Italy	–	–	–	–	–	–	0%	24%	–	–
Jersey	–	–	–	–	–	–	0%	0%	–	–
Malta	–	189,538	189,538	123,815	18,954	18,954	15%	35%	–	–
Spain	10,741,743	3,322,478	14,064,221	884,015	150,361	182,144	21%	25%	15	3,362,981
Switzerland	517,821	42,962,134	43,479,955	13,168,325	786,095	789,835	6%	9%	4	88,201
Guinea	–	–	–	(11,750,075)	–	–	0%	35%	74	–
Madagascar	104,449,403	38,147,401	142,596,804	5,319,095	551,838	696,702	13%	20%	473	739,132,807
Namibia	3,889,781	30,927,620	34,817,401	8,106,364	–	–	0%	32%	496	44,969
South Africa	913,218,316	68,111,878	981,330,194	224,873,711	66,271,423	70,158,434	31%	28%	2,054	1,633,951,427
Botswana	–	177,979	177,979	139,895	–	–	0%	22%	1	3,762
Gabon	–	–	–	–	–	–	0%	30%	–	–
Morocco	–	–	–	66,445	–	–	0%	31%	–	–
Mozambique	–	–	–	(208,630)	–	–	0%	32%	–	638,000
Zambia	219,728	–	219,728	(15,265,052)	–	–	0%	35%	20	1,487,938
Oman	–	275,079	275,079	18,695	27,202	27,202	146%	15%	2	–
United Arab Emirates	–	343,414	343,414	95,031	–	–	0%	0%	1	2,012,518
GRI – Country-by-Country Report Total	44,294,331,441			10,812,227,067	4,551,080,012					61,297,456,818

* Refer to explanation in country summaries

Reconciliations to 2019 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 2019 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 2019 Taxes Paid Report which is also available on our website.

Unrelated-Party Revenue	\$bn
Sales revenue	43.2
Other income	0.8
Financial income	0.3
Exchange gains on external debt	0.1
Adjustments	(0.1)
GRI CBCR Total	44.3

Income Tax Paid (on Cash Basis)	\$m
Tax paid	4,549
Adjustments / rounding	2
GRI CBCR total	4,551

Reconciliation to Taxes Paid Report	\$
GRI CBCR Tax Paid	4,551,080,012
Tax paid by EAUs:	
Chile (Escondida- excluding dividend withholding)	210,112,110
Guinea (Sangaredi)	31,699,051
Oman (Sohar)	5,698,606
Brazil (MRN)	1,251,136
Others / rounding	559,085
Taxes Paid Report Total	4,800,400,000

Profit/(Loss) before Income Tax	\$bn
Profit before tax	11.1
EAU elimination	(0.3)
GRI CBCR total	10.8

Tangible Assets other than Cash or Cash Equivalents	\$bn
Property, plant and equipment	57.4
Inventories (non-current)	0.1
Inventories (current)	3.5
Adjustments	0.3
GRI CBCR Total	61.3

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

RTA Gove Pty Limited

Rio Tinto Aluminium Bell Bay Sales Pty Limited

Rio Tinto Aluminium Services Pty Limited

Rio Tinto Staff Fund (Retired) Pty Limited

Alcan Gove Development Pty Limited

Alcan Gove Superannuation 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 (2013) Ltd

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

PSZ Pty Limited

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 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

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 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

Wimmera Industrial Minerals Pty. Limited

Winchester South Development Company Proprietary Limited

Yarraloola Pastoral Co.

Rio Tinto Winu Pty Limited

TRQ Australia Pty. Ltd

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

Consórcio De Alumínio Do Maranhão

Química e Metalúrgica Mequitall Ltda.

Rio de Contas Desenvolvimentos Minerais Ltda

Rio Santa Rita Empreendimentos e-Participações Ltda

Rio Tinto Desenvolvimentos Minerais Ltda.

Rio Tinto Mineração do Brasil Ltda

Empresa de Mineração Finesa Ltda.

Mineração Tabuleiro Ltda

Canada

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

Carol Lake Company Ltd.

Gulf Power Company/La Compagnie Gulf Power

Quebec North Shore and Labrador Railway Company/Compagnie de Chemin de Fer du Littoral Nord de Quebec et du Labrador Inc.

10029734 Canada Inc.

1043802 Ontario Ltd.

46106 YUKON INC.

46117 YUKON INC.

535630 YUKON INC.

7999674 CANADA INC.

9230556 CANADA INC.

9539549 CANADA INC.

Constituent Entities Resident in Each Tax Jurisdiction

continued

Alcan Packaging Canada Limited

Alcan Realty Limited/Societe Immobiliere Alcan Limitee

Aluminium Company of Canada Limited/Aluminium du Canada Limitee

Diavik Diamond Mines (2012) 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 Fer et Titane inc.

Rio Tinto PACE Canada Inc. / Gestion Rio Tinto PACE Canada Inc.

Rio Tinto Iron and Titanium Canada Inc./Rio Tinto Fer et Titane 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

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.

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

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

Rio Tinto Shipping (Asia) Pte. Ltd. (P.E.)*

1109723 B.C. Ltd.

11091905 Canada Inc.

10676276 Canada Inc.

10676284 Canada Inc.

Rio Tinto FalCon Diamonds Inc.

ELYSIS Limited Partnership/ELYSIS Société en Commandite

Northern Land Company Ltd

Chile

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

China

Turquoise Hill (Beijing) Services Company Ltd

Alcan Management Services (Shanghai) Co., Ltd.

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

Rio Tinto Trading (Shanghai) Co., Ltd.

Rio Tinto Minerals Exploration (Beijing) Co., Ltd

Rio Tinto Limited Shanghai Representative Office (P.E.)*

Rio Tinto Limited Beijing Representative Office (P.E.)*

Rio Tinto Mining Commercial (Shanghai) Co. Ltd.

Colombia

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

France

Aluminium Pechiney

AP Service

Borax Français

Compagnie Générale D'électrolyse Du Palais

France Aluminium Recyclage Sa

Pechiney Bâtiment

Rio Tinto France S.A.S.

Rio Tinto Iron Ore Europe S.A.S.

Société D'entreprises, Carrières Et Mines De L'Esterel
Société Générale de Recherches et d'exploitations Minières

Rio Tinto Aluminium Pechiney

RTA Holdco France 1 S.A.S

RTA Holdco France 2 S.A.S

Gabon

Rio Tinto Exploration Gabon SA

Germany

Alcan Betriebs- und Verwaltungsgesellschaft GmbH

Alcan Lebensmittelverpackungen GmbH

Alcan Packaging Mühlthal GmbH & Co. KG

Rio Tinto Iron & Titanium GmbH

Rio Tinto Iron & Titanium Holdings GmbH

Rio Tinto Commercial 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 Alcan Packaging Flexipack

PT Hutan Lindung Kelian Lestari

PT Kelian Equatorial Mining

PT Rio Tinto Consultants

Italy

Itallumina Srl

Jamaica

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

Japan

Rio Tinto Japan Ltd

Savoie Services Y.K.

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

Turquoise Hill Resources Ltd. (P.E.)*

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.

Minera Kennecott, 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

Morocco

Union Générale Industrielle Africaine

Mozambique

Mutamba Mineral Sands S.A.

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

Namibia

Rössing Uranium Limited

Skeleton Coast Diamonds Limited

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

Netherlands

Oyu Tolgoi Netherlands BV

Turquoise Hill Netherlands Cooperatief U.A.

Bektau B.V.

Alcan Holdings Europe B.V.

Alcan Holdings Nederland B.V.

Aluminium & Chemie Rotterdam B.V.

Borax Rotterdam N.V.

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

Constituent Entities Resident in Each Tax Jurisdiction

continued

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

Constituent Entities Resident in Each Tax Jurisdiction

continued

Rio Tinto Energy America Inc.	Sohio Western Mining Company	Alcan Management Services Canada Limited/Societe de Services de Gestion Alcan Canada Limitee (P.E.)*
Rio Tinto Hydrogen Energy LLC	Swift Current Land & Cattle LLC	201 Logistics Center, LLC
Rio Tinto Minerals Inc.	The Pyrites Company, Inc.	Solutions Strategiques Funding LLC
Rio Tinto Commercial Americas Inc.	U.S. Borax Inc.	Virgin Islands (British)
Rio Tinto Services Inc.	Victoria Technology Inc.	Thr Oyu Tolgoi Ltd.
Rio Tinto Technological Resources Inc.	Waste Solutions and Recycling LLC	Zambia
RTAlcan 1 LLC	Wyoming Coal Resources Company	Rio Tinto Exploration Zambia Limited
Skymont Corporation	Pechiney Bécancour, Inc.	

*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
Turquoise Hill Resources Ltd.	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

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