

Company right of reply from

- Appleby
- MMG
- OzMinerals

1. We take any allegation of wrongdoing, implicit or otherwise, extremely seriously. Appleby operates in highly regulated jurisdictions and like all professional organisations in our regions, we are subject to frequent regulatory checks and we are committed to achieving the high standards set by our regulators. We are also committed to the highest standards of client service and confidentiality. It is what we stand for. This commitment is unequivocal.
2. We are a law firm. We provide legal services within the appropriate regulatory frameworks of the jurisdictions in which we operate. Appleby are not a “financial planning firm”. We are an offshore law firm who advises clients on legitimate and lawful ways to conduct their business
3. We wish to reiterate that our firm was not the subject of a leak but of a serious criminal act. This was an illegal computer hack. Our systems were accessed by an intruder who deployed the tactics of a professional hacker and covered his/her tracks to the extent that a forensic investigation by a leading international Cyber & Threats team concluded that there was no definitive evidence that any data had left our systems.
4. We cannot, and will not, comment on any client related matters, past or present for the purposes of client confidentiality.

Appleby

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22 October 2018

Ms Daisy Gardener
Advocacy Lead
Oxfam Australia

Dear Ms Gardener,

Thank you for your letter of 19 September 2018. We appreciate the opportunity to provide a response to Oxfam's queries prior to publication of your report and more broadly, look forward to continued constructive engagement with Oxfam Australia and your other country and regional offices.

As a major investor, taxpayer, employer and purchaser of local goods and services, MMG is proud of our significant contributions to economic and social development and growth within the countries that we operate. We adhere to the highest standards of corporate governance in all matters, including tax, where our approach to transparency includes the disclosure of tax and royalty payments, as well as broader social contributions.

We are pleased to provide the following responses to Oxfam Australia:

- Per your request, we have drawn on publicly available and externally verified data (from Annual, Sustainable Development and Financial reports found here www.mmg.com/en/Investors-and-Media/Reports-and-Presentations.aspx) to complete the tables. We encourage Oxfam Australia to consult these sources and we welcome questions at any time.
- Whilst Oxfam Australia's report focuses on the years 2008 – 2017, please note that MMG only recently acquired a number of our projects (Kinsevere in 2012; Las Bambas in 2014 with production starting in 2016; Sepon in 2009) and as such, we can only provide data for the years that these sites have been under our management.
- In 2016, to support increased transparency, MMG started reporting on tax contributions across our projects within our annual Sustainable Development Report – see the section titled '*Our Community Tax Contribution*'. Prior to this, our corporate taxes and other payments to government were not collected in this manner. As such, this information is not readily available and we have not completed those cells marked with 'N/A' in the attached tables.
- MMG currently operates one project only in the Democratic Republic of Congo (DRC), Peru, and Laos respectively. As such, our reporting of taxes, royalties and other payments by country is broadly equivalent to project-by-project reporting in those countries. We do however note that in each of these jurisdictions MMG also operates Corporate Services Offices where payment has also been included and cannot be disaggregated given MMG does not publish non-audited financial statements.
- MMG's corporate structure is the result of a number of transactions involving the acquisition of its global mining assets. MMG acquired or incorporated subsidiaries through or for the purpose of transactions with China Minmetals Corporation, Anvil Mining Limited and Glencore Xstrata.
- MMG does not have a relationship with a financial planning firm named Appleby. MMG engages the Appleby law firm, and its affiliate, Estera for advice on legal and corporate secretarial matters.

- Finally, for reasons including ongoing tax losses in Australia and the closure of MMG's Century Mine, we have not paid income tax for our Australian mining operations largely due to declining commodity prices, lower production from Century Mine leading to its eventual closure in 2014/15. With MMG's newest mine, Dugald River coming online, MMG expects to be paying corporate income tax.

At MMG we are committed to continuous improvement – it is a core value that forms the basis of our business activities and relationships. We operate under a policy of full transparency and cooperation with all tax authorities and pay all taxes properly due under the law wherever we operate.

In addition, the following initiatives further support our ongoing commitment to transparency:

- Robust company policies on anti-bribery and anti-facilitation payments;
- Public disclosures in line with the Foreign Investment Review Board, Australian Taxation Office and Hong Kong Stock Exchange requirements, complemented by voluntary disclosure of key payments in annual Sustainable Development reports for MMG and Las Bambas;
- Engagement with the Extractive Industry Transparency Initiative (EITI) as a reporting entity in Peru and DRC and participation in advocacy and pilot programs, including as an inaugural participant in the Australian EITI pilot project; and
- Membership and ongoing engagement with Transparency International Australia.

We value our engagement with Oxfam Australia, which has to date been constructive, open and honest. As we start the process of preparing our 2018 Sustainable Development and Annual Reports, we welcome feedback and suggestions from Oxfam Australia on strengthening our reporting on such matters.

We also welcome regular engagement with Oxfam to ensure we are well positioned to support any future projects.



Yours sincerely,

Melanie Stutsel

General Manager, Safety, Environment and Social Performance

Attachment A: Updated Tax Tables

Note that MMG has reviewed and updated these tables based on publicly available information captured in our Sustainable Development, Annual and Financial reports. In the interests of transparency, we have included footnotes indicating where information was sourced throughout.

Also note that in places, MMG could not ascertain the source of Oxfam's pre-populated data. Where we could not verify this data, we have updated and / or removed altogether to align with our data reporting.

Kinsevere Copper Mine

Year	Total Mine Production (production sold—copper cathode)	MMG's Share of Production %	Total Revenue \$m ¹	MMG's Share of Revenue %	Earnings before tax \$m ²	Total Corporate Taxes \$m ^{3,4}	Total Project Royalties \$m ⁵	Total other payments to government \$m ⁶	TOTAL PAYMENTS TO GOV'T \$m ⁷
2017	80,023t	100	500.9	100	34.5	44.1	19.6	24.4	44.1
2016	80,491t	100	400.4	100	(68.1)	38.8	14.1	24.6	38.8
2015	80,236t	100	418.1	100	(322.2)	N/A	18.5	N/A	N/A
2014	69,522t	100	465.7	100	49.0	N/A	19.8	N/A	N/A
2013	62,074t	100	455.3	100	71.9	N/A	19	N/A	N/A
2012	35,698t	100	279.9	100	60.4	N/A	12	N/A	N/A

Las Bambas Copper Mine

Year	Total Mine Production (production sold—copper concentrate)	MMG's Share of Production %	Total Revenue \$m	MMG's Share of Revenue %	Earnings before tax \$m	Total Corporate Taxes \$m	Total Project Royalties \$m	Total other payments to government \$m	TOTAL PAYMENTS TO GOV'T \$m
2017	442,471t	62.5	2,936.9	62.5	1,151.4	193.3	88.3	99.8	193.3
2016	296,982t	62.5	1,224.2	62.5	405.2	128	34.3	92.8	128

¹ Figures for total revenue taken / verified from MMG's Annual Reports.

² Earnings before tax (EBIT) taken from MMG's Annual Reports.

³ Taken from MMG's Sustainable Development Report.

⁴ Taken from MMG's Sustainable Development Report.

⁵ Data for 2016 – 2017 taken from MMG's Sustainable Development Report, data prior to this taken from MMG's Annual Reports.

⁶ This calculation, for all sites includes the following: incomes taxes, employment-related taxes, and withholding tax. See MMG's Sustainable Development Reports for 2016 and 2016.

⁷ For the years 2016 – 2017, this data has been taken from MMG's Sustainable Development Report.

Sepon Copper Mine

Year	Total Mine Production (production sold—copper cathode)	MMG's Share of Production %	Total Revenue \$m	MMG's Share of Revenue %	Earnings before tax \$m	Total Corporate Taxes \$m	Total Project Royalties \$m	Total other payments to government \$m	TOTAL PAYMENTS TO GOV'T \$m
2017	62,931t	90	391.9	90	4.8	20.1	17.5	2.8	20.1
2016	78,714	90	390.8	90	(36.7)	42.4	17.2	25.2	42.4
2015	88,752	90	496.9	90	134.4	N/A	22.1	N/A	N/A
2014	88,377	90	620.2	90	267.6	N/A	27.6	N/A	N/A
2013	92,687	90	746.2	90	318.7	N/A	33.1	N/A	N/A
2012	85,150	90	806.2	90	410.9	N/A	35.9	N/A	N/A
2011	79,508	90	816.9	90	471.3	N/A	N/A	N/A	N/A
2010	64,241	90	468.4	90	N/A	N/A	N/A	N/A	N/A
2009	67,600	90	330.8	90	N/A	N/A	N/A	N/A	N/A

Tax paid in other countries⁸

Year	Income tax paid at consolidated level \$m	Income tax paid in Hong Kong \$m	Income tax paid in Australia \$m	Earnings before tax in Australia \$m	Income tax paid for Golden Grove Mine (Australia) \$m	Income tax paid for Rosebery Mine (Australia) \$m
2017	87	0	0	75.9	0	0
2016	65	0	0	(12.6)	0	0
2015	89	0	0	(77.4)	0	0
2014	94	0	0	155.7	0	0
2013	111	0	0	72.4	0	0
2012	124	0	0	166.9	0	0
2011	210	0	12.7	256.3	0	0

⁸ All income tax data taken from MMG annual tax returns as submitted to the Australian Government.

18 June 2019

Ms Helen Szoke
Chief Executive
Oxfam Australia
132 Leicester Street
Carlton VIC 3053

Dear Helen,

Thank you for your correspondence of 29 May in relation to the Oxfam Australia embargoed draft research report on Australia mining companies' tax transparency.

MMG appreciates the opportunity to review the report prior to its publication. While we have worked collaboratively with Oxfam on the provision of information over 2018, we were surprised by both the tone and quality of information contained in the draft document and have done our best to respond to this given the short time frame available for our review.

MMG has traditionally valued the high quality of reports produced by Oxfam, however we were disappointed to see that despite Internationally accepted accounting standards and methods being the basis of global tax and transparency dialogues to date, including through the EITI, that this report is not aligned to those globally accepted norms and therefore risks misleading readers of the report.

With regards to the specifics of the report, and your statements on MMG, we would provide the following feedback and look forward to your response on these matters.

Misrepresentation of data that has been publicly disclosed in audited accounts

Your assertion that MMGs payment of taxes is not a 'fair share' is not consistent with our audited accounts, the details of which have been published in our annual reports, with further information provided on request to Oxfam Australia as per our correspondence with Ms Daisy Gardner of 22 October 2018.

On page 4 of the draft report you state: "MMG Limited pays almost no tax in the DRC and has an effective tax rate of zero just about everywhere it operates around the world". The footnote (No.18) refers to Appendix II for "full details" however the Appendix does not show how this statement was established.

A company's effective tax rate is calculated as income tax expense as a percentage of its profit before tax. The company's audited 2018 Annual Report (Pg17) shows the company's effective tax rate as 55% and 53% for the 2018 and 2017 financial years respectively. We would note that this substantially exceeds the effective rate of taxation paid by the mining industry globally, as reported by the ICMM (44% in 2016).

MMG's reporting of taxes paid in the countries of operation includes corporate income taxes, royalties and other indirect taxes imposed by Governments. These are significant financial contributions to Governments. For example, on Page 17 of the company's 2018 annual report, the company's income tax expense is disclosed as \$169.6M and \$394.5M for the 2018 and 2017 years respectively. Similar disclosures can also be found in the company's annual accounts for prior years.

All payments disclosed by MMG have been produced in accordance with International Accounting Standards, audited in line with International Accounting procedures and the consistent with the requirements of our listing rules under both the Hong Kong Stock Exchange, and our secondary listing under the Australian Stock Exchange. Accordingly, we find a number of statements related to these disclosures to be inferring that MMG may be seeking to mislead or engage in deceptive conduct and would request these are amended prior to publication. Examples of these include:

- page 27 of the report: *"This means that if the company's claim that they have paid between US\$65 million and US\$210 million annually in income taxes to governments globally from 2011 to 2017 is correct ..."*. We note that this is not a claim made by MMG but rather relates to numbers determined through independent audit of our accounts and published in an audited annual report.
- Page 29 of the report: Figure 8 compares the revenue to corporate tax paid and is supported by the statement *"by assuming that the Kinsevere mine actually makes profits on par with the industry average of 12% ... we have estimated that MMG could have paid at least US\$39 million extra in taxes between 2012 and 2015.*

This statement does not in any way align with international accounting practices and norms as it is universally understood that revenue does not equate to profits. Furthermore, accounting profit does not equate to taxable profit, as there are certain expenses which reduce the accounting profit to calculate the taxable profit in which income tax is calculated. It is also simplistic to apply an industry average profit margin to revenue, as there are different factors impacting the financial performance of a mine.

We note that the information which has been misreported by Oxfam Australia is already publicly disclosed on Page 26 of MMG's 2018 annual accounts, Kinsevere had earnings before interest and tax ("EBIT") of \$49.8M and \$34.5M for the 2018 and 2017 years respectively. It should be noted that the taxable profits for Kinsevere in those years were less than EBIT as the company also incurred interest to fund the operation of the mine. The interest is tax deductible pursuant to the DRC Mining Code.

- page 30 of the report: *"The company has denied that they have a relationship with the financial planning firm named Appleby"*. As confirmed in our correspondence of 22 October 2018, MMG uses this firm to provide legal and company secretarial services only.
- Page 55 of the report: *"The royalty paid for Kinsevere in MMG Limited's annual reports is more than double the royalty reported in EITI. While it is unclear if it's the government misreporting royalties received or company misreporting royalties paid ..."*

MMG rejects the assertion that it has misreported the amount of royalties paid. The company's annual reports and accounts are audited by Deloitte and in earlier financial years by PricewaterhouseCoopers, both being international reputable accounting and audit firms. For example in the company's 2018 annual report, Page 26 discloses the amount of royalties paid by Kinsevere. Similar details are also disclosed for each mine operated by MMG in the report. This disclosure has been made in the annual reports for each of the years the subject of Oxfam's report and analysis.

- Page 58 of the report: *"Trafigura thereby becomes a related party. If copper concentrate mined from Kinsevere was being sold at a discounted price to Trafigura, then the company is able to claim less profit is made in DRC and therefore less tax is paid to the DRC Government"*. Trafigura is not a related party. MMG does not have an ownership interest in Trafigura. The terms and conditions of trading with Trafigura are at arm's length. It should also be acknowledged by Oxfam that the Hong Kong listing rules related to the disclosure of related party transactions are recognised by some global advocacy groups as providing a higher level of disclosure than is required under the Australian equivalent.

We request that these significant misrepresentations are corrected prior to publication.

Failure to acknowledge the limitations on taxes paid directly correlating to development outcomes due to the issues associated with other non-mining actors

The report asserts that additional resources to the DRC Government would necessarily correlate with additional expenditure on key drivers of sustainable development in the DRC including health and education, as well as food security and poverty alleviation. The only recognition provided by Oxfam that this may not be the case is a footnote on page 2 of the report which states that: *"In addition to ensuring governments receive the correct amount of taxes, there is an important role for governments to make the right decisions on spending on these public sources in order to achieve positive social outcomes."*

This footnote significantly understates the challenge in any jurisdiction, and particularly in a developing country context, of ensuring appropriate levels of Government investment in the provision of essential services like health and education; of ensuring equity of access for all people in the country irrespective of income status or physical location; and to deliver these in a context where there is often the absence of critical infrastructure (like reliable electricity supplies, water and sanitation) essential to their effective functioning.

Further, we note that in a previous Oxfam Australia Report: *The Hidden Billions*, Jamaldeen, M., (2016) that Oxfam recognised that:

"...we find that, on average, 33% of government spending goes towards essential services such as education, health, water and sanitation, social protection and gender equality programs. A large chunk of the rest goes towards servicing debt, which is a major issue for many developing economies."

In addition, the report fails to appropriately recognise the challenges in ensuring that all mining related revenues are invested in state services (e.g. health) given the persistent, widespread and endemic forms of corruption¹ existing in the DRC which de facto negatively impact sustainable development.

Failure to acknowledge the significant value of MMG direct investment in the social and economic development of the DRC.

While Oxfam has not engaged MMG in a dialogue on any other payments made within the DRC, we note that in 2018 MMG directly invested US\$931,163 in social development initiatives to increase the development outcomes to our host communities. This amount of investment has been stable since our acquisition of the mine in

Our investments in the DRC are aligned to United Nations Sustainable Development Goals 1-6, and focus on the following areas:

- *Poverty alleviation* – business programs to support local enterprises, particularly focussed on vulnerable groups including female headed households.
- *Zero Hunger* – operation of a large-scale maize farm as a demonstration site for mechanised food production, a small-scale Farmers Assistance Program benefiting over 420 households, and support for protein in diets through the construction of fish farms in communities.
- *Good Health and Well-being* – we run a community-based hospital which includes surgical and maternal health services to the local community. We also provide support to the regional nursing service to enable their mobile health posts, and run major health campaigns on diseases such as Malaria and HIV/AIDS, including supporting testing and treatment and the provision of relevant medications and prophylaxis.
- *Quality Education* – MMG Kinsevere has constructed 8 schools in our local communities and supports their operations, including the provision of teaching materials and support for teachers' salaries. In addition, we provide a comprehensive range of scholarships, apprenticeships and traineeships, as well as adult literacy and financial education.

¹ Transparency International (2014). Overview of the corruption and anti-corruption in the Democratic Republic of Congo (DRC). Accessed: https://www.transparency.org/files/content/corruption/Country_Profile_DRC_2014.pdf

- *Gender Equality* – Kinsevere in conjunction with a range of civil society organisations runs community engagement sessions on the issues associated with gender biased practices in the DRC. In response to this our communities have reduced the level of early child marriage, increased girls participation in schools (such that they now exceed 50% of the student cohort) and enable women’s economic independence.
- *Water and Sanitation* – MMG Kinsevere has constructed and operates a comprehensive set of water bores in the communities within our area of influence. We undertake constant testing and cleaning of the bores, as well as community education, to minimise the risk of cholera or coliform infections.

In addition to our direct investment, MMG provides a number streams of other direct support to communities in the Katanga Province, examples of which include:

- *Employment* – the MMG workforce at Kinsevere is currently 3,125 people of whom 99.2% are Congolese Nationals. These stable, skilled and highly paid roles contribute substantial incomes to our employees and their families. In addition to their salaries employees and their families also receive high quality health care and education support.
- *Local Procurement* – MMG Kinsevere procures local goods and services within the Haute Katanga Province and other areas of the DRC
- *Management of health epidemics* – e.g MMG recently managed a cholera outbreak in the neighbouring Kilongo community which was subsequently recognised by Medicens Sans Frontieres and leading to the protection of numerous lives in the community; and
- *Management of natural disasters* – e.g MMG has on numerous occasions provided emergency roofing materials to ensure water proofing of houses during significant rainfall events and has supported communities that have lost maize crops due to bushfires.

Despite the implementation of a social basket fund under the new DRC Mining Code, MMG has chosen to maintain its direct investment activities to ensure that nearby communities continue to benefit from our support of development projects aligned to UN SDG’s 1-6.

Failure to acknowledge MMGs leadership on the Extractive Industries Transparency Initiative and commitment to resource transparency

The report leaves readers with an impression that MMG is not acting as a good corporate citizen when MMG is actively participating in improving transparency of the mining sector in the DRC and globally.

In line with the ICMM member commitments on transparency of mining revenues, MMG recognises the value of disclosure of taxes, royalties and other payments made to Governments, and the value of such disclosures in empowering citizens and civil society organisations to hold Governments accountable for the effective expenditure or investment of those funds.

Further, we recognise that increased transparency is most beneficial when pursued as part of broader governance improvement programs to deliver long-term economic growth and poverty alleviation. A related aspect is the implementation of policies and procedures to ensure effective regional planning and investment in critical infrastructure and administrative processes to ensure that revenues are managed effectively.

MMG is committed to several global transparency initiatives, some examples of which follow:

- We support the Extractive Industry Transparency Initiative in its efforts to improve transparency in countries rich in oil, gas and mineral resources. MMG contributes financially to EITI through its membership in International Council on Mining & Metals and is an active participant in the EITI candidacy of the DRC and Peru.
- MMG was a strong advocate of the Australian pilot of the EITI which was catalysed by the Minerals Council of Australia in collaboration with Oxfam and Transparency International and participated as a

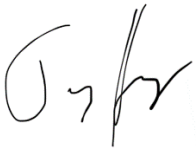
pilot reporting company in this initiative. Since this time, we have continued to reference the importance of the Australian Government adoption of the EITI in full in any advocacy activities.

- We are an active member of International Council on Mining and Metals, an international organisation dedicated to a safe, fair and sustainable mining and metals industry. Through this membership MMG participates in all ICMM initiatives, tax transparency being one of them.
- MMG's Code of Conduct and Standards create a strong governance framework for anti-bribery and corruption. We have a specific Anti-Corruption Standard, as well as anti-bribery and corruption training across the business. We also have appropriate disclosure and grievance management frameworks and whistle-blower protections to strengthen this framework.
- MMG has been engaged in the promulgation of the new Mining Code in the DRC and has actively participated in the industry and government dialogue.

Thank you again for the opportunity to provide feedback on the report. While we have not had an opportunity to respond to every point in the report which we consider warrants review, given the available time we have focused on material errors and omissions which warrant your reconsideration.

We look forward to continuing our productive relationship in the future.

Kind regards

A handwritten signature in black ink, appearing to read 'Troy Hey', with a stylized flourish at the end.

Troy Hey
Executive General Manager – Stakeholder Relations

Lisa Lee

From: Troy Hey <Troy.Hey@MMG.COM>
Sent: Friday, 21 June 2019 6:08 PM
To: Lisa Lee
Cc: Melanie Stutsel; Joy Kyriacou
Subject: RE: MMG Limited Response

Dear Lisa

Thank you for your email confirming your receipt of our input and your willingness to integrate this response into your report.

We appreciate the opportunity to further clarify these matters, please see below.

1. The breakdown of the taxes paid in the jurisdictions we operate in are shown in our annual public sustainability reports, copies of which can be found at: <http://www.mmg.com/en/Sustainability-and-Community/Sustainability-Reports.aspx> . This detail is also available for 2018 and earlier years in our Annual Reports (available at mmg.com) . I have reproduced the 2018 data below. It shows the taxes paid by type and specifically in relation to income tax, tax was paid in Peru and DRC. Australia is still in a carry forward tax loss position largely due to the closure of Century.

Peru USD'000			DRC USD'000			Australia USD'000		
	2018	2017		2018	2017		2018	2017
Total tax contribution	207,302	193,386	Total tax contribution	56,202	44,094	Total tax contribution	7,545	4,627
Royalties	75,794	93,601	Royalties	25,548	19,672	Royalties	2,548	1,967
Income tax	38,058	7,545	Income tax	9,775	4,627	Income tax	9,775	4,627
Employment related taxes*	42,417	38,022	Employment related taxes*	16,615	15,582	Employment related taxes*	16,615	15,582
Withholding tax	51,033	54,218	Withholding tax	4,264	4,213	Withholding tax	4,264	4,213

Note: Royalties, income tax, withholding tax and employment related taxes are based on amounts reported in the 2018 Annual Report (which is a draft). For more information see the 2018 Annual Report available at mmg.com.

2. There is currently no form in which MMG separately discloses its taxable profits, which is consistent with International standards relating to accounting requirements and the disclosure regimes established through listing and incorporation rules. Given this, MMG has not sought to publish this number and have it audited, which is an internal requirement for any material financial disclosure for the company. While I can't provide the precise number, given the income taxes reported as paid in the DRC, and the corporate tax rate in the DRC is defined in law, taxable profits can be inferred.

We look forward to receiving an updated version of the report.

In terms of the right of reply we are equally comfortable with either the joint disclosure of our October correspondence, my recent letter to you and this email, should you wish to provide the information in the form in which it was originally received by you; or alternative we would be equally happy to provide a combined statement incorporating this suite of feedback, potentially with some adjustment in view of the revised report.

I look forward to your response

Kind regards

Troy Hey

Troy Hey

Executive General Manager – Stakeholder Relations

MMG Limited

HKEx: 1208 ASX: MMG

Level 23/28 Freshwater Place
Southbank Victoria Australia 3006
T +61 3 9288 0442 **M** +61 409 709 126

troy.hey@mmg.com **www.mmg.com**

From: Lisa Lee <lisal@oxfam.org.au>
Sent: Friday, 21 June 2019 3:49 AM
To: Troy Hey <Troy.Hey@MMG.COM>
Cc: Melanie Stutsel <Melanie.Stutsel@MMG.COM>; Joy Kyriacou <joykyriacou@oxfam.org.au>
Subject: RE: MMG Limited Response

Dear Troy

Thank you for providing MMG's response to our upcoming report, we appreciate your input and we are happy to review and integrate MMG's response. We would also like to continue our productive relationship going forward.

We note the response identifies a number of company's positive leadership roles including with the EITI, and will be happy to reflect MMG's stated commitments in the report.

There are a number of areas where you requested we provide clarification and we will also endeavour to do this.

We have a couple of queries on specific points made in the right of reply, and would like to see if MMG could clarify these points:

- Regarding MMG's effective tax rate of over 50% at a group level for 2017 and 2018 on p.1: are you able to tell us which countries income taxes are being paid to for the years presented in table 2 of the report (2012-2017), that sum up to the consolidated tax paid? We understood that hardly any taxes were paid to any of the countries where MMG have mining operations, based on the letter from MMG last year. It would be useful for our understanding if MMG could show whether income tax is being paid in places other than the countries where mining operations exist, and where?
- Regarding the second point on p.2, you note that it is simplistic for us to apply an industry average profit margin. Indeed, this is a limited way for civil society to be left to have to guess what taxes should be paid – however as you can see the figure is based on a number of reports by PwC, and we also calculate using a lower profit margin for fairness and present this in the report on p.29 and p.60. Could MMG advise what the taxable profits were for Kinsevere from 2012-2015?

We will send you an updated draft of the report over the next week.

As mentioned, we offer companies the opportunity to have their right of response published on Oxfam's website when this report is published. In light of these questions, will you be happy for us to publish the right of reply provided to us as is, or would you like to send another version with further clarifications/amendments?

Thank you again and look forward to hearing from you.

Kind regards
Lisa

Dr Lisa Lee | Senior Economist | Oxfam Australia
Level 3, 25 Cooper Street Surry Hills 2010
Tel: +61282043944 | www.oxfam.org.au



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From: Troy Hey [<mailto:Troy.Hey@MMG.COM>]
Sent: Tuesday, 18 June 2019 7:33 PM
To: Helen.szoke@oxfam.org.au
Cc: Lisa Lee <lisal@oxfam.org.au>; Melanie Stutsel <Melanie.Stutsel@MMG.COM>
Subject: MMG Limited Response

Dear Helen,

Thank you for the opportunity (and additional time) to respond to your draft report.
Please find attached letter as promised.

Kind regards, Troy

Troy Hey
Executive General Manager – Stakeholder Relations

MMG Limited
HKEx: 1208 ASX: MMG

Level 23/28 Freshwater Place
Southbank Victoria Australia 3006
T +61 3 9288 0442 **M** +61 409 709 126

troy.hey@mmg.com **www.mmg.com**

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8 June 2019

Dr L Lee
Senior Economist
Oxfam Australia
Level 3, 25 Cooper Street
Surry Hills NSW 2010

Re: Australian mining companies tax transparency on its global operations

Dear Lisa,

I refer to your email communication of Friday 31 May regarding the impending release of your paper on the “tax practices of some of Australia’s largest mining companies in developing countries” (the Report). We understand this Report has been prepared in conjunction with Oxfam Australia, Tax Justice Network Australia and the Uniting Church in Australia.

Thank you for providing OZ Minerals with an opportunity to sight this Report and provide a response prior to its release. We understand that the Report has been prepared based on the significant concerns of Oxfam that foreign communities are not benefitting from the taxes mining organisations are expected to contribute from their operations in those communities.

Whilst OZ Minerals is not directly referred to in this Report, we note the reference to Avanco Resources Ltd (ARL) as a “Tier 3” organisation, which is now a wholly owned subsidiary of the OZ Minerals group.

By way of background, OZ Minerals acquired the then ASX listed Avanco Resources Limited (“ARL”) in 2018. The acquisition of ARL resulted in the indirect acquisition of those assets held by ARL in Brazil, including its operating company (AVB Mineracao Ltda – the Antas Project), and a number of exploration projects in early phases of exploration or at pre-feasibility stage (i.e. non operational assets).

At the outset, OZ Minerals acknowledges and respects Oxfam’s concerns in relation to the issues raised. Although OZ Minerals is entitled to certain tax concessions in the ordinary course of its business, it has no appetite for seeking concessions that are motivated by the avoidance of tax. Rather, OZ Minerals supports Australian businesses and foreign subsidiaries of multinational organisations paying the appropriate level of tax on the profits generated in the jurisdictions in which they operate, in accordance with the relevant jurisdiction’s tax legislation and regulations - and as stated in our Annual and Sustainability Report. OZ Minerals does not support the use of artificial structures (e.g. via the use of tax havens) that have no commercial purpose.

OZ Minerals agrees that to address potential public misconceptions that organisations aren’t paying the appropriate levels of tax in the jurisdictions in which they operate, there is a need for strong tax transparency initiatives, as recommended in the Report. Accordingly, OZ Minerals voluntarily registered with the Australian Board of Taxation’s Tax Transparency Code (“TTC”) in 2018.

In accordance with the TTC, OZ Minerals publishes the following additional information in its Annual and Sustainability Report:

- Taxes paid and contributed by the organisation (for example: Income tax, Government royalties, Payroll taxes, etc.)

- Detailed reconciliations of accounting profit to tax expense and accounting profit to income tax paid/payable
- Detailed explanations of the Australian and Global effective tax rate where there are significant variations from the jurisdiction's corporate tax rate
- International related party dealings (if material).

As noted earlier, we understand that Oxfam's general concern is the lack of funding and support provided to the communities in which the Australian mining operations operate, of which tax is a significant component of this funding and support. Notwithstanding OZ Minerals' position on tax transparency and disclosure, aligned with Oxfam's own views, we note that a key element of our strategy includes our '5 Pillars of Value Creation', two of which are Communities and Government stakeholders. We again refer you to the OZ Minerals Annual and Sustainability Report which provides additional information on the following:

- Stakeholder engagement (page 74)
- Economic performance and socioeconomic contributions (page 74)
- Community investment and sponsorship (page 74)
- Local procurement (page 75).

For your reference, the 2018 OZ Minerals Annual and Sustainability Report can be accessed via the following link: https://www.ozminerals.com/uploads/media/190227_ASX_Release_-_OZL_2018_Annual_and_Sustainability_Report.pdf

Yours sincerely,



Andrew Cole
Chief Executive Officer
OZ Minerals Limited

Letters sent to Australian mining companies for this research

- Alumina Ltd
- AngolGold Ashanti
- Austral Gold
- Avenira
- Base Resources
- Bass Oil
- Beadell Resources
- BHP
- Crater Gold Mining
- Frontier Diamonds
- Intra Energy Corporation
- Jupiter Mines
- Kingsrose Mining
- Lucapa Diamond Company
- MacMahon Holdings
- Medusa Mining
- MMG Ltd
- Newcrest Mining Ltd
- Niuminco Group
- OceanaGold Corporation
- Oil Search
- Oilex
- Orocobre
- Oz Minerals
- Paladin energy
- Panterra Gold
- Range Resources
- Red 5
- Santos
- Sino Gas & Energy
- South32 Ltd
- St Barbara Ltd
- Tap Oil Ltd
- Terracom Ltd
- Tiger Resources Ltd
- Troy Resources Ltd
- Universal Coal
- Zimplats Holdings

11 September, 2018

Alumina Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining countries to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding Sangaredi Mine in Guinea and Juruti Mine in Brazil and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We've included the data we have below.

Note:

- Data for Sangaredi Mine was obtained from the website of Compagnie des Bauxites de Guinée (the mine operator) and converted from Guinean francs to USD. It may be inaccurate due to lack of clarity around which exchange rate should be used.
- Revenue data in your annual report combines Sangaredi and Juruti revenue (e.g. 2017 is US\$23.1m). We are interested in the precise division of this revenue by project.
- Payments to Government data for Sangaredi for 2015 seems very large given revenue for this year. Can you clarify the correct data?

Sangaredi Bauxite Mine (USD\$)

CY	Total Mine Production	Alumina's Share of Production	Total Mine Revenue	Alumina's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to govt	TOTAL PAYMENTS TO GOVERNMENT
2017	38.8m tonnes	3.4 mbd	?	?	?	?	\$11.4m	?
2016	15.9m tonnes	3.6m tonnes	?	?	?	?	?	?
2015	16.7m tonnes	3.2 mbd	\$236.49 m	?	\$71m	\$70.2	\$11.6m	\$152.8m

Juruti Bauxite Mine (USD\$)

CY	Total Mine Production	Alumina's Share of Production	Total Mine Revenue	Alumina's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to govt	TOTAL PAYMENTS TO GOVERNMENT
2017	?	4.7 mbd	?	?	?	\$60.93m	\$9.42m	?
2016	5.2m tonnes	5.2m tonnes	?	?	?	?	?	?
2015	?	5.6 mbd	?	?	?	?	?	?

Further questions

- Are data about taxes, royalties and payments to government for these two projects publicly available elsewhere, outside of your Annual Reports?
- Are Annual Reports with data from years prior to 2015 available?
- Is there a reason why taxes, royalties and fees are not reported on a project-by-project basis in Annual Reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com).

Yours sincerely,



Alan Wolfe
Research,
Tax Justice Network Australia

21 September, 2018

AngloGold Ashanti Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining countries to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data regarding 12 AngloGold Ashanti projects and wanted to check that the information is correct before we publish.

Can you verify if the following information for these projects is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We've included the data we have in the tables below.

We note that AngloGold Ashanti's Annual Reports do not break-down payments to government by category. However, these data are available from the Extractive Industries Transparency Initiative (EITI) website for the following mines: Kibali 2013-2015 (DRC), Iduapriem 2008-2015 (Ghana), Siguiri 2008-2015 (Guinea), Morila 2008-2015 (Mali), Sadiola 2008-2015 (Mali), and Geita 2009-2014 (Tanzania). We have therefore used and organised these data into three categories: Corporate Taxes, Royalties and Other Payments to Government. We would be grateful for confirmation of these amounts by these categories, especially as the totals are different to the amounts in your Annual Reports. We recognise the categories used here may vary from those used by AngloGold Ashanti. Please note that our data (and research) excludes taxes on payroll and workforce, as well as import taxes.

1. Kibali Gold Mine, D.R. Congo (USD\$)

Note

- Data for payments to government for 2013-15 are sourced from EITI reports, using the stated exchange rates. It may be inaccurate due to lack of clarity around which exchange rate should be used.

FY	Total Mine Production	AGA's Share of Production	Total Mine Revenue	AGA's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	268,000oz	45%	\$755.0m	\$339.8m	?	?	?	?
2016	264,000oz	45%	\$709.0m	\$319.1m	?	?	?	?
2015	289,000oz	45%	\$747.0m	\$336.2m	\$11.4m	0	\$6.5m	\$17.9m
2014	287,000oz	45%	?	\$293.0m	\$2.2m	\$15.4m	\$1.3m	\$18.9m
2013	40,000oz	45%	?	\$49.0m	\$0.8m	\$5.7m	\$15.2m	\$21.7

2. Iduapriem Gold Mine, Ghana (USD\$)

Note

- Data for payments to government for 2008-15 are sourced from EITI reports, using the stated exchange rates. It may be inaccurate due to lack of clarity around which exchange rate should be used.

FY	Total Mine Production	AGA's Share of Production	Total Mine Revenue	AGA's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	228,000oz	100%	?	100%	?	?	?	?
2016	214,000oz	100%	?	100%	?	?	?	?
2015	193,000oz	100%	?	100%	\$32.3m	?	\$15.0m	\$47.3m
2014	177,000oz	100%	\$234.0m	100%	?	\$22.5m	\$0.8m	\$23.3m
2013	221,000oz	100%	\$301.0m	100%	\$5.3m	\$17.2m	\$1.0	\$23.5m
2012	180,000oz	100%	\$304.0m	100%	\$55.2m	0	\$29.1	\$84.3m
2011	199,000oz	100%	\$308.0m	100%	\$56.8m	\$13.7m	0	\$70.5m
2010	185,000oz	100%	\$218.0m	100%	\$6.0m	\$6.4m	\$0.04m	\$12.4m
2009	190,000oz	100%	\$169.0m	100%	\$4.7m	\$6.5m	\$0.05m	\$11.2m
2008	200,000oz	100%	?	100%	\$4.7m	0	\$0.04m	\$4.7m

3. Siguiri Project, Guinea (USD\$)

Note

- Data for payments to government for 2008-15 are sourced from EITI reports, using the stated exchange rates. It may be inaccurate due to lack of clarity around which exchange rate should be used.

FY	Total Mine Production	AGA's Share of Production	Total Mine Revenue	AGA's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	324,000oz	85%	\$489.0m	\$220.1m	?	?	?	?
2016	259,000oz	85%	\$367.0m	\$312.0m	?	?	?	?
2015	255,000oz	85%	\$350.0m	\$297.5m	\$32.3m	0	\$15.0m	\$47.3m
2014	290,000oz	85%	?	\$373.0m	\$20.3m	0	\$21.0	\$41.3m
2013	268,000oz	85%	?	\$385.0m	\$0.04m	0	\$0.02	\$0.1m
2012	247,000oz	85%	?	\$388.0m	\$55.2	0	\$29.1m	\$84.3
2011	249,000oz	85%	?	\$407.0m	\$42.1m	\$11.4m	\$0.03m	\$53.5m
2010	273,000oz	85%	?	\$313.0m	\$50.7m	0	\$18.2m	\$68.9m
2009	316,000oz	85%	?	\$260.0m	\$38.5m	0	\$19.2m	\$57.2
2008	333,000oz	85%	?	?	\$0.3m	0	\$12.9	\$13.2m

4. Morila Project, Mali (USD\$)

Note

- Data for Morila Mine was obtained from the EITI website and converted from West African CFA francs to USD. It may be inaccurate due to lack of clarity around which exchange rate should be used.

FY	Total Mine Production	AGA's Share of Production	Total Mine Revenue	AGA's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	28,000oz	40%	?	?	?	?	?	?
2016	22,000oz	40%	?	?	?	?	?	?
2015	49,000oz	40%	?	?	\$3.3m	\$1.8m	\$0.9m	\$6.0m
2014	44,000oz	40%	?	\$55.0m	?	?	?	?
2013	57,000oz	40%	?	\$80.0m	\$31.5m	\$6.5	\$0.03m	\$38.1
2012	81,000oz	40%	?	\$135.0m	?	?	?	?
2011	99,000oz	40%	?	\$157.0m	\$41.1m	\$11.4m	\$0.03m	\$53.5m
2010	95,000oz	40%	?	\$117.0m	\$0.04m	0	0	\$0.05m
2009	137,000oz	40%	?	\$135.0m	\$0.07m	0.02m	\$0.01	\$0.1m
2008	170,000oz	40%	?	?	\$0.04m	\$0.01	\$0.01	\$0.1m

5. Sadiola Project, Mali (USD\$)

Note

- Tax payment data for Sadiola Mine was obtained from the EITI website and converted from West African CFA francs to USD. It may be inaccurate due to lack of clarity around which exchange rate should be used.

FY	Total Mine Production	AGA's Share of Production	Total Mine Revenue	AGA's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	63,000oz	41%	?	?	?	?	?	?
2016	70,000oz	41%	?	?	?	?	?	?
2015	69,000oz	41%	?	?	\$3.5m	\$3.4m	\$0.9m	\$9.8m
2014	85,000oz	41%	?	\$107.0m	?	?	?	?
2013	86,000oz	41%	?	\$121.0m	\$13.0m	\$10.0m	\$0.46	\$23.0m
2012	100,000oz	41%	?	\$169.0m	?	?	?	?
2011	121,000oz	41%	?	\$189.0m	\$69.3m	\$13.5m	\$0.05m	\$82.9m
2010	118,000oz	41%	?	\$143.0m	\$0.03m	\$0.01	0	\$0.04m
2009	135,000oz	41%	?	\$134.0m	\$0.1m	\$0.01m	\$0.01	\$0.1m
2008	172,000oz	38%	?	?	\$0.03m	\$0.01	\$0.01	\$0.1m

6. Geita Project, Tanzania (USD\$)

Note

- Data for Geita Mine was obtained from the EITI website and converted from Tanzanian shillings to USD. It may be inaccurate due to lack of clarity around which exchange rate should be used.

FY	Total Mine Production	AGA's Share of Production	Total Mine Revenue	AGA's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	539,000oz	100%	\$664.0m	100%	?	?	?	?
2016	489,000oz	100%	\$591.0m	100%	?	?	?	?
2015	527,000oz	100%	\$615.0m	100%	?	?	?	?
2014	477,000oz	100%	\$605.0m	100%	\$37.1m	\$26.0m	\$4.2m	\$67.1m
2013	459,000oz	100%	\$640.0m	100%	\$68.1m	\$25.6m	\$3.7m	\$97.4m
2012	531,000oz	100%	\$906.0m	100%	\$55.6m	\$30.9m	\$3.9m	\$90.4m
2011	494,000oz	100%	\$753.0m	100%	0	\$15.1m	\$2.2m	\$17.3m
2010	357,000oz	100%	\$501.0m	100%	0	\$11.5m	\$2.4m	\$13.9m
2009	272,000oz	100%	?	100%	0	\$3.8m	\$2.0m	\$5.8m

7. West Wits Project, South Africa (USD\$)

FY	Total Mine Production	AGA's Share of Production	Total Mine Revenue	AGA's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	315,000oz	100%	?	100%	?	?	?	?
2016	400,000oz	100%	?	100%	?	?	?	?
2015	428,000oz	100%	?	100%	?	?	?	?
2014	545,000oz	100%	\$692.0m	100%	?	?	?	?
2013	589,000oz	100%	\$832.0m	100%	?	?	?	?
2012	631,000oz	100%	\$1,050.0m	100%	?	?	?	?
2011	793,000oz	100%	\$1,255.0m	100%	?	?	?	?
2010	813,000oz	100%	\$1,013.0m	100%	?	?	?	?
2009	768,000oz	100%	\$765.0m	100%	?	?	?	?
2008	980,000oz	100%	?	100%	?	?	?	?

8. Vaal River Project, South Africa (USD\$)

FY	Total Mine Production	AGA's Share of Production	Total Mine Revenue	AGA's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	385,000oz	100%	?	100%	?	?	?	?
2016	371,000oz	100%	?	100%	?	?	?	?
2015	371,000oz	100%	?	100%	?	?	?	?
2014	452,000oz	100%	\$574.0m	100%	?	?	?	?
2013	473,000oz	100%	\$664.0m	100%	?	?	?	?
2012	410,000oz	100%	\$682.0m	100%	?	?	?	?
2011	667,000oz	100%	\$1,049.0m	100%	?	?	?	?
2010	792,000oz	100%	\$971.0m	100%	?	?	?	?
2009	865,000oz	100%	\$753.0m	100%	?	?	?	?
2008	1,119,000oz	100%	?	100%	?	?	?	?

9. Surface Operations Project, South Africa (USD\$)

FY	Total Mine Production	AGA's Share of Production	Total Mine Revenue	AGA's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	192,000oz	100%	?	100%	?	?	?	?
2016	186,000oz	100%	?	100%	?	?	?	?
2015	193,000oz	100%	?	100%	?	?	?	?
2014	223,000oz	100%	\$261.0m	100%	?	?	?	?
2013	240,000oz	100%	\$314.0m	100%	?	?	?	?
2012	172,000oz	100%	\$281.0m	100%	?	?	?	?
2011	164,000oz	100%	\$256.0m	100%	?	?	?	?
2010	179,000oz	100%	\$223.0m	100%	?	?	?	?
2009	164,000oz	100%	\$147.0m	100%	?	?	?	?
2008	92,000oz	100%	?	100%	?	?	?	?

10. Cerro Vanguardia Project, Argentina (USD\$)

FY	Total Mine Production	AGA's Share of Production	Total Mine Revenue	AGA's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	283,000oz	92.5%	?	?	?	?	?	?
2016	281,000oz	92.5%	?	?	?	?	?	?
2015	278,000oz	92.5%	?	?	?	?	?	?
2014	246,000oz	92.5%	?	\$297.0m	?	?	?	?
2013	241,000oz	92.5%	?	\$316.0m	?	?	?	?
2012	219,000oz	92.5%	?	\$366.0m	?	?	?	?
2011	196,000oz	92.5%	?	\$275.0m	?	?	?	?
2010	194,000oz	92.5%	?	\$214.0m	?	?	?	?
2009	192,000oz	92.5%	?	\$182.0m	?	?	?	?
2008	154,000oz	92.5%	?	?	?	?	?	?

11. AGA Mineração Project, Brazil (USD\$)

FY	Total Mine Production	AGA's Share of Production	Total Mine Revenue	AGA's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	424,000oz	100%	?	100%	?	?	?	?
2016	407,000oz	100%	?	100%	?	?	?	?
2015	421,000oz	100%	?	100%	?	?	?	?
2014	403,000oz	100%	\$510.0m	100%	?	?	?	?
2013	391,000oz	100%	\$559.0m	100%	?	?	?	?
2012	388,000oz	100%	\$635.0m	100%	?	?	?	?
2011	361,000oz	100%	\$565.0m	100%	?	?	?	?
2010	338,000oz	100%	\$405.0m	100%	?	?	?	?
2009	329,000oz	100%	\$289.0m	100%	?	?	?	?
2008	320,000oz	100%	?	100%	?	?	?	?

12. Serra Grande Project, Brazil (USD\$)

FY	Total Mine Production	AGA's Share of Production	Total Mine Revenue	AGA's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
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2017	133,000oz	100%	?	100%	?	?	?	?
2016	132,000oz	100%	?	100%	?	?	?	?
2015	132,000oz	100%	?	100%	?	?	?	?
2014	136,000oz	100%	\$174.0m	100%	?	?	?	?
2013	138,000oz	100%	\$199.0m	100%	?	?	?	?
2012	98,000oz	50%	\$162.0m	100%	?	?	?	?
2011	67,000oz	50%	\$101.0m	100%	?	?	?	?
2010	77,000oz	50%	\$97.0m	100%	?	?	?	?
2009	77,000oz	50%	\$70.0m	100%	?	?	?	?
2008	87,000oz	50%	?	100%	?	?	?	?

Further questions

- We are aware that historically AngloGold Ashanti has reported data country-by-country for some countries for some years, and therefore combined data is available, for example, for West Wits and Vaal (South Africa) and AGA Mineração and Serra Grande (Brazil). However, this information is not broken down by project. Are comprehensive project-by-project corporation tax, royalty and payments to government data for these mines available?
- Is there a reason why taxes, royalties and fees are not reported on a project-by-project basis in annual reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Friday 12 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com) or by telephone on +61 (0)404 115 038

Yours sincerely,



Alan Wolfe
Research,
Tax Justice Network Australia

11 September, 2018

Austral Gold Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining countries to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data regarding Austral Gold's Guanaco/Amancaya Project in Chile and Casposo Project in Argentina, and wanted to check the information before we publish.

Can you verify if the following information for these projects is correct? We've included the data we have in the tables below. Due to 2017 production and revenue data for both projects being combined, we were not able to separate it by project. However, for previous years we have used and organised the data we have into three categories: Corporate Taxes, Royalties and Other Payments to Government. We recognise the categories used here may vary from those used by Austral Gold. Note our data (and research) excludes taxes on payroll and workforce, as well as import taxes.

1. Guanaco/Amancaya Gold and Silver Project, Chile (USD\$)

	Total Mine Production	AG's Share of Production	Total Mine Revenue	AG's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	100%	?	100%	0	?	?	?
2016	39,776oz (Au) 47,557oz (Ag)	100%	\$54.7m	100%	\$3.3m	0	0	\$3.3m
2015	51,534oz (Au) 40,108oz (Ag)	100%	\$62.2m	100%	\$2.2m	0	0	\$2.2m
2014	?	100%	\$66.4m	100%	\$2.6m	0	\$7.5m	\$10.1m
2013	?	100%	\$62.8m	100%	\$2.9m	0	0	\$2.9m
2012	28,904oz (Au) 74,829oz (Ag)	100%	\$30.1m	100%	\$4.5m	0	0	\$4.5m
2011	12,373oz (Au) 37,511oz (Ag)	100%	\$8.1m	100%	0	0	0	0
2010	8,126oz (Au) 18,386oz (Ag)	100%	0	0	0	0	0	0

2. Casposo Gold and Silver Project, Argentina (USD\$)

	Total Mine Production	AG's Share of Production	Total Mine Revenue	AG's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	70%	?	?	?	?	?	?

Further questions

- Are data about taxes, royalties and payments to government for these two projects publicly available elsewhere, outside of your Annual Reports?
- Is there a reason why taxes, royalties and fees are not reported on a project-by-project basis in Annual Reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com) or by telephone on +61 (0) 404 115 038.

Yours sincerely,



Alan Wolfe
Research,
Tax Justice Network Australia

11 September, 2018

Avenira Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining countries to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data regarding Avenira Limited's 80% stake in Baobab Phosphate project in Senegal and wanted to check the information before we publish.

Can you verify if the following information for these projects is correct? We've included the data we have in the tables below. We have organised the data we have into three categories: Corporate Taxes, Royalties and Other Payments to Government. We recognise the categories used here may vary from those used by Avenira Limited.

Note: Our data (and research) excludes payroll or other taxes that are paid on behalf of employees, as well as import taxes.

Note: Data in red indicate a benefit, not an expense

1. Baobab Phosphate Project, Senegal (AUD\$)

	Total Mine Production	Avenira's Share of Production	Total Mine Revenue	Avenira's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	51,400t	41,120t	\$393,303	\$314,642	-\$308,265	0	0	0

Further questions

- Are data about taxes, royalties and payments to government for Baobab Phosphate publicly available elsewhere, outside of your Annual Reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com) or by telephone on +61 (0)404 115 038

Yours sincerely,



Alan Wolfe
Research,
Tax Justice Network Australia

12 September 2018

Base Resources Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining countries to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data regarding Base Resources' Kwale Minerals Sands Project in Kenya and wanted to check the information before we publish.

Can you verify if the following information for these projects is correct? We've included the data we have in the tables below. We have organised the data we have into three categories: Corporate Taxes, Royalties and Other Payments to Government. We recognise the categories used here may vary from those used by Base Resources. Note our data (and research) excludes taxes on payroll and workforce, as well as import taxes.

1. Kwale Mineral Sands Project, Kenya (AUD\$)

	Total Mine Production	Base Resources' Share of Production	Total Mine Revenue	Base Resources' Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	Rutile 90,625t; Ilmenite 467,359t; Zircon 34,228t; Zircon low grade: 10,210t	100%	\$215.5m	100%	\$7.8m	\$14.8m	0	\$22.6m
2016	Rutile 85,654t; Ilmenite 455,870t; Zircon 31,389t;	100%	\$169.0m	100%	\$0.04m	\$11.9m	0	\$11.9m
2015	Rutile 71,537; Ilmenite 427,655t; Zircon 22,416t	100%	\$145.5m	100%	\$0.08m	\$10.5m	0	\$10.6m
2014	Rutile 24,216t; Ilmenite 165,352t; Zircon 4,486t	100%	\$29.1m	100%	\$0.09m	\$1.9m	0	\$2.0m

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com) or by telephone on +61 (0)404 115 038.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a stylized flourish at the end.

Alan Wolfe
Research
Tax Justice Network Australia

12 September 2018

Bass Oil Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining countries to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data regarding Bass Oil's 55% stake in Tangai-Sukananti Project in Indonesia and wanted to check the information before we publish.

Can you verify if the following information for these projects is correct? We've included the data we have in the tables below. We have organised the data we have into three categories: Corporate Taxes, Royalties and Other Payments to Government. We recognise the categories used here may vary from those used by Bass Oil. Note our data (and research) excludes taxes on payroll and workforce, as well as import taxes.

Tangai-Sukananti Oil Project, Indonesia (AUD\$)

	Total Mine Production	Bass Oil's Share of Production	Total Project Revenue	Bass Oil's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	211,000 barrels	116,000 barrels	\$3.5m	\$1.9m	\$0.07m	0	0	\$0.07m
2016	?	55%	?	100%	\$0.04m	0	0	\$0.04

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,



Alan Wolfe
Research
Tax Justice Network Australia

17 September, 2018

Beadell Resources Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining countries to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data regarding Beadell Resource's Tucano Gold Mine in Brazil and wanted to check the information before we publish.

Can you verify if the following information for these projects is correct? We've included the data we have in the tables below. We have organised the data we have into three categories: Corporate Taxes, Royalties and Other Payments to Government. We recognise the categories used here may vary from those used by Beadell Resources. Note our data (and research) excludes taxes on payroll and workforce, as well as import taxes.

Tucano Gold Mine, Brazil (AUD\$)

FY	Total Mine Production	Beadell's Share of Production	Total Project Revenue	Beadell's Share of Revenue	Total Corporate Taxes	Total Project Royalties	TOTAL PAYMENTS TO GOVERNMENT
2017	129,764oz (recovered)	100%	\$211.1m	100%	-\$14.7m	\$4.6m	-\$10.1m
2016	145,870oz (recovered)	100%	\$239.8m	100%	\$8.1m	\$4.7m	\$12.8m
2015	122,292oz (recovered)	100%	\$190.6m	100%	-\$6.9m	\$4m	-\$2.9m
2014	153,691oz (recovered)	100%	\$260.2m	100%	\$8.4m	\$4.5m	\$12.9m
2013	182,547 oz (recovered)	100%	\$253m	100%	-\$20.5m	\$4.7m	-\$15.8m
2012	0	100%	0	100%	-\$0.27m	0	-\$0.27m

Further Questions:

- According to Beadell's annual reports, royalties are based on quantity produced or as a percentage of revenue that do not have the characteristics of income tax. While your production has varied, your royalty payments are fairly consistent and do not follow the same patterns as production or total revenue. Can you provide more specific details regarding how your royalty payments are determined?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a stylized flourish at the end.

Alan Wolfe
Research
Tax Justice Network Australia

22 October, 2018

BHP Billiton Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining countries to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data regarding 11 BHP Billiton projects and wanted to check that the information is correct before we publish. Please note, 4 of these projects now belong to South32 but we are seeking pre-2015 data which South32 were not able to provide.

Can you verify if the following information for these projects is correct? As we are focusing on operations from 2008-2017, we would appreciate any data you can provide for these years or advice as to where this information is available.

We note that prior to the Economic Contribution reports, BHP Billiton's Annual Reports did not break-down payments by project or by government for all years. However, some of these data are available from the Extractive Industries Transparency Initiative (EITI) website for the Cerrejón Project in Colombia (2013-2016), and the Antamina Mine in Peru (2013-2015). We have therefore used and organised these data into three categories: Corporate Taxes, Royalties and Other Payments to Government. We recognise these categories may vary from those used by BHP Billiton. We would be grateful for confirmation of these amounts by these categories. Note our data (and research) excludes taxes on payroll and workforce, as well as import taxes.

1. Algeria Joint Interest Oil Project (USD\$) – Ownership: 29.5% (2017), 38% (pre-2017)

BHP	Total Mine Production	BHPB's Share of Production	Total Project Revenue	BHPB'S Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	?	\$718.6m	\$212.0m	-\$45.3m	0	\$92.5m	\$47.2m
2016	?	3.6MMboe	\$378.7m	\$144.0m	0	0	\$45.0m	\$45.0m
2015	?	3.9MMboe	\$812.7m	\$309.0m	0	0	\$139.9m	\$139.9m
2014	?	?	\$1,222.9m	\$465.0m	?	?	?	?
2013	?	?	\$1,401.8m	\$533.0m	?	?	?	?

2. Angostura Oil & Gas Project, Trinidad & Tobago (USD\$) – 45% ownership

FY	Total Mine Production	BHPB's Share of Production	Total Project Revenue	BHPB's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	6 MMboe	\$244.4m	\$110.0m	\$0.3m	0	\$28.0m	\$28.7m
2016	?	5.9 MMboe	\$273.3m	\$123.0m	0	0	\$51.1m	\$51.2m
2015	?	6.7 MMboe	\$488.9m	\$220.0m	0	0	\$42.6m	\$42.6m
2014	?	7.5 MMboe	\$606.7m	\$273.0m	?	?	?	\$76.0m
2013	?	7.4 MMboe	?	?	?	?	?	\$64.0m
2012	?	?	?	?	?	?	?	\$119.0m
2011	?	?	?	?	?	?	?	\$33.0m

Notes

- Sustainability Reports from 2011-14 state the overall taxes borne by BHP Billiton in Trinidad, but this figure is not broken down into categories or projects. We have assumed that there is only one producing project in Trinidad & Tobago and all payments relate to Angostura.
- We could not find production figures for Angostura in Annual Reports from 2011-12.

3. Cerrejón Coal Project, Colombia (USD\$) – 33.33% ownership

FY	Total Mine Production	BHPB's Share of Production	Total Mine Revenue	BHPB's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	33.2m tonnes	11.0m tonnes	\$2,247.0m	\$749.0m	?	?	?	\$483.9m
2016	30.6m tonnes	10.1m tonnes	\$1,575.0m	\$525.0m	?	?	?	\$130.5m
2015	34.2m tonnes	11.3m tonnes	\$2,156.0m	\$719.0m	\$30.5m	\$52.9m	\$25.9m	\$109.3m
2014	37.4m tonnes	12.3m tonnes	\$2,466.7m	\$814.0m	\$27.6m	\$71.2m	\$23.5m	\$122.3m
2013	30.4m tonnes	10.0m tonnes	?	?	\$30.1m	\$72.3m	\$28.4m	\$130.8m
2012	?	11.7m tonnes	?	?	?	?	?	?
2011	?	9.9m tonnes	?	?	?	?	?	?
2010	?	10.2m tonnes	?	?	?	?	?	?
2009	?	10.4m tonnes	?	?	?	?	?	?

Notes

- Tax payment data 2013-2015 were obtained from the EITI website and converted from Colombian pesos to USD. There may be inaccuracies due to fluctuations in exchange rates at the specific times payments were made.
- Total payment for 2016 was calculated at 33.3% of the Cerrejón project payment stated in BHP's 'Economic Contribution Report'.
- In 2017, there was no Cerrejón project payment stated in BHP's 'Economic Contribution Report', instead it was aggregated under 'Colombia'. Can you confirm that the entire \$483.9m was related to the Cerrejón project?

4. Antamina Copper Mine (Polymetallic), Peru (USD\$) – 33.75% ownership

FY	Total Mine Production	BHPB's Share of Production	Total Mine Revenue	BHPB's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	133,800t cu concentrate; 5,500t lead; 87,500t zinc; 5.8m oz silver; 1,144t molybdenum	\$3,317.0m	\$1,119.0m	?	?	?	\$456.5m
2016	?	146,400t cu concentrate; 3,700 t lead; 55,400t zinc; 6.7m oz silver; 1,113t molybdenum	\$2,639.0m	\$891.0m	?	?	?	\$258.4m
2015	?	107,700t cu concentrate; 2,100t lead; 66,400t zinc; 3.8m oz silver; 472t molybdenum	\$2,530.0m	\$854.0m	?	?	?	?
2014	?	143,500t cu concentrate; 1,500t lead; 52,000t zinc; 4.4m oz silver; 1,201t molybdenum	\$3,736.3m	\$1,261.0m	?	?	?	\$18.0m
2013	?	139,700t cu concentrate; 1,000t lead; 71,900t zinc; 3.95m oz silver; 1,561t molybdenum	\$3,837.0m	\$1,303m	?	?	?	\$310.0m
2012	?	127,000t cu concentrate; 800t lead; 57,500t zinc; 4.3m oz silver; 2,346t molybdenum	?	\$1,229m	?	?	?	\$187.0m
2011	?	97,800t cu concentrate; 1,200t lead; 91,500t zinc; 3.6m oz silver; 1,445t molybdenum	?	?	?	?	?	\$196.0

2010	?	98,600t cu concentrate; 3,000t lead; 135,600t zinc; 4.7m oz silver; 813t molybdenum	?	?	\$144.3	0	\$0.1m	\$145.3
2009	?	109,000t cu concentrate; 3,300t lead; 108,400t zinc; 4.1m oz silver; 1,363t molybdenum	?	?	\$150.4m	0	\$0.1m	\$150.5m
2008	?	111,700t cu concentrate; 1,600t lead; 83,500t zinc; 3.5m oz silver; 2,542t molybdenum	?	?	\$164.7m	0	\$0.1m	\$164.8m

Notes

- Total tax payment for 2012 uses the figure from the 2012 Sustainability Report, using the assumption that the only project in Peru generating payments was Antamina.
- Tax Payment Data for 2008-2011 uses EITI data because there is no data in Annual or Sustainability Reports. There may be inaccuracies due to differing exchange rates.

Further Questions

- Tax payment data for 2017 uses the figure from the 2017 'Economic Contribution Report' and is based on the assumption that Antamina is the only 'Equity Accounted Investment' in Peru. This assumption was made because in 2016, this seemed to be the case. Can you confirm this figure is correct?

5. Pampa Norte Copper Mine, Chile (USD\$) – 100% ownership

FY	Total Mine Production	BHPB's Share of Production	Total Mine Revenue	BHPB's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	254,300t cu cathode	100%	\$1,401.0m	100%	\$32.5m	0	\$2.2m	\$34.7m
2016	251,400t cu cathode	100%	\$1,098m	100%	\$60.2m	0	\$1.5m	\$61.7m
2015	249,600t cu cathode	100%	\$1,437.0m	100%	\$97.0m	0	\$1.7m	\$98.7m
2014	233,100t cu cathode	100%	\$1,796.0m	100%	?	?	?	?
2013	232,600t cu cathode	100%	\$1,818.0m	100%	?	?	?	?
2012	263,700t cu cathode	100%	\$2,152.0m	100%	?	?	?	?
2011	272,200t cu cathode	100%	?	100%	?	?	?	?
2010	244.8t cu cathode	100%	?	100%	?	?	?	?
2009	274.8t cu cathode	100%	?	100%	?	?	?	?
2008	?	100%	?	100%	?	?	?	?

Notes

- Previous to 2015, all Tax payment data was aggregated by country and it was unclear what payments related to Escondida, and what payments related to Pampa Norte.
- According to the 2017 Economic Contributions Report, there was an additional \$7m paid to the Chilean government between Fees and Other Payments. Can you please tell us the allocation of those payments between the Pampa Norte Copper Mine and Escondida Copper Mine?

6. Escondida Copper Mine, Chile (USD\$) – 57.5% ownership

FY	Total Mine Production	BHPB's Share of Production	Total Mine Revenue	BHPB's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	539,600t cu concentrate; 232,000t cu cathode; 111,000oz au; 4,326,000oz silver	57.5%	\$4,544.0m	\$2,612.8m	\$307.9m	-\$14.0m	\$10.7m	\$304.6m
2016	648,900t cu concentrate; 330,300t cu cathode; 109,000oz au; 5,561,000oz silver	57.5%	\$4,881.0m	\$2,806.6m	\$439.9m	\$88.0m	\$5.3m	\$533.2m
2015	916,100t cu concentrate; 310,400t cu cathode; 81,500oz au; 4,786,000oz silver	57.5%	\$7,819.0m	\$4,495.9m	\$768.6m	\$138.9	\$8.4m	\$915.9m
2014	844,700t cu concentrate; 308,000t cu cathode; 72,900oz au; 4,271,000oz silver	57.5%	\$8,085.0m	\$4,648.9m	?	?	?	?
2013	831,500t cu concentrate; 297,000t cu cathode; 71,500oz au; 2,960,000oz silver	57.5%	\$8,596.0	\$4,927.0m	?	?	?	?
2012	580,500t cu concentrate; 299,100t cu cathode; 88,500oz au; 3,341,000oz silver	57.5%	?	\$4,002.0m	?	?	?	?
2011	390,500t cu concentrate; 179,100t cu cathode; 84,700oz au;	57.5%	?	?	?	?	?	?

	2,849,000oz silver							
2010	448,100t cu concentrate; 174,200t cu cathode; 76,400oz au; 2,874,000oz silver	57.5%	?	?	?	?	?	?
2009	417,600t cu concentrate; 172,100t cu cathode; 67,300oz au; 2,765,000oz silver	57.5%	?	?	?	?	?	?
2008	679,500t cu concentrate; 131,600t cu cathode; 79,700oz au; 3,604,000oz silver	57.5%	?	?	?	?	?	?

Notes

- Previous to 2015, all Tax payment data was aggregated by country and it was unclear what payments related to Escondida, and what payments related to Pampa Norte.
- Items in red represent a benefit, not an expense.
- According to the 2017 Economic Contributions Report, there was an additional \$7m paid to the Chilean government between Fees and Other Payments. Can you please tell us the allocation of those payments between the Pampa Norte Copper Mine and Escondida Copper Mine?

7. Samarco Coal Mine, Brazil (USD\$) – 50% ownership

FY	Total Mine Production	BHPB's Share of Production	Total Mine Revenue	BHPB's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	?	?	?	\$96.6m	\$10.5m	0	\$107.1m
2016	10,808,000t	5,404,000t	?	?	\$8.5m	0	0	\$8.5m
2015	29,026,000t	14,513,000t	?	\$1,406.0m	\$7.8m	0	0	\$7.8m
2014	21,838,000t	10,919,000t	?	\$1,634.0m	?	?	?	?
2013	21,964,000t	10,982,000t	?	\$1,622.0m	?	?	?	?
2012	22,846,000t	11,423,000t	?	\$1,996.0m	?	?	?	?
2011	23,418,000t	11,709,000t	?	?	?	?	?	?
2010	22,188,000t	11,094,000t	?	?	?	?	?	?
2009	16,636,000t	8,318,000t	?	?	?	?	?	?
2008	16,928,000t	8,464,000t	?	?	?	?	?	?

Notes

- Previous to 2015, all Tax payment data was aggregated by country and it was unclear what payments related to Samarco, and what payments related to other operations.

8. South Africa Energy Coal, Mpumalanga (USD\$)

BHP	Total Mine Production	South32's Share of Production	Total Mine Revenue	South32's Share of Revenue	Total Corporate Taxes	Total Project Royalties	TOTAL PAYMENTS TO GOVERNMENT
2015	34,277 kt	34,277 kt	\$1,315m	\$1,315m	0	?	0
2014	30,384 kt	30,384 kt	\$1,247m	\$1,247m	0	?	?
2013	31,267 kt	29,951 kt	?	?	?	?	?
2012	33,279 kt	33,279 kt	?	?	?	?	?
2011	34,328 kt	34,328 kt	?	?	?	?	?
2010	30,459 kt	30,459 kt	?	?	?	?	?
2009	29,896 kt	29,896 kt	?	?	?	?	?
2008	45,072 kt	45,072 kt	?	?	?	?	?

9. Hotazel Manganese Mines, Northern Cape (USD\$)

S32	Total Mine Production: ore; alloy	South32's Share of Production: ore; alloy	Total Mine Revenue	South32's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Other Fees and Payments	TOTAL PAYMENTS TO GOVERNMENT
2015	?	1,682 kt; 246 kt	?	\$420m	0	?	?	0
2014	?	1,566 kt; 226 kt	?	\$473m	0	?	?	?
2013	3,490 kt; 374 kt	1,536 kt; 224 kt	?	?	?	?	?	?
2012	3,625 kt; 404 kt	1595 kt; 242 kt	?	?	?	?	?	?
2011	3,007 kt; 486 kt	1323 kt; 292 kt	?	?	?	?	?	?
2010	2,718 kt; 364 kt	1,196 kt; 218 kt	?	?	?	?	?	?
2009	2,191 kt; 301 kt	964 kt; 181 kt	?	?	?	?	?	?
2008	3,040 kt; 513 kt	1,338 kt; 308 kt	?	?	?	?	?	?

Further Questions

- Prior to 2013, revenue, taxes, and royalties are not delineated by project for HMM. Is there a particular reason that revenue, taxes, and royalties are not reported by project in the annual report?

10. Brazil Alumina (USD\$)

S32	Total Mine Production: alumina; aluminium	South32's Share of Production: alumina ; aluminium	Total Mine Revenue	South32's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Other Fees and Payments	TOTAL PAYMENTS TO GOVERNMENT
2015	?	1,328 kt; 40 kt	?	\$497m	?	?	?	0
2014	?	1,262 kt; 104 kt	?	\$529m	?	?	?	?
2013	?	1,205 kt; 154 kt	?	?	?	?	?	?
2012	?	1,235 kt; 170 kt	?	?	?	?	?	?
2011	?	1,100 kt; 40 kt	?	?	?	?	?	?
2010	?	709 kt; 174 kt	?	?	?	?	?	?
2009	?	537 kt; 177 kt	?	?	?	?	?	?
2008	?	536 kt; 257 kt	?	?	?	?	?	?

11. Cerro Matoso (USD\$)

S32	Total Mine Production	South32's Share of Production	Total Mine Revenue	South32's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Licence Fees	TOTAL PAYMENTS TO GOVERNMENT
2015	?	40.4 kt	?	\$593m	0	?	?	?
2014	?	44.3 kt	?	\$595m	0	?	?	?
2013	?	50.8 kt	?	\$803m	?	?	?	?
2012	?	48.9 kt	?	\$876m	?	?	?	?
2011	?	40 kt	?	?	?	?	?	?
2010	?	49.6 kt	?	?	?	?	?	?
2009	?	50.5 kt	?	?	?	?	?	?
2008	?	41.8 kt	?	?	?	?	?	?

Further questions

- Is there data about specific taxes, royalties and payments to government for these projects publicly available elsewhere, outside of your Annual, Sustainability or Economic Contribution Reports?
- Regarding 'Equity Accounted Investments', such as an Antamina in Peru or Cerrejon in Colombia, is there any particular reason why corporate taxes, royalties, and other fees paid to government are not allocated by project in the Annual or Economic Contribution Reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Friday 16 November 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,



Alan Wolfe
Research
Tax Justice Network Australia

12 September 2018

Crater Gold Mining Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding the Crater Mountain HGZ Project in PNG and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We've included the data we have below.

Crater Mountain HGZ Project, PNG (AUD\$)

	Total Mine Production	CGM's Share of Production	Total Project Revenue	CGM'S Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	?	\$225,000	100%	0	0	0	0
2016	?	?	\$385,000	100%	0	0	0	0
2015	?	?	\$53,000	100%	0	0	0	0

Further questions

- Are data about taxes, royalties and payments to government for the Crater Mountain HGZ Project publicly available elsewhere, outside of your annual reports?
- Is there a particular reason why royalties and income tax are not reported on a project-by-project basis in Crater Gold Mining's annual reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,



Alan Wolfe
Research
Tax Justice Network Australia

12 September, 2018

Frontier Diamonds Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding the Star Diamond Mine and Sedibeng Joint Venture Project in South Africa, and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We understand that your ownership of the project commenced in 2014, so it is the years following this date in which we're interested. We've included the data we have below.

1. Star Mine, Free State, South Africa (USD\$)

Note that the production data for 2014-2016 is an average derived from the combined three-year production figure of 19,033 carats given on Frontier Diamonds' website.

	Total Mine Production	Frontier's Share of Production	Total Project Revenue	Frontier's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	?	\$9.0m	\$6.7m	?	?	?	?
2016 + 2 months of 2017	9,704 carats	74%	?	?	?	?	?	?
2015	8,997 carats	74%	?	?	?	?	?	?
2014 (5 months)	3,572 carats	74%	?	?	?	?	?	?

2. Sedibeng JV Diamond Project, Northern Cape South Africa (USD\$)

Note that the production data for 2014-2016 is an average derived from the combined three-year production figure of 23,628 carats given in Frontier Diamonds' website.

	Total Mine Production	Frontier's Share of Production	Total Project Revenue	Frontier's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	?	\$20.0m	\$14.8m	?	?	?	?
2016 +2 months of 2017	12,133 carats	74%	?	?	?	?	?	?
2015	11,609 carats	74%	?	?	?	?	?	?
2014 (6 months)	3,770 carats	74%	?	?	?	?	?	?

Further questions

- Are data about taxes, royalties and payments to government publicly available elsewhere, outside of your annual reports?
- Is there a particular reason why royalties and income tax are not reported on a project-by-project basis in Frontier Diamonds' annual reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 6 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,



Alan Wolfe
Research
Tax Justice Network

12 September 2018

Intra Energy Corporation

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding the Tancoal Mbalawala Mine in Tanzania and the Nkhachira Mine in Malawi, and wanted to check the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We have combined revenue data for these projects for 2017 (A\$22.7m) and 2016 (A\$14.m) but are interested in specific data for each project. We've included the data we have below.

1. Tancoal Mbalawala Mine, Tanzania (AUD\$)

	Total Mine Production	IEC's Share of Production	Total Project Revenue	IEC's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	4.0m tonnes	?	?	?	?	?	?	?
2016	?	?	?	?	?	?	?	?

Further questions

- Are data about your taxes, royalties and payments to government publicly available elsewhere, outside of your annual reports?
- Is there a particular reason why royalties and income tax are not reported on a project-by-project basis in Intra Energy Corporation's annual reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a large, sweeping flourish at the end.

Alan Wolfe
Research
Tax Justice Network Australia

12 September, 2018

Jupiter Mines Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding the Tshipi Borwa Manganese Joint Venture Project in South Africa, and wanted to check the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We've included the data we have below.

1. Tshipi Borwa JV Manganese Project, South Africa (AUD\$)

	Total Mine Production	Jupiter's Share of Production	Total Project Revenue	Jupiter's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	?	?	\$41.5m	?	0	0	?
2016	?	?	?	-\$6.9m	?	0	0	?
2015	?	?	?	\$18.4m	?	0	0	?
2014	?	?	?	\$8.8m, 8 months only	0	0	0	0
2013	?	?	?	\$1.9m	?	0	0	?
2012	?	?	?	\$1.0m	?	0	0	?
2011	?	?	\$0.8m	100%	?	0	0	?
2010	?	?	?	?	?	?	?	?

Further questions

- Are data about your taxes, royalties and payments to government publicly available elsewhere, outside of your annual reports?
- Is there a particular reason why corporate tax is not reported on a project-by-project basis in Jupiter Mines' annual reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a stylized flourish at the end.

Alan Wolfe
Research
Tax Justice Network Australia

19 September, 2018

Kingsrose Mining Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding the Way Linggo Gold Project in Indonesia, and wanted to check the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. The data we have is shown below. Please note that our data and research excludes payroll or other taxes that are paid on behalf of employees, as well as import taxes.

Way Linggo Gold Project, Indonesia (AUD\$)

	Total Mine Production	Kingsrose's Share of Production	Total Project Revenue	Kingsrose's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	12,862oz Au 42,766oz Ag	85%	?	\$21.3m	\$11.0m	\$0.3m	0	\$11.3m
2016	18,641oz Au Silver?	85%	?	\$31.7m	\$0.7m	\$0.6m	0	\$1.3m
2015	24,227oz Au 59,949oz Ag	85%	?	\$33.2m	\$5.6m	\$0.7m	0	\$6.3m
2014	1,995oz Au 7,840oz Ag	85%	?	\$3.8m	-\$10.5m	\$0.08m	0	-\$10.4m
2013	8,830oz Au 93,146oz Ag	85%	?	\$20.7m	0	\$0.5	0	\$0.5m
2012	37,650oz Au 432,754oz Ag	85%	?	\$71.7m	0	\$1.6m	0	\$1.6m
2011	27,056oz Au 318,869oz Ag	85%	?	\$45.2m	\$1.8m	\$0.9m	0	\$2.7m

Further Questions:

- Your 2015 Annual Report says that you received a tax refund of \$3,601,761 during the year. Is that refund reflected in the Consolidated Income Statement in your Annual Reports?
- Your 2014 Annual Report says you received a corporate tax income refund of \$5,195,718 from the Indonesian government during the year. Is that refund reflected in the Consolidated Income Statement in your Annual Reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a stylized flourish at the end.

Alan Wolfe
Research
Tax Justice Network Australia

12 September, 2018

Lucapa Diamond Company Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding the Lulo Diamond Project in Angola, and wanted to check the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. The data we have is shown below. Please note our data and research excludes payroll or other taxes that are paid on behalf of employees, as well as import taxes.

Lulo Diamond Project, Angola

	Total Mine Production	Lucapa's Share of Production	Total Project Revenue	Lucapa's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	18,706 carats	40%	USD\$31.6m	40%	USD\$0.02m	0	0	USD\$0.02m
2016	19,833 carats	40%	USD\$51m	40%	USD\$1.1m	0	0	USD\$1.1m
2015	8,394 carats	40%	USD\$3.9m	40%	?	?	?	AUD\$?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com) or by telephone on +61 (0)404 115 038

Yours sincerely,



Alan Wolfe
Research,
Tax Justice Network Australia

12 September 2018

MacMahon Holdings Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports and those of Agincourt Resources regarding the Martabe Gold Mine and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We've included the data we have below.

MATARBE GOLD MINE

FY	Total Mine Production	MacMahon's Share of Production	Total Mine Revenue	MacMahon's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Land & Building Tax	Other Taxes	TOTAL PAYMENTS TO GOVERNMENT
2017	Gold: 355,377 oz Silver: 2.39 million oz	50%	MacMahon reported revenue: A\$57.39m. Indonesian JV reported revenue: USD \$484.44m	100% of Australian revenue / 50% of Indonesian revenue	MacMahon reported: A\$1.26m Indonesian JV reported: USD \$51.87m	USD \$2.66m	USD \$1.0m	USD \$1.45m	?
2016	Gold: 310,550 oz Silver: 2.41 million oz	50%	MacMahon reported revenue: A\$26.62m. Indonesian JV reported revenue: USD \$426.44m	100% of Australian revenue / 50% of Indonesian revenue	MacMahon reported: A\$0.40m Indonesian JV reported: USD \$41.35m	USD \$2.31m	USD \$1.1m	USD \$1.77m	?

Notes

- Production information and all USD amounts have been sourced from Agincourt Resources Annual Reports

Further Questions

- Are data about taxes, royalties and payments to government for this project publicly available elsewhere, outside of your Annual Reports?

- Can you please provide some context regarding the different amounts for revenue reported by the Indonesian JV and MacMahon Holdings in Australia? Specifically, if a MacMahon subsidiary has 50% ownership of the Matarbe project, does it not receive 50% of the profit after tax? In FY 2017, the profit after tax was USD \$151.34 million. The revenue reported by MacMahon from this JV was A\$57.39 million.

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com) or by telephone on +61 (0)404 115 038

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a large, dark, scribbled flourish at the end.

Alan Wolfe
Research,
Tax Justice Network Australia

11 September 2018

Medusa Mining

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding Co-O in East Mindanao, Philippines and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We've included the data we have below.

Co-O Gold Mine								
Medusa Mining	Total Mine Production (Gold)	Total Mine Revenue	Income Tax	Total Corporate Taxes Paid	Royalties Paid To Government	Royalties Paid to Indigenous Groups	Other Fees and Payments	TOTAL PAYMENTS TO GOVERNMENT
2017	80,743oz	US\$99.8m	US\$7.6m	?	?	?	?	?
2016	108,578oz	US\$127.8m	US\$2.2m	?	?	?	?	?
2015	98,359oz	US\$123.1m	-US\$0.7m	?	?	?	?	?
2014	59,904oz	US\$83.9m	-US\$0.2m	?	?	?	?	?
2013	62,243oz	US\$100.6m	US\$0.0m	?	?	?	?	?
2012	60,595oz	US\$80.8m	-US\$1.1m	?	?	?	?	?
2011	101,474oz	US\$148.7m	US\$0.1m	?	?	?	?	?
2010	89,679oz	US\$93.8m	US\$0.0m	?	?	?	?	?
2009	47,869oz	US\$57.0m	-US\$2.3m	?	?	?	?	?
2008	19,009oz	US\$17.6m	US\$2.4m	?	?	?	?	?

Notes

- Although a 1% figure is stated for royalties to Indigenous Groups, no amounts were found in the Annual Reports

Further questions

- Are data about taxes, royalties and payments to government for Co-O publicly available elsewhere, outside of your Annual Reports?
- Is there a particular reason why corporate taxes, royalties and other payments to government are not reported by project in Medusa's annual reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a stylized flourish at the end.

Alan Wolfe
Research
Tax Justice Network Australia

19 September 2018
Melanie Stutsel
General Manager, Safety, Environment and Social Performance
MMG Ltd
Level 23/28 Freshwater Place
Southbank VIC Australia 3006

Dear Ms Stutsel

Oxfam Australia is working collaboratively with Tax Justice Network Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania collecting data on the contribution of Australian mining companies to developing countries.

We have data regarding MMG's Kinsevere Mine in D.R. Congo (ATTACHMENT A), Las Bambas Mine in Peru (ATTACHMENT B) and Sepon Mine in Laos (ATTACHMENT C) and other operations (ATTACHMENT D) gathered from EITI reports and company Annual Reports and want to check that the information is correct before we publish. We ask several questions in turn:

1. Can you please verify if the tables are correct? If not could you provide the correct figures, and fill in missing figures (where we placed a question mark, indicating a lack of publicly available information).
2. As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available.
3. In regards to Kinsevere Mine, we note that MMG's annual reports do not break-down payments to government by category, however, these data are available from the Extractive Industries Transparency Initiative (EITI) website for 2012-2015. We have therefore used and organised these data into three categories: Corporate Taxes, Royalties and Other Payments to Government. We would be grateful for confirmation of these amounts by these categories, especially as the totals are different to the amounts in your annual reports. We recognise the categories used here may vary from those used by MMG. Note our data on corporate taxes are only those paid in relation to income tax paid on taxable profits.
4. Are there any other sources of information, outside the EITI that provide comprehensive project-by-project payments to Government of countries where mining operations are occurring?
5. Is there a reason why taxes, royalties and fees are not reported on a project-by-project basis in annual reports?

HEAD OFFICE
132 Leicester Street, Carlton
Victoria 3053, Australia

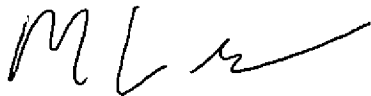
Tel +61 3 9289 9444 Fax +61 3 9347 1983

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6. Why does MMG have multiple subsidiaries in the British Virgin Islands, Cayman Islands, Switzerland and the Netherlands?
7. What is MMG's relationship with the financial planning firm Appleby?
8. The Australian mines have turned revenues of over \$1 billion every year from 2014-16. Has MMG paid income taxes for these mining operations in Australia?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **28th September 2018**. If you have any questions or additional time is needed please contact Lisa Lee lisal@oxfam.org.au or (02) 8204 3944.

Yours sincerely,



Mal Larsen

Extractives Lead, Oxfam Australia

malcolml@oxfam.org.au

(02) 8204 3966

Attachment A

Kinsevere Copper Mine (USD\$)

	Total Mine Production (production sold)	MMG's Share of Production	Total Revenue \$mill	MMG's Share of Revenue	Earnings before tax \$mill	Total Corporate Taxes \$mill	Total Project Royalties \$mill	Total other payments to government \$mill	TOTAL PAYMENTS TO GOVERNMENT \$mill
2017	80,023t copper cathode	100%	\$500.9m	100%	?	?	\$19.8m	?	?
2016	80,491t copper cathode	100%	\$400.4m	100%	?	?	\$16.9m	?	?
2015	80,236t copper cathode	100%	\$418.1m	100%	?	\$10.5m	\$18.5m	\$13.1m	\$52.1m
2014	69,522t copper cathode	100%	\$465.7m	100%	?	\$7.8m	\$19.8m	\$14.1m	\$62.1m
2013	62,074t copper cathode	100%	\$455.3m	100%	?	\$0.4m	\$19m	\$5.2m	\$43.5m
2012	35,698t copper cathode	100%	\$279.9m	100%	?	\$0.4m	\$12m	\$70.1m	\$85.3m

Attachment B

Las Bambas Copper Mine (USD\$)

	Total Mine Production (production sold)	MMG's Share of Production	Total Revenue \$mill	MMG's Share of Revenue	Earnings before tax \$mill	Total Corporate Taxes \$mill	Total Project Royalties \$mill	Total other payments to government \$mill	TOTAL PAYMENTS TO GOVERNMENT \$mill
2017	442,471t copper concentrate	62%	\$2,937m	?	?	?	\$88.3m	?	?
2016	296,982t copper concentrate	62%	\$1,912m	?	?	?	\$34.3m	?	?

Attachment C

Sepon Copper Mine (USD\$)

	Total Mine Production (production sold)	MMG's Share of Production	Total Revenue \$mill	MMG's Share of Revenue	Earnings before tax \$mill	Total Corporate Taxes \$mill	Total Project Royalties \$mill	Total other payments to government \$mill	TOTAL PAYMENTS TO GOVERNMENT \$mill
2017	62,931t copper cathode	90%	\$391.9m	?	?	?	\$17.5m	?	\$17.5m
2016	78,714t copper cathode	90%	\$518m	?	?	?	\$17.2m	?	\$17.2m
2015	88,752t copper cathode	90%	\$627m	?	?	?	\$22.1m	?	\$22.1m
2014	88,377t copper cathode	90%	\$708m	?	?	?	\$27.6m	?	\$27.6m
2013	92,687t copper cathode	90%	\$746m	?	?	?	\$33.1m	?	\$33.1m
2012	85,150t copper cathode	90%	\$806m	?	?	?	\$35.9m	?	\$35.9m
2011	78,859t copper cathode	90%	\$817m	?	?	?	0	?	?
2010	64,241t copper cathode	90%	\$597m	?	?	?	0	?	?
2009	38,077t copper cathode	90%	\$288m	?	?	?	0	?	?

Attachment D

Tax paid in other countries (\$USD)

	Income tax paid at consolidated level \$mill	Income tax paid in Hong Kong \$mill	Income tax paid in Australia \$mill	Earnings before tax in Australia \$mill	Income tax paid for Golden Grove Mine (Australia) \$mill	Income tax paid for Rosebery Mine (Australia) \$mill
2017	\$87m	0	0	?	0	0
2016	\$65m	0	0	?	0	0
2015	\$89m	0	0	?	0	0
2014	\$94m	0	0	?	0	0
2013	\$111m	0	0	?	0	0
2012	\$124m	0	0	?	0	0
2011	\$210m	0	0	?	0	0

24 January 2019

Ms Narelle Wolfe
Group manager Social Performance
MMG Limited

Dear Ms Wolfe,

Thank you for meeting with us this week. We are appreciative of your good will and MMG Ltd's willingness to assist Oxfam with our work on tax transparency in the extractives sector.

As discussed in yesterday's meeting, we have progressed further with the project and have a few follow up question for MMG Ltd. We appreciate your assistance.

Below are the questions we would like to ask MMG Ltd:

1. MMG has a \$2.7 billion related party loan with Top Create (a related party based in British Virgin Islands), and made \$100-300 million in annual repayments from 2015 and 2017¹. Can you help us understand if these interest expenses have been used as cost deductions for MMG's Australian operations? If not, in which country has the interest expenses been deducted?
2. Oxfam has analysed the copper sales from the Kinsevere mine while it was under Anvil ownership, and found the copper was sold at a substantial discount compared to global benchmark prices to its majority shareholder Trafigura (who also had a life of mine offtake agreement with the Kinsevere mine²). At the time of acquiring Anvil Mining, was MMG concerned about this arrangement with Trafigura? And has MMG taken any action to rectify the arrangement? If so, what action has MMG taken since acquiring Anvil Mining?
3. We've observed some discrepancies in the royalty paid for the Kinsevere mine as reported by the Extractives Industries Transparency Initiative (EITI) and MMG Ltd's reply letter in October 2018. Could you help us understand why there is this difference?

Kinsevere royalty paid USD\$mill	2011	2012	2013	2014	2015
EITI	3.2	5.8	7.5	8.6	8.2
MMG reply letter	na	12	19.0	19.8	18.5

¹ MMG annual reports

² Anvil Mining Ltd (2009) consolidated Financial Statements

HEAD OFFICE

132 Leicester Street, Carlton
Victoria 3053, Australia

Tel +61 3 9289 9444 Fax +61 3 9347 1983

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4. In MMG Ltd's response letter to Oxfam in October 2018, it shows there is considerable consolidated tax expense, but not much tax paid for each of the mines. The table below summarises the tax paid information we gathered.
- Can you please explain the discrepancy below? From this data below, it appears that MMG isn't paying any taxes in any country. However, the consolidated tax paid is relatively high. Can you help us understand why the consolidated tax paid is so high while the taxes paid by country/mine is so low? Can you provide a breakdown of the consolidate tax figure to demonstrate where the tax was paid specifically?
 - Could MMG please provide the corporate tax paid by the Sepon Mine in Laos for the years 2011-2015? This would help us to demonstrate MMG's commitment to tax transparency.

corporate tax USD\$mill	2011	2012	2013	2014	2015	2016	2017
Consolidated Income Tax Paid*	210	124	111	94	89	65	87
income tax expense/paid in Hong Kong*	-	-	-	-	-	-	-
Century Mines (Aust)**	na	na	-	-	-	na	na
Golden Grove Mines (Aust)*	-	-	-	-	-	-	-
Rosebery Mines (Aust)*	-	-	-	-	-	-	-
<i>Income tax paid in Australia*</i>	12.7	-	-	-	-	-	-
Las Bambas (Peru)*	-	-	-	-	-	128	193.3
Sepon Mines (Laos)*	na	na	na	na	na	42.4	20.1
Kinsevere (DRC)***	0.07	0.39	0.38	7.85	10.49	na	na

* MMG reply letter. ** ATO entity tax information database. *** EITI data from 2012-2015.

We would be grateful for your advice on this query by Friday 15th February. If you have any questions please contact either Daisy Gardener or Lisa Lee (contact information below).

Yours sincerely,



Lisa Lee
Economics lead, Oxfam Australia lisal@oxfam.org.au
(02) 8204 3944

Daisy Gardener
Advocacy lead, Oxfam Australia daisyg@oxfam.org.au
(03) 9289 9420

12 September 2018

Newcrest Mining Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports and Tax Contribution Report regarding Gosowong in Indonesia and Lihir in Papua New Guinea and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. The data we have is shown below. Please note that our data and research excludes payroll or other taxes that are paid on behalf of employees, as well as import taxes.

Gosowong

Newcrest Mining Limited	Total Mine Production (Gold)	Newcrest's Share of Production	Total Mine Revenue	Newcrest's Share of Revenue	Income Tax	Total Corporate Taxes Paid	Royalties Paid To Government	Other Fees & Payments to Government	TOTAL PAYMENTS TO GOVERNMENT
2017	295,876oz gold; 361,266oz silver	75%	US\$350m	75%	?	?	?	?	?
2016	197,463oz gold; 290,530oz silver	75%	\$US257m	75%	?	US\$74m	US\$2m	?	?
2015	331,555oz gold; 410,970oz silver	75%	A\$499m	75%	?	?	?	?	?
2014	344,747oz gold	75%	A\$484m	75%	?	?	?	?	?
2013	312,711oz gold	75%	A\$483m	75%	?	?	?	?	?
2012	439,384oz gold; 271,342oz silver	82.5%	A\$711m	82.5%	?	?	?	?	?
2011	463,218oz gold; 284,139oz silver	82.5%	A\$654m	82.5%	?	?	?	?	?
2010	442,525oz gold	82.5%	A\$554.8m	82.5%	?	?	?	?	?
2009	400,220oz gold	82.5%	A\$473.6m	82.5%	?	?	?	?	?
2008	400,202oz gold	?	A\$376.8m	?	?	?	?	?	?

Lihir Gold Mine

Newcrest Mining Limited	Total Mine Production (Gold)	Total Mine Revenue	Income Tax	Total Corporate Taxes Paid	Royalties Paid To Government	Other Fees & Payments to Government	TOTAL PAYMENTS TO GOVERNMENT
2017	940,060 oz gold; 42,257 oz silver	US\$1.2m	?	?	?	?	?
2016	900,034oz gold	US\$1,035.0m	?	?	?	?	?
2015	688,714oz gold	A\$1,020.0m	?	?	?	?	?
2014	721,264oz gold	A\$1,055.0m	?	?	?	?	?
2013	649,340oz gold	A\$961.0m	?	?	?	?	?
2012	604,336oz gold	A\$964.0m	?	?	?	?	?
2011	790,974oz gold	A\$887.0m	?	?	?	?	?

Further questions

- Are data about taxes, royalties and payments to government for Gosowong or Lihir publicly available elsewhere, outside of your Annual Reports?
- We note that you published a 'Tax Contribution Report' in 2016. Is there a forthcoming edition for 2017 and will this continue to be published?
- Is there are a reason why taxes, royalties and other payments to government are not reported on a project-by-project basis in your Annual Reports or Tax Contribution Report?
- According to the Tax Contribution Report 2016, US\$74 million was paid in corporate taxes in Indonesia. Can you please provide a breakdown of these taxes?
- Regarding the Key International Related Party Transactions, the Tax Contribution Report 2016 states that these "do not have a material impact on the Newcrest's Australian taxable income." Can you please clarify what benchmark Newcrest uses to define materiality?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com).

Yours sincerely,



Alan Wolfe
Research
Tax Justice Network Australia

12 September, 2018

Niuminco Group Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding the Edie Creek gold and silver mine in PNG and wanted to check the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We've included the data we have below.

Edie Creek Mine, PNG (AUD\$)

	Total Mine Production	Niuminco's Share of Production	Total Project Revenue	Niuminco's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	423oz Au 416oz Ag	100%	\$0.7m	100%	0	0	0	0
2016	689oz Au 602oz Ag	100%	\$1.1m	100%	0	0	0	0
2015	1,172oz Au 988oz Ag	100%	\$1.7m	100%	?	0	0	?
2014	132oz Au 110oz Ag	100%	\$0.2m	100%	?	0	0	?

Further questions

- Are data about your taxes, royalties and payments to government publicly available elsewhere, outside of your Annual Reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com) or by telephone on +61 (0)404 115 038

Yours sincerely,



Alan Wolfe
Research,
Tax Justice Network Australia

12 September, 2018

OceanaGold Corporation

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding the Didipio gold and copper mine in The Philippines and wanted to check the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would appreciate any data you can provide for these years or advice as to where this information is available. The data we have is shown below.

Note:

- Our data and research excludes payroll or other taxes that are paid on behalf of employees, as well as import taxes.
- We are interested in specific corporate tax, royalty and other payments to government data, which we understand is consolidated in your Annual Reports and not reported project-by-project.

Didipio Gold & Copper Mine, Philippines (USD\$)

FY	Total Mine Production	OG's Share of Production	Total Project Revenue	OG's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	176,790oz Au; 18,351t Cu; 225,823oz Ag	100%	\$306.4m	100%	?	?	?	\$26.8m
2016	147,150oz Au; 21,123t Cu; 253,161oz Ag	100%	\$272.7m	100%	?	?	\$2.08m	\$11.45m
2015	127,086oz Au; 23,109t Cu; 274,308oz Ag	100%	\$240.0m	100%	?	?	?	?
2014	106,256oz Au; 25,010t Cu; 291,889oz Ag	100%	\$296.5m	100%	?	?	?	?
2013	66,277oz Au; 203t Cu	100%	\$199.5m	100%	?	?	?	?

Further questions

- Are data about your taxes, royalties and payments to government publicly available elsewhere, outside of your annual reports?
- Is there a particular reason why specific income tax, royalty and other payments to government are not reported on a project-by-project basis in OceanaGold Corporation's reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com) or by telephone on +61 (0)404 115 038

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a stylized flourish at the end.

Alan Wolfe
Research,
Tax Justice Network Australia

12 September, 2018

Oilex Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian energy and mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have limited data from your Annual Reports regarding the Bhandut Oil Field in India, but wanted to check the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would appreciate any data you can provide for these years or advice as to where this information is available. Note we are interested in specific corporate tax, royalty and other payments to government data, which we understand is consolidated in your Annual Reports and not reported project-by-project. The data we have is shown below.

Note:

- Our data and research excludes payroll or other taxes that are paid on behalf of employees, as well as import taxes.

Bhandut Oil Field, India (AUD\$)

	Total Mine Production	Oilex's Share of Production	Total Project Revenue	Oilex's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	28.5m mscf	40%	?	?	?	?	?	?
2016	46m mscf; 164bbl condensate	40%	?	?	?	?	?	?

Further questions

- Are data about your taxes, royalties and payments to government publicly available elsewhere, outside of your Annual Reports?
- Is there a particular reason why specific income tax, royalty and other payments to government are not reported on a project-by-project basis in Oilex's reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or

additional time is needed please contact Alan Wolfe (alan@extractivesdata.com) or by telephone on +61 (0)404 115 038

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a stylized flourish at the end.

Alan Wolfe
Research,
Tax Justice Network Australia

21 September, 2018

Oil Search Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian energy and mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data regarding 11 Oil Search projects in Papua New Guinea and wanted to check that the information is correct before we publish.

Can you verify if the following information for these projects is correct? As we are focusing on operations from 2008-2017, we would appreciate any data you can provide for these years or advice as to where this information is available.

We understand that Oil Search publishes data for revenue, corporate taxes and royalties that is consolidated across all projects. We are interested in project-by-project data that falls into three categories: Corporate Taxes, Royalties and Other Payments to Government. (We recognise these categories may vary from those used by Oil Search). We would be grateful for confirmation of these amounts by these categories. Please note that our data and research excludes payroll or other taxes that are paid on behalf of employees, as well as import taxes.

Note

- Oil Search's Production Summary units for Oil and Liquids appeared to change from mmbbl (2008-2016) to mbbl in 2017, although the Production Summary was still labelled mmbbl. We have presented all oil and liquids data in the new format of mbbl to maintain consistency.

1. LNG Project (USD\$) – 29% ownership

	Total Project Production	OS's Share of Production	Total Project Revenue	OS's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	106,266 mmscf	?	?	?	?	?	?
2016	?	101,827 mmscf	?	?	?	?	?	?
2015	?	96,646 mmscf	?	?	?	?	?	?
2014	?	52,199 mmscf	?	?	?	?	?	?

2. LNG Gas-to-Power Project, (USD\$) – 29% ownership

	Total Project Production	OS's Share of Production	Total Project Revenue	OS's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	665 mmscf	?	?	?	?	?	?

3. Hides GTE Gas Project (USD\$) – 100% ownership

	Total Project Production	OS's Share of Production	Total Project Revenue	OS's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	5,843 mmscf	?	?	?	?	?	?
2016	?	5,573 mmscf	?	?	?	?	?	?
2015	?	5,312 mmscf	?	?	?	?	?	?
2014	?	5,675 mmscf	?	?	?	?	?	?

4. Kutubu Gas Project (USD\$) – 60.05% ownership

	Total Project Production	OS's Share of Production	Total Project Revenue	OS's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	2,630 mbbl	?	?	?	?	?	?
2016	?	3,279 mbbl	?	?	?	?	?	?
2015	?	3,800 mbbl	?	?	?	?	?	?
2014	?	3,690 mbbl	?	?	?	?	?	?
2013	?	3,473 mbbl	?	?	?	?	?	?
2012	?	3,267 mbbl	?	?	?	?	?	?
2011	?	3,028 mbbl	?	?	?	?	?	?
2010	?	3,587 mbbl	?	?	?	?	?	?
2009	?	3,877 mbbl	?	?	?	?	?	?
2008	?	3,258 mbbl	?	?	?	?	?	?

5. S.E. Gobe Gas to PNG LNG (USD\$) – 22.34% ownership

	Total Project Production	OS's Share of Production	Total Project Revenue	OS's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	3,265 mmscf	?	?	?	?	?	?
2016	?	3,060 mmscf	?	?	?	?	?	?
2015	?	1,886 mmscf	?	?	?	?	?	?
2014	-	0	-	-	-	-	-	-

6. Moran Project (USD\$) – 49.51% ownership

	Total Project Production	OS's Share of Production	Total Project Revenue	OS's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	1,267 mbbl	?	?	?	?	?	?
2016	?	1,643 mbbl	?	?	?	?	?	?
2015	?	1,560 mbbl	?	?	?	?	?	?
2014	?	1,990 mbbl	?	?	?	?	?	?
2013	?	2,041 mbbl	?	?	?	?	?	?
2012	?	1,865 mbbl	?	?	?	?	?	?
2011	?	2,296 mbbl	?	?	?	?	?	?
2010	?	2,633 mbbl	?	?	?	?	?	?
2009	?	2,536 mbbl	?	?	?	?	?	?
2008	?	3,184 mbbl	?	?	?	?	?	?

7. Gobe Main Project (USD\$) – 10.0% ownership

	Total Project Production	OS's Share of Production	Total Project Revenue	OS's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	20 mbbl	?	?	?	?	?	?
2016	?	24 mbbl	?	?	?	?	?	?
2015	?	30 mbbl	?	?	?	?	?	?
2014	?	30 mbbl	?	?	?	?	?	?
2013	?	36 mbbl	?	?	?	?	?	?
2012	?	39 mbbl	?	?	?	?	?	?
2011	?	41 mbbl	?	?	?	?	?	?
2010	?	59 mbbl	?	?	?	?	?	?
2009	?	61 mbbl	?	?	?	?	?	?
2008	?	72 mbbl	?	?	?	?	?	?

8. S.E. Gobe Project (USD\$) – 22.34% ownership

	Total Project Production	OS's Share of Production	Total Project Revenue	OS's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	57 mbbl	?	?	?	?	?	?
2016	?	76 mbbl	?	?	?	?	?	?
2015	?	120 mbbl	?	?	?	?	?	?
2014	?	130 mbbl	?	?	?	?	?	?
2013	?	132 mbbl	?	?	?	?	?	?
2012	?	198 mbbl	?	?	?	?	?	?
2011	?	208 mbbl	?	?	?	?	?	?
2010	?	255 mbbl	?	?	?	?	?	?
2009	?	394 mbbl	?	?	?	?	?	?
2008	?	489 mbbl	?	?	?	?	?	?

9. Hides GTE Liquids Project (USD\$) – 100% ownership

	Total Project Production	OS's Share of Production	Total Project Revenue	OS's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	118 mbbl	?	?	?	?	?	?
2016	?	113 mbbl	?	?	?	?	?	?
2015	?	110 mbbl	?	?	?	?	?	?
2014	?	120 mbbl	?	?	?	?	?	?
2013	?	119 mbbl	?	?	?	?	?	?
2012	?	112 mbbl	?	?	?	?	?	?
2011	?	130 mbbl	?	?	?	?	?	?
2010	?	134 mbbl	?	?	?	?	?	?
2009	?	135 mbbl	?	?	?	?	?	?
2008	?	130 mbbl	?	?	?	?	?	?

10. LNG Liquids Project (USD\$) – 29.0% ownership

	Total Project Production	OS's Share of Production	Total Project Revenue	OS's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	?	3,470 mbbl	?	?	?	?	?	?
2016	?	3,451 mbbl	?	?	?	?	?	?
2015	?	3,270 mbbl	?	?	?	?	?	?
2014	?	1,960 mbbl	?	?	?	?	?	?

11. S.E. Mananda Gas (USD\$) – 72.27% ownership

	Total Project Production	OS's Share of Production	Total Project Revenue	OS's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	-	0	-	-	-	-	-	-
2016	-	0	-	-	-	-	-	-
2015	-	0	-	-	-	-	-	-
2014	?	5 mbbl	?	?	?	?	?	?
2013	?	18 mbbl	?	?	?	?	?	?
2012	?	22 mbbl	?	?	?	?	?	?
2011	?	60 mbbl	?	?	?	?	?	?
2010	?	100 mbbl	?	?	?	?	?	?
2009	?	190 mbbl	?	?	?	?	?	?
2008	?	380 mbbl	?	?	?	?	?	?

Further questions

- We understand Oil Search pays development levies, petroleum tax, other taxes, and some payments to Police. Are these amounts calculated centrally for all projects, or are they specific to each project but only the aggregated sum actually gets reported?
- Are data about taxes, royalties and payments to government publicly available elsewhere, outside of your Annual Reports and in 2017, your Transparency Report?
- Is there a particular reason why royalties and income tax are not reported on a project-by-project basis in Oil Search's annual reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Friday 12 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,



Alan Wolfe
Tax Justice Network

12 September, 2018

Orocobre Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding the Borax Argentina project, and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. The data we have is shown below.

Note:

- Our data and research excludes payroll or other taxes that are paid on behalf of employees, as well as import taxes.

Borax Argentina, Argentina (USD\$) – 100% ownership

FY	Total Mine Production	Orocobre's Share of Production	Total Project Revenue	Orocobre's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	41,777t Combined product	100%	\$17.4m	100%	?	?	?	?
2016	35,482t Combined product	100%	\$18.9m	100%	?	?	?	?
2015	34,091t Combined product	?	\$21.1m	100%	?	?	?	?
2014	40,098t Combined product	100%	\$26.8m	100%	?	?	?	?
2013	?	?	\$19.1m	100%	?	?	?	?

Further questions

- Are data about taxes, royalties and payments to government publicly available elsewhere, outside of your Annual Reports?
- Is there a particular reason why corporate income tax, royalties and other payments to government are not reported project-by-project in Orocobre's Annual Reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com) or by telephone on +61 (0)404 115 038

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a stylized flourish at the end.

Alan Wolfe
Research,
Tax Justice Network Australia

12 September, 2018

Orocobre Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding the Salar de Olaroz Lithium Project in Argentina, and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. The data we have is shown below.

Note:

- Our data and research excludes payroll or other taxes that are paid on behalf of employees, as well as import taxes.

Salar de Olaroz Lithium Project, Argentina (USD\$) – 66.5% ownership

	Total Mine Production	Orocobre's Share of Production	Total Project Revenue	Orocobre's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	11,682t lithium carbonate	100%	\$120.0m	\$79.8m	?	?	?	?
2016	7,000t lithium carbonate	100%	\$15.4m	\$10.2m	?	?	?	?
2015	?	?	\$0.3m	?	?	?	?	?

Further questions

- Are data about taxes, royalties and payments to government publicly available elsewhere, outside of your Annual Reports?
- Is there a particular reason why corporate income tax, royalties and other payments to government are not reported project-by-project in Orocobre's Annual Reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com) or by telephone on +61 (0)404 115 038

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a stylized flourish at the end.

Alan Wolfe
Research,
Tax Justice Network Australia

12 September, 2018

Oz Minerals Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining countries to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data regarding Oz Minerals' copper/gold project in Brazil and wanted to check the information before we publish.

Can you verify if the following information for these projects is correct? We've included the data we have in the tables below. We have organised the data into three categories: Corporate Taxes, Royalties and Other Payments to Government. We recognise the categories used here may vary from those used by Oz Minerals. Note our data and research excludes payroll or other taxes that are paid on behalf of employees, as well as import taxes.

1. Antas copper/gold Project, Brazil (USD\$)

	Total Mine Production	Oz Minerals' Share of Production	Total Mine Revenue	Oz Minerals' Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	14,101t (Cu) 11,366oz (Au)	100%	\$90.3m	100%	\$0.8m	0	0	\$0.8m
2016	11,188t (Cu) 7,779oz (Au)	100%	\$54.7m	100%	\$3.7m	0	0	\$3.7m

Further questions

- Are data about taxes, royalties and payments to government for Antas publicly available elsewhere, outside of your Annual Reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com) or by telephone on +61 (0)404 115 038

Yours sincerely,



Alan Wolfe

Research,
Tax Justice Network Australia

12 September, 2018

Paladin Energy Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding the Langer Heinrich Uranium Mine in Namibia, and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We've included the data we have below.

Langer Heinrich Uranium Mine, Namibia (USD\$) – 75% ownership

Note: Data in red are benefits, not expenses

Note: Our data and research excludes payroll or other taxes that are paid on behalf of employees, as well as import taxes.

	Total Mine Production	Paladin's Share of Production	Total Project Revenue	Paladin's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	4.2 Mlb	100%	\$96.0m	100%	\$36.3m	\$3.1m	0	\$39.4m
2016	4.8 Mlb	100%	\$184.9m	100%	(-\$84.2m)	\$5.7m	0	(-\$78.5m)
2015	5.1 Mlb	100%	\$191.9m	100%	\$17.0m	\$5.8m	0	\$22.8m
2014	5.6 Mlb	100%	\$207.0m	100%	(-\$10.7m)	\$4.3m	0	(-\$6.4m)
2013	5.3 Mlb	100%	\$265.4m	100%	\$1.4m	\$7.4m	0	\$8.8m
2012	4.4 Mlb	100%	\$239.2m	100%	\$4.2m	\$7.1m	0	\$11.3m
2011	3.5 Mlb	100%	\$166.5m	100%	(-\$15.7m)	?	0	?
2010	3.6 Mlb	100%	\$133.5m	100%	\$23.5m	?	0	?
2009	2.7 Mlb	100%	\$111.8m	100%	\$7.7m	?	0	?
2008	1.2 Mlb	100%	\$93.8m	100%	\$1.2m	?	?	?

Further questions

- Are data about taxes, royalties and payments to government publicly available elsewhere, outside of your Annual Reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a stylized flourish at the end.

Alan Wolfe
Research,
Tax Justice Network

12 September, 2018

Panterra Gold Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding the Las Lagunas Gold/Silver Mine in Dominican Republic, and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. The data we have is shown below.

Note:

- Our data and research excludes payroll or other taxes that are paid on behalf of employees, as well as import taxes.

Las Lagunas Gold/Silver Mine, Dominican Republic (USD\$)

FY	Total Mine Production	Panterra's Share of Production	Total Project Revenue	Panterra's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	42,998oz Au 153,713oz Ag	100%	\$54.3m	100%	0	\$1.7m	0	\$1.7m
2016	46,021oz Au 236,284oz Ag	100%	\$55.4m	100%	0	\$1.7m	0	\$1.7m
2015	37,760oz Au 239,088oz Ag	100%	\$46.6m	100%	?	\$1.3m	0	\$1.3m
2014	32,342oz Au 261,376oz Ag	100%	\$45.4m	100%	0	\$1.5m	0	\$1.5m
2013	23,645oz Au 219,081oz Ag	100%	\$38.1m	100%	0	\$1.2m	0	\$1.2m
2012	?	100%	\$12.0m	100%	0	\$0.8m	0	\$0.8m

Further questions

- Are data about taxes, royalties and payments to government for Las Lagunas publicly available elsewhere, outside of your Annual Reports?
- Can you please confirm the exact status regarding any potential Income Tax holidays?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com) or by telephone on +61 (0)404 115 038

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a large, sweeping flourish at the end.

Alan Wolfe
Research,
Tax Justice Network Australia

17 September, 2018

Range Resources Limited

Dear Ms. Bezruchko,

We are collecting data on the contribution of Australian energy and mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding the South Quarry, Morne Diablo and Beach Marcelle Oil Project in Trinidad & Tobago, and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We've included the data we have below.

South Quarry, Morne Diablo and Beach Marcelle Oil Project, Trinidad & Tobago

Data is in USD\$ 2013-2017

	Total Production	RR's Share of Production	Total Project Revenue	RR's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	190,546 barrels	100%	\$8.4m	100%	\$5.0m	\$2.5m	0	\$7.5m
2016	193,868 barrels	100%	\$7.1m	100%	\$1.1m	\$2.1m	0	\$3.2
2015	205,209 barrels	100%	\$13.2m	100%	\$1.5m	\$4.7m	0	\$6.2m
2014	208,979 barrels	100%	\$21.2m	100%	\$0.9m	\$7.4m	0	\$8.3m
2013	?	100%	\$27.3m	100%	\$2.6m	\$7.0m	0	\$9.6m

Data is in **AUD\$** 2011-2012

	Total Mine Production	RR's Share of Production	Total Project Revenue	RR's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2012	?	100%	\$24.2m	100%	-\$2.6m	?	?	?
2011	?	?	\$3.1m	100%	0	?	?	?

Further questions

- Are data about taxes, royalties and payments to government publicly available elsewhere, outside of your annual reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com) or by telephone on +61 (0)404 115 038

Yours sincerely,



Alan Wolfe
Research,
Tax Justice Network Australia

Red 5 Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding the Siana Gold Mine Project in The Philippines, and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We have included the data we have below.

Note:

- Our data (and research excludes payroll or other taxes that are paid on behalf of employees, as well as import taxes.

Siana Gold Mine, Philippines

	Total Mine Production	Red 5's Share of Production	Total Project Revenue	Red 5's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	41,296oz Au 45,597oz Ag	100%	\$68.5m	100%	\$0.08m	0	0	\$0.08m
2016	59,663oz Au 60,307oz Ag	100%	\$97.3m	100%	\$3.2m	?	0	?
2015	23,645oz Au 25,341oz Ag	100%	\$27.7m	100%	0	0	0	?
2014	? oz Au ? oz Ag	100%	\$0.07m	100%	0	0	0	?
2013	18,255oz Au 36,719oz Ag	100%	\$28.5m	100%	\$0.13m	?	0	?
2012	5,119oz Au 35,496oz Ag	100%	\$4.3m	100%	0	?	0	?

Further questions

- Are data about taxes, royalties and payments to government publicly available elsewhere, outside of your Annual Reports?
- Are royalties and other payments to government made for the Siana Project but not reported in Red 5's Annual Reports?
- Is there a specific reason why the payment of separate taxes and royalties are aggregated in Red 5's Annual Reports? For example, the 2016 Annual Report claims that \$5.2 million was paid in national taxes, royalties and local taxes but no breakdown of this figure is provided.

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com) or by telephone on +61 (0)404 115 038

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a stylized flourish at the end.

Alan Wolfe
Research,
Tax Justice Network Australia

12 September, 2018

Santos Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian energy and mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding your LNG project in Papua New Guinea and Bayu Undan project in the Joint Petroleum Development Area of Australia / Timor-Leste, and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available.

We understand Santos publishes data for revenue, corporate taxes and royalties that is consolidated across operational segments. We are interested in project-by-project data that falls into three categories: Corporate Taxes, Royalties and Other Payments to Government. (We recognise these categories may vary from those used by Santos). We would be grateful for confirmation of these amounts by these categories. The data we have is shown below. Please note that our data and research excludes payroll or withholding taxes that are paid on behalf of employees, as well as import taxes

LNG Project, PNG (USD\$) – 13.5% ownership

	Total Mine Production	Santos' Share of Production	Total Project Revenue	Santos' Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	12.6 mmboe	13.5%	\$532.0m	13.5%	?	?	?	?
2016	12.2 mmboe	13.5%	\$444.0m	13.5%	?	?	?	?
2015	11.4 mmboe	13.5%	\$566.0m	13.5%	?	?	?	?
2014	6.9 mmboe	13.5%	?	?	?	?	?	?

Bayu Unda Project, Timor-Leste / Australia (USD\$) – 11.5% ownership

FY	Total Project Production	Santos' Share of Production	Total Project Revenue	Santos' Share of Revenue	Total Corporate Taxes	Total Project Royalties	Additional Profits Tax	Fines, penalties, and forfeits (EITI label)	Other taxes payable by natural resource companies	TOTAL PAYMENTS TO GOVERNMENT
2017	?	4.0 mmboe	?	\$153.0m	?	?	?			?
2016	?	4.2 mmboe	?	\$145.0m	?	?	?			?
2015	?	4.3 mmboe	?	\$215.0m	\$3.8m	\$55.6m	\$18.8m			\$78.2m
2014	?	0.9 mmboe	?	?	\$34.9m	\$117.4m	\$29.2m			\$64.1m
2013	?	1.5 mmboe	?	?	?	?	?			\$311.8m less Withholding taxes or equivalent
2012	?	4.2 mmboe	?	?	?	?	?			\$329.5m less Withholding taxes or equivalent
2011	?	4.4 mmboe	?	?	\$73.3m	\$214.1m	\$64.2m	\$13.7m		\$365.4m
2010	?	?	?	?	\$45.5m	\$122.7m	\$48.0m	\$38.4m		\$220.1m
2009	?	?	?	?	?	\$107.8m	?		\$72.2m	\$179.9m
2008	?	?	?	?	?	\$132.7m	?		\$96.4m	\$229.0m

Note:

- All payment data was sourced from EITI reports in Timor-Leste

Further questions

- Are data about taxes, royalties and payments to government publicly available elsewhere, outside of your Annual Reports?
- Is there a particular reason why corporate royalties and other payments to government are not reported project-by-project in Santos' Annual Reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com) or by telephone on +61 (0)404 115 038

Yours sincerely,



Alan Wolfe
Research,
Tax Justice Network Australia

12 September, 2018

Sino Oil & Energy Holdings Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian energy and mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding your SGE Gas project in China, and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We've included the data we have below.

We are interested in that falls into three categories: Corporate Taxes, Royalties and Other Payments to Government. (We recognise these categories may vary from those used by Sino Oil & Energy). We would be grateful for confirmation of these amounts by these categories. Note our data (and research) excludes taxes on payroll and workforce, as well as import taxes.

SGE Gas Project, China (USD\$) – 49% ownership

	Total Mine Production	SOE's Share of Production	Total Project Revenue	SOE's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Total other payments to government	TOTAL PAYMENTS TO GOVERNMENT
2017	6,205 mmscf	49%	\$31.4m	\$15.4m	\$0.1m	?	?	\$0.1m
2016	7,665 mmscf	49%	\$12.1m	\$6.0m	\$0.4m	?	?	\$0.4m
2015	?	?	?	?	?	?	?	?
2014	?	?	?	?	?	?	?	?

Further questions

- Are data about taxes, royalties and payments to government publicly available elsewhere, outside of your annual reports?
- Is there a particular reason why corporate royalties and other payments to government are not reported in Sino Oil & Energy's annual reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or

additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a large, sweeping flourish at the end.

Alan Wolfe
Research
Tax Justice Network Australia

11 September 2018

South32 Limited

Dear Mr. James Clothier,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding South Africa Energy Coal in Mpumalanga, Hotazel Manganese Mines (Mamatwan and Wessels) in Northern Cape, Brazil Alumina in Trombetas Region, Para, and Cerro Matoso in Cordoba and wanted to check that the information is correct before we publish. We've included data prior to South32's demerger from BHP as it relates to these projects.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We've included the data we have below. Note:

- The 2016 and 2017 tax transparency reports delineate corporate taxes and royalties by country. We are interested in the allocation of taxes and royalties by project.
- For years 2008-2015, when a tax transparency report was not published, corporate taxes and royalties are infrequently delineated even by country. We are interested in the precise allocation of taxes and royalties by project.
- The Segment Information in the Notes to Financial Statements for 2014 and 2015, indicates no Income Tax Expense for these projects. Can you confirm this is correct?

South Africa Energy Coal, Mpumalanga (USD\$)

S32	Total Mine Production	South32's Share of Production	Total Mine Revenue	South32's Share of Revenue	Total Corporate Taxes	Total Project Royalties	TOTAL PAYMENTS TO GOVERNMENT
2017	28,913 kt	28,913 kt	\$1,103m	\$1,103m	\$42m	\$22.1m	\$64.1m
2016	31,681 kt	31,681 kt	\$1,009m	\$1,009m	\$1.7m	\$17.8m	0
2015	34,277 kt	34,277 kt	\$1,315m	\$1,315m	0	?	0
2014	30,384 kt	30,384 kt	\$1,247m	\$1,247m	0	?	?
2013	31,267 kt	29,951 kt	?	?	?	?	?
2012	33,279 kt	33,279 kt	?	?	?	?	?
2011	34,328 kt	34,328 kt	?	?	?	?	?
2010	30,459 kt	30,459 kt	?	?	?	?	?
2009	29,896 kt	29,896 kt	?	?	?	?	?
2008	45,072 kt	45,072 kt	?	?	?	?	?

Hotazel Manganese Mines, Northern Cape (USD\$)

S32	Total Mine Production: ore; alloy	South32's Share of Production: ore; alloy	Total Mine Revenue	South32's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Other Fees and Payments	TOTAL PAYMENTS TO GOVERNMENT
2017	?	2,038 kwmt; 73 kt	?	\$391m	0	\$14.3m	\$0.1m	\$14.4m
2016	?	1,711 kwmt; 91 kt	?	\$234m	0	\$0.4m	0	\$0.4m
2015	?	1,682 kt; 246 kt	?	\$420m	0	?	?	0
2014	?	1,566 kt; 226 kt	?	\$473m	0	?	?	?
2013	3,490 kt; 374 kt	1,536 kt; 224 kt	?	?	?	?	?	?
2012	3,625 kt; 404 kt	1595 kt; 242 kt	?	?	?	?	?	?
2011	3,007 kt; 486 kt	1323 kt; 292 kt	?	?	?	?	?	?
2010	2,718 kt; 364 kt	1,196 kt; 218 kt	?	?	?	?	?	?
2009	2,191 kt; 301 kt	964 kt; 181 kt	?	?	?	?	?	?
2008	3,040 kt; 513 kt	1,338 kt; 308 kt	?	?	?	?	?	?

Further Questions

- Prior to 2013, revenue, taxes, and royalties are not delineated by project for HMM. Is there a particular reason that revenue, taxes, and royalties are not reported by project in the annual report?

Brazil Alumina (USD\$)

S32	Total Mine Production:	South32's Share of	Total Mine Revenue	South32's Share of	Total Corporate	Total Project Royalties	Other Fees and	TOTAL PAYMENTS TO
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	alumina; aluminium	Production: alumina; aluminium		Revenue	Taxes		Payments	GOVERNMENT
2017	?	1,329 kt alumina	?	\$385m	\$33.4m	0	\$0.8	\$4.3m
2016	?	1,335 kt alumina	?	\$346m	\$38.8m	0	\$0.8	\$26.2m
2015	?	1,328 kt; 40 kt	?	\$497m	?	?	?	0
2014	?	1,262 kt; 104 kt	?	\$529m	?	?	?	?
2013	?	1,205 kt; 154 kt	?	?	?	?	?	?
2012	?	1,235 kt; 170 kt	?	?	?	?	?	?
2011	?	1,100 kt; 40 kt	?	?	?	?	?	?
2010	?	709 kt; 174 kt	?	?	?	?	?	?
2009	?	537 kt; 177 kt	?	?	?	?	?	?
2008	?	536 kt; 257 kt	?	?	?	?	?	?

Further Questions

- Total Payments to Government takes into account Net Taxes Refunded. Why were nearly 90% of South32's taxes paid to the Brazilian government refunded in FY2017?

Cerro Matoso (USD\$)

S32	Total Mine Production	South32's Share of Production	Total Mine Revenue	South32's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Licence Fees	TOTAL PAYMENTS TO GOVERNMENT
2017	?	36.5 kt	?	\$377m	\$5.1m	\$25.4m	\$1m	\$31.5m
2016	?	36.8 kt	?	\$333m	(\$23.3m)	\$22.5m	\$0.9m	\$0.1m
2015	?	40.4 kt	?	\$593m	0	?	?	?
2014	?	44.3 kt	?	\$595m	0	?	?	?
2013	?	50.8 kt	?	\$803m	?	?	?	?
2012	?	48.9 kt	?	\$876m	?	?	?	?
2011	?	40 kt	?	?	?	?	?	?
2010	?	49.6 kt	?	?	?	?	?	?
2009	?	50.5 kt	?	?	?	?	?	?
2008	?	41.8 kt	?	?	?	?	?	?

Further questions

- Other than for 2016 and 2017, is there data about specific taxes, royalties and payments to government for these projects publicly available elsewhere, outside of your annual reports?
- Is there any particular reason why corporate taxes, royalties, and other fees paid to government are not allocated by project in the annual reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a stylized flourish at the end.

Alan Wolfe
Research
Tax Justice Network Australia

11 September 2018

St. Barbara Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding Simberi Project in the Simberi region of PNG and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We've included the data we have below.

Note:

- Corporate tax data in your Annual Reports is not delineated by jurisdiction. We are interested in the precise division of taxes by project.

Simberi Project (AUD\$)

SBM	Total Mine Production	St. Barbara's Share of Production	Total Mine Revenue	St. Barbara's Share of Revenue	Total Corporate Taxes	Total Project Royalties	TOTAL PAYMENTS TO GOVERNMENT
2017	116,000 oz	116,000 oz	\$199.8m	\$199.8m	?	\$4.5m	?
2016	110,286 oz	110,286 oz	\$169.8m	\$169.8m	0	\$3.8m	\$3.8m
2015	79,568 oz	79,568 oz	\$112.5m	\$112.5m	?	\$2.6m	?
2014	44,251oz	44,251oz	\$61.0m	\$61.0m	?	\$1.4m	?
2013	45,609 oz	45,609 oz	\$69.5m	\$69.5m	?	\$1.6m	?

Further questions

- Are data about taxes, royalties and payments to government for this project publicly available elsewhere, outside of your annual reports?
- Is there a particular reason why royalties and income tax are not reported on a project-by-project basis in St. Barbara's annual reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or

additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a stylized flourish at the end.

Alan Wolfe
Research
Tax Justice Network Australia

11 September 2018

Tap Oil Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding Manora Field in the G1/48 Concession and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We've included the data we have below.

Note:

- Corporate tax data in your Annual Reports are consolidated for all projects. (e.g., 2017 total income tax expense is \$12.9 million) We are interested in the precise division of corporate tax paid by project. What is the allocation of corporate tax paid to the Government of Thailand for this project for 2014-2017?
- In your Annual Reports, Government royalties seem to refer to payments to the Government of Thailand. Can you confirm this data?

Manora Field (USD\$)

TAP	Total Production	Tap Oil's Share of Production	Total Revenue	Tap Oil's Share of Revenue	Total Corporate Taxes	Total Project Royalties	TOTAL PAYMENTS TO GOVERNMENT
2017	?	786,000 barrels	?	\$39.2m	?	\$3.1m	?
2016	?	1,184,000 barrels	?	\$42.4m	?	\$3.8m	?
2015	?	149,300 barrels	?	\$80.1m	?	\$6.9m	?
2014	?	100,000 barrels	?	\$1.8m	?	-	?

Further questions

- Are data about taxes, royalties and payments to government for this project publicly available elsewhere, outside of your annual reports?
- Is there a reason why taxes are not reported on a project-by-project basis in your annual reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a large, sweeping flourish at the end.

Alan Wolfe
Research
Tax Justice Network Australia

11 September 2018

Terracom Limited

Dear Mr. Nathan Boom,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports regarding Baruun Noyon Uul Mine (BNU) in South Gobi, Mongolia, and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We've included the data we have below.

Notes:

- Your 2015 Annual Report report sales revenue of \$9.1 million due to “high quality and excellent value in use of the BNU brand of coking coal.” Is this figure the BNU mine’s total revenue for the year or does it include other projects?

Baruun Noyon Uul Mine (AUD\$)

TER	Total Mine Production	Terracom's Share of Production	Total Mine Revenue	Terracom's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Withholding Tax Expense	TOTAL PAYMENTS TO GOVERNMENT
2017	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
2016	368,773 tonnes	368,773 tonnes	\$9.9m	\$9.9m	0	0	-	?
2015	187,679 tonnes	187,679 tonnes	?	?	\$950	0	-	?
2014	0	0	?	?	\$22,500	0	2,000,000	?

Further Questions

- Are data about taxes, royalties and payments to government for this project publicly available elsewhere, outside of your annual reports?
- Is there a particular reason why corporate royalties and other payments to government are not reported in Terracom’s annual reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a stylized flourish at the end.

Alan Wolfe
Research
Tax Justice Network Australia

11 September 2018

Tiger Resources Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports on the Kipoi Copper Project's operations in Katanga and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We've included the data we have below.

Note:

- All tax data here includes deferred.
- Your Annual Reports state that Tiger Resources is 5% state owned. Does the production and revenue data in your Annual Reports reflect Tiger Resources 95% share or total production and revenue?
- Annual Reports state that from 2011-2013 Tiger owned 60% of the operating company. We are interested in your precise share of production and revenue for these years.

Kipoi Copper Project (USD\$)

TGS	Total Mine Production	Tiger's Share of Production	Total Mine Revenue	Tiger's Share of Revenue	Total Corporate Taxes	Total Project Royalties	TOTAL PAYMENTS TO GOVERNMENT
2017	n/a	n/a	n/a	n/a	n/a	n/a	n/a
2016	23,099t cu cathode	?	\$112.7m	?	(\$17.6m)	\$4.9	?
2015	26,151t cu cathode	?	\$146.4m	?	\$1.3m	\$6.3m	?
2014	13,557t cu cathode	?	\$143.4m	?	\$13.1m	\$6.3m	?
2013	41,255t cu concentrate	?	\$193.1m	?	\$20.2m	\$8.6m	?
2012	36,966t cu concentrate	?	\$146.4m	?	\$15.7m	\$5.3m	?
2011	12,321t cu concentrate	?	\$41.7m	?	\$3.7m	0	?

Further questions

- Are data about taxes, royalties and payments to government for this project publicly available elsewhere, outside of your annual reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a large, sweeping flourish at the end.

Alan Wolfe
Research
Tax Justice Network Australia

11 September 2018

Troy Resources Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports on the Casposo project in Argentina, Karouni project operations in Guyana, and Andorinhas project in Brazil and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We've included the data we have below.

Note:

- Corporate tax data in your Annual Report combines all "continuing operations" (e.g., 2013 is A\$15.4m). We are interested in the precise division of corporate tax by project.
- Royalty data in your Annual Report segments royalties by operational status (either continuing or discontinuing). We are interested in the precise division of royalties by project.

Casposo Mine (AUD\$)

TRY	Total Mine Production	Troy's Share of Production	Total Mine Revenue	Troy's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Export Taxes or "Other" Taxes	TOTAL PAYMENTS TO GOVERNMENT
2017	0	0	\$55m	\$55m	?	-	-	?
2016	39,297 oz	?	\$70m	?	?	?	3,167,000	?
2015	99,963 oz	99,963 oz	\$145.7m	\$145.7m	?	?	8,183,000	?
2014	101,734 oz	101,734 oz	\$133.7m	\$133.7m	?	?	7,575,000	?
2013	69,314 oz	69,314 oz	\$147.4m	\$147.4m	?	?	7,657,000	?
2012	70,989 oz	70,989 oz	\$132.6m	\$132.6m	?	?	7,804,000	?
2011	17,106 oz	17,106 oz	\$25.5m	\$25.5m	?	?	1,258,000	?

Further Questions:

- What is Troy's share of production and revenue of Casposo Mine for 2016 after the sale of 51% interest in the mine to Austral Gold in March 2016, and then the additional 19% in March 2017?

Karouni Mine (AUD\$)

TRY	Total Mine Production	Troy's Share of Production	Total Mine Revenue	Troy's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Export Taxes or "Other" Taxes	TOTAL PAYMENTS TO GOVERNMENT
2017	56,023 oz	56,023 oz	\$40m	\$40m	?	\$8.9m	?	?
2016	34,740 oz (to 30 June 2016)	82,826 oz	\$29.6m	\$53.4m	?	?	?	?

Andorinhas Mine (AUD\$)

TRY	Total Mine Production	Troy's Share of Production	Total Mine Revenue	Troy's Share of Revenue	Total Corporate Taxes	Total Project Royalties	Export Taxes or "Other" Taxes	TOTAL PAYMENTS TO GOVERNMENT
2017	-	-	-	-	-	-	-	-
2016	8,789 oz	8,789 oz	\$15m	\$15m	?	?	?	?
2015	22,142 oz	22,142 oz	\$32.4	\$32.4	?	?	?	?
2014	31,205 oz	31,205 oz	\$44.3m	\$44.3m	?	?	?	?
2013	33,688 oz	33,688 oz	\$55.3m	\$55.3m	?	?	?	?
2012	48,632 oz	48,632 oz	\$76m	\$76m	?	?	?	?
2011	49,099 oz	49,099 oz	\$68.4m	\$68.4m	?	?	?	?
2010	31,568 oz	31,568 oz	\$38.8m	\$38.8m	?	?	?	?
2009	28,903 oz	28,903 oz	?	?	?	?	?	?
2008	?	?	?	?	?	?	?	?

Further Questions

- Is there data about royalties or income tax from these projects publicly available elsewhere (outside of your annual reports)?
- Is there a particular reason why royalties and income tax are not reported on a project-by-project basis in Troy Resources' annual reports?

We would be grateful for your advice regarding whether corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,



Alan Wolfe
Research
Tax Justice Network Australia

11 September 2018

Universal Coal PLC

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports on Kangala and New Clydesdale Collieries' operations in Witbank and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We've included the data we have below.

Note:

- Royalty data in your annual report combines the Kangala Colliery and the New Clydesdale Colliery into one payment of \$657,000. We are interested in the precise division of these payments by project.

Kangala Colliery (AUD\$)

UNV	Total Mine Production	UNV's Share of Production	Total Mine Revenue	UNV's Share of Revenue	Total Corporate Taxes	Total Project Royalties	TOTAL PAYMENTS TO GOVERNMENT
2017	3.7m tonnes	3.7m tonnes	\$129.3m	\$129.3m	\$4.4m	?	?
2016	3.3m tonnes	3.3m tonnes	\$95.5m	\$95.5m	\$2m	320,000	\$2.32m
2015	2.5m tonnes	2.5m tonnes	\$75m	\$75m	\$1.1m	327,000	\$1.33m

New Clydesdale Colliery (AUD\$)

UNV	Total Mine Production	UNV's Share of Production	Total Mine Revenue	UNV's Share of Revenue	Total Corporate Taxes (Benefit)	Total Project Royalties	TOTAL PAYMENTS TO GOVERNMENT
2017	764,000 tonnes	764,000 tonnes	\$20m	\$20m	(\$4.4m)	?	?

Further questions

- Is there data about royalties for these projects publicly available elsewhere (outside of your annual reports) for 2017?

- Is there a particular reason why royalties are not reported on a project-by-project basis in Universal Coal's annual reports beginning in 2017?
- Are data about taxes, royalties and payments to government publicly available elsewhere, outside of your annual reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a stylized flourish at the end.

Alan Wolfe
Research
Tax Justice Network Australia

11 September 2018

Zimplats Holdings Limited

Dear Sir/Madam,

We are collecting data on the contribution of Australian mining companies to developing countries as a project for the Tax Justice Network Australia, Oxfam Australia and the Uniting Church in Australia, Synod of Victoria and Tasmania. We have data from your Annual Reports on Zimplats' operations in Mashonaland West, Zimbabwe, and wanted to check that the information is correct before we publish.

Can you please verify if the following information is correct? As we are focusing on operations from 2008-2017, we would also appreciate any data you can provide for these years or advice as to where this information is available. We've included the data we have below.

Zimplats Mine (USD\$)

ZIM	Total Mine Production	Zimplats' Share of Production	Total Mine Revenue	Zimplats' Share of Revenue	Total Corporate Taxes	Total Project Royalties	TOTAL PAYMENTS TO GOVERNMENT
2017	569,000 oz 4E	569,000 of 4E zz	\$512.5m	\$512.5m	\$55.8m	\$12.7m	\$68.5m
2016	583,000 oz 4E	583,000 of 4E oz	\$471.8m	\$471.8m	\$22.0m	\$11.7m	\$33.7m
2015	384,000 oz 4E	384,000 of 4E oz	\$408.41m	\$408.41m	\$130.5m	(\$95.8m); \$10.2m	\$44.8m
2014	487,000 oz 4E	487,000 oz 4E	\$576m	\$576m	\$31.5m	\$44.4m	\$75.9m
2013	389,000 oz 4E	389,000 oz 4E	\$471.6m	\$471.6m	\$40.8m	\$39.4m	\$80.2m
2012	375,000 oz 4E	375,000 oz 4E	\$473.3m	\$473.3m	\$29.2m	?	?
2011	368,000 oz 4E	368,000 oz 4E	\$527.3m	\$527.3m	\$35.7m	?	?
2010	350,000 oz 4E	350,000 oz 4E	\$404m	\$404m	\$44.5m	?	?
2009	191,000 oz 4E	191,000 oz 4E	\$120.3m	\$120.3m	-\$1m	\$3.2m	\$2.2m
2008	189,000 oz 4E	189,000 oz 4E	\$294.3m	\$294.3m	\$21.1m	\$8.2m	\$29.3m

Further Question

- Are data about taxes, royalties and payments to government for this two project publicly available elsewhere, outside of your annual reports?

We would be grateful for your advice regarding whether any corrections are needed or additional information is available, by **Monday 8 October 2018**. If you have any questions or

additional time is needed please contact Alan Wolfe (alan@extractivesdata.com or +61 (0)404 115 038).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Wolfe', with a stylized flourish at the end.

Alan Wolfe
Research
Tax Justice Network Australia

25 July 2019

Dr Helen Szoke, AO
Chief Executive
Oxfam Australia
132 Leicester St, Carlton
VICTORIA 3053

Dear Helen,

Oxfam report on Australian mining companies' tax transparency

Iluka supports tax transparency, which plays an important role in building and maintaining trust with the communities in which we operate. Iluka adopts a responsible and sustainable approach to its tax affairs which includes a Tax Risk Policy that prohibits the company from engaging in any profit shifting or tax evasion activities. Transparent disclosure of its taxes paid is a cornerstone of Iluka's Approach to Tax¹ under which Iluka was one of the first Australian companies to adopt the Australian Board of Tax's Voluntary Tax Transparency Code.

Sierra Rutile's economic contribution in Sierra Leone

Iluka believes that working towards sustainable and profitable operations at Sierra Rutile Limited ("Sierra Rutile") will make a significant contribution to alleviating poverty and inequality in Sierra Leone. Sierra Rutile contributes directly to Sierra Leone's economy via local jobs, support of local businesses and taxes paid to Government. Since Iluka's acquisition of Sierra Rutile in late 2016, total taxes paid / remitted to Government across 2017 and 2018 represent over 20% of total Government company tax and royalty receipts. In 2017, Sierra Rutile's operations represented approximately 3% of Sierra Leone's total gross domestic product (measure of total economic activity), without accounting for indirect economic contribution.

In 2017 and 2018, Sierra Rutile made total payments to Government (inclusive of taxes borne and collected) of US\$24 million and US\$31 million respectively, representing over 20% of the company's revenue in those years. This is in spite of the Sierra Rutile being in a financial loss position across both years. The make-up of taxes paid is set out in Appendix A and explained further below.

Sierra Rutile is also the largest employer in the country, with a workforce exceeding 2,500 people, over 98% of which is Sierra Leonean. In 2018, Sierra Rutile's operations saw US\$59 million paid to local suppliers².

In addition to direct economic contributions, Sierra Rutile provides a wide range of community benefits, including support for education. In 2018, the company awarded over 56 scholarships,

¹ Available on Iluka's website – www.iluka.com

² Being suppliers which are at least 50% Sierra Leonean owned.

providing parents of local communities with financial support to ensure access to education for their children.

Sustainable operations also means looking after the health of our workforce. In 2018, the Sierra Rutile Clinic was subject to a major review and improvement program that resulted in increased staffing, additional training and resources for the clinic which receives over 30,000 visits a year.

Iluka's acquisition of Sierra Rutile is the most significant recent source of direct foreign investment in Sierra Leone, which the Government of Sierra Leone (GoSL) has identified as essential to the country's economic growth. The company's recently announced strategic partnership with the International Finance Corporation (IFC) is also positive for Sierra Leone's investment profile. The IFC is a sister organisation of the World Bank and a member of the World Bank Group. As part of this partnership, Sierra Rutile has committed to meeting IFC's high standards of transparency reporting over payments to the GoSL.

Iluka's approach to tax transparency

Consistent with Iluka's support for tax transparency, the company has been disclosing publicly its taxes paid in Australia, Sierra Leone and the United States via annual sustainability reports since 2017. Iluka notes that while this reporting format may not align strictly with Oxfam's views on how Iluka ought to report taxes on a country by country basis, the taxes paid as disclosed by Iluka align with where Iluka's operations exist, with remaining jurisdictions being immaterial. Referring to Iluka as a company that is among those 'least transparent on tax payments' is misleading.

Sierra Rutile's activities are governed substantially by the *Sierra Rutile (Ratification) Act 2002* ("the Act"). Under the Act, Sierra Rutile must pay corporate income tax at the higher of 30%³ of taxable profits or 3.5% of revenue. The Act therefore guarantees a minimum amount of income tax to be paid which cannot be shielded by any historically accumulated tax losses. Without the Act, income tax would not be payable until and unless the company generated a profit and recouped its historical tax losses. In addition, under the Sierra Rutile Act, Sierra Rutile pays royalties to the GoSL at a rate that is 1% higher than that set out in the domestic law.

Sierra Rutile's total payments to the Government in 2017 and 2018 was US\$55 million, representing an average of 21% of Sierra Rutile's revenue over the two income years. Total payments consisted of taxes borne directly by the company (inclusive of company income tax), taxes collected and remitted by the company and social security contributions, duties and levies, which, though not direct taxes, are a part of Sierra Rutile's total economic contribution in Sierra Leone.

Data collated in Oxfam's report focuses predominantly on company income tax paid. As Oxfam is aware, company income tax is only one of the vast array of taxes paid by companies to Government. Royalties, levies and duties and employee personal income tax remittances all form part of Government revenues and therefore should be represented as part of the company's economic contribution. Focusing solely on corporate income tax significantly under represents a company's overall economic contributions and is misleading to readers. For example, Oxfam has cited that Iluka reported that Sierra Rutile paid taxes of AUD \$5.2 million (US\$4.2 million) in 2017 representing 3.6% of revenues. What Oxfam has reported was company income tax only, notwithstanding that Iluka had informed Oxfam that total taxes paid in 2017 was in fact US\$21 million, representing 20% of revenue. Taxes paid are split between direct taxes borne by Sierra Rutile, being corporate income tax, royalties, mining license and surface rents and import duties

³ The prevailing corporate income tax rate under domestic tax law.

and taxes collected, represented by employee PAYE remittance and withholding taxes (refer Appendix A).

As noted above, Iluka supports strong tax transparency and has reflected its commitment in this area by

- Being one of the first signatories to the Australian Board of Tax's Voluntary Tax Transparency Code ("the Code") and publishing its first Tax Transparency Report ("TTR") on its website for the 2016 income year.⁴
- Inclusion of the company's taxes paid data, including Sierra Rutile's contribution, in its 2017 Sustainability Report and more recently in the 2018 Sustainability Report, as part of Iluka's commitment to align with the sustainable development principles of the International Council on Mining and Metals (ICMM). Appendix A to this letter sets out the economic contribution data for Sierra Rutile that feeds into Iluka's sustainability reports.
- Recently publishing an Approach to Tax statement⁵, which sets out the guiding principles upon which the company's tax risk management framework is based. These principles include:
 - managing tax affairs in a responsible, efficient, transparent and sustainable manner;
 - full compliance with relevant tax laws, including paying taxes on time;
 - ensuring related party dealings reflect arm's length principles in accordance with Organisation for Economic Co-operation and Development (OECD) guidelines; and
 - developing and maintaining relationships with tax policy makers and revenue authorities.

Iluka is continuously reviewing the adequacy of its tax transparency disclosures, including ensuring full compliance with its tax transparency obligations globally. The company is currently working through various proposed tax disclosure measures such as the GRI draft standard on *Tax and Payments to Government*, which contains a recommendation on country by country reporting of taxes. As noted, Iluka effectively reports all material taxes on a country by country basis already.

The below section addresses some specific issues raised in Oxfam's draft report.

1. *Sierra Rutile (Ratification) Act 2002 (Sierra Rutile Act)*

The provisions of the *First Amendment Agreement* ("First Amendment") to the Act ended on 31 December 2014, before Iluka's acquisition of Sierra Rutile in December 2016.

In accordance with Iluka's Approach to Tax and Tax Risk Policy, Sierra Rutile meets its tax obligations in Sierra Leone in full compliance with the law. This entails observation of the domestic tax regime in Sierra Leone, taking into account the fiscal provisions of the the Act. Pursuant to this regime, total tax and remittances to Government by Sierra Rutile since Iluka's acquisition in December 2016 are nearly US\$55 million, representing 21% of Sierra Rutile's revenue.

This includes payment of company income tax at 3.5% of revenue for both 2017 and 2018 despite the company making losses over the same period. In contrast, company income tax under Sierra Leone's domestic tax law and under most other country's domestic tax laws (including

⁴ Please refer to the published report in the Transparency Hub at www.iluka.com.au. Sierra Rutile Limited's (SRL) taxes paid data was not included in Iluka's 2016 TTR as the acquisition was only completed on 7 December 2016.

⁵ Refer to Appendix B and published on Iluka's website.

Australia's) does not entail a company paying income tax until it has taxable profits post utilisation of any carried forward tax losses.

Significant carried forward tax losses are common for mining companies given the significant upfront capital outlay required for mining operations. Sierra Rutile's ability to carry forward and utilise these tax losses is no different to the rules in many other jurisdictions, including Australia.

2. Subsidiary entities in the British Virgin Islands (BVI)

Iluka has three BVI entities in its structure, two of which were inherited on acquisition of Sierra Rutile and the other (being Iluka Investments BVI Limited) incorporated to merge with the pre-existing Sierra Rutile BVI head entity⁶ (previously listed on the AIM exchange in London).

3. Netherlands third party warehouse

As noted in Oxfam's report, Iluka has a third party warehouse arrangement with Eggerding (industrial minerals company) in the Netherlands to provide logistics services including storage of Iluka and Sierra Rutile products at Eggerding's warehouse such that it is close to our European customer base. Neither Iluka nor any of its subsidiaries own this warehouse, nor have a lease and / or control over the warehouse premises or any ownership or other interest in Eggerding. The product stored in the warehouse is sold by Iluka / Sierra Rutile direct to our customers and is not subject to any intra-group transfer pricing arrangements.

Iluka confirms that it has subsidiary entities in the Netherlands but reiterates that they have no connection with the third party warehouse arrangement. There are no intra-group arrangements between Iluka's Netherlands subsidiaries and Sierra Rutile's operations. The inference in Oxfam's report that the existence of Iluka's Netherlands subsidiaries could allow profit shifting to the Netherlands via marketing activities or otherwise is incorrect, as it would be expressly prohibited by Iluka's Tax Risk Policy and Approach to Tax.

Iluka has one sales and marketing employee based in the Netherlands interacting with European customers in respect of Iluka Australia's activated carbon product. All sales of the product are concluded direct between Iluka Australia and third party customers and are not made through Iluka's Netherlands subsidiaries.

As with its stance on anti-bribery and corruption, Iluka maintains high standards of conduct in relation to transparency on taxes paid. The tax transparency landscape has evolved significantly over the last few years as many measures have been introduced by various Government and non-Government bodies. Iluka is working through these in a diligent and responsible fashion to continue to enhance its approach to tax transparency.

Iluka welcomes scrutiny on its approach to tax transparency and requests that such scrutiny be reported accurately and transparently and without incorrect and/or unfair inference.

⁶ This entity was subsequently de-listed and deregistered post the merger.

Further information about Iluka's economic contribution in Sierra Leone can be found in the company's 2018 Sustainability Report, published on Iluka's website.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Adele Stratton', with a stylized flourish at the end.

Adele Stratton
Chief Financial Officer

Appendix A – SRL 2017 and 2018 Payments to Government

	2017 USD \$millions	2018 USD \$millions	Total 2017 and 2018
Taxes borne			
Corporate income tax	4.2	4.1	8.3
Royalties	5.9	5.0	10.9
Mining license and surface rents	1.3	1.0	2.3
Import duties	1.9	6.7	8.6
Taxes collected			
Employee PAYE remittance	6.0	7.6	13.6
Withholding tax	1.9	4.0	5.9
Total taxes borne and collected	21.3	29.0	49.7
Other payments and contributions			
Employee social security contributions (NASSIT)	1.5	1.7	3.2
Fees and permits	1.1	0.9	2.0
Total payments to Government⁷	23.9	31.0	54.9
Mineral sands revenue	110.2	151.6	261.8
Segment profit / (loss) before tax	(10.8)	(1.9)	
Total payments to Government as a % of SRL revenue	21.7%	20.4%	21.0%

⁷ Sum of total taxes borne and collected and other payments and contributions.

APPENDIX B – OUR APPROACH TO TAX STATEMENT



OUR APPROACH TO TAX

In pursuing our objective of delivering sustainable value, we prioritise the sustainability of our business, our people and our communities, including our commercial customers, suppliers, governments and other external stakeholders.

We recognise that our economic contribution, of which tax is a part, creates value for our communities.

Building and maintaining trust is essential to the sustainability of our communities. We do this by delivering on our commitments, including paying tax in accordance with our legal obligations.

As fiscal policies are a factor that impact long term investment decisions, we consider that tax regimes should promote economic growth by being stable, competitive, administratively efficient and provide long term certainty.

We have in place a board-approved tax risk governance framework which includes our Tax Risk Policy. This framework makes it clear that we manage our global tax affairs in a responsible, efficient, transparent and sustainable manner, in full compliance with relevant laws.

We seek to develop and maintain transparent and trusting relationships with tax policy developers and revenue authorities, proactively clarifying interpretations and practices.

Our international related party payments take place in accordance with the arm's length principles contained in the Organisation for Economic Co-operation and Development (OECD) guidelines.

We participate in the Australian Board of Taxation's Voluntary Tax Transparency Code and support the Extractive Industry Transparency Initiative.

We welcome transparency on our tax payments and disclosures under global financial reporting standards and other applicable local regulations, including disclosure of material taxes paid and collected in jurisdictions where we operate.