

HKEX: 1208

ICMM
International Council
on Mining & Metals

MINING WITH
PRINCIPLES



MMG Limited

Tax and Community Contribution 2024

We mine for
progress

Tax and community contribution

MMG makes significant contributions to the economies of the countries in which we operate, as a major investor, taxpayer, employer and purchaser of local goods and services.

For the financial year ended 31 December 2024, total taxes paid were US\$399.9 million and total royalties paid were US\$156.9 million. Taxes paid in relation to previous years are available in our Tax and community contribution disclosures (available on our website), together with a broad overview of corporate income taxes specific to the mining sector.

MMG's 2024 Sustainability Report is prepared with reference to the GRI Sustainability Reporting Standards. The disclosures in this report are guided by the GRI 207 Tax Standard and include corporate income taxes, value-added taxes, royalties on mineral extraction, withholding taxes and taxes paid on significant uncertain tax positions.

Tax governance, control and risk management

With mining operations in Peru, the Democratic Republic of the Congo (DRC), Botswana and Australia, as well as companies in Hong Kong, China, Canada, Singapore, Brazil, Zambia and South Africa, MMG maintains a high standard of corporate governance with transparency and accountability to all shareholders together with tax risk management. Internal tax standards, tax exposure management procedures and regular reviews of our tax function comply with these standards. External assurance is further provided as part of the audit process for the purpose of publishing our Annual Report on the HKEx.

Stakeholder engagement and management of tax-related concerns

MMG operates under a policy of full transparency and cooperation with all tax authorities and the payment of all taxes properly due under the law wherever we operate. We are a member of numerous industry associations, such as the DRC Chamber of Mines, ICMM, International Zinc Association, Extractive Industries Transparency Initiative, Transparency International (Australia), Queensland Resources Council and Tasmanian Minerals Council. As a result, we are often party to regular tax transparency and reporting dialogues, engaging in robust and active discussions with local tax authorities on tax policy implementation and interpretation matters.

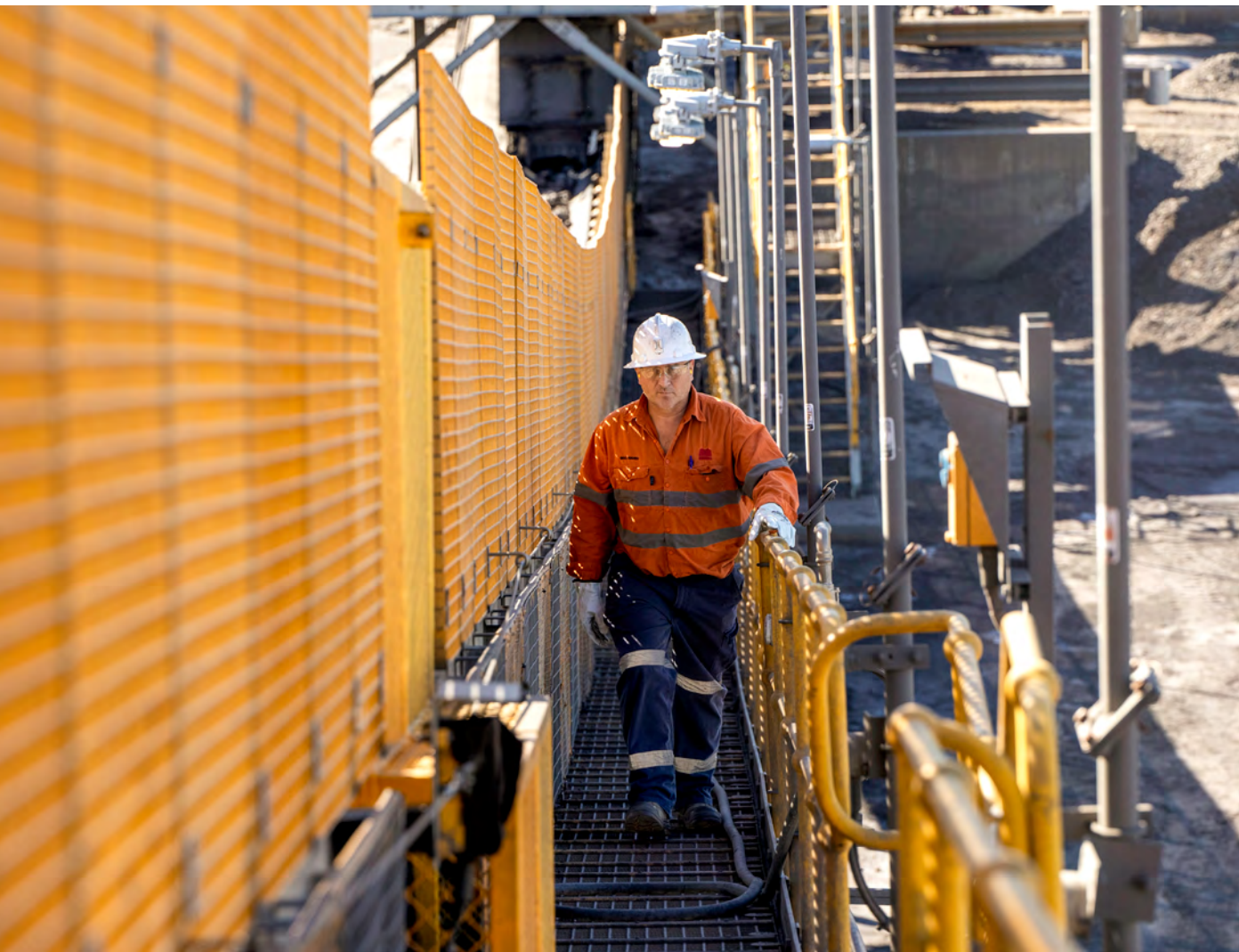
\$399.9 million

Total taxes paid (US\$)

\$156.9 million

Total royalties paid (US\$)





Tax transparency and reporting

Transparency on mineral revenues paid to governments is important for regulatory stability and stakeholder understanding of the responsible use of taxes. Broadly, there are two approaches to tax disclosures. The first involves taxes paid by a company that contributes to government public expenditure. The second focuses on a company’s role in assisting with the collection of taxes from third parties, in addition to making its own contributions. MMG’s current approach reflects the former. MMG further demonstrates transparency by:

- making disclosures in line with the OECD’s Base Erosion and Profit Shifting Action Plan regarding country-by-country reporting and transfer pricing documentation
- our Code of Conduct and anti-bribery and anti-corruption policies
- public disclosures in line with the Foreign Investment Review Board, Australian Taxation Office and HKEx disclosure requirements, complemented by voluntary disclosure of key payments in annual sustainable development reports for MMG and Las Bambas
- engaging with the Extractive Industries Transparency Initiative (EITI) requirements as a reporting entity in Peru and the DRC, and as a participant in the Australian EITI pilot project

- participating in the ICMM annual tax contribution survey, providing information on MMG’s corporate income tax and royalty payments (aggregated in the ICMM members’ tax contribution publication)
- annually disclosing tax information in the Australian Corporate Tax Transparency Report.

In accordance with the 2015 OECD Report on Transfer Pricing Documentation and Country-by-Country Reporting, CMC meets the requirements for filing the country-by-country report to the tax authority in Beijing, China, by May each year. This report contains information regarding multinational enterprises on a tax jurisdiction basis, which includes tax jurisdiction per entity, revenues from related and unrelated parties, number of employees and core business activities.

Tax and community contribution
(continued)



US\$'000		2024	2023
Total taxes paid (excluding royalties)		399,888	307,059
Total royalties paid		156,912	147,593
National supply procurement		2,645,758	2,249,236
Goods and services (excluding taxes and royalties)		3,006,725	2,744,209
New property, plant and equipment		927,900	813,500
Employee benefits		434,400	365,700
Social development programs		47,864	31,850
New property, plant and equipment from acquisition of subsidiaries (Khoemacau)		2,425,500	



US\$'000		2024
Royalties ¹	8,370	
Income tax ²	1,993	
Withholding tax ²	15,372	
Other taxes ³	755	
Employment-related taxes	4,582	
Total tax contribution ⁴	31,072	



US\$'000	2024	2023
Royalties ¹	26,062	17,825
Income tax ²	6,283	23,802
Withholding tax ²	4,822	5,040
Other taxes ³	40,386	47,512
Employment-related taxes	19,908	18,244
Total tax contribution⁴	97,461	112,423



US\$'000	2024	2023
Royalties ¹	93,908	111,133
Income tax ²	85,957	2,862
Withholding tax ²	21,134	18,450
Other taxes ³	72,350	41,065
Employment-related taxes	52,523	54,241
Total tax contribution⁴	325,872	227,751



US\$'000	2024	2023
Royalties ¹	28,572	18,635
Income tax ²	14,126	44,992
Withholding tax ²	2,245	2,233
Other taxes ³	0	0
Employment-related taxes in Australia	57,452	48,618
Total tax contribution⁴	44,942	114,478

1 Paid/accrued in respect of FY2024.
2 Income tax liability does not always align with tax payments. This disclosure has been made on a cash tax paid basis.
3 This category includes amounts such as taxes paid in dispute, unrecovered VAT and net GST paid.
4 Components of total tax contribution are all assured on an aggregate level during the 2024 Annual Reporting audit (assured by Deloitte Touche Tohmatsu).
5 Relevant to Botswana, the tax contribution includes the information from 22 March 2024 onwards, following the acquisition of Khoemacau.

