TAX TRANSPARENCY AND PAYMENTS TO GOVERNMENTS REPORT 2026

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About this report

Our 2026 Annual Reporting Suite

This year we have integrated our Sustainable Development Report and Corporate Governance Statement into our Annual Report. The following documents also form part of our 2026 Annual Reporting Suite and are published separately:

Annual Report

Modern Slavery Statement

Climate-related Reporting Methodology

Our Annual Reporting Suite also includes the:

- Sustainability Databook
- Sustainability Standards and Frameworks Index
- Tax Transparency Databook

You can view all the documents in our Annual Reporting Suite at www.south32.net

Tax Transparency and Payments to Governments Report 2026

This report is about our approach to tax, how we conduct our tax arrangements globally and the size of the tax payments and contributions to governments we made for the year ended 30 June 2026.

Disclaimer

In this report, unless otherwise noted:

1. references to South32, the South32 Group, the Group, we, us, our and similar expressions refer to South32 Limited, its subsidiaries and operated joint ventures[1];
2. references to 'our operations', phrases such as commodities 'we produce', 'we refine', or in 'our portfolio' includes commodities such as bauxite, alumina, aluminium and copper that may form part of, or be produced by our non-operated joint ventures[2];
3. financial information is presented based on the Group's equity share in its subsidiaries,[3] operated joint ventures[4] and non-operated joint ventures[5];
4. monetary amounts are expressed in US dollars.

Non-IFRS

This report includes non-IFRS financial measures, including underlying measures of earnings, effective tax rate, returns on invested capital, cash flow and net cash/(debt). Non-IFRS measures should not be considered as alternatives to an IFRS measure of profitability, financial performance or liquidity. For an explanation of how South32 uses non-IFRS measures, see page 22 of our Annual Report 2026.

Non-IFRS measures should be considered in addition to, and not as a substitute for, IFRS measures of profitability, financial performance or liquidity.

Forward-looking statements

Any forward-looking statements in this report are based on South32's current expectations, best estimates and assumptions as at the date of preparation, many of which are beyond South32's control. These forward-looking statements are not guarantees or predictions of future performance, and involve known and unknown risks and uncertainties, which may cause actual results to differ materially from those expressed in the report.

Cover: Specialist Digital Technology at the South Africa Manganese Wessels mine.
Right: Anindiliyakwa woman from Groote Eylandt in Australia.

1 Details of operations which are not wholly owned by South32 Limited or its subsidiaries and for which South32 manages the operation, can be found in the Glossary.
2 Details of operations which are not wholly owned by South32 Limited or its subsidiaries and for which South32 does not manage the operation, can be found in the Glossary.
3 Cerro Matoso SA financial information is presented on a 100% basis.
4 Minera Sud Argentina financial information is presented on a 100% basis.
5 Mineração Rio do Norte S.A (MRN) and Port Kembla Coal Terminal (PKCT) financial information is excluded.

Contents

Acknowledgement

We acknowledge and pay our respects to the Indigenous, Traditional and Tribal Peoples of the lands, waters and territories on which South32 is located and where we conduct our business around the world.

We respect and acknowledge the unique cultural and spiritual relationships that Indigenous, Traditional and Tribal Peoples have to the lands, waters and territories, and their rich contribution to society.

In the spirit of respect and reconciliation, we will continue to support initiatives that strengthen culture and ways of life so that their legacy continues and extends to future generations.

Our purpose-led approach

ABOUT SOUTH32

Our purpose

Our purpose is to make a difference by developing natural resources, improving people's lives now and for generations to come. We are trusted by our owners and partners to realise the potential of their resources.

Our strategy

Our strategy underpins our purpose and outlines what we do to achieve it.

OPTIMISE

We optimise our business by working safely, minimising our impact, consistently delivering stable and predictable performance, and continually improving our competitiveness.

UNLOCK

We unlock the full value of our business through our people, innovation, projects and technology.

IDENTIFY

We identify and pursue opportunities to sustainably reshape our business for the future, and create enduring social, environmental and economic value.

Our values

Our values guide how we achieve our purpose. Every day, our values shape the way we behave and the standards we set for ourselves and others.

CARE

We care about people, the communities we're a part of and the world we depend on.

TRUST

We deliver on our commitments and rely on each other to do the right thing.

TOGETHERNESS

We value difference and we openly listen and share, knowing that together we are better.

EXCELLENCE

We are courageous and challenge ourselves to be the best in what matters.

Introduction

DELIVERING TAX TRANSPARENCY

We are committed to delivering relevant, meaningful information to our stakeholders.

Our values of care, trust, togetherness and excellence shape the way we behave and the choices we make in relation to all aspects of tax. Publishing an annual Tax Transparency and Payments to Governments Report provides a consistent view of our tax profile, demonstrating accountability and commitment to responsible practices.

Our Board and Chief Executive Officer (CEO) continue to affirm their commitment to the following principles guiding our approach to tax across all jurisdictions:

- Complying with all applicable laws, regulations, disclosure requirements, the accurate payment of taxes and timely lodgement of returns;
- Building and maintaining constructive relationships with revenue authorities, government bodies and all other relevant parties;
- Making decisions at an appropriate level, supported by comprehensive documentation;
- Confirming that technical filing positions include robust risk assessment with appropriate risk mitigation activities (e.g., professional opinions, appropriate disclosure);
- Supporting tax positions taken with evidence, so they can be substantiated if reviewed by a revenue authority;
- Immediate voluntary reporting of any detected errors/omissions to all relevant revenue authorities; and
- Complying with all our Group and tax-specific controls and maintaining evidence of their operation.

We support initiatives that require companies to publicly disclose relevant tax information. Our disclosures provide information on a country-by-country and project-by-project basis, and are aligned with a range of recognised global frameworks.

We support the Extractive Industries Transparency Initiative (EITI) and disclose all relevant tax payments made to governments, as well as our mineral development contracts. We also support the EITIs continued efforts for beneficial ownership transparency globally. The EITI recently confirmed South32 meets all expectations of supporting companies. Details on how we comply with tax transparency initiatives, including the EITI expectations and GRI 207, are provided on pages 21 and 22.

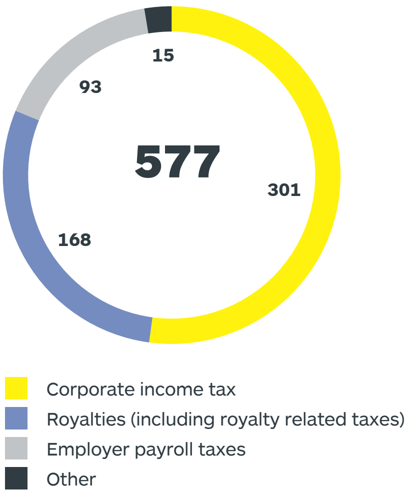
Our Tax Transparency and Payments to Government Report is supplemented by the Tax Transparency Databook which provides full data on a country-by-country and government-by-government basis. We provide additional transparency and information beyond legislative requirements applicable to our business. The link to the Tax Transparency Databook is here.

Throughout this report, we have included extensive footnotes with explanations and reconciliations to also help readers understand how the numbers quoted in this report reconcile to our Annual Report 2026.

A description of technical terms used in this report and information regarding the approach adopted in compiling the data presented can be found in the Basis of Preparation and the Glossary (refer to pages 23 and 24). For example, references to taxes and royalties differ from total government payments because total government payments also include employer payroll taxes and other levies.

Our tax payments reflect the nature of our operations and the jurisdictions in which we operate, with our tax contributions aligned to business activities, financial performance and the applicable tax regimes. In the year ended 30 June 2026, the Group paid US$577 million (US$576.4m before rounding) in taxes and royalties. The Group had an Underlying effective tax rate (ETR) of 32.9% and a Statutory ETR of 23.4%. Further details of our current year tax rates and payments are included on page 9-13.

Total taxes and royalties paid in the year ended 30 June 2026 (US$ millions)



32.9%
Underlying ETR

23.4%
Statutory ETR

Where we operate and the income tax and royalties we pay

INCOME TAX AND ROYALTY PAYMENTS SINCE FY16

Our tax contributions represent the value generated by our operations and the jurisdictions in which we operate. They are attributable to the performance, maturity and geographic mix of our assets. The map below illustrates the global distribution of income taxes and royalties paid since FY16.

AMBLER METALS

Joint venture
South32 share: 50%
Copper, lead, gold, silver and zinc

HERMOSA

Operated development project
South32 share: 100%
Zinc, lead, silver and manganese

BRAZIL ALUMINA

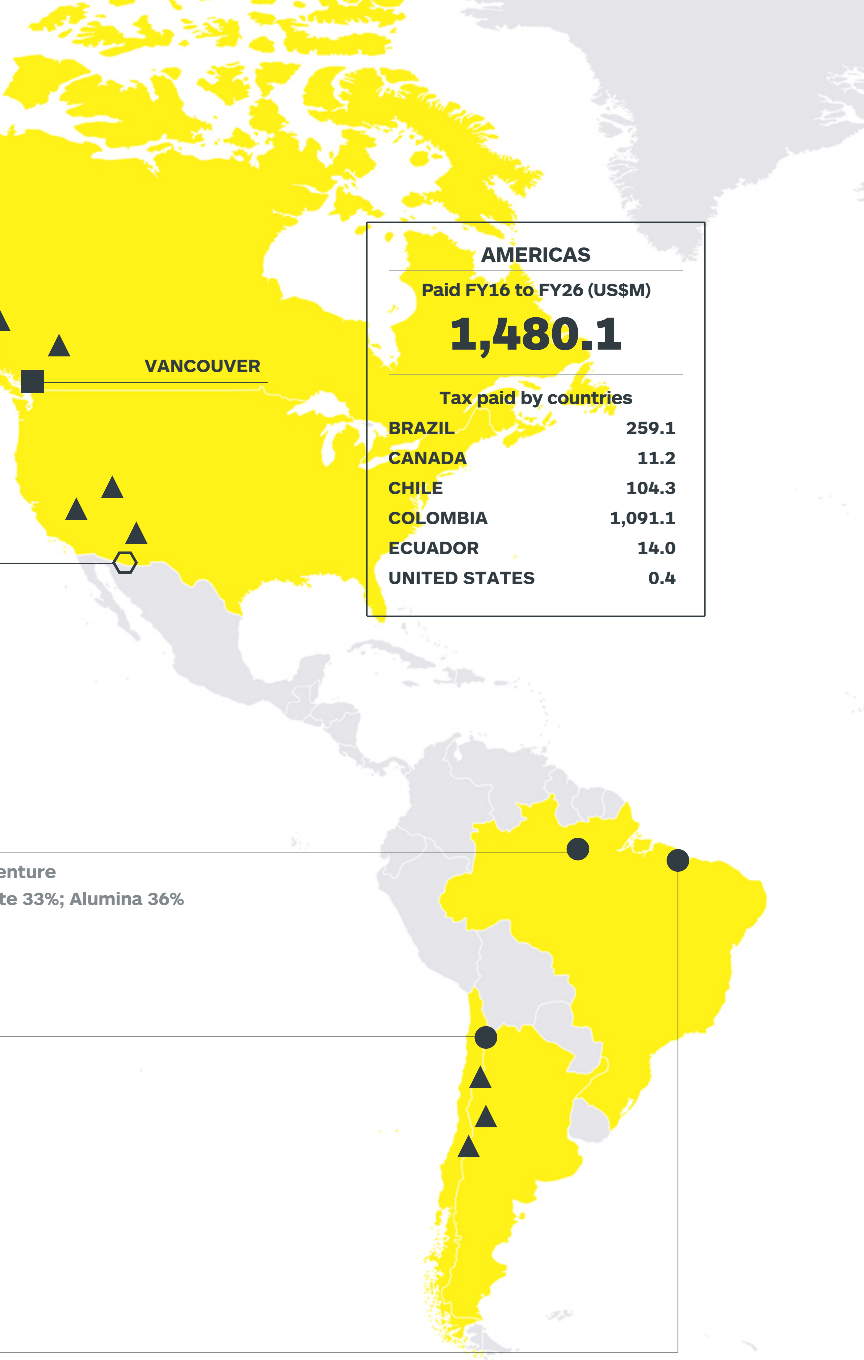
Non-operated joint venture
South32 share: Bauxite 33%; Alumina 36%
Alumina

SIERRA GORDA

Non-operated joint venture
South32 share: 45%
Copper, molybdenum and gold

BRAZIL ALUMINIUM

Non-operated joint venture
South32 share: 40%
Aluminium



AMERICAS

Paid FY16 to FY26 (US$M)

1,480.1

Tax paid by countries

BRAZIL	259.1
CANADA	11.2
CHILE	104.3
COLOMBIA	1,091.1
ECUADOR	14.0
UNITED STATES	0.4

KEY: Mining and processing, Development, Exploration, Office

SOUTHERN AFRICA

PAID FY16 to FY26 (US$M)

1,371.6

Tax paid by countries

MOZAMBIQUE[7]	68.0
SOUTH AFRICA	1,303.6

REST OF THE WORLD

Paid FY16 to FY26 (US$M)

304.2

Tax paid by countries

NETHERLANDS	244.1
SINGAPORE	49
SWITZERLAND	4.3
UNITED KINGDOM	6.8

AUSTRALIA

Paid FY16 to FY26 (US$M)

4,568.0

OUR APPROACH TO MANAGING TAX

Across all jurisdictions, our consistent approach to tax and the decisions we make are shaped by our core values of Care, Trust, Togetherness and Excellence.

Tax Governance

Our values underpin our approach to tax governance, driving clear accountability, robust controls and consistent processes across all jurisdictions. This supports transparency, consistency, effective risk management and trust with revenue authorities and stakeholders, and is reinforced through our governance framework overseen by our Board.
We have globally consistent authority levels required for tax decisions and approvals. These authorities are based on risk assessments which are consistent with broader business approvals and the risk tolerance levels applied to other decisions in our business.

Board of Directors

The Board of Directors and Risk and Audit Committee review and approve the Tax Policy annually that is to be adhered to by the entire organisation. The Risk and Audit Committee also monitors the status of uncertain tax positions and disputes, the effectiveness of our tax risk management framework and approve any amendments to the Tax Risk Management Framework that results in a substance change of the document.

Chief Executive Officer & Chief Financial Officer

The CEO has authority for day-to-day management of the Group and will be escalated any tax matters that are outside the risk tolerance levels of the CFO.

The Chief Financial Officer attends the Risk and Audit Committee meetings. The CFO is primarily responsible for managing the financial risks of South32, financial planning and financial reporting. The CFO is also responsible for endorsing and approving any tax risk within the tolerance levels outlined in the Tax Risk Management Framework.

Head of Tax and Treasury

Head of Tax & Treasury is responsible for establishing the Tax functional mandate and ensuring tax compliance and reporting systems are maintained to deliver on strategy and meet all statutory obligations. Head of Tax & Treasury oversees all aspects of tax advisory, compliance and tax risk management to ensure South32 maintains a competitive, stable, and sustainable approach that complies with tax laws. This is achieved via the effective implementation and maintenance of the Tax Management Framework, active involvement in the tax risk management process, allocation of sufficient resources and engagement with all relevant stakeholders on tax risks. The Head of Tax & Treasury presents regular tax updates to the Risk and Audit Committee.

Global Team of Tax Professionals

Our internal Tax Management Framework (which is applicable to all tax employees) and our internal Tax Standard (which is applicable to all employees) guide how tax matters are managed across the business.

Our Tax Risk Management Framework outlines the framework by which the Tax Function and its global team members operate to ensure tax obligations and reporting requirements of South32 are met from an operational, governance and tax risk management perspective.

The tax function maintains contemporaneous evidence for our tax governance processes, which are reviewed annually by our Tax Governance team and subject to independent review at least every three years.

All employees

Our Tax Standard outlines the circumstances in which all employees are required to liaise with Tax to support:

- the tax governance and the processes and controls in place to manage our global tax risks; and
- compliance with all tax obligations.

All employees, including members of our global tax team, receive training on our Code of Business Conduct (Code) which is based on our values and sets the standard for our behaviour. We also make available EthicsPoint, a 24/7 independent external platform for employees, contractors and the community to anonymously report concerns regarding potential breaches of our Code, including tax-related matters. A copy of our Code can be found at www.south32.net.

Dealing with tax authorities, including disputes

We engage with tax authorities in an open, transparent and timely manner, consistent with our values, Code and Tax Policy. Our approach is underpinned by our Tax Risk Management and Governance Framework, which supports responsible tax compliance and effective oversight across all jurisdictions in which we operate.

We are committed to paying the right amount of tax, in the right jurisdictions, in accordance with applicable laws and regulations. Given the scale of our operations and the complexity of global tax regimes, differences in interpretation can arise in the application of tax laws.

Where this occurs, we seek to resolve matters through constructive engagement with tax authorities, consistent with our Tax Policy. We aim to achieve timely and appropriate outcomes through dialogue and cooperation. In certain cases, where matters cannot be resolved through engagement, it may be necessary for issues to be clarified through formal dispute resolution processes, including litigation.

Supporting effective tax systems

We actively engage with a range of stakeholders, including governments and industry associations, to contribute to the development of sustainable and effective tax systems.

Through our membership with the International Council on Mining and Metals (ICMM), we contributed to the development of the *ICMM Members' Tax Contribution* Report.

We remain committed to meaningful consultation and collaboration with stakeholders. This includes participation in consultation with civil society and the EITI.

Tax incentives and grants

We consider tax incentives and grants available in the jurisdictions where we operate and view such incentives as beneficial when they support targeted investments or address specific challenges. When we utilise incentives, we ensure full compliance with legislative intent and regulatory requirements.

Organisation for Economic Co-operation and Development's (OECD) BEPS Pillar Two Project

The Group has applied the mandatory exception to recognise and disclose information about deferred tax assets and liabilities related to Pillar Two income taxes in accordance with AASB 112 Income Tax. The impact on the Group's current tax expense is not material.

International related party dealings

Our global operating model includes operations and support functions located in many countries. This operating model results in cross-border intra-group transactions between Group entities. We prepare detailed documentation to support the understanding and pricing of these transactions and provide this documentation to tax authorities. We also obtain independent expert advice confirming the transactions are completed on arm's length terms.

Sales and purchases of commodities by our Singapore marketing subsidiary

We conduct sales and purchasing activities, including marketing, logistics and customer credit risk management, from Singapore. As a commercial hub with proximity to the markets that we trade with, Singapore is well suited to be the location for these activities. Our Singapore marketing headquarters is supported by staff in our London office.

All sales and purchase transactions between our operations (including our manganese operations) and marketing office are priced in accordance with OECD guidelines and local laws. Refer Tables 20 and 23 in the Tax Transparency Databook for further details.

Intra-group cross border charges

We charge service fees for Group management activities and other intra-group services. These services are provided on arm's length terms. Refer to Tables 21 and 24 in the Tax Transparency Databook for further details.

Our captive insurance company provides insurance options to assist the Group to manage business risks. The company is incorporated in Singapore, and is a tax resident in Australia. Tax is paid in Australia.

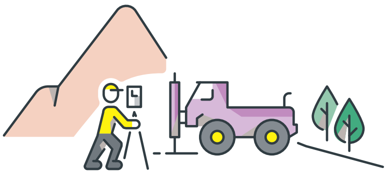
Intra-group cross-border financing

Our companies, located in various countries, place funds on deposit with one of our UK companies. There are also funding arrangements between one of our UK companies and some of our operating companies. These financing arrangements are provided at market rates and the interest income is assessed and tax paid in the jurisdiction of the lending company. Interest withholding taxes are also paid in the jurisdiction of the borrowing company. Refer to Tables 22 and 25 of the Tax Transparency Databook for further details.

Payments to governments over the mining lifecycle

TAX CONTRIBUTIONS THROUGH THE MINING LIFECYCLE

Our tax contributions vary depending on the stage of each of our long-term investments

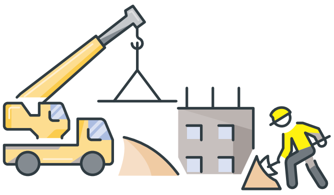


1. Explore

Exploration and evaluation in the search for new deposit sites can take time. Tax contributions during this phase are relatively low, reflecting the upfront risk and investment required before profits can be returned. The payments we contribute to governments during this phase include:

- employment taxes for project teams
- payments for relevant permits, fees and licenses
- withholding taxes

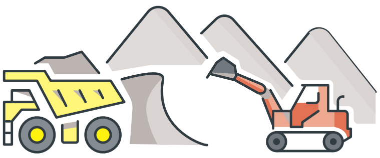
As there are costs being incurred with no income received, these losses are either carried forward as tax losses or capitalised against the project.



2. Develop

In the development phase, further investment towards preparing a mine for operation includes cost of mine infrastructure, securing permits, and preparing for the mining and/or processing phase. The payments we contribute to governments during this phase expand to include:

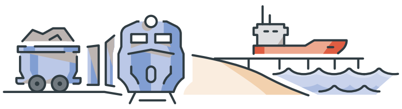
- further permits, fees and licenses
- higher employment taxes
- non-refundable input taxes
- custom duties, withholding taxes and property taxes



3. Mine, process, refine and smelt

This incorporates the production phase and marks the beginning of the mine or refining process. This phase can last multiple decades. The payments we contribute to governments during this phase are the most significant. This extends payments to include:

- corporate income taxes and royalties (which are paid based on revenues). Payments may be lower in the early years of operation as tax losses generated from the explore and develop phases may be available to offset income. As the production matures, higher taxes are paid based on profitability
- employment taxes
- property taxes
- royalties and resources taxes



4. Market and deliver

This phase involves transporting our minerals to where they are needed for our end customers. This phase can include:

- income taxes
- value-added taxes
- employment taxes

5. Rehabilitate and close

Planning for closure begins well before the end of operational life. Rehabilitation activities are often embedded into every phase of the lifecycle. As production activities wind down and profits reduce, tax payments to governments will be lower.

Current year overview

OUR FY26 PAYMENTS

Our tax contributions are closely linked to our financial results and follow the tax rules and rates in the jurisdictions where we operate. We summarise below the FY26 results for the jurisdictions where we have operations.

SOUTH32 GROUP

FY26 Underlying Profit/(Loss) before Tax (US$M) and ETR

1,558 | 32.9%
FY25 1030 | 35.0%

FY26 Statutory Profit/(Loss) before tax (US$M) and ETR

1,390 | 23.4%
FY25 542 | 74.9%

FY26 Income tax and royalties paid (US$M)

468.2
FY25 401.4

For the year ended 30 June 2026, the Group paid US$468 million in income taxes and royalties (2025: US$401 million).

Our profits are directly tied to the price at which our commodities can be sold and our tax contributions will be directly impacted by periods of challenging economic conditions.

The increase in tax payments is attributable to the increase in profitability and revenue of our operations. Our financial performance is reflective of broadly stronger commodity prices compared to the prior year and increased production volumes, predominantly at Cannington and Sierra Gorda.

Our Underlying Profit/(Loss) before tax of US$1,558 million and Underlying ETR of 32.9% is largely influenced by the geographic distribution of the Group's profit and tax rates of the countries where we operate.

Our Statutory Profit/(Loss) before tax of US$1,390 million and Statutory ETR of 23.4% include earnings adjustments and significant one-off items. The key adjustments for FY26 relate to accounting revaluations, interest and foreign exchange differences, explained further on a country-by-country basis in the following highlights.

AUSTRALIA

FY26 Underlying Profit/(Loss) before Tax (US$M) and ETR

190 | 73%
FY25 486 | 39%

FY26 Statutory Profit/(Loss) before tax (US$M) and ETR

322 | 24%
FY25 511 | 41%

FY26 Income tax and royalties paid (US$M)

188.3
FY25 231.5

Our Australian operations include Worsley Alumina in Western Australia, producing alumina from bauxite, and Cannington in Queensland, producing silver, lead and zinc. We also operate Australia Manganese in the Northern Territory, a manganese mining and processing site.

All of our Australian operations are in a mature production phase, contributing to Australian Underlying profit of US$190 million in FY26 and resulting in corporate income tax and royalty payments of US$188 million.

In the Northern Territory, royalties payable by our Australia Manganese operation is based on a net profit regime and is therefore considered an income tax for accounting purposes.

Following Tropical Cyclone Megan, operations at Australia Manganese were suspended until May 2025. Tax losses generated during the period of suspension have been fully recouped in FY26.

We have recently announced that we have entered into a binding conditional agreement to sell our Aluminium value chain assets to Alcoa, which includes Worsley Alumina. The transaction is expected to complete in H2 FY27, subject to satisfaction or waiver of conditions precedent[6]. No tax payable is expected to arise on divestment.

6. Refer to market release dated 1 July 2026 at www.south32.net.

Current year overview continued

BRAZIL

FY26 Underlying Profit/(Loss) before Tax (US$M) and ETR

(3)	(33)%
FY25 105	42%

FY26 Statutory Profit/(Loss) before Tax (US$M) and ETR

18	400%
FY25 93	41%

FY26 Income tax and royalties paid (US$M)

8.3

FY25 28.3

We hold a 33% interest in the MRN Bauxite mine in North Brazil, 36% share of the Alumar Alumina refinery and a 40% share in the non-operated Alumar Aluminium smelter, both located in north-east Brazil. These assets form part of the binding conditional agreement to sell our Aluminium value chain assets[7].

In FY26 we paid US$8 million in corporate income tax and royalties. This includes US$1.5 million of withholding tax on intra-group interest payments. This decrease in tax payments in FY26 is attributable to decreased profitability and revenue.

The statutory ETR of 400% was significantly impacted by foreign exchange movements and non-deductible items relative to a low profit base.

COLOMBIA

FY26 Underlying Profit/(Loss) before Tax (US$M) and ETR

9	11%
FY25 26	42%

FY26 Statutory Profit/(Loss) before Tax (US$M) and ETR

(5)	40%
FY25 (93)	(10)%

FY26 Income tax and royalties paid (US$M)

38.8

FY25 35.2

Cerro Matoso is an open-cut mine in northern Colombia and a significant producer of ferronickel.

In December 2025, we completed the divestment of Cerro Matoso. We have contributed US$39 million in corporate income tax and royalties during FY26 for our ownership period. There is no tax payable in relation to the divestment[8].

CHILE

FY26 Underlying Profit/(Loss) before Tax (US$M) and ETR

391	32%
FY25 149	28%

FY26 Statutory Profit/(Loss) before Tax (US$M) and ETR

48	0%
FY25 124	0%

FY26 Income tax and royalties paid (US$M)

35.5

FY25 16.9

We hold a 45% interest in the Sierra Gorda copper mine. This investment is equity accounted and our FY26 Group Underlying and Statutory profit reflects Sierra Gorda on a proportionally consolidated basis.

The increase in tax payments in FY26 is attributable to increased copper prices, profitability and revenue at Sierra Gorda, noting Sierra Gorda has carried forward tax losses being utilised.

MOZAMBIQUE

FY26 Underlying Profit/(loss) before Tax (US$M) and ETR

108	0%
FY25 34	0%

FY26 Statutory Profit/(Loss) before Tax (US$M) and ETR

31	0%
FY25 331	0%

FY26 Income tax and royalties paid (US$M)

9.1

FY25 8.3

We hold a 63.7% interest in Mozal Aluminium. On 15 March 2026, Mozal was placed on care and maintenance following the expiration of its electricity supply agreement as sufficient and affordable electricity supply could not be secured to support ongoing operations[9].

7. Refer to market release dated 1 July 2026 at *www.south32.net*.
8. Refer to market release dated 1 December 2025 at www.south32.net.
9. Refer to market releases dated 16 December 2025 and 16 March 2026 at www.south32.net.

SOUTH AFRICA

FY26 Underlying Profit/(Loss) before Tax and ETR

566	29%
FY25 53	49%

FY26 Statutory Profit/(Loss) before Tax (US$M) and ETR

521	24%
FY25 90	26%

FY26 Income tax and royalties paid (US$M)

142

FY25 38.7

We have two operations in South Africa, South Africa Manganese and Hillside Aluminium.

Our manganese operation includes two mines located in the Kalahari Basin. The manganese mines are a part of the Hotazel Manganese Mines (HMM) of which we hold a 44.4% interest.

Hillside Aluminium forms part of the binding conditional agreement to sell our Aluminium value chain assets, which is expected to complete in H2 FY27, subject to satisfaction or waiver of conditions precedent[10].

In FY26, our South African operations contributed US$142 million in corporate income tax and royalties. The increase in tax contributions reflects increased profitability.

OTHER JURISDICTIONS (NON-PRODUCING)

Our global tax payments are aligned to the countries where we operate and conduct business.

NETHERLANDS

We pay taxes in the Netherlands on interest income that is received by our Dutch subsidiaries relating to the long-term funding of our Sierra Gorda operation. During FY26, we paid US$32 million in Dutch corporate income tax. Additional tax is payable on the interest in Australia under the controlled foreign company attribution rules.

SINGAPORE

We pay taxes in Singapore in relation to our marketing operations. This is currently subject to a 5% tax rate under an incentive program provided by the Singapore Government. This program is part of a suite of legislated incentives accessible to all eligible taxpayers in Singapore who demonstrate substantial economic contributions and meet ongoing qualitative and quantitative criteria. Additionally, trading profits from our Singapore-based marketing activities involving Australian-sourced commodities are fully reported in our Australian income tax return and taxed in Australia.

The Singaporean tax incentive expired on 30 June 2026. The standard corporate income tax rate of Singapore of 17% will be applicable from 1 July 2026.

UNITED STATES

Located in the Patagonia Mountains, approx. 80 kilometres south-east of Tucson, our Taylor Project in the United States is currently in the development phase.

The Project forms part of our Hermosa Project and is a large-scale zinc, lead and silver development with an initial operating life of approximately 33 years and is expected to commence production in H2 FY28 and reach name plate capacity by FY31[11].

The Hermosa Project also includes the Clark Project, a polymetallic deposit containing zinc, manganese and silver mineralisation that represents a future development opportunity and provides additional long-term growth potential alongside the Taylor Project[11].

During FY26, our payments to governments predominantly relate to employer related taxes and property taxes. The Hermosa Project also pays State, County and City Sales taxes indirectly, in that these are collected by vendors and remitted to the State on behalf of the various jurisdictions. The presence of Hermosa contractors in the areas surrounding the project also contribute to additional Sales taxes on their purchases and temporary lodging.

10. Refer to market release dated 1 July 2026 at www.south32.net.
11. Refer to market release dated 30 April 2026 at www.south32.net.

Total payments to governments by country

Table 1 Total payments made by country and level of government for the year ended 30 June 2026 (by country of tax residence)

(Refer to Tax Transparency Databook for level of government detail)

US$M[12]	Corporate income tax	Royalty related taxes	Royalties	License fees	Payments to governments for UK Regulation purposes	Employer payroll taxes	Other taxes and payments	Total government payments borne	Employee payroll taxes (not borne)[13]	Net transaction taxes paid/ (refunded)[14]
Argentina	0.1	–	–	–	**0.1**	0.2	0.2	**0.5**	0.1	0.4
Australia	90.8	22.1	75.4	0.1	**188.4**	28.2	5.1	**221.7**	135.8	50.0
Brazil	5.0 [15]	–	3.3	–	**8.3**	11.3	4.1 [16]	**23.7**	21.9	20.9
Canada	0.2	–	–	–	**0.2**	0.1	0.2	**0.5**	2.4	0.1
Chile	9.4 [17]	26.1	–	–	**35.5**	–	3.9	**39.4**	17.0	(74.2)
Colombia	9.7	–	29.1	–	**38.8**	–	0.2	**39.0**	2.7	(7.5)[18]
Ecuador[19]	4.0	–	–	–	**4.0**	–	–	**4.0**	–	–
Ireland	–	–	–	–	**–**	–	–	**–**	–	–
Mozambique	–	–	9.1	–	**9.1**	10.4	–	**19.5**	–	–
Netherlands	32.4	–	–	–	**32.4**	–	–	**32.4**	–	(0.1)
Singapore	9.8	–	–	–	**9.8**	–	–	**9.8**	–	0.1
South Africa	139.4	–	2.6	–	**142.0**	40.1	0.8	**182.9**	–	(186.2)
United Kingdom	(0.3)[20]	–	–	–	**(0.3)**	0.5	–	**0.2**	1.3	(0.2)
United States	–	–	–	–	**–**	2.4	0.4	**2.8**	8.4	–
Total taxes paid[21]	300.5	48.2	119.5	0.1	**468.3**	93.2	14.9	**576.4**	189.6	(196.7)

12 Payments reported are based on the portion of the total payment that relates to South32's ownership.
13 These taxes are deducted by the Company from employees' remuneration and remitted to revenue authorities on the employees' behalf.
14 Net transaction taxes refunded include Goods and Services Tax (GST), Value Added Tax (VAT) and fuel tax credits. Refer to the Glossary of terms on page 24.
15 Includes US$1.5 million withholding tax for intra-group interest.
16 Includes Federal Excise taxes, import tax, state tax on vehicles and other tax payments as well as our share of MRN other levies/fees/charges to both state and federal governments.
17 Includes interest withholding taxes and taxes on interest and charges paid to related foreign entities.
18 Includes Net GST refund position of $8,417,365 and Withholding taxes collected from suppliers of $864,974.
19 Withholding tax deducted for royalty payments received from unrelated parties.
20 Includes refund of overpaid Corporate Tax Instalments paid for FY24 in the United Kingdom.
21 Refer to page 18 for a reconciliation of corporate income tax paid to the income tax (paid)/received as shown in the Consolidated Cash Flow Statement of our 2026 Annual Report.

Total payments to governments by project

Table 2 Total payments to government by project for the year ended 30 June 2026

US$M[22]	Corporate income tax	Royalty related taxes	Royalties	License fees	Payments to governments for UK Regulation purposes	Employer payroll taxes	Other taxes and payments	Total government payments borne	Employee payroll taxes (not borne)[23]	Net transaction taxes paid/ (refunded)[24]
Cannington - Australia	111.1	–	35.8	–	**146.9**	5.6	0.2	**152.7**	25.6	4.6
Worsley Alumina - Australia	4.3	–	32.1	–	**36.4**	10.3	3.4	**50.1**	46.7	50.3
Eagle Downs Metallurgical Coal - Australia	(2.4)[25]	–	–	–	**(2.4)**	0.1	–	**(2.3)**	–	–
Cerro Matoso - Colombia	9.7	–	29.1	–	**38.8**	–	0.2	**39.0**	2.7	(7.6)
Hermosa - United States	–	–	–	–	**–**	2.4	0.2	**2.6**	8.4	–
Total extractive project related payments - Subsidiaries	122.7	–	97.0	–	**219.7**	18.4	4.0	**242.1**	83.4	47.3
Equity accounted investments										
Australia Manganese - Australia	–	22.1	7.5	–	**29.6**	5.6	1.5	**36.7**	25.0	1.2
South Africa Manganese - South Africa	0.1	–	2.6	–	**2.7**	12.2	0.1	**15.0**	–	(33.8)
MRN - Brazil	–	–	3.3	–	**3.3**	7.6	1.4	**12.3**	1.5	6.2
Sierra Gorda - Chile	9.4[26]	26.1	–	–	**35.5**	–	3.8	**39.3**	16.6	(74.5)
Total extractive project related payments including equity accounted investments	132.2	48.2	110.4	–	**290.8**	43.8	10.8	**345.4**	126.5	(53.6)
Non-extractive project related payments	168.3	–	9.1	0.1	**177.5**	49.4	4.1	**231.0**	63.1	(143.1)
Total taxes paid[27]	300.5	48.2	119.5	0.1	**468.3**	93.2	14.9	**576.4**	189.6	(196.7)

22 Payments reported are based on the portion of the total payment that relates to South32's ownership.
23 These taxes are deducted by the Company from employees' remuneration and remitted to revenue authorities and on the employees' behalf.
24 Net transaction taxes refunded include GST, VAT and fuel tax credits. Refer to the Glossary of terms on page 24.
25 Relates to refund of FY25 corporate income tax payments
26 Includes interest withholding taxes and taxes on interest and charges paid to related foreign entities.
27 Refer to page 18 for a reconciliation of corporate income tax paid to the income tax (paid)/received as shown in the Consolidated Cash Flow Statement of our 2026 Annual Report.

Reconciliation to financial results

RECONCILIATION TO FINANCIAL RESULTS

Reconciling tax expense and tax payable to earnings builds transparency by explaining differences caused by the design of tax laws in jurisdictions where we operate

We use Underlying earnings as a key measure in assessing the performance of our business as it excludes revenue and expense items that do not reflect the performance or outcome of our operations.

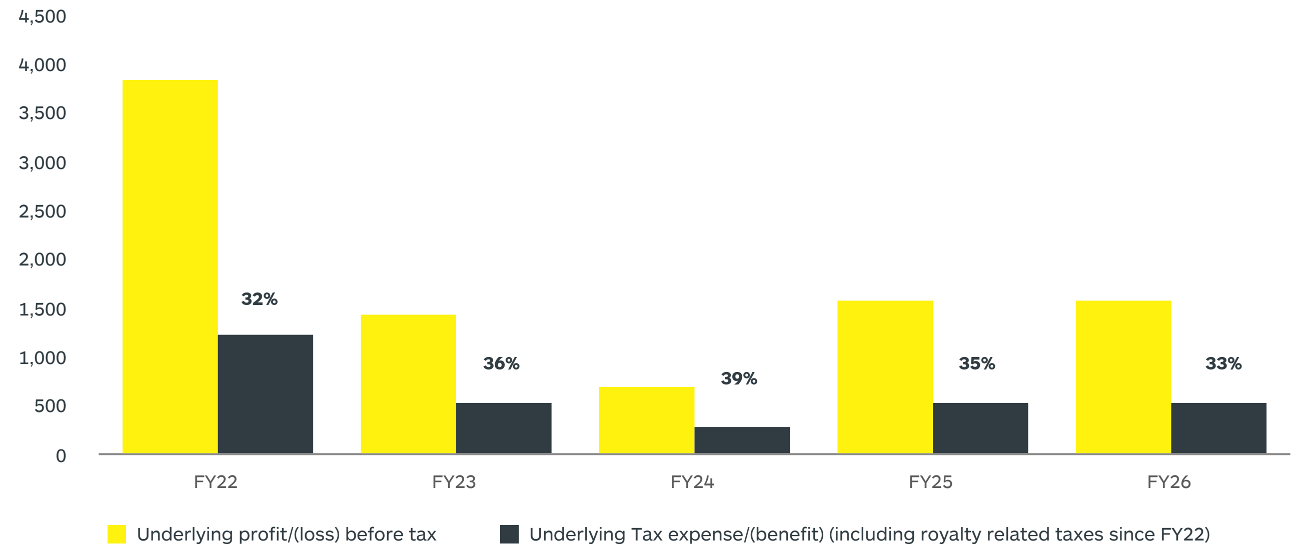
Underlying earnings is calculated as Underlying earnings before interest and tax (EBIT) less Underlying net financing (revenue)/costs less Underlying income tax expense, as can be seen in Table 3.

Our Underlying earnings and Underlying ETR include our manganese operations and the Sierra Gorda copper mine's results on a proportionally consolidated basis since FY22.

Our tax contributions follow the tax rules and tax rates of the countries where we operate. Our tax obligations are closely linked to our financial results, which are influenced by fluctuations in commodity prices and production performance. Income tax is levied on profits, such that higher commodity prices usually result in higher profits and higher income tax payments. Our payment of royalties reflects the design of laws in jurisdictions where we operate and includes royalties levied on material produced, based on the value of sales or linked to profits.

The chart below shows the trend in our Underlying financial performance, tax expense (including royalty related taxes) and ETR. As the countries we operate in have varying tax rates, our Underlying ETR is largely influenced by the geographic distribution of the Group's profit.

Trends in Underlying profit, tax expense and ETR[28] (US millions)



28 Permanent differences have a disproportionate impact on ETR when profits are low.

Our Underlying income tax expense and Underlying effective tax rate

We use Underlying earnings as a key measure in assessing the performance of our business. Underlying earnings excludes revenue and expense items that do not reflect the performance or outcome of our operations. Underlying earnings is calculated as Underlying earnings before interest and tax (EBIT) add Underlying net financing (revenue)/costs less Underlying income tax expense. In the Group's broader Annual Reporting Suite, the Group's Underlying financial results includes our material equity accounted investments on a proportionally consolidated basis. The table below has also been prepared on this basis. As the countries we operate in have varying tax rates our Underlying ETR is largely influenced by the geographic distribution of the Group's profit.

Table 3 Underlying tax expense and Underlying ETR for the year ended 30 June 2026

(Refer to the Tax Transparency Databook for full country-by-country information)

	South32	Australia	Brazil	Chile	Colombia	Mozambique	Netherlands	Singapore	South Africa	United Kingdom	United States	Others[29]
	US$M	30%	34%	27%	35%	0%	25.8%	5%	27%	25%	21%	Mixed[30]
Underlying EBIT (profit)/loss	**(1,717)**	(334)	2	(572)	(17)	(112)	1	(141)	(587)	2	66	(25)
Add: Underlying net financing (revenue)/costs	**175**	144	17	181	8	4	(164)	(26)	21	(10)	–	–
Less: Equity accounted investments loss[31]	**16**	—	16	–	–	–	–	–	–	–	–	–
Underlying (profit)/loss before tax	**(1,558)**	(190)	3	(391)	(9)	(108)	(163)	(167)	(566)	(8)	66	(25)
Income tax at 30 per cent	**469**	57	(1)	117	3	32	49	51	171	2	(20)	8
Tax rate differential on non-Australian income	**(87)**	–	–	(12)	–	(32)	(7)	(25)	(17)	–	6	–
Tax on sales attributable to Australia	**15**	15	–	–	–	–	–	–	–	–	–	–
Tax on other income attributable to Australia	**10**	10	–	–	–	–	–	–	–	–	–	–
Withholding tax[32]	**12**	–	–	–	–	–	–	–	–	12	–	–
Non-recognition of future tax benefits[33]	**36**	13	–	–	(2)	–	–	–	10	–	14	1
Prior year under/over	**5**	4	1	–	–	–	–	–	–	–	–	–
Non-deductible exploration expenditure	**4**	–	–	–	–	–	–	–	–	4	–	–
Other non-deductible expenses	**9**	9	–	–	–	–	–	–	–	–	–	–
Permanent differences [34]	**(19)**	2	1	(10)	–	–	(15)	–	(2)	5	–	–
Underlying income tax expense/ (benefit)	**454**	110	1	95	1	–	27	26	162	23	–	9
Royalty-related taxation (net of income tax benefit)	**58**	28	–	30	–	–	–	–	–	–	–	–
Total Underlying taxation expense	**512**	138	1	125	1	–	27	26	162	23	–	9
Underlying effective tax rate including Royalty-related taxation	**32.9%**	73%	(33%)	32%	11%	0%	17%	16%	29%	288%	0%	36%
Underlying effective tax rate excluding Royalty-related taxation	**29.1%**	58%	(33%)	24%	11%	0%	17%	16%	29%	288%	0%	36%
Underlying profit before tax	**(1,558)**											
Underlying income tax expense	**454**											
Royalty-related taxation (net of income tax benefit)	**58**											
Underlying profit after tax	**(1,046)**											
Add: Equity accounted investments profit	**16**											
Underlying Earnings	**(1,030)**											

For the year ended 30 June 2026, Mozal Aluminium paid US$14 million of royalties to the Mozambique Government[35].

29 Others includes Argentina, Canada, Ireland and Group Profit in Stock Elimination.
30 Tax rates for other countries are as follows: Argentina (30%), Canada (27%) and Ireland (12.5%).
31 Refer to page 20 for information regarding our extractive equity accounted investments.
32 5% South African withholding tax applicable to dividends paid to the UK. Withholding tax due to be paid in FY27.
33 Largely relates to de-recognition of deferred tax assets relating to future rehabilitation obligations and exploration expenditure.
34 Largely relates to long-term funding of our Sierra Gorda operation.
35 There were no dividends paid in FY26 to the Mozambique Government.

Our statutory income tax expense and effective tax rate

The table below presents a reconciliation of our statutory profit and income tax expense for the year ended 30 June 2026. The country ETRs are different from the country statutory tax rates due to non-deductible expenses and the impact of foreign exchange movements on tax balances.

Table 4 Reconciliation of statutory profit to income tax expense and current tax payable for the year ended 30 June 2026
(Refer to the Tax Transparency Databook for full country-by-country information)

	South32	Australia	Brazil
	US$M	30%	34%
(Profit)/loss before tax	**(1,390)**	(322)	18
Less: (Profit)/loss on equity accounted investments	**(89)**	(94)	16
(Profit)/loss subject to tax	**(1,301)**	(228)	2
Income tax on (profit)/loss at 30 per cent	**390**	68	(1)
Tax rate differential on non-Australian income	**(47)**	–	–
Tax on sales income attributable to Australia	**15**	15	–
Tax on other income attributable to Australia	**10**	10	–
Withholding tax	**12**	–	–
Non-recognition of future tax benefits	**20**	–	–
Prior year under/over	**4**	4	1
Exchange variations and other translation adjustments	**(27)**	1	(9)
Non-deductible exploration expenditure	**4**	–	–
Other non-deductible expenses	**9**	9	–
Permanent differences	**(85)**	(52)	1
Income tax expense/(benefit)	**305**	55	(8)
Temporary differences			
Depreciation	**17**	(23)	23
Closure and rehabilitation	**19**	27	(4)
Non-tax-depreciable FV adjustments, revaluations & mineral rights	**4**	–	–
Finance leases	**13**	13	–
Income tax losses	**(2)**	–	2
Brazil tax deferral Incentives	**(7)**	–	(7)
Provisions	**(12)**	(1)	(11)
Other	**(4)**	(11)	12
Temporary differences movement	**28**	5	15
Current income tax payable	**333**	60	7
Effective tax rate	**23%**	24%	400%
Cash effective tax rate	**26%**	26%[36]	(350)%[37]

[36] Australia ETR and cash ETR is lower than the country statutory rate primarily due to periodic revaluation of contingent receivables, which adjusts capital losses for which no deferred tax asset is recognised.
[37] Brazil ETR and cash ETR is higher and lower respectively, than the country statutory rate due to non-assessable exchange variations and temporary differences.

Chile	Colombia	Mozambique	Netherlands	Singapore	South Africa	United Kingdom	United States	Others
27%	35%	0%	25.8%	5%	27%	25%	21%	Mixed
(48)	5	31	(412)	(183)	(521)	1	66	(25)
(49)	–	–	–	(10)	48	–	–	–
1	5	31	(412)	(173)	(569)	1	66	(25)
–	(2)	(9)	124	52	170	–	(20)	8
–	(1)	9	(17)	(26)	(18)	–	6	–
–	–	–	–	–	–	–	–	–
–	–	–	–	–	–	–	–	–
–	–	–	–	–	–	12	–	–
–	(2)	–	–	–	7	–	14	1
–	–	–	–	–	(1)	–	–	–
–	(3)	–	–	–	(18)	–	–	–
–	–	–	–	–	–	4	–	–
–	–	–	–	–	–	–	–	–
–	6	–	(46)	–	(1)	7	–	–
–	(2)	–	63	26	139	23	–	9
–	2	–	–	–	15	–	–	–
–	(4)	–	–	–	–	–	–	–
–	4	–	–	–	–	–	–	–
–	–	–	–	–	–	–	–	–
–	–	–	–	–	–	(4)	–	–
–	–	–	–	–	–	–	–	–
–	–	–	–	–	–	–	–	–
–	1	–	–	–	3	–	–	(9)
–	3	–	–	–	18	(4)	–	(9)
–	1	–	63	26	157	19	–	–
0%	40%	0%	15%	15%	24%	(2300%)	0%	36%
0%	(20%)	0%	15%[38]	15%	28%	(1900%)[39]	0%	0%

[38] Netherlands ETR and cash ETR is lower than the country statutory rate primarily due to periodic revaluation of the long-term funding of our Sierra Gorda operation.
[39] United Kingdom ETR and cash ETR is lower than the country statutory rate due to non-deductible expenses.

Our income tax payable and deferred tax movements

The current tax balances in the Consolidated Financial Statements of our Annual Report 2026 are presented in the table below.

Table 5 Reconciliation of current tax balances for the year ended 30 June 2026
(Refer to the Tax Transparency Databook for full country-by-country information)

	South32	Australia	Brazil	Chile	Colombia	Mozambique	Netherlands	Singapore	South Africa	United Kingdom	United States	Others
	US$M	30%	34%	27%	35%	0%	25.8%	5%	27%	25%	21%	Mixed
Net opening current tax payable/ (receivable)	**27**	30	–	–	(3)	–	(1)	9	(8)	–	–	–
Current income tax payable/(receivable)	**333**	60	7	–	1	–	63	26	157	19	–	–
Payments relating to current income year	**(243)**	(63)	–	–	(6)	–	(31)	–	(136)	(7)	–	–
Payments relating to prior income year	**(42)**	(31)	–	–	–	–	(2)	(9)	–	–	–	–
Other movements[40]	**(3)**	2	(4)	–	8	–	1	–	2	(12)	–	–
Net closing current income tax payable/ (receivable)	**72**	(2)	3	–	–	–	30	26	15	–	–	–

Table 6 Reconciliation of income tax paid for the year ended 30 June 2026

	US$M[41]
Income tax paid per 2026 Annual Report and Table 5 of this report[42]	**(285)**
Include: Our share of payments related to Manganese equity accounted investments	**(3)**
Include: Our share of payments related to Sierra Gorda equity accounted investments	**(9)**
Include: Our share of payments related to MRN equity accounted investments	**–**
Include: Brazil Tax Payments paid via VAT Offsets (non-cash payment)	**(4)**
Corporate Income Taxes paid per Table 1 and Table 2 of this report[43]	**(301)**

Table 7 Deferred tax movements for the year ended 30 June 2026
(Refer to the Tax Transparency Databook for full country-by-country information)

	South32	Australia	Brazil	Chile	Colombia	Mozambique	Netherlands	Singapore	South Africa	United Kingdom	United States	Others
	US$M	30%	34%	27%	35%	0%	25.8%	5%	27%	25%	21%	Mixed
Opening deferred tax asset/(liability)	**311**	435	(56)	–	(1)	–	–	–	(79)	4	–	8
Movements through income statement	**28**	5	15	–	3	–	–	–	18	(4)	–	(9)
Other movements[44]	**(8)**	(6)	–	–	(2)	–	–	–	–	–	–	–
Closing deferred tax asset/(liability)	**331**	434	(41)	–	–	–	–	–	(61)	–	–	(1)

40 Other Movements in Colombia relate to income tax offset from indirect tax account.
41 Numbers are rounded to whole millions consistent with the presentation of numbers in the 2026 Annual Report.
42 Refer to the Consolidated Cash Flow Statement in the 2026 Annual Report. Total income tax payments for the year of US$285 million (rounded) are calculated as payments relating to current income year (US$243 million) plus payments relating to prior income years (US$42 million).
43 Refer to pages 12 to 13.
44 Other movements relate to financial assets fair value adjustments and employee entitlement movements through equity accounts.

2026 Country-by-Country information

This table below presents our Country-by-Country (CbC) information, providing a summary of our financial, economic and tax activities in the jurisdictions in which we operate. The CbC disclosures are prepared in accordance with GRI 207, supporting a consistent and transparent view of our global tax profile.

Table 8 Country by country report for the year ended 30 June 2026

	Unrelated party revenues[45]	Related party revenues	(Profit)/loss before tax	(Profit)/loss subject to tax excluding Equity Accounted Investments	Income tax paid during the period	Income tax accrued in the period	Tangible assets[46]	Number of employees at 30 June 2026 (unrounded)[47]
Argentina	0	0	4	4	0	0	0	0
Australia	537	1,707	(322)	(228)	91	60	3,151	3,699
Brazil	353	498	18	2	5	7	700	22
Canada	0	11	0	0	0	0	35	24
Chile[48]	0	0	(48)	1	9	0	0	16
Colombia	2	189	5	5	10	1	0	0
Ecuador	0	0	0	0	4[49]	0	0	0
Ireland[50]	0	0	0	0	0	0	0	0
Mozambique	120	693	31	31	0	0	21	45
Netherlands	64	100	(412)	(412)	32	63	0	0
Singapore	4,631	1,148	(183)	(173)	10	26	79	75
South Africa	543	1,681	(521)	(569)	139	157	831	2,713
United Kingdom	43	6	1	1	0	19	0	14
United States	0	2	66	66	0	0	3,065	259
South32 Total	**6,293**	**6,035**	**(1,361)**	**(1,272)**	**300**	**333**	**7,882**	**6,867**

45 Comprising Group production revenue of US$5,653 million (US$5,460 million of continuing operations and US$193 million of discontinued operation), Third party product and services revenue of US$356 million (US$356 million of continuing operations and US$— million of discontinued operation), Other income of US$125 million (US$124 million of continuing operations and US$1 million of discontinued operation) and Finance income of US$259 million (US$258 million of continuing operations and US$1 million of discontinued operation), excluding the Sierra Gorda shareholder loan interest income (US$100 million). Refer to our Consolidated Income Statement and discontinued operation section in our 2026 Annual Report for further details regarding the nature of each type of income.

46 Comprising Inventories - Current assets of continuing operations (US$812 million), Inventories - Non Current assets of continuing operations (US$32 million) and Property, plant & equipment of (US$7,038 million) of continuing operations. Refer to the Consolidated balance sheet section in our 2026 Annual Report for more detail.

47 More detail about employees can be found in the Our People section of our 2026 Sustainability Databook at www.south32.net. These values do not include our Equity Accounted Investments.

48 Our presence in Chile includes wholly owned subsidiaries which hold our 45% interest in Sierra Gorda.

49 Royalty withholding tax that is paid to the Ecuadorian Government.

50 Our presence in Ireland is limited to funding exploration.

Our subsidiaries

A full list of our subsidiaries, their country of incorporation, tax residency, principal activity and our ownership interest can be found in our Annual Report 2026 and in the Tax Transparency Databook (refer to List of Subsidiaries). The table below summarises the country of incorporation and tax residence for all Group companies at 30 June 2026. The total number of subsidiaries has decreased from 60 last year to 52 in the current year. The decrease of eight entities was entirely attributable to the divestment of Cerro Matoso[51], resulting in the disposal of three British Virgin Islands[52] entities, four Colombian entities, and one UK entity.

Table 9 Country of incorporation and tax residence of our subsidiaries

Country	Number of Subsidiaries	Tax Resident of Subsidiaries
Argentina	2	2
Australia[53,54]	20	22
Brazil	1	1
Canada	2	2
Chile	3	3
Ireland	1	1
Jersey[53]	1	0
Mozambique	1	1
Netherlands	3	3
Singapore[54]	2	1
South Africa	12	12
United Kingdom	1	1
United States[55]	3	3
Total	**52**	**52**

Our Equity Accounted Investments

Our 2026 Group Underlying earnings includes our manganese operations and Sierra Gorda on a proportionally consolidated basis. Our 2026 Group statutory results reflect our manganese operations, Sierra Gorda and MRN as equity accounted investments. This means the post-tax (profit)/loss from each operation is recorded in the Group's overall (profit)/loss before tax. The value of the equity accounted investments in each operation is held as an asset on the balance sheet, at its cost, plus post-acquisition accumulated (profit)/loss after tax.

Table 10 shows South32 groups ownership interest in each of the Equity Accounted Investments. Tables 11 to Table 19 in the Tax Transparency Databook show the tax balances of the Manganese, Sierra Gorda and MRN Investments and are presented on a 100 per cent ownership basis.

Table 10 Equity accounted investment companies

	Country of incorporation	Country of tax residency	Principal Activity	Ownership interest %
Groote Eylandt Mining Company Pty Ltd	Australia	Australia	Manganese mine	60.0
Hotazel Manganese Mines Proprietary Limited	South Africa	South Africa	Manganese mine	54.6
Samancor Holdings Proprietary Limited	South Africa	South Africa	Holding company	60.0
Samancor Manganese Proprietary Limited	South Africa	South Africa	Holding company	60.0
Samancor Marketing Pte. Ltd.	Singapore	Singapore	Sales, Marketing and Distribution of manganese	60.0
Terra Nominees Proprietary Limited	South Africa	South Africa	Holding company	60.0
Sierra Gorda Sociedad Contractual Minera (SCM)	Chile	Chile	Copper mine	45.0
Mineração Rio do Norte S.A.	Brazil	Brazil	Bauxite mine	33.0

51 The divestment of Cerro Matoso was completed on 1 December 2025. Please refer to market release dated 1 December 2025 at www.south32.net.
52 The three British Virgin Island entities divested were tax residents of Australia prior to divestment
53 The subsidiary incorporated in Jersey is a resident of Australia for tax purposes.
54 One subsidiary incorporated in Singapore is a resident of Australia for tax purposes.
55 South32 also holds a 50% interest in Ambler Metals LLC, a US Limited Liability Company (LLC) which is disclosed in the Corporate Entity Disclosure Statement (CEDS). For US federal income tax purposes, the LLC is a partnership.

Our approach to disclosure and transparency

OUR APPROACH TO TRANSPARENT DISCLOSURE

South32 is committed to maintaining the highest standards of corporate disclosure and transparency.

Transparent disclosure of our payments to governments is central to building and maintaining trust with our stakeholders, including shareholders, customers, employees and the communities where we operate and hold investments. We recognise that clear, consistent reporting supports accountability and provides meaningful insight into our economic contribution across jurisdictions.

Our Basis of Preparation on Page 23, references all of the global framework and transparency initiatives that this report has been prepared in accordance with.

Global Reporting Initiative (GRI)

The GRI is an independent, international organisation that sets the standards that represent the global best practice for publicly reporting on a range of economic, environmental and social impacts. GRI 207 sets out disclosures related to tax and payments to governments aimed to help promote greater transparency on an organisation's approach to taxes.

The requirements of GRI 207 are set out below and includes the relevant page reference within this report.

GRI 207 compliance

GRI 207: Tax	South32
207-1: Approach to tax[56]	Refer to pages 3, 6 and 7
207-2: Tax governance, control and risk management	Refer to pages 3, 6 and 7
207-3: Stakeholder engagement and management concerns related to tax	Refer to page 7
207-4: Country-by-country reporting requires reporting of financial, economic and tax-related information for each jurisdiction in which the organisation operates	Refer to Table 8 on page 19

[56] GRI 207-1(a) requires South32 to disclose whether it has a tax strategy and if so, a link to this strategy if publicly available. For 2026, our tax strategy has been disclosed through the tax policy principles outlined on Page 3 and the Our Approach to Managing Tax section of this report.

Extractive Industries Transparency Initiative (EITI)

The EITI promotes the open and accountable management of oil, gas and mineral resources. South32 is a supporting company of the EITI association and its objectives to make the EITI Principles and the EITI Standard the internationally accepted standard for transparency in these sectors.

The table below demonstrates our compliance with the EITI expectations.

EITI Expectations		**South32**
One	Publish support for the EITI and its objectives of the EITI Association.	Refer to page 3
Two	Make comprehensive disclosures in accordance with the EITI Standard in all EITI implementing countries where the company or its controlled subsidiaries operate. Publicly disclose a list of controlled subsidiaries operating in the oil, gas or mining sectors in EITI implementing countries.	We disclose information in all jurisdictions where we operate. We publish our controlled subsidiaries list in our Annual Report 2026 on our website
Three	Publicly disclose taxes and payments to governments at a project level in line with the EITI Standard in all non-EITI implementing countries where the company operates, unless disclosure is not feasible.	Refer to Tables 1 and 2 on pages 12 to 13
Four	Disclose volumes received and payments made if buying oil, gas and minerals from governments.	No such purchases are made
Five	Publicly disclose audited financial statements, or the main items (i.e. balance sheet, profit/ loss statement, cash flows) where financial statements are not available.	Audited financial statements are included in our Annual Report 2026
Six	Publicly declare and publish support for beneficial ownership transparency and publicly disclose beneficial owners in line with the EITI Standard, recognising that listed companies will disclose the name of the stock exchange(s), include a link(s) to stock exchange filings where they are listed.	We publicly declare our support for beneficial ownership transparency on page 3 of this report. Refer to the shareholder information section in our Annual Report 2026 and all our stock exchange releases are available in the investor centre at *www.south32.net*
Seven	Engage in rigorous due diligence processes and publish an anti-corruption policy setting out how the company manages corruption risk.	Our Anti-Bribery and Corruption Policy and Program details are available in our Sustainable Development Report 2026. We obtain the beneficial ownership data when we engage with third parties.
Eight	Publicly declare and publish support for governments' efforts to publicly disclose contracts and licenses that govern the exploration and exploitation of oil, gas and minerals in line with the EITI Standard, and contribute to public disclosure of contracts and licenses in EITI implementing countries consistent with government procedures.	Refer below
Nine	Publish a commitment and/or policy on gender diversity in the oil, gas or mining sectors and support reporting by EITI implementing countries under the EITI Standard by disclosing employment in the sectors disaggregated by gender.	Our inclusion and diversity details are available in our Sustainable Development Report 2026 and Sustainability Databook 2026

Government mineral development contracts - EITI Expectation 8

We disclose all contracts with governments and support the public disclosure of contracts and licences for the exploration and development of minerals and other nature resources as outlined in the EITI standard. We also encourage other companies to provide this level of transparency.

All our exploration, and most of our mineral developments, are in jurisdictions that issue licences pursuant to public legislation, including Sierra Gorda and Mineração Rio do Norte S.A. (MRN) and we would pay income tax and royalties under the general revenue laws of these countries. We have one mineral development contract with governments. This is publicly available, and details of the contract are below, including links to the document.

List of Mineral Development Contracts with governments

South32 project	Contract name	South32 entities	South32 ownership interest in project	Host Government	Contract term	Link to publicly available document
Worsley Alumina Refinery (including Boddington Bauxite Mine)	Alumina Refinery (Worsley) Agreement Act 1973	South32 Aluminium (Worsley) Pty Ltd South32 Aluminium (RAA) Pty Ltd	86%	State of Western Australia	To 2046	Yes - *Worsley contract*

All other mining and exploration activity is conducted under licenses issued under public legislation and subject to published and consistently applied law and, as such, is not required to be separately disclosed.

Further information on beneficial ownership can be found in our Sustainability Databook 2026 and in the shareholder information section of our Annual Report 2026 at *www.south32.net*.

Basis of preparation for the year ended 30 June 2026

Our report and accompanying Tax Transparency Databook discloses information that satisfies the requirements of the following transparency initiatives:

- United Kingdom's (UK) Report on Payments to Governments Regulations 2014 (UK Regulations);
- Chapter 10 of the European Union (EU) Accounting Directive;
- Disclosure of tax information in line with the Australian Board of Taxation's Voluntary Tax Transparency Code for increased public disclosure of tax information;
- Australian Voluntary Tax Transparency Code;
- European Union Public Country-by-Country reporting requirements[57];
- Global Reporting Initiative (GRI) Sustainability Reporting Guidelines, including GRI 207;
- Extractive Industries Transparency Initiative reporting; and
- ICMM Social and Economic Reporting Framework and Guidance Indicator 1.

Our report and accompanying Tax Transparency Databook includes payments to governments made by South32 Limited and its subsidiaries for the period they form part of the South32 Limited accounting consolidated group. Our report includes Table 1 - Payments Made by Country (by country of tax residence) made by South32 Limited and its subsidiaries. The accompanying Tax Transparency Databook provides further details and includes the level of government for these payments. Please refer to Table 1 - Payments Made by Country and Level of Government (by country of tax residence) in the Tax Transparency Databook. We have also included payments to governments made by our extractive equity accounted investments and joint ventures. We include payments to governments made by extractive equity accounted investments and joint venture operations using South32's ownership proportions.

Payments have been disclosed in US dollars in line with the South32 functional currency for consolidated accounting purposes and where relevant, payments have been translated from the applicable local currency to US dollars at the exchange rate on the date of the payment. Payments are not reported where the aggregate taxes paid to a level of government or government body do not exceed US$0.1 million.

In accordance with requirements of UK Reports on Payments to Governments Regulations 2014 and the EU Accounting Directive, Table 2: Total payments to government by project provides an analysis of our taxes paid split by project relating to extractive operations. We have also included all payments relating to non-extractive projects to reconcile the table to other disclosures in this report. Our non-extractive projects include Hillside Aluminium (South Africa), Brazil Aluminium, Mozal Aluminium (Mozambique), our equity accounted South Africa manganese alloy smelter and companies which provide services (management, marketing or financing) or are limited to holding investments.

[57] South32 is in scope of the European Union Public Country-by-Country reporting requirements, as the Group's consolidated revenue exceeded €750 million at each of the two consecutive balance sheet dates preceding the relevant reporting period.

Glossary of terms

Cash effective tax rate (ETR)
Current tax payable/refundable divided by profit/loss subject to tax.

Corporate income taxes
Payments to governments (net of refunds) based on taxable profits, including withholding taxes paid on dividends, interest, royalties or other distributions of profits. Generally, these taxes are reflected in the corporate income tax returns made to government and included as income taxes in the Consolidated Income Statement.

Effective tax rate (ETR)
Income tax expense/benefit divided by profit/loss subject to tax.

Employer payroll taxes
Payments to governments in relation to South32's capacity as an employer. These taxes are calculated as a percentage of salary, wages and on-costs and are generally paid monthly.

Extractive
Any activity involving the exploration, prospection, discovery, development and extraction of minerals, oil, natural gas or other materials. South32's extractive operations include Cannington (Australia), Worsley Alumina (Australia), Cerro Matoso (Colombia), Hermosa (United States), equity accounted Australia Manganese Ore, equity accounted South Africa Manganese Ore, equity accounted Sierra Gorda (Chile) and equity accounted MRN (Brazil).

Fees
Payments to governments where no specific service is attached but rather levied on the initial or ongoing right to use an area for extractive activities.

Government
Any national, regional or local authority of a country and includes any department, agency or undertaking controlled by such an authority.

IFRS (International Financial Reporting Standards)
Accounting standards as issued by the International Accounting Standards Board (IASB).

Net transaction taxes paid/(refunded)
South32 claims refunds of transactional taxes, for example, Goods and Services Tax (GST), Value Added Tax (VAT) and Fuel Tax paid to suppliers for in-country purchases of goods, services and fuel. South32 also collects GST/VAT in respect of certain sales.

Non-extractive
Any activity which does not involve the exploration, prospection, discovery, development, and extraction of minerals, oil, natural gas or other materials. South32's non-extractive operations include Hillside Aluminium (South Africa), Brazil Aluminium, Mozal Aluminium (Mozambique), equity accounted South Africa Manganese Alloy (in care and maintenance) and any companies that provide services (management, marketing or financing) or are limited to holding investments.

Non-operated joint ventures
Operations, development projects and options, and exploration projects which are not wholly owned by South32 Limited or its subsidiaries and for which South32 does not manage the operation, being Ambler Metals, Brazil Alumina, Brazil Aluminium, Sierra Gorda S.C.M, and Mineração Rio do Norte S.A (MRN). Details of South32's ownership interest can be found in our Annual Report 2026 at *www.south32.net*.

Operated joint ventures
Operations, development projects and options, and exploration projects which are not wholly owned by South32 Limited or its subsidiaries and for which South32 manages the operation, being, Australia Manganese, South Africa Manganese, Minera Sud Argentina, Mozal Aluminium and Worsley Alumina. Details of South32's ownership interest can be found in our Annual Report 2026.

Other taxes and payments
Payments to governments under other legislated rules where no specific service is attached, including fringe benefits tax, property tax, stamp duty, environmental tax, wealth tax and other levies/charges.

Payment
An amount paid whether in money or in kind.

Permanent differences
Differences between taxable income/ loss and pre-tax statutory profit/loss. These differences arise because of certain expense or revenue items which under income tax legislation will never be included in the determination of taxable income/loss although they are recognised in the Consolidated Income Statement.

Project
Operational activities that are governed by a single contract, licence, lease, concession or similar legal agreement and form the basis for payment of liabilities to a government. Where multiple such agreements are substantially interconnected, this is considered a single project.

Royalties
Payments to governments in respect of revenue or production related to extraction of minerals or metals.

Royalty related taxes
Payments to governments in respect of profits from the extraction of natural resources. Royalty related taxes are presented as income tax in the Consolidated Income Statement. Both our Australia Manganese and Sierra Gorda operations have royalty related taxes.

Statutory profit/(Loss)
The profit/loss calculated in accordance with IFRS and presented in the Consolidated Income Statement in the South32 2026 Annual Report.

Subsidiaries
Subsidiaries are entities controlled by the parent entity.

South32, South32 Group or Group
Refers to South32 Limited and its controlled entities and operated joint arrangements, unless otherwise stated.

Temporary differences
Differences between taxable income/ loss and the pre-tax statutory profit/loss. These differences arise because certain revenue or expense items are included in the determination the taxable income/loss, which does not coincide with the period in which they are recognised in the Consolidated Income Statement.

Underlying earnings
Underlying earnings is profit after tax and earnings adjustment items. Earnings adjustments represent items that do not reflect our underlying operations. In order to calculate Underlying earnings, the following items are adjusted as applicable each period, irrespective of materiality: Exchange rate gains/losses on restatement of monetary items; Impairment losses/reversals; Gains/losses on disposal and consolidation of interests in operations; Gains/losses on non-trading derivative instruments, contingent consideration and other investments measured at fair value through profit or loss; Major corporate restructures; Joint venture adjustments; Exchange rate variations on net cash/debt; Tax effect of earnings adjustments; and Exchange rate variations on tax balances. In addition, items that do not reflect the underlying operations of South32, and are individually, or in combination with other related earnings adjustments, significant to the financial statements, are excluded to determine Underlying earnings. When applicable, significant items are detailed in the Financial Report. We believe that Underlying earnings provides useful information, but should not be considered as an indication of, or an alternative to, profit or attributable profit as an indicator of operating performance.

A reconciliation of our Underlying earnings to our Statutory earnings can be found in our Segment information section within our Annual Report 2026.

Underlying EBIT
Underlying EBIT is profit/loss before net finance income/costs, tax and any earnings adjustments, including impairments, from continuing and discontinued operations. The performance of each of the South32 operations and operational management is assessed based on Underlying EBIT. In order to calculate Underlying EBIT, the following items are adjusted as applicable each period, irrespective of materiality: Exchange rate gains/losses on restatement of monetary items; Impairment losses/reversals; Gains/losses on disposal and consolidation of interests in operations; Gains/losses on non-trading derivative instruments, contingent consideration and other investments measured at fair value through profit or loss; Major corporate restructures; and Joint venture adjustments. In addition, items that do not reflect the underlying operations of South32, and are individually, or in combination with other related earnings adjustments, significant to the financial statements, are excluded to determine Underlying earnings. When applicable, significant items are detailed in the Financial Report.

Underlying effective tax rate (ETR)
Underlying income tax expense/benefit divided by Underlying profit/loss subject to tax.

Underlying income tax expense
Corporate income tax incurred during the period on items included in Underlying earnings before tax. A reconciliation of our Underlying income tax expense to our statutory tax expense can be found in our 2026 Annual Report.

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