

Hong Kong

Summary tax notes for Anglo American employees: Hong Kong	
<p>The information below is provided to Anglo American employees holding Anglo American shares, and who receive the demerger distribution and Platinum shares, in the Anglo American Employee Corporate Nominee Account or under the Anglo American MyShare Plan.</p> <p>This information is intended only as a general guide to current tax law and published tax authority practice. It is not intended to be a comprehensive description of all of the tax considerations that may be relevant to the proposed demerger and/or share consolidation.</p> <p>If you are in any doubt about any matters, including but not limited to financial, taxation and legal matters, referred to in this information or their application to your own specific circumstances, you are recommended to seek your own independent financial, tax and legal advice from an appropriately authorised independent professional advisor.</p> <p>Please refer to the “Important Information” below for further details of the basis on which this information is given.</p> <p>The information below will be updated from time to time. Updated information will be uploaded to the microsite once available.</p>	
Receipt of Platinum shares by Anglo American employees	
Tax impact	<p><u>Nature of tax on receipt</u></p> <p>On the basis that the Platinum Shares will be treated as a dividend³², there is no tax payable by the Anglo American shareholders (for owned shares and shares purchased under an incentive plan which have been vested) on receipt of the receivable or Platinum shares. There is no tax on dividends in Hong Kong.</p> <p><u>Value of tax</u></p> <p>No tax is payable on receipt of the receivable or the Platinum shares.</p> <p><u>Reporting of tax</u></p> <p>As employees will receive the Platinum shares in their capacity as a shareholder of Anglo American, not in the capacity as employees, and the Platinum shares are in the nature of a dividend, no declaration of the receipt of the Platinum shares is required for tax purposes.</p>
Sale of Platinum shares by Anglo American employees	
Tax impact	<p><u>Nature of tax on sale</u></p> <p>There is no tax on capital gains.</p>

³² Whether the receipt of the Receivable and the Platinum shares under the demerger will be treated as a dividend will depend on the nature of the receivable when this is to be communicated to the shareholders. As the Platinum shares will be distributed to all shareholders, this will be similar to a dividend as the entitlement is by way of ownership of the Anglo American shares.

	<p>Reporting of tax</p> <p>No declaration of the sale of the Platinum shares is required.</p>
<p>Treatment of fractional entitlement to Platinum Shares</p>	
<p>Depending on the value of the receivable, it may not be possible to satisfy the receivable with a whole number of Platinum shares.</p> <p>In this case, in respect of shares held under an Anglo American share plan or in the Employee Corporate Nominee, employees will receive a fraction of a Platinum share, which may be sold on their behalf. The receipt and sale of this fraction of a Platinum share should generally be subject to the same tax treatment as the receipt and sale of any other whole Platinum share, as set out above.</p>	
<p>Anglo American Share Consolidation</p>	
<p>The Anglo American share consolidation generally should be a tax neutral event for employees holding Anglo American shares.</p> <p>The Anglo American share consolidation may result in employees who hold Anglo American shares under an Anglo American share plan or in the Employee Corporate Nominee holding a fraction of an Anglo American share. Where this is the case, this fraction of an Anglo American share may be sold on the employees' behalf. The sale of this fraction of an Anglo American share should generally be subject to the same tax treatment as would apply to the sale of any other whole Anglo American shares.</p>	
<p>Important Information</p>	
<ol style="list-style-type: none"> 1. The information included in this tax note does not constitute tax, financial, legal or investment advice and is not intended to be a comprehensive description of all of the legal, financial, tax or other considerations that may be relevant to the proposed demerger and/or share consolidation. 2. If you are in any doubt about any matters, including but not limited to financial, taxation and legal matters, referred to in this tax note or their application to your own specific circumstances, you are recommended to seek your own independent financial, tax and legal advice from an appropriately authorised independent professional advisor. 3. No member of the Anglo American group or any of their officers, employees, nominees, agents or representatives is giving you financial, legal, investment, tax or other advice in relation to the Anglo American share plans or the impact of the demerger and/or share consolidation on your awards and/or shares. 4. Any Anglo American shareholder is recommended to review the Anglo American shareholder circular which sets out information addressed to all Anglo American shareholders including those who hold or have a beneficial interest in Anglo American shares through the Anglo American share plans. 5. Please refer to the Platinum prospectus for information relating to Platinum and the Platinum shares. 6. To the extent there is a conflict between any of the above information and the Anglo American circular, the Anglo American circular shall take precedence. 7. The value of Anglo American and Platinum shares can go down as well as up and nothing in the information above is intended as advice or predictions on any share price movement. It is important to note that the share prices of each of Anglo American and Platinum could be higher or lower than prior to the distribution and consolidation. 	

8. No member of the Anglo American group or any of their officers, employees, nominees, agents or representatives accepts any liability for any loss arising from reliance on any information contained in the information above.
9. Any references to third-party sources or links are provided for convenience only and do not constitute endorsement or verification of the content.
10. The tax information included above is intended only as a general guide to current tax law and published tax authority practice, as applied in the jurisdiction referred to in the tax information as at 3 April 2025, both of which are subject to change at any time, possibly with retrospective effect.
11. Any tax information included in the information above applies only to Anglo American employees holding Anglo American shares who are tax resident, domiciled and working solely in the jurisdiction in respect of which this tax information is provided through-out both the entire vesting or equivalent period of any Anglo American share award and during the entire tax period in which the demerger occurs.
12. This tax advice is for employees who hold Anglo American shares in the Employee Corporate Nominee and the Anglo American MyShare Plan. Whilst the tax principles set out above may be expected to be the same in respect of any other Anglo American shares you own, you should seek your own independent financial, tax and legal advice from an appropriately authorised independent professional advisor.
13. It is the responsibility of each employee to ensure compliance with applicable tax regulations based on their personal circumstances.