Tax Transparency Report 2024





FY24 Tax Transparency Report

Introduction

IGO Limited (IGO or the Company or the Group) is pleased to present its Tax Transparency Report (Report) for the year ended 30 June 2024 (FY24).

The Report is published on a voluntary basis, in line with the Company's Corporate Governance framework, and as part of IGO's ongoing commitment to provide a high level of financial and regulatory compliance.

This Report has been prepared to conform with the recommendations of the Board of Taxation's Voluntary Tax Transparency Code (the Code), and the disclosures in this report are in accordance with the recommendations contained in Part A and Part B of the Code. Further information about the Code can be found at: https://www.ato.gov.au/businesses-and-organisations/corporatetax-measures-and-assurance/large-business/corporate-tax-transparency/ voluntary-tax-transparency-code

Group Summary

IGO is an ASX 100 listed company (ASX:IGO / ADR:IIDY) focused on creating a better planet for future generations by discovering, developing and delivering products critical to clean energy. As a purpose-led organisation with strong, embedded values and a culture of caring for our people and our stakeholders, we believe we are Making a Difference by safely, sustainably and ethically delivering the products our customers need to advance the global transition to decarbonisation.

The Company's primary operations are located in Western Australia and include:

- Tianqi Lithium Energy Australia Pty Ltd (TLEA) Joint Venture (IGO: 49% interest in TLEA, a lithium focused corporate entity jointly owned with Tianqi Lithium Corporation holding the remaining 51%). TLEA is a tax resident of Australia and its investments comprise a 51% stake in the Greenbushes lithium spodumene mine and a 100% interest in the Kwinana lithium hydroxide processing facility.
- 2. Nova Operation (IGO: 100%, in production nickel-copper-cobalt).
- Forrestania Operation (IGO: 100%, in production - nickel-cobalt).
 Production ceased at the Flying

Fox underground mine in November 2023, and the Spotted Quoll mine will transition into care and maintenance in the September 2024 quarter.

 Cosmos Nickel Project (IGO: 100%, in care and maintenance - nickel-cobalt). The Cosmos Project was placed into care and maintenance following a detailed review of the Project during the year.

In addition, IGO has a significant portfolio of exploration projects located in Western Australia (including the Albany Fraser Range, the Kimberley region and the Paterson Province), the Northern Territory (Lake Mackay JV and the Raptor Project), and in South Australia (Copper Coast Project and Western Gawler).



Traditional Owner groups by project/region

Bloodwood

Copper Coast Barngarla, Ngadjuri Cosmos Tjiwarl

East Kimberley Jaru, Koongie-Elvire,

Malarngowem, Miriuwung-Gajerrong, Ngarrawanji, Yi-Martuwarra Ngurrara, Yurriyangem Taam, Gooniyandi

Forrestania

Ballardong (South West Settlement), Marlinyu Ghoorlie Fraser Range / Nova Operation

Ngadju, Untiri Pulka, Upurli Upurli Nguratja

Greenbushes

South West Boojarah (South West Settlement), Wagyl Kaip Southern Noongar (South West Settlement), Gnaala Karla Booja (South West Settlement)

Ida Valley

Irindina

Arrernte People Kwinana

Gnaala Karla Booja (South West Settlement)

Lake Campion Ballardong (Noongar South West Settlement) and Marlinyu Ghoorlie

Paterson Nyangumarta People, Martu, Ngurrara

Raptor

Warlpiri, Anmatyerre, Kaytetye South Perth

Whadjuk (South West Settlement) West Kimberley

Bunuba, Warrwa, Wanjina Wunggurr Wilinggin, Dambimangari

Western Gawler Mirning - Far West Coast, Wirangu - Far West Coast, Kokatha - Far West Coast, Yalata, Maralinga Tjaratja

- Far West Coast



Financial and Tax Reporting

This Report provides information relating to Australian taxation activities for IGO for the 2024 and 2023 financial years (FY24 and FY23, respectively). IGO prepares a single consolidated set of financial statements that discloses the accounting profit before tax and income tax expense!

IGO has formed a tax consolidated group for income tax purposes, whereby a single consolidated income tax return is prepared and lodged by IGO with the Australian Taxation Office for all Australian wholly-owned subsidiaries. All IGO subsidiary companies are domiciled in Australia, with the exception of a minor exploration entity that is domiciled in British Columbia, Canada. The Company has an estimated current income tax receivable of \$35 million at 30 June 2024 (FY23: \$74 million). This tax receivable comprises current year income tax instalments paid of \$35 million, with nil tax on profits of the year. The Company has a further \$226 million of revenue tax losses available to be offset against future taxable income (FY23: \$13 million). In addition, the Company has \$63 million of net capital losses to carry over to future income years (FY23: \$63 million).

The following information should be read in conjunction with the disclosures in the <u>2024 Annual Report</u>.

Reconciliation of Accounting Profit to Income Tax Expense/(Benefit)

Income tax expense/(benefit) reported on the Company's income statement is calculated by multiplying the accounting profit/(loss) for the year, adjusted for non-temporary differences, by the relevant corporate tax rate.

A reconciliation of accounting profit/(loss) to income tax expense/(benefit) is provided as follows:

	2024 \$M	2023 \$M
Profit/(loss) before income tax	(94.4)	680.3
Tax expense/(benefit) at the Australian tax rate of 30% (2023: 30%)	(28.3)	204.1
Tax effect of non-temporary amounts that are not deductible / (not taxable) in calculating taxable income:		
Share-based payments	(0.9)	(0.4)
Non-deductible costs associated with acquisition of subsidiary and associate	-	(1.9)
Other non-deductible items	0.2	0.6
Deferred tax unwind of investment in associate	(228.4)	(355.3)
Adjustments for current tax of prior periods	3.0	0.1
Recoupment of tax losses not recognised	(7.4)	(1.4)
Recoupment of capital losses not recognised	-	(8.3)
Deferred tax assets not brought to account	84.3	293.7
Current year tax losses not brought to account	67.9	-
Write-back of deferred tax assets previously brought to account	12.4	-
Income tax expense/(benefit)	(97.2)	131.2

Material Non-Temporary and Temporary Differences

The items listed in the table above are primarily non-temporary tax differences that are not, or may never be, assessable or deductible for tax purposes, based on existing tax legislation.

Temporary differences on the other hand arise when income or expenses are recognised in different periods in the financial statements than for tax purposes due to differences in the timing of assessability or deductibility relative to accounting income or expense. They represent differences between the carrying amount of an asset or liability and its notional tax carrying amount (tax base), at the prevailing Australian company tax rate. In the table below, these differences are represented as either a deferred tax asset or a deferred tax liability, and as such they are recorded as assets or liabilities on the Company's balance sheet.

A deferred tax liability arises when the tax base is lower than the amount carried on the financial statements. This could be due to accelerated tax deductibility of the expensing of an asset (for example, certain mine properties) relative to the accounting expensing of the asset.

Deferred tax assets are recognised for deductible temporary differences and unused tax losses only if it is probable that future forecast taxable profits are available to utilise those temporary differences and losses, and the tax losses continue to be available having regard to the relevant tax legislation associated with their recoupment. The following table sets out the movements in temporary differences of the Group for the 2024 and 2023 financial years. The "Balance Sheet" columns of the table outline the temporary differences at balance date, and the "Profit or Loss" and "Equity" columns represent how those differences have changed and impacted the financial accounts during the relevant year.

	Balance Sh	Balance Sheet Profit or los		SS	Equity	Equity	
	2024 \$M	2023 \$M	2024 \$M	2023 \$M	2024 \$M	2023 \$M	
Deferred tax assets							
Property, plant and equipment	28.0	34.5	6.5	(34.5)	-	-	
Capitalised development expenditure	241.6	254.9	13.3	(226.0)	-	-	
Capitalised exploration expenditure	45.7	-	(45.7)	-	-	-	
Accrued expenses	7.3	6.4	(0.9)	(1.7)	-	-	
Concentrate inventories	10.7	-	(10.7)	-	-	-	
Business-related capital allowances	3.6	6.2	2.6	2.2	-	-	
Provision for employee entitlements	8.7	8.0	(0.7)	(2.5)	-	-	
Provision for rehabilitation	29.9	29.1	(0.8)	(4.8)	-	-	
Other provisions	7.7	4.7	(3.0)	(4.7)	-	-	
Financial assets	-	13.7	(0.1)	(0.5)	13.8	(13.2)	
Leased assets	1.3	3.5	2.2	(3.3)	-	-	
Other	0.9	2.2	1.3	0.1	-	-	
Deferred tax assets not brought to account	(378.0)	(293.7)	84.3	293.7	-	-	
Gross deferred tax assets	7.4	69.5	48.3	18.0	13.8	(13.2)	
Set-off of deferred tax liabilities pursuant to set-off provisions	(7.4)	-	-	-	-	-	
Net deferred tax assets	-	69.5	48.3	18.0	13.8	(13.2)	
Deferred tax liabilities							
Capitalised exploration expenditure	-	(16.5)	(16.5)	7.8	-	-	
Mine properties	-	(41.1)	(41.1)	(24.0)	-	-	
Deferred gains and losses on hedging contracts	(4.3)	(0.4)	1.1	(10.8)	2.8	(3.5)	
Trade receivables	(0.4)	(1.2)	(0.8)	1.2	-	-	
Consumable inventories	(2.3)	(2.3)	-	(0.1)	-	-	
Financial assets	-	-	-	(13.8)	-	-	
Investment in associates	(94.9)	(157.6)	(62.7)	125.8	-	-	
Other	(0.4)	(0.4)	-	(0.1)	-		
Gross deferred tax liabilities	(102.3)	(219.5)	(120.0)	86.0	2.8	(3.5)	
Set-off of deferred tax assets pursuant to set-off provisions	7.4	-	-	-	-	-	
Net deferred tax liabilities	(94.9)	(219.5)	(120.0)	86.0	2.8	(3.5)	

Income Tax Paid

A reconciliation of the Australian income tax payable per the audited statutory accounts to the Australian income tax paid in the year ended 30 June 2024 and 30 June 2023 is set out below.

	2024 \$M	2023 \$M
Income tax payable/(receivable) at 1 July	(74.3)	83.3
Income tax expense/(benefit)		
- Current year	(71.7)	133.1
- Prior year adjustments	(25.5)	(1.9)
Total income tax expense/(benefit)	(97.2)	131.2
Movement in deferred tax balances (temporary differences)	71.7	(104.0)
Current year income tax payable/(receivable)	(25.5)	27.2
Income tax received/(paid) during the year ¹	65.1	(184.8)
Income tax payable/(receivable) at 30 June	(34.6)	(74.3)

1. Agrees to income tax paid/received as per the Consolidated Statement of Cash Flows in the 2024 and 2023 Annual Report.

As discussed above, the Group has revenue tax losses of \$226 million (FY23: \$13 million) available to IGO in the future, however these tax losses have not been recognised as a deferred tax asset as their utilisation in the future is considered to be uncertain. Further, the Group did not bring to account deferred tax assets of \$378 million (FY23: \$294 million) in line with accounting standards whereby deferred tax assets are only recognised when it is probable that future forecast taxable profits will be available to utilise the deferred tax assets.

Accounting Effective Company Tax Rate

The Australian company tax rate remains unchanged at 30% of taxable income for the 2024 and 2023 financial years. The Australian and Global Effective Company Tax Rate (ETR) is calculated as income tax expense divided by accounting profit before tax. The ETR will differ from the company tax rate due to non-temporary differences explained above. The ETRs for IGO for the years ended 30 June 2024 and 30 June 2023 were as follows:

	2024 \$M	2023 \$M
Profit/(loss) before tax	(94.4)	680.3
Less: Share of profit from associates	(552.6)	(1,603.6)
(A) Adjusted loss before tax	(647.0)	(923.3)
Income tax expense/(benefit) included in the Group's Consolidated statement of profit or loss	(97.2)	131.2
Adjustments:		
Movement in deferred tax liability arising from investment in associate	62.7	(125.8)
Deferred tax assets not brought to account	(96.7)	(293.7)
Tax losses not brought to account	(67.9)	-
Adjustments for tax expense of prior years	4.4	1.3
Recognition of capital losses not previously brought to account	-	8.3
(B) Adjusted income tax expense/(benefit)	(194.7)	(278.7)
Australian effective tax rate (B/A)	30.1%	30.2%
Global effective tax rate (B/A)	30.1%	30.2%

The Company's ETR reflects the rate calculated for the entire accounting consolidated group, which includes worldwide operations.

Tax Treatment of IGO's Investment in TLEA

As a non-controlling shareholder of TLEA, IGO accounts for its investment in TLEA in accordance with *Investments in Associates* (AASB 128). AASB 128 provides that IGO's initial investment in TLEA is recorded at cost, with the carrying amount then adjusted for the following:

- The carrying amount is increased/ decreased to recognise IGO's share of net profit/loss from TLEA for each reporting period; and
- Dividend distributions from TLEA (once received) are deducted from the carrying amount of the investment in TLEA.

The Group's profit before income tax includes IGO's share of net profit after tax (NPAT) from TLEA. However, for income tax purposes, this amount is not assessable and excluded from the calculation of income tax payable. However, the dividends received by IGO from TLEA will be treated as assessable income and give rise to a current tax liability (to the extent that the dividend is unfranked).

Further, IGO is also required to consider the impact of AASB 112 *Income Taxes* (AASB 112) on its share of NPAT from TLEA and the dividends received from TLEA. AASB 112 provides that an entity is required to recognise a deferred tax liability for all taxable temporary differences connected with investments in associates, subject to certain exceptions. This results in IGO recognising a deferred tax liability on its investment in TLEA on the difference between its share of NPAT from TLEA and the dividends received from TLEA, with a corresponding adjustment to income tax expense. During FY24, this resulted in a net credit to income tax expense of \$62.7 million (FY23: debit of \$125.8 million).

Tax Contribution Summary

The table below outlines the major taxes and government charges paid (i.e. cash basis) by IGO during the 2024 and 2023 financial years. The table does not include payments made by TLEA and its controlled operations.

	Tax Authority	2024 \$M	2023 \$M
Income Tax ¹	Federal	34.6	78.6
Government Royalties	State	26.8	37.6
Payroll Tax	State	8.9	6.8
Fringe Benefits Tax	Federal	3.4	2.5
Other Taxes and Levies	State	7.0	4.7
Government Stamp Duties ²	State	51.3	-
Total		132.0	130.2

 FY23 income tax has been restated to allocate the \$106.1M income tax refund received upon lodgement of 2023 income tax return in FY24. FY24 income tax payments of \$34.6M comprises income tax instalments relating to FY24 and are expected to be refunded on completion of the FY24 income tax return.

2. Stamp duty of \$51.3M primarily relates to stamp duty associated with the acquisition of Western Areas Limited in June 2022.



Approach to Tax Strategy and Governance

The Board of Directors of IGO recognise tax risk management and governance as a subset of corporate governance.

IGO's risk management system is designed to ensure that the Company identifies, documents, communicates and proactively manages risks in a systematic way. At IGO, risk management remains fundamentally embedded within the culture of its business.

On 29 August 2024, IGO released its annual Corporate Governance Statement that details IGO's approach to corporate governance. The Board of Directors of IGO have a clear understanding of its responsibility for corporate governance and recognises the importance of its corporate governance framework in establishing accountabilities, guiding and regulating activities, monitoring and managing risks and optimising the Company's performance.

In line with good corporate governance principles and the Company's commitment to properly manage tax risks, IGO has an established Audit and Risk Committee (ARC) to assist the Board to fulfil its responsibilities in relation to tax risk management by overseeing, monitoring, reviewing and reporting to the Board on the Company's tax risk management framework. Furthermore, and in accordance with the ARC's Charter, the ARC's responsibilities also include considering the appropriateness of material tax judgements applied in the preparation of financial reports of the Group, considering the implications of unexpected changes in prevailing tax laws to the Group's operating business and reviewing the findings of any examination by regulatory agencies of the Group's tax governance and practices.

Taxation Policy

IGO is committed to contributing to the communities in which we operate and taxes are an important mechanism through which our contribution is made. At IGO, we are committed to full and timely compliance with the letter and intent of the prevailing tax laws of all jurisdictions in which we operate.

In addition to having a tax risk management and internal control framework, IGO also commits to:

- Comply with all applicable tax laws and regulations of each country in which we operate
- Ensure that all taxes are paid as and when they become due and payable
- Enter into transactions based on commercial merit, not for the purpose of avoiding tax
- Maintain open and constructive relationships with all relevant taxation authorities
- Operate in good faith through appropriate transfer pricing and not undertaking 'profit shifting' activities

- Allocate the necessary resources to continually improve our approach to tax risk management, and
- Ensure public disclosures are transparent, timely, accurate and meet stakeholder expectations.

International Related Party Dealings

As stated above, IGO is one of two shareholders of TLEA. Tianqi Lithium Corporation is the other shareholder and is domiciled in China. Other than this, IGO does not have material international related party dealings nor material operations located outside of Australia. IGO's regular tax obligations from its investment in TLEA will arise from the receipt of future expected dividends to be sourced from cashflows and profits that are expected to be generated by TLEA's operations.

IGO also has a minor incorporated subsidiary, IGO Canada Holdings B.C. Ltd, domiciled in British Columbia, Canada, which was set up in 2022 to establish a Canadian presence and consider growth opportunities. The Canadian subsidiary is consolidated into the IGO Group for accounting purposes. This entity is also a tax resident in its respective country of incorporation. However, it is assessed as an Australian resident under the Income Tax Assessment Act 1997 and therefore not classified as a foreign resident under that Act. The subsidiary had no significant activity during the year ended 30 June 2024.

With the exception of the above, IGO does not have any international related party dealings. Hence, IGO's Global Effective Tax Rate is the same as its Australian Effective Tax Rate.



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