

## Taxation Policy

Last updated: 24 March 2022

### Our Commitment

- Australian Strategic Materials (ASM) strives to create and deliver value for its shareholders and the broader community.
- We commit to contributing to the economies of the countries in which we operate and to ensuring communities benefit from the growth and development of our businesses.
- We commit to full and timely compliance with the letter and intent of the prevailing tax laws of all countries in which we operate.

### Our Principles

#### Tax Strategy

We will drive effective tax governance by:

- Ensuring the implementation of the Group Wide Tax Governance Framework.
- Complying with all tax compliance obligations in a timely manner.
- Ensuring that tax risks are considered as part of any commercial transaction.
- Taking a low-risk approach to the assessment and management of tax risk.
- Not participating in any form of tax evasion or indirectly facilitating tax evasion by a third party.
- Maintaining open and constructive relationships with all relevant tax authorities.
- Ensuring public disclosures are transparent, timely, accurate and meet stakeholder expectations.
- Engaging proactively and transparently with the Board, Audit and Risk Committee and others.

#### Tax Risk

- ASM takes a low-risk approach to the assessment and management of tax. Where the application of tax legislation is unclear, ASM seeks external tax advice and consults with the relevant tax authorities to achieve an appropriate level of certainty.

### Everyone's Responsibility

Australian Strategic Materials expects all employees, contractors, suppliers, and customers to adhere to this policy.

Australian Strategic Materials will not allow any form of retaliation, discrimination, harassment, or intimidation against anyone who decides to Speak-Up under this Policy, or on any other occasion when they feel it is necessary.

At Australian Strategic Materials we foster a culture of corporate compliance, ethical behaviour, and good corporate governance. This reflects our values of Integrity, Effectiveness, Sustainability, Professionalism, Transparency, Safety and Wellbeing.

## Internal Use Only

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Approved	Board
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