

Taxation

Policy

June 2024

PLS-POL-FI-003

1 OUR COMMITMENT

Pilbara Minerals Limited (Pilbara Minerals or the Company) and its subsidiaries (the Group) are committed to conducting itself with integrity, honesty and fairness in all business practices and to observing the rule and spirit of the legal and regulatory environment in which the Group operates.

Pilbara Minerals' commitment applies to all business activities involving tax authorities, regulators, government organisations, suppliers, contractors, customers, shareholders, competitors and employees in Australia and overseas.

2 APPROACH TO TAX

Pilbara Minerals recognises that delivering on this commitment is fundamental to its long-term success and to creating shared value for the Group and the communities in which it operates.

As a result, Pilbara Minerals is committed to ensuring its tax affairs are completed with the following principles in all territories in which the Group operates:

- Complying with the tax laws, regulations and disclosure requirements.
- Paying the right amount of tax, at the right time.
- Developing, implementing and maintaining processes that proactively identify, assess and manage tax risks and compliance.
- Ensuring relevant tax authorities and government stakeholders are identified and proactively engaged as appropriate.
- Building and maintaining constructive and respectful relationships with relevant authorities or other government bodies.
- Addressing tax disputes in a fair, timely and respectful manner through appropriate proceedings as necessary.
- Only entering transactions based on commercial merit and not for the purpose of avoiding tax.
- Ensuring any international related party transactions occur in accordance with the arm's length principles as provided by the Organisation for Economic Cooperation and Development (OECD) guidelines.
- Ensuring public disclosures are transparent, timely, accurate and meet the stakeholder expectations.

3 TAX GOVERNANCE AND RISK MANAGEMENT

Fundamental to Pilbara Minerals achieving its strategic objectives in a sustainable manner includes recognising and managing risk and consequently this is a crucial part of the role of the Board, Audit and Risk Committee and all employees.

Pilbara Minerals understands that a failure by the Group to recognise or manage risk appropriately can adversely impact not only the Group and its shareholders, but also other stakeholders who have an association with the Group including tax authorities and local communities where the Group operates.

The Board has ultimate responsibility for the risk management framework designed to identify and manage risk on an on-going basis. The Board of Directors is supported by the Audit and Risk Committee to oversee tax governance and risk management.

The Board have set a low-risk appetite in relation to tax risk. A low-risk appetite is determined to be a risk averse approach where the Board is not prepared to compromise on this area given the alignment with the

purpose and values of the Company. In addition, the Group also requires the adherence to the approved internal Tax Management Framework.

The operational risk owners of the tax risk governance and management is the Chief Financial Officer (CFO) as the public officer, and the Group Tax Manager.

As part of the Tax Management Framework, the CFO and Group Tax Manager regularly provide tax updates to the Audit and Risk Committee and Board as required.

The operation of the tax governance processes and controls is contemporaneously evidenced, reviewed regularly by the Group Tax department and subject to independent review on a periodic basis.

The Board is committed to ensuring that the Company has effective policies and procedures in place to manage tax risk and as a result the tax controls are subject to periodic testing.

4 TAX COMPLIANCE

Pilbara Minerals believes that embedding a strong culture of compliance sets the foundation for a sustainable organisation to continue to grow for many years to come. As a result, the Group has adopted a Compliance Policy which outlines the Group's Compliance Framework and overall commitment and approach with respect to compliance. The Policy ensures that the Group complies with all legal and regulatory requirements that affect the Group's business wherever it operates.

Tax compliance within the Group abides by the Compliance Policy as follows:

- Internal Compliance – adhering to established Company Policies, Processes and Procedures, and the Tax Governance Framework; and
- External Compliance – adhering to all regulatory requirements, specifically concerning reporting obligations for a listed mining company, and what is required under laws in the relevant territories in which the Group operates.

5 POLICY HISTORY

This Policy will be reviewed by Management on an annual basis and amended as required and approved by the Board of Directors.

Established	19 June 2024
Last reviewed	19 June 2024
Frequency	Annually