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**Zijin Mining Group Co., Ltd.\***

**紫金礦業集團股份有限公司**

*(a joint stock limited company incorporated in the People's Republic of China with limited liability)*

**(Stock code: 2899)**

## **Withholding and Payment of Enterprise Income Tax on Behalf of Non-resident Enterprise Shareholders in respect of 2023 Final Dividend**

References are made to the annual results announcement for the year ended 31 December 2023 dated 22 March 2024, the circular and notice of 2023 annual general meeting dated 16 April 2024 and the announcement in relation to closure period of register of members of H Shares for the proposed distribution of 2023 final dividend dated 7 May 2024 of Zijin Mining Group Co., Ltd.\* (the "Company") which, among others, mentioned the proposed distribution of final dividend of the Company for the year ended 31 December 2023 (the "2023 Final Dividend").

Pursuant to the "Enterprise Income Tax Law of the People's Republic of China" (the "Enterprise Income Tax Law"), the "Detailed Rules for the Implementation of the Enterprise Income Tax Law of the People's Republic of China" (the "Tax Law"), and the "Notice of the State Taxation Administration on the Issues concerning Withholding and Payment of the Enterprise Income Tax on the Dividends Paid by Chinese Resident Enterprises to H-share Holders Which Are Overseas Non-resident Enterprises" (Guoshuihan [2008] No. 897) (《國家稅務總局關於中國居民企業向境外 H 股非居民企業股東派發股息代扣代繳企業所得稅有關問題的通知》(「國稅函[2008]897 號」)) all implemented in 2008, with effect from 1 January 2008, any Chinese domestic enterprise which pays dividend to a non-resident enterprise shareholder in respect of accounting periods beginning from 1 January 2008 shall withhold and pay 10% enterprise income tax on behalf of such shareholder.

The 2023 Final Dividend will be paid to the holders of H Shares of the Company (the "H Shareholders") whose names appear on the register of members of H Shares of the Company (the "Register of Members of H Shares") on 29 May 2024 (Wednesday) (the "Record Date"). The Company intends to dispatch the cheques for the 2023 Final Dividend to the H Shareholders by ordinary mail at their own risk on 28 June 2024 (Friday).

In accordance with the Tax Law and its relevant rules and regulations, the Company has an obligation to withhold and pay 10% enterprise income tax from the payment of the 2023 Final Dividend on behalf of the

H Shareholders who are non-resident enterprise (including HKSCC Nominees Limited) whose names are registered on the Register of Members of H Shares as of the Record Date. The term “non-resident enterprise” when used in this announcement shall have the same meaning as defined under the Tax Law and its relevant rules and regulations.

If any resident enterprise (as defined in the Enterprise Income Tax Law) listed on the Register of Members of H Shares which is duly incorporated in the PRC or under the laws of a foreign country (or a region) but with a PRC-based de facto management body does not wish the Company to withhold and pay the said 10% enterprise income tax, it shall submit to the H share registrar of the Company, Computershare Hong Kong Investor Services Limited at 17M Floor, Hopewell Centre, 183 Queen’s Road East, Wanchai, Hong Kong at or before 4:30 p.m., 22 May 2024 (Wednesday) the related documents to confirm its resident enterprise status, including: 1. a legal opinion issued by a Mainland China qualified lawyer (with the seal of the applicable law firm affixed); and 2. together with duly certified true copies of the certificate of enterprise code for PRC enterprises (中華人民共和國組織機構代碼證) issued by the relevant PRC governmental authorities or equivalent documents certified by a Hong Kong solicitor or accountant, that establishes its resident enterprise status.

### **Withholding and payment of income tax on behalf of H Shareholders through the Shanghai-Hong Kong Stock Connect and the Shenzhen-Hong Kong Stock Connect**

Pursuant to the Notice on the Taxation Policies Related to the Pilot Programme of the Shanghai-Hong Kong Stock Connect (Cai Shui [2014] No. 81) (《關於滬港股票市場交易互聯互通機制試點有關稅收政策的通知》(財稅[2014]81號)) promulgated on 17 November 2014 and the Notice on the Taxation Policies Related to the Pilot Programme of the Shenzhen-Hong Kong Stock Connect (Cai Shui [2016] No. 127) (《關於深港股票市場交易互聯互通機制試點有關稅收政策的通知》(財稅[2016]127號)) promulgated on 5 December 2016:

1. for Mainland individual investors who invest in the H Shares of the Company through the Shanghai-Hong Kong Stock Connect and/or the Shenzhen-Hong Kong Stock Connect, the Company will withhold and pay on behalf of these shareholders individual income tax at the rate of 20% in the distribution of dividend. Individual investors may, by producing valid tax payment proofs, apply to the competent tax authority of China Securities Depository and Clearing Corporation Limited for tax credit relating to the withholding tax already paid abroad. For Mainland securities investment funds that invest in the H Shares of the Company through the Shanghai-Hong Kong Stock Connect and/or the Shenzhen-Hong Kong Stock Connect, the Company will withhold individual income tax in the distribution of dividend pursuant to the foregoing provisions;
2. for Mainland enterprise investors that invest in the H Shares of the Company through the Shanghai-Hong

Kong Stock Connect and/or the Shenzhen-Hong Kong Stock Connect, the Company will not withhold and pay the income tax on behalf of the Mainland enterprise investors in the distribution of dividend and the Mainland enterprise investors shall file the tax returns on their own.

The 2023 Final Dividend to be distributed to the H Shareholders through the Shanghai-Hong Kong Stock Connect and the Shenzhen-Hong Kong Stock Connect will be paid in Renminbi. The Record Date and the date of distribution of cash dividends and other arrangements for the investors of Shanghai-Hong Kong Stock Connect and the Shenzhen-Hong Kong Stock Connect will be the same as those for the H Shareholders.

Should the H Shareholders have any doubt in relation to the aforesaid arrangements, they are recommended to consult their tax advisors for relevant tax implications in Mainland China, Hong Kong and other countries (regions) on the possession and disposal of the H Shares of the Company.

Investors should note that the Company has no obligation and will not be responsible for confirming the identities of any shareholders. The Company will withhold and pay the enterprise income tax strictly in accordance with the Tax Law and its relevant rules and regulations, based on the information contained in the Register of Members of H Shares on the Record Date. The Company shall owe no liability whatsoever in respect of and will not entertain any claims arising from any delay in, or inaccurate determination of, the status of the shareholders or any disputes over the mechanism of withholding.

The abovementioned proposed distribution of the Final Dividend is subject to the approval of shareholders at the annual general meeting of the Company to be held on 17 May 2024 (Friday).

Any subsequent changes to the expected timetable will be published by way of public announcement.

This announcement is made on a voluntary basis.

This announcement is published in both Chinese and English. In the case of any discrepancies, the Chinese version shall prevail over its English version.

**Investors and shareholders are advised by the board of directors of the Company to exercise caution when dealing in the securities of the Company.**

As at the date of this announcement, the Board of Directors of the Company comprises Messrs. Chen Jinghe (Chairman), Zou Laichang, Lin Hongfu, Ms. Lin Hongying, Messrs. Xie Xionghui and Wu Jianhui as executive directors, Mister Li Jian as non-executive director, and Messrs. He Fulong, Mao Jingwen, Li Changqing, Suen Man Tak, Bo Shao Chuan and Ms. Wu Xiaomin as independent non-executive directors.

By Order of the Board of Directors  
**Zijin Mining Group Co., Ltd.\***  
**Chen Jinghe**  
*Chairman*

7 May 2024, Fujian, the PRC

*\*The Company's English name is for identification purpose only*