

The RioTinto logo consists of the word "RioTinto" in a white, sans-serif font, centered within a solid red rectangular background.

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Vanessa A. Countryman
Secretary Securities and Exchange Commission
100 F Street NE, Washington, DC 20549-1090
Country

16 March 2020

Your reference **File Number S7-24-19**

Dear Vanessa

File Number S7-24-19 - Disclosure of Payments by Resource Extraction Issuer Proposed Rule

We welcome the opportunity to make a submission in response to the proposed rules for the implementation of Section 1504 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

Rio Tinto is a founding member of the Extractive Industries Transparency Initiative "EITI", a supporter of the EITI Principles and has played an active role in this global standard since 2003.

Rio Tinto supports the EITI's position on project-by-project reporting. Our annual taxes paid report discloses country-by-country data on taxes and payments to government, as well as project-by-project disclosures. We also file additional reports to disclose payments to governments connected with extractive activity to meet requirements in the UK and Canada (Chapter 10 of EU Accounting Directive "EUAD" 2013/34 and the Extractive Sector Transparency Measures Act "ESTMA" respectively). These reports include the project-by-project information disclosed in our annual taxes paid reports.

Rio Tinto encourages the harmonisation of reporting obligations aligned with global best practice. We believe that the creation of a consistent standard by which companies can report their contributions with integrity and responsibility is essential to promoting confidence in business. Accordingly, we support the harmonisation of the section 1504 proposal with the requirements under the UK and Canadian mandatory disclosure regimes.

Rio Tinto supports the proposed rule which permits companies subject to alternative foreign disclosure to submit the report prepared under those foreign requirements in lieu of the SEC's form, where that foreign disclosure satisfies the transparency objectives of Section 1504. We believe that the requirements of the EUAD will satisfy this requirement.

It will be important for the SEC, as early as possible, to confirm that the EUAD meets the requirements of an acceptable foreign disclosure.

Yours sincerely

A handwritten signature in black ink, appearing to read "awolff", written in a cursive style.

Ann-Maree Wolff
Head of Tax