

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

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Private & Confidential

Jay Clayton
Chairman, Securities and Exchange Commission
100 F Street NE, Washington, DC 20549-1090

11 December 2020

Dear Chairman Clayton

Disclosure of Payments by Resource Extraction Issuer Proposed Rule

We refer to our submission dated 16 March 2020 in response to proposed rules for the implementation of Section 1504 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. We understand from the SEC that it will consider whether to adopt rules at its meeting scheduled for 16 December 2020.

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 seeks to again express our support for rules which permit 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.

In finalising any rules, it is Rio Tinto's view that it will be important for the SEC to confirm that the EUAD meets the requirements of an acceptable foreign disclosure.

Yours sincerely

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

Ann-Maree Wolff
Head of Tax