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# TIANCI LITHIUM

# **Tianqi Lithium Corporation**

天齊鋰業股份有限公司

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

(Stock Code: 9696)

# ANNOUNCEMENT DISTRIBUTION OF THE FINAL DIVIDEND

References are made to the circular of the 2023 annual general meeting (the "AGM Circular") dated 29 April 2024 and the poll results announcement of the 2023 annual general meeting (the "AGM") dated 28 May 2024 of Tianqi Lithium Corporation (the "Company") in relation to, among others, the Shareholders have approved the 2023 profit distribution plan of the Company at the AGM. Unless the context otherwise requires, capitalised terms used herein shall have the same meanings as those defined in the AGM Circular.

#### **DISTRIBUTION OF THE 2023 FINAL DIVIDEND**

The Board wishes to inform the Shareholders that details of the distribution of the final dividend for the year ended 31 December 2023 (the "2023 Final Dividend") are as follows:

The Company is expected to distribute the 2023 Final Dividend on Monday, 22 July 2024 to Shareholders whose names appeared on the register of members of the Company on Sunday, 23 June 2024 (the "Record Date"). The 2023 Final Dividend payable to the Shareholders shall be denominated and declared in Renminbi. The cash dividend is RMB13.50 (tax inclusive) for every 10 Shares. The 2023 Final Dividend payable to the holders of A Shares and the holders of H Shares through Southbound Trading will be paid in Renminbi, while the 2023 Final Dividend payable to the holders of H Shares not through Southbound Trading will be paid in Hong Kong dollars. The amount of Hong Kong dollars payable shall be calculated on the basis of the average benchmark exchange rate of Renminbi to Hong Kong dollars as announced by the People's Bank of China for the five business days prior to the date of the AGM for declaration of the 2023 Final Dividend (i.e. RMB0.910696 equivalent to HK\$1.00).

In order to determine the list of H Shareholders who will be entitled to receive the 2023 Final Dividend, the H Shares register of members of the Company will be closed from Tuesday, 18 June 2024 to Sunday, 23 June 2024 (both days inclusive), during which period no transfer of H Shares will be effected. In order for the H Shareholders to qualify for receiving the 2023 Final Dividend, Shareholders whose H Shares are not registered in their names should complete and lodge their respective instruments of transfer with the relevant H Share certificates with Computershare Hong Kong Investor Services Limited, the Company's H Share Registrar in Hong Kong, at Shops 1712-1716, 17th Floor, Hopewell Centre, 183 Queen's Road East, Wanchai, Hong Kong, and in any case no later than 4:30 p.m. on Monday, 17 June 2024.

The Company has appointed Bank of China (Hong Kong) Trustees Limited as the receiving agent in Hong Kong (the "Receiving Agent") and will pay to such Receiving Agent the 2023 Final Dividend declared for payment to holders of H Shares who are not via the Southbound Trading. The Receiving Agent will distribute the 2023 Final Dividend on Monday, 22 July 2024. Relevant cheques will be dispatched to holders of H Shares entitled to receive such dividend by ordinary post and at their own risk on Monday, 22 July 2024. In case of joint shareholding, the cheques for the profit distribution will be posted to the first named person on the H Shareholders' register in respect of such joint shareholding.

#### Taxation in Relation to 2023 Final Dividend

## Non-resident enterprise Shareholders

According to the Law of the People's Republic of China on Enterprise Income Tax and its implementation regulations implemented on 1 January 2008 and amended on 24 February 2017 and 29 December 2018, the Company is obligated to withhold and pay enterprise income tax at the rate of 10% from the cash dividend payable to non-resident enterprise Shareholders whose names appear on the H Shareholders' register of the Company on their behalf. Any H Shares registered under the name of non-individual Shareholder, including the H Shares registered under the name of HKSCC Nominees Limited, other nominees, agents or trustees, other organizations or entities, shall be deemed as Shares held by non-resident enterprise Shareholders, and therefore, enterprise income tax will be withheld from the dividend payable to such Shareholders. If holders of H Shares intend to change its Shareholder status, please enquire about the relevant procedures with your agents or trustees. The Company will strictly comply with the law or the requirements of the relevant government authority and withhold and pay enterprise income tax on behalf of the relevant Shareholders based on the register of members for H Shares as at the Record Date.

#### Non-resident individual Shareholders

Pursuant to the Notice on the Issues on Levy of Individual Income Tax after the Abolishment of Guoshuifa (1993) No. 045 Document (《關於國稅發(1993)045 號文件廢止後有關個人所得稅徵管問題的通知》) (Guo Shui Han (2011) No. 348) issued by the State Administration of Taxation, the Company shall withhold and pay the individual income tax for dividend payable to its individual Shareholders and individual Shareholders are entitled to relevant tax preferential treatments according to the tax agreements between those countries where the individual Shareholders are residents and China and the provisions in respect of tax arrangements between the mainland China and Hong Kong (Macau). The Company would withhold and pay the individual income tax at the tax rates of 10% on behalf of the individual Shareholders who are Hong Kong residents, Macau residents or residents of those countries having agreements with China for individual income tax rates in respect of dividend of 10%. For individual Shareholders who are residents of those countries having agreements with China for individual income tax rates in respect of dividend of lower than 10%, the Company may make applications on their behalf to seek entitlement of the relevant agreed preferential treatments pursuant to the Notice of the State Administration of Taxation in relation to the Administrative Measures on Preferential Treatment Entitled by Non-

resident Taxpayers under Tax Treaties (SAT Notice [2019] No. 35) (《關於發佈<非居民納稅人享受協定待遇管理辦法>的公告》(國家稅務總局公告 2019 年第 35 號)). For individual Shareholders who are residents of those countries having agreements with China for individual income tax rates in respect of dividend of higher than 10% but lower than 20%, the Company would withhold the individual income tax at the agreed-upon effective tax rate. For individual Shareholders who are residents of those countries without any taxation agreements with China or having agreements with China for individual income tax in respect of dividend of 20% and other situations, the Company would withhold the individual income tax at a tax rate of 20%.

Shareholders are recommended to consult their tax advisor regarding the ownership and disposal of H Shares in the PRC and in Hong Kong and other tax effects.

The Company will have no liability in respect of any claims arising from any delay in, or inaccurate determination of the status of the Shareholders or any disputes over the mechanism of withholding.

## Investors of Southbound Trading

For investors of the Shenzhen Stock Exchange and Shanghai Stock Exchange (including enterprises and individuals) investing in the H Shares of the Company listed on SEHK (the "Southbound Trading"), the Company has entered into the Agreement on Distribution of Cash Dividends of H Shares for Southbound Trading (《港股通 H 股股票現金紅利派發協議》) with China Securities Depository and Clearing Corporation Limited, pursuant to which China Securities Depository and Clearing Corporation Limited, as the nominee of holders of H Shares for Southbound Trading, will receive all cash dividends distributed by the Company and distribute the cash dividends to the relevant investors of H Shares of Southbound Trading through its depositary and clearing system.

The cash dividends for the investors of H Shares of Southbound Trading will be paid in RMB. Pursuant to the relevant requirements under the Notice on the Tax Policies Related to the Pilot Program of the Shenzhen-Hong Kong Stock Connect (《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》) (Caishui [2016] No. 127) and the Notice on the Tax Policies Related to the Pilot Program of the Shanghai-Hong Kong Stock Connect (《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》) (Caishui [2014] No. 81) and, for dividends received by domestic individual investors from investing in H Shares listed on SEHK through Southbound Trading, the company of such H Shares shall withhold individual income tax at the rate of 20% on behalf of the relevant investors. Individual investors who have paid withholding taxes overseas, with effective taxation certificates, can apply to competent taxation authorities of China Securities Depository and Clearing Corporation Limited for tax credit. For dividends received by domestic securities investment funds from investing in shares listed on SEHK through Southbound Trading, the tax payable shall be the same as that for individual investors. The company of such H Shares shall not withhold income tax of dividends for domestic enterprise investors and those domestic enterprise investors shall report and pay the relevant tax themselves.

### **Investors of Northbound Trading**

For investors (including enterprises and individuals) investing in the A Shares listed on the Shenzhen Stock Exchange through SEHK (the "Northbound Trading"), their dividends will be distributed in RMB by the Company through the Shenzhen Branch of China Securities Depository and Clearing Corporation Limited to the account of the nominees holding such Shares. The Company will withhold and pay income taxes at the rate of 10% on behalf of those investors and will report to the competent tax authorities for such withholding. For investors of Northbound Trading who are tax residents of other countries and whose country of domicile is a country which has entered into a tax treaty with the PRC stipulating a dividend tax rate of lower than 10%, those enterprises and individuals may apply to the competent tax authorities for the entitlement of the rate under such tax treaty by themselves. Upon approval by the tax authorities, the paid amount in excess of the tax payable by such enterprises and individuals based on the tax rate according to such tax treaty will be refunded.

The Record Date and the distribution date of cash dividends and other arrangements for the investors of Northbound Trading will be the same as those for the A Shareholders.

Shareholders are recommended to consult their tax advisor regarding the tax effects of ownership and disposal of the Shares in the PRC, Hong Kong and other countries (regions).

By order of the Board

Tianqi Lithium Corporation

Jiang Anqi

Chairlady of the Board and Executive Director

Hong Kong, 31 May 2024

As at the date of this announcement, the Board comprises Ms. Jiang Anqi, Mr. Jiang Weiping, Mr. Ha, Frank Chun Shing and Mr. Zou Jun, as executive Directors, and Mr. Xiang Chuan, Ms. Tang Guoqiong, Ms. Huang Wei and Ms. Wu Changhua as independent non-executive Directors.