洛阳钼业

洛陽欒川鉬業集團股份有限公司
CMOC Group Limited*

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

(Stock Code: 03993)

ANNOUNCEMENT
UPDATE ON WITHHOLDING TAX WITH RESPECT TO THE INTERIM DIVIDEND

Reference is made to the interim results announcement of CMOC Group Limited* (the "**Company**") for the six months ended 30 June 2026 dated 19 August 2026 (the "**Announcement**") in relation to, among other things, the interim dividend for the six months ended 30 June 2026 (the "**Interim Dividend**"). Unless otherwise defined, capitalised terms used in this announcement shall have the same meanings as those defined in the Announcement.

INTERIM DIVIDEND

As disclosed in the Announcement, the Company will pay the Interim Dividend of RMB0.95 per ten Shares (tax inclusive) for the six months ended 30 June 2026 to H Shareholders whose names appeared on the H Share Register of Members on Tuesday, 8 September 2026. The Interim Dividend is expected to be paid to H Shareholders on Thursday, 24 September 2026.

UPDATE WITH RESPECT TO THE WITHHOLDING TAX

The Board wishes to provide the following update on the withholding tax treatment applicable to overseas individual shareholders in respect of the Interim Dividend.

Pursuant to the Announcement on Matters Relating to the Individual Income Tax Policy for Dividend Income Received by Overseas Individuals (《關於外籍個人股息紅利個人所得稅政策有關事項的公告》) jointly issued by the Ministry of Finance and the State Taxation Administration of the PRC on 1 September 2026, with effect from 1 September 2026, dividend income received by overseas individuals from the Company shall be subject to individual income tax under the category of "interest, dividend and bonus income" at a tax rate of 20%. The Company is required to withhold and remit such tax when distributing dividends to overseas individuals. Accordingly, relevant exemption applicable to the overseas individuals as described under the second paragraph under the section "Payment of the Interim Dividend - Tax" in the Announcement is no longer applicable.

Save as disclosed above, all other information and arrangements relating to the Interim Dividend as set out in the Announcement remain unchanged. For completeness, the Company sets out the updated "Payment of the Interim Dividend – Tax" section for Shareholders' reference.

Tax

In accordance with the "Enterprise Income Tax Law of the People's Republic of China" (《中華人民共和國企業所得稅法》) and the "Rules for the Implementation of Enterprise Income Tax Law of the People's Republic of China" (《中華人民共和國企業所得稅法實施條例》), both implemented on 1 January 2008 and the "Notice on Issues in Relation to the Withholding of Enterprise Income Tax on Dividends Paid by PRC Enterprises to Overseas Non-resident Enterprise Holders of H Shares" (Guo Shui Han [2008] No. 897) (《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)) promulgated on 6 November 2008, the Company is obliged to withhold and pay PRC enterprise income tax on behalf of non-resident enterprise Shareholders at a tax rate of 10%, when the Company distributes an interim dividend to non-resident enterprise Shareholders whose names appear on the H Share Register of Members on the Record Date. As such, any H Shares registered in the name of a non-individual Shareholder, including Shares registered in the name of HKSCC Nominees Limited, and other nominees, trustees, or other organizations and groups, shall be deemed to be H Shares held by non-resident enterprise Shareholder(s), and the PRC enterprise income tax shall be withheld from any dividends payable thereon. Non-resident enterprise Shareholders may wish to apply for a tax refund (if any) in accordance with the relevant requirements, such as tax agreements (arrangements), upon receipt of any dividends.

Pursuant to the "Announcement on Matters Relating to the Individual Income Tax Policy for Dividend Income Received by Overseas Individuals (《關於外籍個人股息紅利個人所得稅政策有關事項的公告》)" jointly issued by the Ministry of Finance and the State Taxation Administration of the PRC on 1 September 2026, dividend income received by overseas individuals from the Company shall be subject to individual income tax under the category of "interest, dividend and bonus income" at a tax rate of 20%. The Company is required to withhold and remit such tax when distributing dividends to overseas individuals.

Pursuant to the "Notice on Relevant Taxation Policies Concerning the Pilot Inter-connected Mechanism for Trading on the Shanghai Stock Market and the Hong Kong Stock Market" (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)) and the "Notice on Tax Policies about Inter-communication Pilot of Shenzhen-Hong Kong Stock Exchange Mechanism" (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)):

- For mainland individual investors who invest in the H Shares via the Shanghai-Hong Kong Stock Connect or Shenzhen-Hong Kong Stock Connect, the Company will withhold individual income tax at the rate of 20% in the distribution of the Interim 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 via the Shanghai – Hong Kong Stock Connect or Shenzhen-Hong Kong Stock Connect, the Company will withhold individual income tax in the distribution of the Interim Dividend pursuant to the foregoing provisions; and

- For mainland corporate investors that invest in the H Shares via the Shanghai-Hong Kong Stock Connect or Shenzhen-Hong Kong Stock Connect, the Company will not withhold the income tax in the distribution of the Interim Dividend and the mainland corporate investors shall file the tax returns on their own.

H Shareholders are recommended to consult their tax advisors regarding the relevant tax laws and regulations in the PRC, Hong Kong and other countries on the dividend payment by the Company and on the taxation implications of holding and dealing in the H Shares of the Company.

By Order of the Board
CMOC Group Limited*
Liu Jianfeng
Chairman

Luoyang City, Henan Province, the People's Republic of China
18 September 2026

As at the date of this announcement, the executive Directors are Mr. Liu Jianfeng, Mr. Peng Xuhui and Mr. Que Chaoyang (Employee Director); the non-executive Directors are Mr. Lin Jiuxin, Mr. Jiang Li and Mr. Ma Fei; and the independent non-executive Directors are Mr. Wang Kaiguo, Ms. Gu Hongyu and Mr. Cheng Gordon.

* *For identification purposes only*