



ASX Release

15 February 2024

## ATO Class Ruling – Capital Return and Special Dividend

Danakali Limited (ASX: DNK, **Danakali**, or the **Company**) advises that the Australian Taxation Office (**ATO**) has published a Class Ruling (CR 2024/8) in relation to Danakali's:

- Capital Return of 27.3 cents per share; and
- Special dividend of 14.7 cents per share,

as announced on 23 October 2023 and paid on 8 January 2024.

The ATO Class Ruling (**Ruling**) confirms, amongst other matters, that:

- On the basis the Special Dividend is unfranked and declared to be conduit foreign income:
  - Australian tax resident shareholders will include the Special Dividend as assessable income; and
  - For non-Australian resident Shareholders, the Special Dividend will be non-assessable non-exempt income (i.e., not included as assessable income) and is not subject to Australian dividend withholding tax; and
- No part of the Capital Return will be assessable as a dividend for Australian taxation purposes.

Shareholders should read the Ruling in its entirety and seek their own professional advice as to their income tax implications arising from the distribution.

The Ruling can be viewed and downloaded at: [CR 2024/8 | Legal database \(ato.gov.au\)](#).

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This announcement has been authorised for release by the Executive Chairman of Danakali Limited.

**Danakali**

Seamus Cornelius  
Executive Chairman

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