IN THE HIGH COURT OF AUSTRALIA SYDNEY REGISTRY

No. S102 of 2015

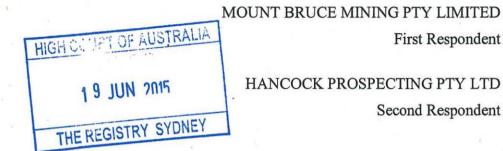
BETWEEN:

WRIGHT PROSPECTING PTY LIMITED

Appellant

and

10



APPELLANT'S CHRONOLOGY

Part I:

The Appellant certifies that this document is in a form suitable for publication on the internet.

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Part II:

This document contains a chronology of:

- (1) facts in addition to the facts agreed between the parties (adopting the same definitions as in the Appellant's Submissions dated 19 June 2015);
- (2) corporate structure of the Hamersley Group presented in a diagram format as agreed between the parties at trial; and
- (3) common directors of the Hamersley Group presented in a table format as agreed between the parties at trial.

THE APPELLANT'S SOLICITOR IS:

Douglas Bishop of Clayton Utz

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Tel: +61 2 9353 4000
Fax: +61 2 8220 6700

Date: 19 June 2015

Ref: 60020/15512/80162538

Item No.	Date	Event	Appeal Book Reference
1.	10/1962	Hamersley Iron becomes the operative company for the "Hamersley project" in WA.	TJ[13]
2.	8/10/1968	The 1968 Hanwright State Amendment Agreement amended the 1963 Hamersley State Agreement and enabled Hamersley Iron to obtain an additional mining lease over the Paraburdoo area over which Hanwright held rights of occupancy.	
3.	31/12/1968 to 14/01/1970	Hancock Prospecting and Wright Prospecting hold no rights of occupancy over the areas of land formerly covered by TRs 4594H-4627H by reason of the expiry of those rights of occupancy.	
4.	10/10/1969	The State grants to Hamersley Iron rights of occupancy over TR 4968H, being the Paraburdoo area, for a period expiring on 31 December 1969.	
5.	1/01/1970 to 3/06/1970	Hamersley Iron holds no rights of occupancy over the area of land formerly covered by TR 4968H (the Paraburdoo area) by reason of the expiry of the rights of occupancy as granted.	
6.	28/05/1970	Hamersley Iron applies for a mining lease over the Paraburdoo area as contemplated under the 1968 Amended Hamersley Range State Agreement.	
7.	3/06/1970	ML246SA (over the Paraburdoo area) commences.	
8.	29/07/1970	Executive Council confirms the rights of occupancy to Hamersley Iron over TR 4968H (the Paraburdoo area) expiring 31 December 1969.	·
9.	12/08/1970	Executive Council confirms the grant of ML246SA to Hamersley Iron over the Paraburdoo area expressed to have retrospective effect commencing on 3 June 1970.	

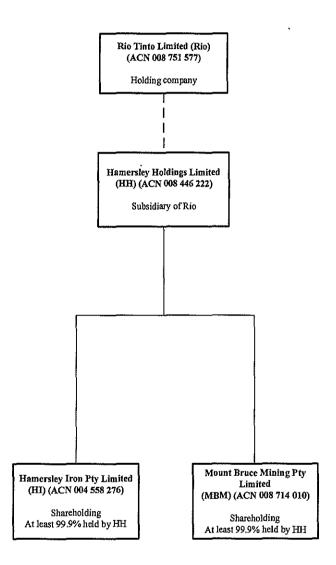
Item No.	Date	Event	Appeal Book Reference
10.	21/08/1970	WA Government Gazette records grant of ML246SA to Hamersley Iron.	
11.	4/04/1974	Hamersley Holdings approves Mount Bruce Mining applying for a mineral lease over parts of the area of land covered by the MBM TRs.	
12.	31/05/1974	Mount Bruce Mining's application for grant of a mineral lease for iron ore over 19 portions of land within TRs 4937H-4946H & 4963H-4967H (the MBM TRs) totalled 210.91 square miles (which would become ML252SA). This is less than the 300 square miles allowed for under clause 4(2) of the 1972 Mount Bruce State Agreement.	TJ[29], TJ[39]
13.	7/06/1974	ML252SA commences.	
14.	24/05/1977	Mount Bruce Mining applies for rights of occupancy over an area which covers a large part of the previous TR 4967H and would become TR 6603H, in the Eastern Range area, as Mount Bruce Mining wishes to "extend its present investigations in section 19 of ML 252SA towards the south east boundary of Mineral Lease 246SA held by [HI]". The application records that Mount Bruce Mining, as a wholly owned subsidiary of Hamersley Holdings, has access to the exploration services of Hamersley Exploration and Hamersley Iron.	TJ[31]
15.	31/12/1978	Hamersley group conducts further drilling on the "Channar Deposit".	
16.	19/11/1979	TR 6663H Quarterly Report records operator as Hamersley Iron.	
17.	. 12/1979	Annual Report for TR 6982H for 1979 records "work and expenditure" undertaken by Hamersley Iron.	
18.	12/1979	Annual Report for TR 6983H for 1979 records "work and expenditure" undertaken by Hamersley Iron.	

Item No.	Date	Event	Appeal Book Reference
19.	01/06/1981	TR 6663H Annual Report documents the work and expenditure undertaken by Hamersley Iron.	
		Internal Hamersley memo recommends certain areas at Paraburdoo and Tom Price be taken up as "additional mineral leases to our main ore bodies". The memo also stated:	
20.	31/08/1981	"It is important to stress that these new areas are really areas flanking [Hamersley's] main ore bodies and have come to light by our continuing investigation of the mineralisation in the area and therefore should come within our present State Agreements."	
		"The only way to mine these areas would be in conjunction with the current operations."	
21.	19/04/1982	Mount Bruce Mining applies to surrender rights of occupancy over TR 6603H.	TJ[33]
22.	8/12/1982	Sections 236 and 237 of ML4SA (Eastern Range) fell wholly within the area that had been covered by TR 4967H (as a part of the MBM TRs).	CAJ[14]
23.	8/12/1982	Section 238 of ML4SA (Channar A) fell wholly within the area that had been covered by TRs 4965H and 4966H (as a part of the MBM TRs).	CAJ[14]
24.	5/10/1984	Hamersley Iron notes, in a letter to the Minister for Minerals and Energy, that "[t]he majority of the ore on which the [Channar] project is based occurs within ss18 and 19 of ML252SAapproximately 10% occurs within section 238 of ML4".	

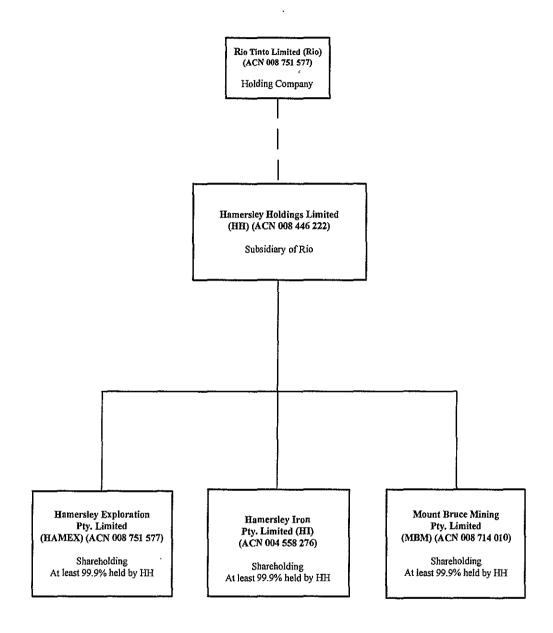
Item No.	· Date	Event	Appeal Book Reference
25.	27/10/1987 ·	1987 Channar State Agreement. Pursuant to clause 15(1) of the 1987 Channar State Agreement, the mining lease to be granted is subject to the surrender of sections 18 and 19 of ML252SA by Mount Bruce Mining and the surrender of section 238 of ML4SA by Hamersley Iron. The preamble to the Channar JV State Agreement records that the Joint Venturers have established the economic viability of recovering and marketing iron ore from the relevant land to the People's Republic of China from the land to which the agreement related, which is the Channar Area.	TJ[49]
26.	16/11/1987	Channar Joint Venture Agreement. Preamble E to the Channar Joint Venture Agreement sets out that HI Sub (i.e. Channar Mining Pty Ltd) has represented and warranted to CMIEC Sub that there exist with the Mining Area reserves of 200 million tonnes of mineable/recoverable iron ore of the nature and quality described in the Sixth Schedule. The Sixth Schedule provides further detail of the warranty of 200 million tonnes of mineable/recoverable iron ore in the Channar area.	CAJ[22]
27.	8/01/1988	Hamersley Iron writes to the Department of Mines on behalf of Hamersley Iron and Mount Bruce Mining stating that Hamersley Iron and Mount Bruce Mining wished to have surrender documents prepared in relation to their respective lease areas (sections 18 and 19 of ML252 SA for Mount Bruce Mining and section 238 of ML4SA for Hamersley Iron).	
28.	15/01/1988	The Department of Mines sends Hamersley Iron the surrender documents for sections 18 and 19 of ML252SA and section 238 of ML4SA.	
29.	22/03/1988	The surrender documents for sections 18 and 19 of ML252SA and section 238 of ML4SA describe the lodging party as "HI Pty Limited".	TJ[50] CAJ[22]

Item No.	Date	Event	Appeal Book Reference
30.	22/03/1988	Mount Bruce Mining surrenders sections 18 and 19 of ML252SA and Hamersley Iron surrenders s 238 of ML4SA. These surrenders were by arrangement between Mount Bruce Mining, Hamersley Iron and the Channar Joint Venturers.	ТЈ[128]
31.	8/05/1988	ML265SA is granted to the Channar Joint Venturers. ML265SA included the area of land contained within Channar A. A prerequisite for the grant of ML265SA was the surrender by Mount Bruce Mining of land including that which was the subject of sections 18 and 19 of ML252SA.	TJ[51] CAJ[22]

HAMERSLEY CORPORATE STRUCTURE 1970

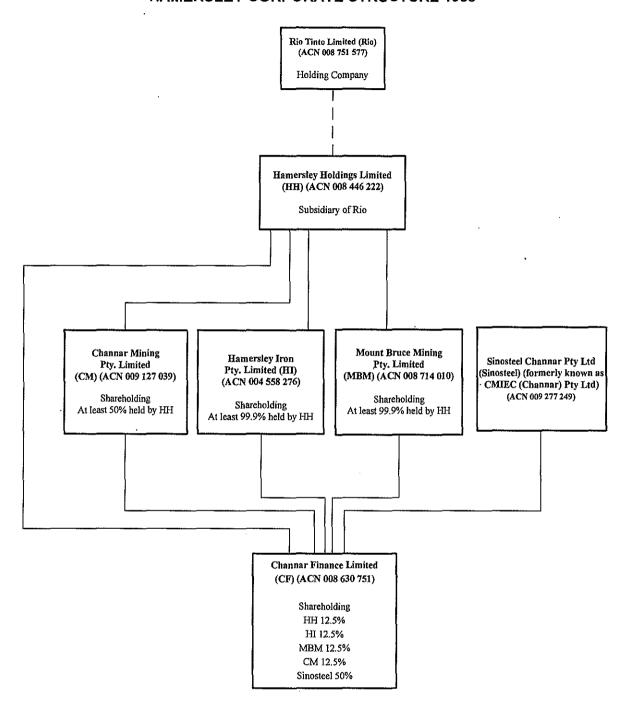


HAMERSLEY CORPORATE STRUCTURE 1982



Corporate Structure alleged and admitted in paragraph 2(c), 3(c), 5(b), 5(c), 6(b) and 7(b) of the FACLS and FACLR

HAMERSLEY CORPORATE STRUCTURE 1988



Corporate Structure alleged and admitted at paragraphs 2(c), 3(c), 5(b), 5(c), 7(b) and 8(b) of the FACLS and FACLR and Notice Disputing Facts dated 19 December

²⁰¹² para 4 except:

1. for shareholding in CF see: HWR.019.004.0030 [CB 17/13596-13600]; HWR.019.004.0017 [CB 19/14616]; WPL.023.003.0001 [CB 20/15210-15218] and

2. for Rio as a holding company of CF: HWR.019.040.0001 [CB 19/14669-14671]; WPL.023.003.0001 [CB 20/15210-15218]; WPL.023.003.0001 [C 15218].

COMMON DIRECTORS AND SECRETARIES OF RIO GROUP

Entity	Directors	Secretaries
31 January 1968		
Conzinc Riotinto of Australia	Maurice A Mawby (Chairman) Val Duncan	
	Russell T Madigan (The Rio Defendants do not admit that Russell T Madigan was a director before February 1968)	
	Reference: CRA Annual Report dated 26 February 1969: HWR.596.001.0001 at 0003 [CB 02587]	
Hamersley Holdings	Maurice A Mawby (Chairman) Russell T Madigan (Managing Director) Val Duncan	Charles Wyatt
	Reference: HH Annual Report 1967 dated 20 February 1968 HWR.067.002.0163 at 0166 [CB 01581] HH Annual Report 1968 dated 12 February 1969) HWR.023.002.0024 at 0027 [CB 0256]	Reference: HH Annual Report 1967 dated 20 February 1968 HWR.067.002.0163 at 0166 [CB 01581] HH Annual Report 1968 dated 12 February 1969 HWR.023.002.0024 at 0027 [CB 0256]
Hamersley Iron	Maurice A Mawby (Chairman) Russell T Madigan (Managing Director) Val Duncan	Charles Wyatt

Entity	Directors	Secretaries
	References:	Reference:
	Minutes of Board of Directors meeting 12 March 1968 HWR.068.004.0001 [CB 01623_0001]	Minutes of Board of Directors meeting 12 March 1968 HWR.068.004.0001 [CB 01623_0001]
,	1968 Royalty Agreement between WPPL, HPPL and HI HWR.280.005.0169 at 0177 [CB 01537]	,
8 October 1968		
Hamersley Holdings	Maurice A Mawby (Chairman)	Charles Wyatt
	Russell T Madigan (Managing Director)	
	Reference: HH Annual Report 1967 dated 20 February 1968 HWR.067.002.0163 at 0166	References: HH Annual Report 1967 dated 20 February 1968 HWR.067.002.0163 at 0166 [CB 01581-01603]
	[CB 01581-01603] HH Annual Report 1968 dated 12 February 1969 HWR.023.002.0024 at 0027 [CB 02561-02586]	HH Annual Report 1968 dated 12 February 1969 HWR.023.002.0024 at 0027 [CB 02561-02586]
Hamersley Iron	Maurice A Mawby (Chairman)	Charles Wyatt (The Rio Defendants do not admit that
	Russell T Madigan (Managing Director)	Charles Wyatt was the secretary as at 8 October 1968. They cannot confirm this office-holding after 12 March 1968 from the available
	Reference:	documents.)
	Minutes of Board of Directors meeting 12 March 1968 HWR.068.004.0001 [CB 01623_0001]	Reference:
	1968 Royalty Agreement HWR.280.005.0169 at 0177 [CB 01537	Minutes of Board of Directors meeting 12 March 1968 HWR.068.004.0001 [CB 01623_0001]

Entity	Directors	Secretaries
Mount Bruce Mining	Maurice Mawby	
	Russell Madigan	
	Reference:	
	MBM Articles of Association	
	WPL.023.012.0001 at 0029 [CB 02211_0001]	
5 May 1970		
Hamersley Holdings	Maurice A Mawby (Chairman)	J Calder
	Russell T Madigan (Managing Director)	
	Val Duncan	
	Reference:	Reference:
	HH Annual Report attached to	HH Annual Report attached to
	doc dated 17 April 1970 HWR.011.007.0006 at 0013	doc dated 17 April 1970 HWR.011.007.0006 at 0013
	[CB 04030_0001]	[CB 04030_0001]
Hamersley Iron	Russell T Madigan	J Calder
	Maurice A Mawby	
	Val Duncan	
	Reference:	Reference:
	Minutes of Board of Directors meeting HWR.039.004.0001	HI Annual Return dated 1971 HWR.011.014.0001 at 0002
	[CB 04329-04564] at 0025 dated 9 February 1970, at 0048 dated 11 March 1970	[CB 05507_0001]
	1971 HI Annual Return HWR.011.014.0001 at 0003 [CB 05507_0001]	

Entity	Directors	Secretaries
Mount Bruce Mining	Russell T Madigan	John Calder
	Maurice A Mawby	
	Reference:	Reference:
	1970 Royalty Agreement	1970 Royalty Agreement
	HWR.356.059.0034 at 0043 [CB 04202-04213]	HWR.356.059.0034 at 0043 [CB 04202-04213]
	MBM Articles of Association WPL.023.012.0001 at 0029	•
10 March 1972		
Hamersley Holdings	Russell T Madigan (Chairman)	John Calder
	Maurice A Mawby (Managing Director)	Robert M Houston
	Val Duncan	
	Reference: HH 1970 Annual Report attached to doc dated 3 May 1971 HWR.011.007.0064 at 0070 [CB 05610_0001] HH 1972 Annual Report attached to a doc dated 11 May 1973 HWR.011.007.0130 at 0133 [CB 07472_0001]	Reference: HH 1970 Annual Report attached to doc dated 3 May 1971 HWR.011.007.0064 at 0070 [CB 05610_0001] HH 1972 Annual Report attached to a doc dated 11 May 1973 HWR.011.007.0130 at 0133 [CB 07472_0001]
Hamersley Iron	Russell T Madigan (Chairman)	John Calder
	Maurice Mawby	,
	Val Duncan	
	Reference:	
	HI 1972 annual return HWR.011.014.0042 at 0045 [CB 07469_0001]	Reference: HI Annual return 1972 HWR.011.014.0042 at 0068

Entity	Directors	Secretaries
	2	[CB 07469_0001]
Mount Bruce Mining	Russell T Madigan Maurice A Mawby	John Calder
	Reference: Directors report of MBM dated 6 March 1972 HWR.637.001.0009 at 0010 [CB 06688_0002]	Reference: Correspondence on MBM letterhead signed by Calder dated 7 March 1972 HWR.637.001.0008 [CB 06688_0001]
31 May 1974		
Hamersley Holdings	Russell T Madigan (Chairman) Donald Stewart (Managing Director)	Christopher Renwick
	Reference: HH annual return dated 4 April 1974 HWR.011.011.0223 at 0228 and 0234 [CB 07592_0001] HH annual return dated 6 May 1975 HWR.011.011.0116 at 0121 and 0131)] [CB 08564_0001]	Reference: HH annual return dated 4 April 1974 HWR.011.011.0223 at 0226 and 0234 [CB 07592_0001] HH annual return dated 6 May 1975 HWR.011.011.0116 at 0121 and 0131) [CB 08564_0001]
Hamersley Iron	Russell T Madigan (Chairman) Donald Stewart (Managing Director) Thomas Barlow Colin Smith	Christopher Renwick
	Reference:	Reference: HI annual return dated 19 April

Entity	Directors	Secretaries
	HI annual return dated 19 April 1974 HWR.011.014.0070 at 0072 [CB 07592_0038] HI Annual Return dated 2 April 1975 HWR.011.014.0105 at 0107) [CB 08463_0015]	1974 HWR.011.014.0070 at 0074 [CB 07592_0038] HI Annual Return dated 2 April 1975 HWR.011.014.0105 at 0109) [CB 08463_0015]
Mount Bruce Mining	Russell T Madigan Donald Stewart (The Rio Defendants do not admit that Donald Stewart was a director as at 31 May 1974. They cannot confirm this office-holding before 10 April 1975 from the available documents.) Thomas Barlow (The Rio Defendants do not admit Thomas Barlow was a director as at 31 May 1974. They cannot confirm this office-holding before 10 April 1975 from the available documents.) Colin Smith (The Rio Defendants do not admit that Colin Smith was a director as at 31 May 1974. They cannot confirm this office-holding before 10 April 1975 from the available documents.) Reference:	Christopher Renwick (The Rio Defendants do not admit that Christopher Renwick was a secretary as at 31 May 1974. They cannot confirm this office-holding before 10 April 1975 from the available documents.) Charles Wyatt (The Rio Defendants do not admit that Charles Wyatt was a secretary as at 31 May 1974. They cannot confirm this office-holding before 10 April 1975 from the available documents.) Reference: MBM annual return dated 10 April 1975 HWR.019.015.0122 at 0123 [CB 08463_0046]
	MBM annual return dated 10 April 1975 HWR.019.015.0122 at 0123 [CB 08463_0046]	
Hamersley Exploration	Russell T Madigan (The Rio Defendants do not admit that Russell T Madigan was a director as at 31 May 1974. They cannot confirm this office- holding before 10 April 1975 from the available documents.)	Christopher Renwick (The Rio Defendants do not admit that Christopher Renwick was a secretary as at 31 May 1974. They cannot confirm this office-holding before 10 April 1975 from the available

Entity	Directors	Secretaries
	Donald Stewart (The Rio Defendants do not admit that Donald Stewart was a director as at 31 May 1974. They cannot confirm this office-holding before 10 April 1975 from the available documents.) Thomas Barlow (The Rio Defendants do not admit Thomas Barlow was a director as at 31 May 1974. They cannot confirm this office-holding before 10 April 1975 from the available documents.)	Charles Wyatt (The Rio Defendants do not admit that Charles Wyatt was a secretary as at 31 May 1974. They cannot confirm this office-holding before 10 April 1975 from the available documents.)
	Reference: HE annual return dated 10 April 1975 HWR.011.005.0023 at 0024 [CU 08463_0001]	Reference: HE annual return dated 10 April 1975 HWR.011.005.0023 at 0024 [CU 08463_0001]
17 October 1974		
Hamersley Holdings	Russell Madigan (Chairman) Donald Stewart (Managing Director)	Christopher Renwick
	Reference: HH annual return dated 6 May 1975 HWR.011.011.0116 at 0121 and 0131 [CB 08564_0001]	Reference: HH annual return dated 6 May 1975 HWR.011.011.0116 at 0021 and 0131 [CB 08564_0001]
Hamersley Iron	Russell T Madigan (Chairman) Donald S Stewart (Managing Director)	Christopher J Renwick
,	Thomas Barlow	

Entity	Directors	Secretaries
	Colin Smith	
	Reference:	
•	HI Annual Return dated 2 April 1975 HWR.011.014.0105 at	Reference:
	0107 [CB 08463_0015]	HI Annual Return dated 2 April 1975 HWR.011.014.0105 at 0109 [CB 08463_0015]
Mount Bruce Mining	Russell T Madigan Donald Stewart (The Rio Defendants do not admit that Donald Stewart was a director as at 17 October 1974. They cannot confirm this office- holding before 10 April 1975 from the available documents.) Thomas Barlow (The Rio Defendants do not admit Thomas Barlow was a director as at 17 October 1974They cannot confirm this office- holding before 10 April 1975 from the available documents.) Colin Smith (The Rio Defendants do not admit that Colin Smith was a director as at 17 October 1974. They cannot confirm this office-holding before 10 April 1975 from the available documents.)	Christopher Renwick (The Rio Defendants do not admit that Christopher Renwick was a secretary as at 17 October 1974. They cannot confirm this office-holding before 10 April 1975 from the available documents.) Charles Wyatt (The Rio Defendants do not admit that Charles Wyatt was a secretary as at 17 October 1974. They cannot confirm this office-holding before 10 April 1975 from the available documents.)
	Reference:	Reference:
	MBM annual return dated 10 April 1975	MBM annual return dated 10 April 1975
	HWR.019.015.0122 at 0123 [CB 08463_0046]	HWR.019.015.0122 at 0123 [CB 08463_0046]
Hamersley Exploration	Russell T Madigan (The Rio Defendants do not admit that Russell T Madigan was a	Christopher Renwick (The Rio Defendants do not admit that Christopher Renwick was a

Entity	Directors	Secretaries
	director as at 17 October 1974. They cannot confirm this office-holding before 10 April 1975 from the available documents.) Donald Stewart (The Rio Defendants do not admit that Donald Stewart was a director as at 17 October 1974. They cannot confirm this office-holding before 10 April 1975 from the available documents.) Thomas Barlow (The Rio Defendants do not admit Thomas Barlow was a director as at 17 October 1974They cannot confirm this office-holding before 10 April 1975 from the available documents.) Reference:	secretary as at 17 October 1974. They cannot confirm this office-holding before 10 April 1975 from the available documents.) Charles Wyatt (The Rio Defendants do not admit that Charles Wyatt was a secretary as at 17 October 1974. They cannot confirm this office-holding before 10 April 1975 from the available documents.)
	HE annual return dated 10 April 1975 HWR.011.005.0023 at 0024 [CU 08463_0001]	Reference: HE annual return dated 10 April 1975 HWR.011.005.0023 at 0024 [CU 08463_0001]
16 August 1977		
Hamersley Exploration	Russell T Madigan	Christopher J Renwick
	Donald S Stewart	Charles J Wyatt
}		Reference:
,	Reference:	Para 11, WPPL Notice to Admit dated 6 December 2012
	Paras 1, 2 and 5, WPPL Notice to Admit dated 6 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	
Mount Bruce Mining	Russell T Madigan	Christopher J Renwick

Entity	Directors	Secretaries
	Donald S Stewart	Charles J Wyatt
	Colin A Watts	
	Colin L Smith	
	Reference:	Reference:
	Paras 1, 2, 3, 4 and 5, WPPL Notice to Admit dated 6 December 2012	Para 11, WPPL Notice to Admit dated 6 December 2012
	Para 1 and 2(a), Rio Notice Disputing Facts dated 19 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012
Hamersley Iron	Russell T Madigan	Christopher J Renwick
	Donald S Stewart	
	Colin A Watts	
	Colin L Smith	1
	Reference:	Reference:
	Paras 1, 2, 3 and 4, WPPL Notice to Admit dated 6	Para 12, WPPL Notice to Admit dated 6 December 2012
	December 2012 Paras 1 and 2(a), Rio Notice Disputing Facts dated 19 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012
Hamersley Holdings	Russell T Madigan	Christopher J Renwick
	Donald S Stewart	
	Colin A Watts	
The state of the s		
	Reference:	Reference:
	Paras 1, 2, 3, WPPL Notice to Admit dated 6 December 2012	Para 13, WPPL Notice to Admit dated 6 December 2012
	Paras 1 and 2(b), Rio Notice Disputing Facts dated 19	Para 4, Rio Notice Disputing

Entity	Directors	Secretaries
	December 2012	Facts dated 19 December 2012
2 October 1978		
Hamersley Iron	Russell T Madigan	Christopher J Renwick
	Thomas Barlow	(up until June 1978)
	Colin A Watts	
·	Reference:	Reference:
	Paras 6, 7, and 8 WPPL Notice to Admit dated 6 December 2012	Para 12 WPPL Notice to Admit dated 6 December 2012
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012
Hamersley Holdings	Russell T Madigan	Christopher J Renwick
	Thomas Barlow	(up until June 1978)
	Colin A Watts	
1	Reference:	Reference:
	Paras 6, 7 and 8, WPPL Notice to Admit dated 6 December 2012	Para 13, WPPL Notice to Admit dated 6 December 2012
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Para 4, Rio Notice Disputing Facts dated 19 December 2012
Mount Bruce Mining	Thomas Barlow	Charles J Wyatt
	Colin A Watts	Christopher J Renwick
		(up to August 1978)
	Reference:	Reference:
	Paras 7 and 8, WPPL Notice to Admit dated 6 December 2012	Paras 10 and 12, WPPL Notice to Admit dated 6 December 2012
	Para 1, Rio Notice Disputing	Para 1, Rio Notice Disputing

Entity	Directors	Secretaries
	Facts dated 19 December 2012	Facts dated 19 December 2012
Hamersley Exploration	Thomas Barlow	Charles J Wyatt Christopher J Renwick (up to August 1978)
	Reference: Para 7, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012	Reference: Paras 10 and 11(a), WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012
26 April 1982		
Hamersley Exploration	Thomas Barlow Ian F Burston Kevin D Mutch	Jack R Wood Charles J Wyatt
	Reference: Paras 14, 15 and 16, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012	Reference: Paras 18 and 19, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012
Mount Bruce Mining	Thomas Barlow Ian F Burston Kevin D Mutch John A Innes	Jack R Wood Charles J Wyatt
	Reference: Paras 14, 15, 16 and 17, WPPL Notice to Admit dated 6	Reference: Paras 18 and 19, WPPL Notice to Admit dated 6 December

Entity	Directors	Secretaries
·	December 2012	2012
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012
Hamersley Iron	Thomas Barlow	Jack R Wood
Trainersiey non-	Ian F Burston	Jack K Wood
	John A Innes	
	Reference:	Reference:
•	Paras 14, 15 and 17, WPPL Notice to Admit dated 6 December 2012	Para 18, WPPL Notice to Admit dated 6 December 2012
		Para 1, Rio Notice Disputing
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Facts dated 19 December 2012
Hamersley Holdings	Thomas Barlow	Jack R Wood
	Ian F Burston	
	Reference:	Reference:
	Paras 14 and 15, WPPL Notice	Paras 18, WPPL Notice to
•	to Admit dated 6 December 2012	Admit dated 6 December 2012
		Para 1, Rio Notice Disputing
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Facts dated 19 December 2012
17 May 1982		
	Thomas Barlow	Took P. Wood
Hamersley Exploration		Jack R Wood
	Ian F Burston	Charles J Wyatt
	Kevin D Mutch	
	Reference:	Reference:
	Paras 20, 21, 22, WPPL Notice to Admit dated 6 December	Paras 24 and 25, WPPL Notice to Admit dated 6 December

Entity	Directors	Secretaries
	2012	2012
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012
Mount Bruce Mining	Thomas Barlow	Jack R Wood
	Ian F Burston	Charles J Wyatt
	Kevin D Mutch	
	John A Innes	
	Reference:	Reference:
	Paras 20, 21, 22 and 23, WPPL Notice to Admit dated 6 December 2012	Paras 24 and 25, WPPL Notice to Admit dated 6 December 2012
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012
Hamersley Iron	Thomas Barlow	Jack R Wood
	Ian F Burston	
	John A Innes	
	Reference:	Reference:
	Paras 20, 21 and 23, WPPL Notice to Admit dated 6	Para 24, WPPL Notice to Admit dated 6 December 2012
	December 2012	
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012
Hamersley Holdings	Thomas Barlow	Jack R Wood
	Ian F Burston	
	Reference:	Reference:
·	Paras 20 and 21, WPPL Notice to Admit dated 6 December	Para 24, WPPL Notice to Admit dated 6 December 2012
	2012	Para 1, Rio Notice Disputing

Entity	Directors	Secretaries
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Facts dated 19 December 2012
December 1982		
Hamersley	Thomas Barlow	Jack R Wood
Exploration	Ian F Burston	Charles J Wyatt
	Kevin D Mutch	,
	Reference:	Reference:
	Paras 26, 27 and 28, WPPL Notice to Admit dated 6 December 2012	Paras 30 and 31, WPPL Notice to Admit dated 6 December 2012
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012
Mount Bruce Mining	Thomas Barlow	Jack R Wood
	Ian F Burston	Charles J Wyatt
	Kevin D Mutch	
	John A Innes	
	Reference:	- <u>Reference:</u>
	Paras 26, 27, 28 and 29, WPPL Notice to Admit dated 6 December 2012	Paras 30 and 31, WPPL Notice to Admit dated 6 December 2012
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012
Hamersley Iron	Thomas Barlow	Jack R Wood
·	Ian F Burston	
	John A Innes	
	Reference:	Reference:
	Paras 26, 27 and 28, WPPL Notice to Admit dated 6	Para 30, WPPL Notice to

Entity	Directors	Secretaries
	December 2012	Admit dated 6 December 2012
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012
Hamersley Holdings	Thomas Barlow	Jack R Wood
	Ian F Burston	
	Reference:	Reference:
	Paras 26 and 27, WPPL Notice to Admit dated 6 December 2012	Para 30, WPPL Notice to Admit dated 6 December 2012
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012
27 October 1987		
Mount Bruce Mining	Michael O'Leary	Garry Babon
	Peter Knowles	{
	Thomas Barlow	
	Christopher Renwick	
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,	Reference:	Reference:
	Paras 32, 33, 34, and 35, WPPL Notice to Admit dated 6	Para 36, WPPL Notice to Admit dated 6 December 2012
	December 2012	Para 1, Rio Notice Disputing
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Facts dated 19 December 2012
Hamersley Iron	Michael O'Leary	Garry Babon
	Thomas Barlow	
	Christopher Renwick	
	Reference:	Reference:
	Paras 32, 34 and 35, WPPL Notice to Admit dated 6	Para 36, WPPL Notice to

Entity	Directors	Secretaries
	December 2012	Admit dated 6 December 2012
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012
Hamersley Holdings	Thomas Barlow	Garry Babon
	Christopher Renwick	
	Reference:	Reference:
	Paras 34 and 35, WPPL Notice to Admit dated 6 December 2012	Para 36, WPPL Notice to Admit dated 6 December 2012
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012
Channar Mining	Michael O'Leary	Garry Babon
	Peter Knowles	
	Reference:	Reference:
	Paras 32 and 33, WPPL Notice to Admit dated 6 December 2012	Para 36, WPPL Notice to Admit dated 6 December 2012
,	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012
2 March 1988		
Mount Bruce Mining	Michael O'Leary	Garry Babon
	Peter Knowles	
	Thomas Barlow	
	Christopher Renwick	
	Reference:	Reference:
	Paras 37, 38, 39 and 40, WPPL Notice to Admit dated 6 December 2012	Para 41, WPPL Notice to Admit dated 6 December 2012 Para 1 Rio Notice Disputing
	Dooming 2012	Para 1, Rio Notice Disputing

Entity	Directors	Secretaries
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Facts dated 19 December 2012
Hamersley Iron	Michael O'Leary	Garry Babon
	Thomas Barlow	
	Christopher Renwick	
	Reference:	Reference:
	Paras 37, 39 and 40, WPPL Notice to Admit dated 6 December 2012	Para 41, WPPL Notice to Admit dated 6 December 2012
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012
Hamersley Holdings	Michael O'Leary	Garry Babon
	Thomas Barlow	
	Christopher Renwick	
1		
	Reference:	Reference:
	Paras 37, 39 and 40, WPPL Notice to Admit dated 6	Para 41, WPPL Notice to Admit dated 6 December 2012
	December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012
Channar Mining	Michael O'Leary	Garry Babon
	Peter Knowles	
	Reference:	Reference:
	Paras 37 and 38, WPPL Notice to Admit dated 6 December 2012	Para 41, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Facts dated 19 December 2012

Entity	Directors	Secretaries
Channar Management Services	Michael O'Leary Thomas Barlow	Garry Babon
To a contract of the contract	Reference:	Reference:
	Paras 37 and 39, WPPL Notice to Admit dated 6 December 2012	Para 41, WPPL Notice to Admit dated 6 December 2012
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012
8 May 1988		
Mount Bruce Mining	Michael O'Leary Peter Knowles Thomas Barlow Christopher Renwick	Garry Babon
	Reference: Paras 42, 43, 44 and 45, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012	Reference: Para 46, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012
Hamersley Iron	Michael O'Leary Thomas Barlow Christopher Renwick	Garry Babon
	Reference: Paras 42, 44 and 45, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012	Reference: Para 46, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012

Entity	Directors	Secretaries
Hamersley Holdings	Michael O'Leary Thomas Barlow Christopher Renwick Reference: Paras 42, 44 and 45, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012	Reference: Para 46, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012
Channar Mining	Michael O'Leary Peter Knowles Christopher Renwick Reference: Paras 42, 43 and 45, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012	Reference: Para 46, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012
Channar Management Services	Michael O'Leary Thomas Barlow Reference: Paras 42 and 44, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012	Reference: Para 46, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012

Entity	Directors	Secretaries
17 June 1988		
Mount Bruce Mining	Michael O'Leary	Gary Babon
	Peter Knowles	
	Thomas Barlow	
	Christopher Renwick	
	Reference:	Reference:
	Paras 47, 48, 49 and 50, WPPL Notice to Admit dated 6 December 2012	Para 51, WPPL Notice to Admit dated 6 December 2012
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012
Hamersley Iron	Michael O'Leary	Garry Babon
	Thomas Barlow	
	Christopher Renwick	
	Reference:	Reference:
	Paras 47, 49, and 50, WPPL Notice to Admit dated 6	Para 51, WPPL Notice to Admit dated 6 December 2012
	December 2012	Para 1, Rio Notice Disputing
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Facts dated 19 December 2012
Hamersley Holdings	Michael O'Leary	Garry Babon
	Thomas Barlow	1
	Christopher Renwick	
	Reference:	Reference:
	Paras 47, 49 and 50, WPPL Notice to Admit dated 6 December 2012	Para 51, WPPL Notice to Admit dated 6 December 2012
	Para 1, Rio Notice Disputing Facts dated 19 December 2012	Para 1, Rio Notice Disputing Facts dated 19 December 2012

Entity	Directors	Secretaries
Channar Mining	Michael O'Leary Peter Knowles	Garry Babon
Channar Management Services	Reference: Paras 47 and 48, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012 Michael O'Leary Thomas Barlow	Reference: Para 51, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012 Garry Babon
	Reference: Paras 47 and 49, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012	Reference: Para 51, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012
Channar Finance	Peter Knowles Christopher Renwick Reference: Para 48 and 50, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012	Reference: Para 51, WPPL Notice to Admit dated 6 December 2012 Para 1, Rio Notice Disputing Facts dated 19 December 2012

Dated 19 June 2015

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10

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