

UPDATE ON BHP BILLITON DEMERGER TAX RELIEF APPLICATION

30 April 2016

BHP Billiton filed a demerger tax relief application for the BHP Billiton Limited Canadian shareholders with the Department of Finance in Canada for the foreign spinoff of South32 Limited under Section 86.1 of Income Tax Act (Canada) on 21 April 2015. BHP Billiton received on 29 April 2016, a letter from the Department of Finance in Canada indicating it will recommend to the Minister of Finance such tax relief in respect of the South32 shares received by Canadian shareholders of BHP Billiton Limited shares in the demerger. The Canada Revenue Authority's policy is to allow taxpayers to file their tax returns on the basis of positions reflected in such "comfort letters". Details of the decision will be published once the Minister of Finance has formally approved it.

The information provided does not constitute tax advice. All shareholders should consult with their own independent taxation advisers given the particular circumstances which apply to them.