

28 November 2025

Shareholder Update

Firefinch Limited (**Firefinch** or the **Company**) provides the following update to shareholders.

ATO PUBLISHES CLASS RULING 2025/81

The Australian Taxation Office (**ATO**) published Class Ruling 2025/81 (**CR 2025/81**) on 26 November 2025. The ruling can be accessed via this link [CR 2025/81 | Legal database](#).

CR 2025/81 outlines the tax implications for Firefinch shareholders who received the Special Dividend payment on 26 September 2025 and the First and Second Capital Return payments on 11 November 2025.

CR 2025/81 provides the following guidance. Firefinch shareholders should read the ruling in its entirety to determine how they are personally impacted. A link to the ruling is included with this announcement and below is a summary.

Shareholders should seek their own tax advice in order to determine how this Class Ruling will apply their individual circumstance.

SPECIAL DIVIDEND

The Special Dividend was an unfranked conduit foreign income dividend.

If you are a resident of Australia for income tax purposes, you include the Special Dividend in your assessable income.

If you are a non-resident for income tax purposes, the Special Dividend is non-assessable non-exempt income and not included in your Australian assessable income as the distribution statement associated with the Special Dividend declared 100% of the Special Dividend to be conduit foreign income.

CAPITAL RETURN

No part of the Capital Return that you received from Firefinch on the Capital Return Payment Date is a dividend for income tax purposes. Therefore, no part of the Capital Return is included in your assessable income.

CGT event G1 happened on the Capital Return Payment Date, when you received the First and Second Capital Return in respect of each Firefinch share you owned at the Record Date and continued to own at the Capital Return Payment Date.

You made a capital gain when CGT event G1 happened if the First and Second Capital Returns you received were more than your Firefinch share's cost base. The amount of the capital gain is equal to the excess. If you made a capital gain, the share's cost base and reduced cost base is reduced to nil.

If the First and Second Capital Returns you received were equal to or less than the cost base of your Firefinch share, the cost base and the reduced cost base of the share is reduced by the amount of the Capital Return, but not below nil.

You cannot make a capital loss from CGT event G1.

Firefinch thanks the ATO for its expediency in issuing CR 2025/81 within two weeks of the First and Second Capital Returns.



Brett Fraser
Chairman