

ATO CLASS RULING IN-SPECIE DISTRIBUTION OF RVT SHARES

Horizon Minerals Limited (ASX: HRZ) (**Horizon**) advises that the Australian Taxation Office (**ATO**) has published Class Ruling CR 2023/52 in relation to the distribution of shares in Richmond Vanadium Technology Limited (ASX: RVT) (**RVT**) to the shareholders of Horizon.

In summary, the Class Ruling confirms that:

- Demerger relief is not available as the scheme did not satisfy the relevant requirements.
- The RVT shares you received from Horizon are not considered an assessable dividend.
- The cost base and reduced cost base of your Horizon share is reduced by 1.28 cents and CGT event G1 may occur if the payment received was more than the cost base of your Horizon share.
- The first element of the cost base and reduced cost base of each RVT share you acquired is 40 cents.

The Class Ruling is available on the ATO website at www.ato.gov.au – [CR 2022/52](#). Shareholders are encouraged to review the Class Ruling and seek their independent advice regarding the income tax implications. This announcement is a summary only and does not constitute tax advice or take into account individual circumstances of any shareholder.

By order of the Board



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