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# 中信資源控股有限公司 CITIC Resources Holdings Limited

*(Incorporated in Bermuda with limited liability)*

(Stock Code: 1205)

## INSIDE INFORMATION ANNOUNCEMENT

This announcement is made by the Company pursuant to Rule 13.09(2) of the Listing Rules and the Inside Information Provisions (as defined in the Listing Rules) of Part XIVA of the Securities and Futures Ordinance (Chapter 571 of the Laws of Hong Kong).

The Board would like to inform the Shareholders and potential investors that it has recently been brought to the Company's attention on 6 February 2023 that, KBM, an indirect subsidiary of a joint venture of the Company, has received the final tax audit results from the local tax authority in Kazakhstan, claiming for tax payment, penalties and late charges in the aggregate amount of approximately KZT39.10 billion (equivalent to approximately US\$87.74 million).

KBM is a subsidiary of CCPL, which in turn is a wholly-owned subsidiary of CCEL, a joint venture of the Company in which the Company has an indirect 50% attributable interest as at the date of this announcement (as disclosed in the announcement of the Company dated 26 August 2022 in respect of commencement of public tender in relation to the Proposed Disposal, CCEL is not a subsidiary of the Company and its results are accounted for in the Group's consolidated financial statements using the equity method). KBM is engaged in the development, production and sale of oil and holds the right to explore, develop, produce and sell oil from the Karazhanbas oilfield until 2035.

KBM has sought legal and tax advice since the Claims arose. The Company has been informed that, having considered the advice from its legal counsel and tax advisor, KBM refutes the majority of the Claims primarily relating to the withholding tax on dividend(s) paid to CCPL and the deductibility of certain fees and interests incurred by KBM. The disputed amount of the Claims in aggregate is approximately KZT37.40 billion (equivalent to approximately US\$83.92 million).

If KBM does not agree with the final tax audit results by the local tax authority, it may file a complaint against the final tax audit results and apply to the Ministry of Finance of Kazakhstan for administrative review within 30 business days. KBM may further initiate administrative proceedings before the court if it does not agree with the administrative review results.

The Board has been informed that KBM intends to continue to vigorously defend its position and as at the date of this announcement, KBM is in discussion with its legal and tax advisors for preparation of the compliant and application for administrative review. Accordingly, based on circumstances as at the date of this announcement made known to the Board, the Board believes that no provision is expected to be made by the Group in relation to the disputed amount of the Claims. Having considered the financial resources of KBM and the Group, it is expected that the Claims will not have any material adverse effect on the business operation and financial position of the Group as a whole.

The Company will keep the Shareholders and potential investors informed of any further material development by way of announcement(s) as and when appropriate.

**Shareholders and potential investors are advised to exercise caution when dealing in the shares of the Company.**

## **DEFINITIONS**

In this announcement, the following terms and expressions shall, unless the context requires otherwise, have the following meanings:

“Board”	the board of Directors
“CCEL”	CITIC Canada Energy Limited, a company incorporated under the laws of Alberta, Canada with limited liability and a joint venture of the Company

“CCPL”	CITIC Canada Petroleum Limited, formerly known as Nations Energy Co Ltd, a company incorporated under the laws of Alberta, Canada with limited liability and a wholly-owned subsidiary of CCEL
“CITIC Oil & Gas”	CITIC Oil & Gas Holdings Limited, a company incorporated under the laws of BVI with limited liability and an indirect wholly-owned subsidiary of the Company
“Claims”	the claims by the local tax authority in Kazakhstan for tax payment, penalties and late charges by KBM in the amount of approximately KZT39.1 billion (equivalent to approximately US\$87.74 million) in the final tax audit results
“Company”	CITIC Resources Holdings Limited, a company incorporated in Bermuda with limited liability and whose shares are listed on the Main Board of the Stock Exchange (stock code: 1205)
“Directors”	directors of the Company
“Group”	the Company and its subsidiaries
“Kazakhstan”	the Republic of Kazakhstan
“KBM”	JSC Karazhanbasmunai, a company incorporated under the laws of Kazakhstan
“KZT”	Tenge, the lawful currency of Kazakhstan
“Listing Rules”	the Rules Governing the Listing of Securities on the Stock Exchange, as amended, supplemented or otherwise modified from time to time
“Proposed Disposal”	the proposed disposal of its interests in Kazakhstan oil assets and shareholder’s loans by the Company, details of which are set out in the announcement of the Company dated 26 August 2022
“Shareholders”	holders of the Shares

“Stock Exchange”	The Stock Exchange of Hong Kong Limited
“US\$”	United States dollars, the lawful currency of the United States of America
“%”	per cent

By Order of the Board  
**CITIC Resources Holdings Limited**  
**Sun Yufeng**  
*Chairman*

Hong Kong, 27 February 2023

*For the purpose of this announcement, unless otherwise indicated, the exchange rate of US\$1.00=KZT445.65 has been used, where applicable, for purpose of illustration only and it does not constitute any representation that any amount has been, could have been or may be exchanged at that rate or at any other rate.*

*As at the date hereof, Mr. Sun Yufeng is an executive director of the Company, Mr. Chan Kin is a non-executive director of the Company, and Mr. Fan Ren Da, Anthony, Mr. Gao Pei Ji and Mr. Look Andrew are independent non-executive directors of the Company.*