

Share Match Plan | Tax Summary - Australia

This document (**Tax Summary**) has been provided to you for further information in relation to the invitation to apply for share-based awards under the Northern Star Resources Ltd (**Northern Star, NST** or the **Company**) Employee Share Match Plan (**Plan**).

The Tax Summary is not intended to summarise the Plan. A copy of the Plan can be provided to you if requested. In the event of any inconsistency between the Tax Summary and the Plan, the Plan will prevail.

The Tax Summary is not tax advice. The Tax Summary is general in nature and is based on Australian income tax laws that are currently in force and certain assumptions. As each employee's circumstances will be different, it is strongly recommended that you seek independent professional taxation advice in relation to your specific personal circumstances. The Company will not be held responsible where employees act solely on the information provided in the Tax Summary.

There will be a further document (**US Tax Summary**) made available to NST employees subject to taxation in the United States (**US Tax**). If you are subject to US Tax (whether subject to Australian tax as well), you should have regard to the US Tax Summary.

Executive Summary

You have been invited to participate in the Company's Share Match Plan and may receive the following:

- Acquired Shares, which will be transferred to you using your Contributions; and
- Matched Shares, to be provided for no additional monetary outlay by you.

Generally, the Acquired Shares and the Matched Shares will have different income tax implications.

- the Acquired Shares have been purchased using your after-tax income and therefore will have no income tax implications upon receiving the Acquired Shares; and
- the Matched Shares will be subject to income tax when received.

For a further summary of the Australian tax implications associated with the Plan, please see below.

Tax Summary

The Australian income tax treatment in respect of your Acquired and Matched Shares is summarised in the table below. The summary is based on the tax implications which may apply upon transfer of Shares to Participants (whether Acquired and/or Matched Shares) and future sale choices which you may make.

Event	Tax Implications
You receive Acquired Shares	There are no income tax implications on transfer to you of any Acquired Shares. The cost base of the Acquired Shares will be the amount you paid to purchase the Acquired Shares.
You receive Matched Shares	<p>At the end of the Qualification Period where the Matching Conditions are satisfied, you will receive one Matched Share per Acquired Share.</p> <p>Income tax will apply when your Matched Shares are delivered to you.</p> <p>The taxing point for the Matched Shares is the date that the Matched Shares are transferred to you, and are able to be sold.</p> <p>You will need to include an assessable amount in your tax return for the relevant income year in which the abovementioned taxing point/s occurs. The assessable amount should be the market value of the Matched Shares at the taxing point.</p> <p>The assessable amount is considered ordinary income and will be taxed at your marginal rate of income tax.</p>

<p>You sell your Matched Shares within 30 days of the taxing point</p>	<p>If you sell the Matched Shares within 30 days of the above taxing point, your taxing point will be deferred to the time of sale. The proceeds received from this sale (less any selling costs) should be included in your tax return as an assessable amount. Tax will be payable at your marginal rate of income tax and Capital Gains Tax (CGT) will be disregarded.</p>
<p>You sell the Matched Shares more than 30 days after the taxing point</p>	<p>If you sell the Matched Shares more than 30 days after the above taxing point, you will be subject to income tax at the taxing point and also have a CGT event upon the sale. The CGT event may result in a further capital gain or a capital loss (or neither).</p> <p>Broadly, the capital gain or loss will be calculated as the sale proceeds, less the cost base of the Matched Shares (which is the amount assessed at the taxing point), less any selling costs incurred.</p> <p>If you realise a capital gain, the gain (after first offsetting any available capital losses) will be taxed at your marginal rate of tax.</p> <p>If the sale proceeds are less than the cost base of the Matched Shares, a capital loss may arise. Capital losses can be offset against any current year capital gains, and the remaining balance can be carried forward and offset against future capital gains. Where a capital loss arises, there may be no guarantee you will be able to utilise the capital loss in the future.</p> <p>You may need to disclose the CGT event, and any resulting capital gain or loss in your relevant tax return.</p>
<p>You sell your Acquired Shares (at any time)</p>	<p>CGT will be applicable for the sale of Acquired Shares. The resulting CGT event may result in a capital gain or a capital loss (or neither).</p> <p>Broadly, the capital gain or loss will be calculated as the sale proceeds, less the indexed cost base of the Acquired Shares (which is the amount you paid to receive the Acquired Shares, adjusted for inflation), less any selling costs incurred. You may need to disclose the CGT event, and any resulting capital gain or loss in your relevant tax return.</p> <p>If you realise a capital gain, the gain (after first offsetting any available capital losses) will be taxed at your marginal rate of tax.</p> <p>If the sale proceeds are less than the cost base of the Acquired Shares, a capital loss may arise. Capital losses can be offset against any current year capital gains, and the remaining balance can be carried forward and offset against future capital gains. Where a capital loss arises, there may be no guarantee you will be able to utilise the capital loss in the future.</p>

Employer Reporting

The Company will be required to provide details about your Matched Shares to the ATO. A statement should be available to you through your MyGov ATO account by the 14th of July after the end of a financial year in which a taxing point for your Matched Shares occurs. Some examples of the details that your employer may need to report about you include: your name, address and TFN (if provided); and the number and market value of your Matched Shares at the relevant taxing point.