

# SCHEDULE OF APPROXIMATE DAMAGES (INC. INTEREST) CLAIMED

(Calculated and using the exchange rate as at 10 August 2020)

#	Description	Amount (AUD)*	Amount (USD)*	Pinpoint reference Applicants' Amended Statement of Issues, Facts and Contentions dated 28 May 2020
<b>Approximate value of First Damages Claim</b>				
1.	Value of Balmoral South Iron Ore Project (BSIOP)	AUD 10.78 billion	<b>USD 7.768 billion</b>	Pg 90, para [187(a)]
2.	International Minerals wasted expenditure	<b>AUD 37.25 million</b>	USD 26.68 million	Pg 90, para [187(b)]
3.	Mineralogy's loss associated with being unable to sell any project required under the State Agreement	AUD 11.37 billion	<b>USD 8.19 billion</b>	Pg 90, para [187(c)]
4.	Mineralogy's loss associated with inability to obtain royalties in relation to BSIOP	AUD 326.18 million	<b>USD 233.7 million</b>	Pg 90, para [187(d)]
5.	Interest (@6% from 9 October 2012 on items 1, 2 and 4 above)	AUD 5.24 billion	USD 3.77 billion	Pgs 90-91, paras [187(f)] - [187(h)]
	<b>TOTAL</b>	AUD 27.75 billion	USD 19.99 billion	
<b>Approximate value of Second Damages Claim</b>				
6.	International Minerals Wasted expenditure	Unquantified	Unquantified	Pg 90, para [187(e)]
7.	Interest on any award amount from 22 July 2014	Unquantified	Unquantified	Pg 91, para [187(i)]
	<b>TOTAL</b>	Unquantified	Unquantified	

\*Figures in bold are the amounts specifically referred to in the Applicants' Amended Statement of Issues, Facts and Contentions. Other figures have been converted/calculated based on those figures.

<b>Approximate further interest (based on 6% interest rate and 10 August exchange rates)</b>	
Daily (i.e. items 1 + 2 + 4 x 6% interest ÷ 366 days (2020 is a leap year))	AUD 1.83 million
Monthly (i.e. daily interest x 31 days)	AUD 56.7 million
Between 16 August 2020 and end of the proposed arbitration hearing (i.e. daily interest until approx. 18 December 2020 or 124 days)	AUD 226 million