

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
Inmet Mining Corporation		98-0510671	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
Karen Tyler	(416) 361-6400	info@fgml.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact		7 City, town, or post office, state, and Zip code of contact	
330 Bay Street, Suite 1000		Toronto, ON M5H 2S8	
8 Date of action		9 Classification and description	
March 27, 2013 - April 23, 2013		Common Stock	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
Foreign	Foreign	IMN.TO	

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ [Please refer to Attachment to Form 8937 \(Part II - Question 14\).](#)

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ [Cash Option - Sale or exchange treatment of shares.](#)

[Share Option - The aggregate tax basis of the First Quantum shares received by a US holder of Issuer shares shall be the same as that of the property exchanged \(i.e., Issuer shares\) decreased by the amount of any money received by the shareholder \(including tax paid on behalf of Issuer shareholders to Panama\) and increased by the amount of gain to the shareholder which was recognized on such exchange.](#)

[Cash and Share Option - The aggregate tax basis of the First Quantum shares received shall be the same as that of the property exchanged \(i.e., Issuer shares\) decreased by the amount of any money received by the shareholder \(including tax paid on behalf of Issuer shareholders to Panama\) and increased by the amount of gain to the shareholder which was recognized on such exchange.](#)

[Each holder of Issuer shares should consult their US tax advisor to determine their specific outcome.](#)

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ [Cash Option - Sale or exchange treatment of shares.](#)

[Share Option - The basis of First Quantum shares received shall be the same as the basis of the Issuer shares surrendered, decreased by the amount of any money received by the shareholder and increased by the amount of gain recognized on the exchange.](#)

[Cash and Share Option - The basis of First Quantum shares received shall be the same as the basis of the Issuer shares surrendered, decreased by the amount of any money received by the shareholder and increased by the amount of gain recognized on the exchange.](#)

[The fair market value per share of First Quantum common stock is to be determined based on the relevant acquisition dates for the individual shareholders. The acquisition of 100 percent of Issuer was obtained over three separate purchases, with dates and related closing TSX list prices as follows: March 27, 2013 \(C\\$19.00\), April 5, 2013\(C\\$19.29\) and April 9, 2013 \(C\\$19.24\)\).](#)

[Please consult your US tax advisor with respect to all options to determine specific outcomes.](#)

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ _____

IRC Section 368(a)

IRC Section 358(a)(1)

18 Can any resulting loss be recognized? ▶ N/A

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The reportable tax year is 2013.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here Signature ▶ KATY Date ▶ July 4 2013

Print your name ▶ KAREN TYLER Title ▶ DIRECTOR INTERNATIONAL TAX

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	<u>Gibson Turley III</u>	<u>[Signature]</u>	<u>7/4/2013</u>		<u>P00353020</u>
	Firm's name ▶ <u>KPMG LLP</u>	Firm's EIN ▶ <u>98-0173533</u>		Phone no.	
	Firm's address ▶ <u>Suite 900, 777 Dunsmuir Street Vancouver, B.C., Canada</u>				

Inmet Mining Corporation
Attachment to Form 8937
Acquisition of Issuer by Akubra

Date of Action: March 27, 2013 – April 23, 2013

Part II – Question 14

Between March 27, 2013 and April 23, 2013 all of the outstanding shares of Issuer were acquired by FQM (Akubra) Inc. ("Akubra"). On April 23, 2013 Issuer amalgamated with Akubra under Canadian law. In exchange for each Issuer share, each Issuer shareholder could elect to receive C\$72.00 of cash (the "Cash Option"), 3.2967 common shares of First Quantum Minerals Ltd. ("First Quantum") (the "Share Option"), or C\$36.00 and 1.6484 common shares of First Quantum (the "Cash and Share Option").

In addition, US\$0.96 per Issuer share was paid to the government of Panama in respect of Panamanian capital gains tax owing by Issuer shareholders on the transaction.

First Quantum Shares issued to the Issuer shareholders exceeded 40 percent of the total fair market value of the consideration provided to Issuer shareholders pursuant to the integrated acquisition. For discussion regarding the classification of this transaction as a reorganization for US federal income tax purposes under IRC Section 368(a), please refer to pages 84-85 of the Offering Document dated January 9, 2013 as filed by First Quantum.

No opinion or ruling from the IRS has been or will be sought regarding the tax consequences of the transaction, and the IRS or the courts may disagree with this conclusion.

Potential classification as a reorganization could also be affected if either Issuer or First Quantum were designated as a passive foreign investment company ("PFIC") at the time of the transaction. For discussion regarding the potential consequences of PFIC status of either party please refer to pages 85-87 of the Offering Document dated January 9, 2013 as filed by First Quantum.