

Gibraltar - Tax Guide

SuperShare Plan

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1. Introduction

The following is a summary of the tax treatment of an award made to you by Aristocrat Leisure Limited under the SuperShare Plan (the "Plan"). This summary assumes that you have been resident in Gibraltar during the lifecycle of the award.

The tax treatment as explained herein is intended as a guide only. It is limited to a general description of the national tax laws, and is not intended to address city, regional, or other local tax laws that may be applicable to you. It may not apply to your particular tax or financial situation, and we are not in a position to assure you of any particular tax result. Therefore, we recommend that you consult with your own independent tax advisor regularly to determine the consequences of taking or not taking any action concerning your shares, and to determine how the tax or other laws in Gibraltar apply to your specific situation. This information was last reviewed in September, 2024.

2. Overview

Award of Matching Shares	<ul style="list-style-type: none"> An award is a promise to receive Aristocrat Leisure Limited shares in the future. You are not subject to taxation on equity at this point.
Vesting of Matching Shares	<ul style="list-style-type: none"> You will be subject to tax at this point. Taxable income is calculated based on the fair market value (FMV) of the shares. Aristocrat Leisure Limited is responsible for reporting the income.
Sale of shares	<ul style="list-style-type: none"> You are not subject to taxation on equity at this point.

3. Tax Treatment

	Award of Matching Shares	Vesting of Matching Shares	Sale of shares
Income tax / Capital gains tax	No	Income tax payable at rates up to 25%.	No
Employee social tax	No	Yes Social Insurance Contributions: Flat rate of 10% capped at earnings of GIP 38.85 of income per week.	No
Employer's social tax	No	Yes Social Insurance Contributions: Flat rate of 18% capped at earnings of GIP 53.55 of income per week.	No
Income tax withholding	No	Yes	No
Employee social tax withholding	No	Yes	No
Employee tax reporting	No	Yes	No
Employer tax reporting	No	Yes	No

Income Tax - The rates set out in this guide are marginal rates. In the event that you are required to pay income tax on the value of your award, the amount of income tax you pay will depend on your marginal tax rate. Generally, the more you earn, the higher your marginal income tax rate.

4. Will I pay tax when I am granted an award under the Plan?

You will not have to pay any tax at the time you are granted an award under the Plan.

5. Will I pay tax when I receive my Matching Shares?

Income Taxes

When your award vests, income tax will be triggered on the market value of the Matching Shares at the time of vesting at rates of up to 25%.

Social Taxes

Social Insurance Contributions: For earnings up to GIP 38.85 per week, you will be required to pay Social Insurance Contributions on the market value of the Matching Shares when you receive these shares at a rate of 10%.

Payment Method

Aristocrat Leisure Limited will deduct and withhold tax on your behalf.

Any variance between the amount of tax withheld and your actual tax liability will be your responsibility.

6. How will any benefits under the Plan be reported?

Purchased Shares:

You will not need to report the purchase of the shares.

Matching Shares:

You will need to report:

- Any taxable income to the tax authorities in the annual tax return.

7. Will I have to pay any tax on any dividends paid on the shares?

There will be no tax payable on any dividends you receive.

8. Will I pay any tax when I sell my shares?

You will not have to pay any tax on the sale of the shares.

9. Additional Information

Purchased Shares:

High Executive Possessing Specialist Skills status

High Executive Possessing Specialist Skills (HEPSS) status is a specialist tax status available to employees who intend to relocate to Gibraltar. An individual in respect of whom a HEPSS certificate is issued will need to earn a minimum amount of £160,000 in order to qualify under this allowance. They will pay tax on this amount and no further taxes will be payable on annual earnings above this amount.

Matching Shares:

Income tax bands

The rates displayed in this summary are applicable for employees who opt to be subject to the Gross Income Based System with gross assessable income exceeding GIP 25,000. A comparison of the rates of tax for gross assessable income of GIP 25,000 or less and gross assessable income of between GIP 25,000 and GIP 100,000 is set out below.

Gross assessable income of GIP 25,000 or less

- GIP 0 - GIP 10,000 at 6%
- GIP 10,000 - GIP 17,000 at 20%
- GIP 17,000 - Up at 28%

Gross assessable income exceeding GIP 25,000

- GIP 0 - GIP 17,000 at 16%
- GIP 17,000 - GIP 25,000 at 19%
- GIP 25,000 - GIP 40,000 at 25%
- GIP 40,000 - GIP 100,000 at 28%
- Balance at 25%

Employees may opt to be taxed under the Allowances Based System. In that case, different rates of tax may apply.

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Social tax note

Regardless of earnings, the minimum weekly employee social insurance contribution is GIP 13.65 per week, and the minimum weekly employer social insurance contribution is GIP 30.45 per week.

Employees aged 60 or older are exempt from making employee social insurance contributions.

10. Sample tax calculation

The following is an example of the tax implications upon vesting of shares and subsequent sale of shares under the Plan. This example assumes:

- You were in Gibraltar the whole time from grant to vest of the SuperShare Plan award.
- An income tax rate of 25%.
- This illustration does not take into account any capped social tax amount.
- Tax calculation is based on the currency in which the shares are traded and any subsequent currency conversion has not been applied.

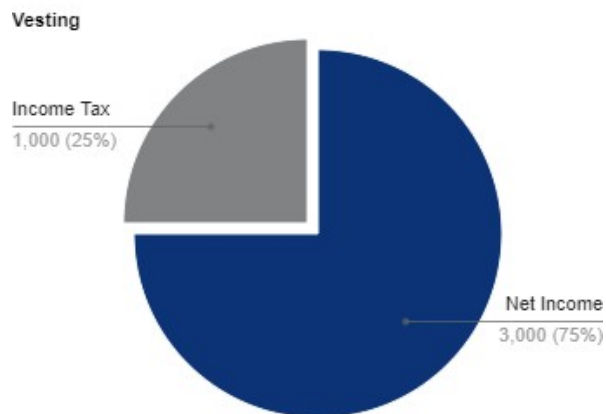
Tax implications

Award

No taxes due.

Vesting

Number of Matching Shares Vested	100
Fair Market Value (FMV) of the Matching Shares on Vesting	AUD 40
Taxable Income (100 x AUD 40)	AUD 4,000
<u>Income Tax Withheld (AUD 4,000 x 25%)</u>	<u>AUD 1,000</u>
Net Income (AUD 4,000 - AUD 1,000)	AUD 3,000



Sale

No Taxes Due.

** Please note the above is for information purposes only. Transaction fees may also apply and are not included.*

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