



**Tax Guide**  
**Purchased Shares and Matching Rights**  
**SINGAPORE**

**OVERVIEW**

This guide has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of Purchased Shares and Matching Rights by **Aristocrat Leisure Limited** (the “Company”) under the **Aristocrat Leisure Limited SuperShare Plan** (the “Plan”).

This summary is based on the tax laws in effect in your country as of **August 2021**.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with your enrollment in the Plan, the purchase of Purchased Shares, the grant and vesting of your Matching Rights, the issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this summary is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). **You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.**

If you are a citizen or resident of another country or transfer employment and/or residency after you enroll in the Plan and/or the Matching Rights are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

## GENERAL INFORMATION

This supplement assumes that neither the Plan nor the Purchased Shares and Matching Rights granted under the Plan qualify as a Qualified Employee Equity-Based Remuneration Scheme.

## TAXATION OF PURCHASED SHARES AND MATCHING RIGHTS

<b>Enrollment</b>	No taxation.
<b>Purchase of Purchased Shares</b>	No taxation, assuming there is no difference between the fair market value of the shares when you purchase them and the purchase price.
<b>Grant of Matching Rights</b>	No taxation.
<b>Vesting of Matching Rights</b>	You will be subject to taxation on the date the Matching Rights vest and you acquire shares.
<i>Taxable Amount</i>	The fair market value of the shares issued to you at vesting.
<i>Nature of Taxable Amount</i>	Employment income.
<i>Is Income Tax Payable?</i>	Yes.
<i>Are Employee Social Insurance Contributions Payable?</i>	No.
<b>Other Taxes</b>	No.

## COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING

<b>Withholding</b>	
<i>Is Income Tax Withheld?</i>	<p>No, unless a “tax clearance event” (as discussed below) is triggered.</p> <p><u>Tax Clearance Event</u></p> <p>If you are not a Singapore citizen, your employer is required to seek tax clearance from the IRAS at least one (1) month before you (a) cease employment, (b) leave Singapore for any period exceeding three (3) months or (c) are posted overseas (“tax clearance event”), and withhold any monies due to you until (i) tax clearance is given or (ii) 30 days after IRAS receives the Form IR21, whichever is earlier.</p> <p>Typically, any unvested awards that will not be forfeited upon termination of the Singapore employment will be deemed to have been vested one (1) month before the tax clearance event occurs or on the date the awards were granted (whichever is later) and the taxable amount will be computed based on the fair market value at that time (“deemed vesting rule”).</p>

## COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING

	<p>If you are a Singapore Permanent Resident who is not leaving Singapore permanently, your employer may not be required to seek tax clearance or withhold monies due to you, although it may request an undertaking by you to confirm that you are not leaving Singapore permanently.</p> <p><i>You should consult with your personal tax advisor for additional information about the deemed vesting rule and the tax clearance procedures in Singapore.</i></p>
<i>Are Employee Social Insurance Contributions Withheld?</i>	Not applicable.
<i>Are Other Taxes Withheld?</i>	Not applicable.
<b>Reporting</b>	
<i>Does the Taxable Amount Need to be Reported?</i>	<p>Your employer will prepare a Return of Employee's Remuneration (i.e., Form IR8A and its Appendices) reporting the taxable amount as taxable income and will give you this return before March 1 of each year following the year of the taxable event for the preparation of your tax return to the IRAS.</p> <p>Where your employer is under the Auto-Inclusion Scheme for Employment Income, such information will be submitted by your employer directly to the IRAS electronically and you will only need to complete and submit your annual tax return to the IRAS.</p> <p>In the event tax clearance is triggered, your employer will prepare the Form IR21 and submit this to IRAS (as discussed above).</p>

## DIVIDENDS

<b>Taxation in Your Country</b>	You will not be subject to taxation on any dividends you receive on the Company shares you acquire under the Plan, on the basis that the dividend income is considered foreign-sourced. <sup>19</sup>
<b>Taxation in Australia</b>	You should not be subject to tax in Australia to the extent any dividend is franked (i.e., paid out of profits that have been subject to Australian tax). If a dividend is partly franked or unfranked, the company may be required to withhold Pay-As-You-Go ("PAYG") withholdings from the dividend payment. If your address is in a country with which Australia has a tax treaty, the tax treaty will set the rate of PAYG withholdings required. If there is no tax treaty, the rate will be 30%.

<sup>19</sup> If the issuer is not tax resident in Singapore (i.e., the control and management of its business is exercised outside Singapore), and the dividends are declared during a board meeting that is held outside Singapore, the dividend income should not be Singapore-sourced and should be considered foreign-sourced for Singapore tax purposes.

SALE OF SHARES	
<b>Taxation in Your Country</b>	When you subsequently sell your Company shares, you generally will not be subject to taxation on the gain, if the gain is considered capital in nature (assuming you are not in the business of buying and selling shares).
<b>Taxation in Australia</b>	Assuming you are not an Australian tax resident, you should not be subject to tax in Australia on any gain you realize when shares acquired under the Plan are sold.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
<b>Purchase of Purchased Shares</b>	None.
<b>Vesting of Matching Rights</b>	<p>You are responsible for paying any tax due directly to the local tax authorities.</p> <p>If your income for a year of assessment is more than SGD 22,000, you generally will be required to file your income tax returns by way of electronic filing by April 18, or by way of paper filing (Form B / B1 / M) by April 15, unless otherwise notified by the Comptroller of Income Tax. If your employer is not under the Auto-Inclusion Scheme for Employment Income, you may be required to send a copy of the Form IR8A and its Appendices (as discussed above) to IRAS.</p> <p>If you need additional time to file your tax return, you can submit a request to IRAS, subject to IRAS' approval.</p> <p><i>You should consult with your personal tax advisor for additional information on whether you are required to file a tax return.</i></p>
<b>Dividends</b>	Not applicable.
<b>Sale of Shares</b>	Not applicable.

OTHER INFORMATION	
<b>Other Reporting</b>	If you hold the position of "director" <sup>20</sup> of the local affiliate in Singapore, you must give written notice to the affiliate whenever you receive and/or dispose of an interest (e.g., rights to shares, Company shares, etc.) in the affiliate or a related corporation, such as the Company, regardless of whether you are resident or employed in Singapore. In this case, notice must be given within

<sup>20</sup> "Director" includes any person, by whatever name described, who occupies the position of director of a Singapore corporation and includes a shadow director on whose instructions the directors of the corporation are accustomed to act. A director shall be deemed to have an interest in securities or securities-based derivatives contracts referred to above if a family member of the director (not being themselves a director) holds or has an interest in those securities or securities-based derivatives contracts; and any contract entered into by, any assignment or right of subscription made or exercised by, or any grant made to, a family member of a director of a corporation (not being himself a director) shall be deemed to have been entered into by, made or exercised by or made to the director. A "family member" means a spouse, or a son, adopted son, step-son, daughter, adopted daughter or step-daughter below the age of 21 years.

**OTHER INFORMATION**

	2 business days either after you become aware of the change in respect of the particulars of any of the aforesaid, the date on which you become such a director or the date on which you become a holder of, or acquire an interest in, the shares, debentures, rights, options, contracts, participatory interests, other securities or securities-based derivatives contracts, whichever last occurs. There is no prescribed form for such disclosure.
<b>Exchange Control</b>	None.