Australia - Tax Guide

Sharesave RoW (excludes UK & IOM)

1. Introduction

The following is a summary of the tax treatment of a grant granted to you by Flutter Entertainment plc under the Sharesave RoW (excludes UK & IOM) (the "Plan"). This summary assumes that you have been resident in Australia during the lifecycle of the grant.

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 options, and to determine how the tax or other laws in Australia apply to your specific situation. This information was last reviewed in June, 2024.

Please note that the information presented above is relevant for participants who have had no period of overseas work during the vesting period of their awards. The tax treatment of your share awards may change if you have relocated internationally, and as such the above rules may not be relevant to you. If you are in doubt regarding the tax treatment of your share awards, please seek advice from a professional tax advisor to confirm the tax position.

2. Overview

Grant	• Option to purchase Flutter Entertainment plc shares in the future at a specified price. • You are **not subject to taxation on equity** at this point.

Vesting	• You are **not subject to taxation on equity** at this point.

Exercise	• You will **be subject to tax** at this point. • Taxable income is calculated based upon the appreciation between the grant price value and the fair market value (FMV) on exercise date. • **Flutter Entertainment plc is responsible for reporting the income.** • You are also **responsible for reporting the income.**

Sale	• The date you sell Flutter Entertainment plc shares. • This event may generate additional income known as Capital Gain (CG), or a loss. • If there is a **Capital Gain** on the sale of shares, tax is due in the tax year of sale. • You are responsible for calculating the tax and reporting this capital gain.

3. Tax Treatment

	Grant	Vesting	Exercise	Sale
Income tax / Capital gains tax	No	No	Income tax payable at rates up to 45%.	Capital gains tax payable at rates up to 47%.
Employee social tax	No	No	Yes **Medicare Levy:** Uncapped flat rate of 2%.	No
Income tax withholding	No	No	No	No
Employee social tax withholding	No	No	No	No
Employee tax reporting	No	No	Yes	Yes

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 options under the Plan?

You will not have to pay any tax when you are granted options under the Plan.

5. Will I pay tax when my options vest under the Plan?

You will not have to pay any tax when your options become exercisable under the Plan.

6. Will I pay tax when I exercise my options?

When you exercise your options you will be required to pay income tax on the difference between the option price and the market value of the shares at that time at rates of up to 45%.

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

You will need to report:

- Any income tax due on exercise of the options to the tax authorities in the annual tax return, due by October 31.
  Employees have the ability to file post October 31 if using a registered tax agent.
- Any social security due on exercise of the options to the tax authorities in the annual tax return, due by October 31.

- Any capital gains tax due on the sale of shares to the tax authorities in the annual tax return, due by October 31.
  Please note: If your options were granted prior to 1 July 2015, you will need to report the vesting of the options.

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

A dividend is a right to participate in the company's profits, at the discretion of the board of directors.

Any dividends you receive will be taxed at rates up to 47%.

Included in this rate is a Medicare levy, taxed at a flat rate of 2% on any annual taxable income.

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

As the calculation of capital gains can be complex and may be subject to certain exemptions, we recommend that you consult your personal financial/tax advisor.

When you sell your shares, the amount by which the sale proceeds exceed your cost basis in the shares will be subject to capital gains tax at a rate up to 47%. Your cost basis will generally be equal to the fair market value of the shares at the income taxing point. If the sale price is lower than the cost basis of the shares, you may realize a capital loss.

Included in this rate is a Medicare levy, taxed at a flat rate of 2% on any taxable gains on the sale of shares.

If the shares are held by an Australian resident employee for at least 12 months, tax will only be payable on 50% of the gain, after allowing for other capital losses.

Please note that if the shares are sold within 30 days of acquisition, income tax will be due on the sale proceeds less the price paid to acquire the shares (if any) and any incidental costs associated with selling the shares (e.g., broker fees). In this case, the income taxing point will be the date of sale instead of the date of vesting/exercise and there are no additional capital gains tax implications.

If the shares are not sold within 30 days of acquisition, capital gains tax will be due on the difference between the Market Value of the shares at the date of acquisition and any price paid to acquire the shares.

When you sell your shares, the local company will not withhold any taxes on the gains. You should report any gain or loss arising in your tax return for the tax year in which the sale took place.

10. Additional Information

Tax deferral

The tax treatment assumes that tax deferral applies (i.e. no tax at grant) and that there are no transfer or disposal restrictions at vesting or exercise, as applicable.

Tax point

Options granted from July 1, 2009 - June 30, 2015 (assuming the options are subject to vesting conditions that constitute a real risk of forfeiture), tax is due at the earliest of:

- the date of vesting; or
- 7 years from the date of grant.

Options granted after 1 July 2015 - tax is due at the earliest of:

- the date of exercise (unless the shares remain subject to genuine restrictions on disposal or, prior to the exercise of options, there is no real risk of forfeiture and the options are no longer subject to genuine disposal restrictions); or
- 15 years from the date of grant.

Tax Market Value

The tax market value in cases of taxation at grant will be the greater of:

- the market value of the share on the grant date less the exercise price;
- the amount determined in accordance with Australian tax tables.

Further advice is recommended.

Taxation Rules for Significant Shareholders

The taxation rules may be different for significant shareholders (i.e. owners of more than 10% of the company's equity); further advice is recommended.

Disposal restrictions

To the extent that employees are restricted from selling the shares acquired on exercise/purchase/vesting because there is a holding lock and/or trading blackout period (and that restriction existed at grant of the award), the income taxing point will generally be deferred until those disposal restrictions are first lifted and employees are free to sell the shares. The amount subject to income tax will instead be calculated based on the tax market value of the shares at this time.

Indeterminate rights

Where the award is an 'indeterminate right', and the employee retains their unvested award when they leave, the award will only be treated as an ESS interest (and taxed accordingly) if and when the award is settled and shares are issued. An 'indeterminate right' includes:

- a right to acquire shares with a specified value (rather than a specified number of shares);
- a right to acquire an indeterminate number of shares; or
- a right which entitles the employee to receive either shares or a cash payment (at the provider's discretion, not the employee's).

Medicare levy

Please note the applicable capital gains tax rates displayed assume that you are earning taxable income above the Medicare levy threshold.

Exchange Control issues

There are no exchange control restrictions, but there is a reporting requirement to the Australian Transaction Reports and Analysis Centre (**AUSTRAC**) where funds equal to or greater than AUD 10,000 are transferred (see section 43 of the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (**AML/CTF Act**). In addition, international funds transfers (regardless of the value of the funds transfer) are also required to be reported to AUSTRAC in certain circumstances (see sections 45 and 46 of the AML/CTF Act). If an Australian bank is assisting the participant with the transaction, the bank will file the report on the participant's behalf. If there is no Australian bank involved in the transfer, the participant will be required to file the report.

Foreign asset reporting

You are required to report any cash or share accounts held in a foreign institution where the value of the asset is more than AUD 49,999. The information must be submitted to the Australian Taxation Office (on Form Annual Income Tax Return) by October 31.

The threshold applies at any time during the tax year. The deadline may be extended if filing through a registered tax agent.

11. Sample tax calculation

This illustrative example assumes the following:

- Grant price of GBP 100.
- An income tax rate of 45%.
- Social taxes of 2%.

- Capital Gains Tax of 47%.
- This example does not take into account any annual Capital Gains Tax (CGT) exemptions which may be available.
- Tax calculation is based on the currency in which the shares are traded and any subsequent currency conversion has not been applied.

Tax implications

Grant

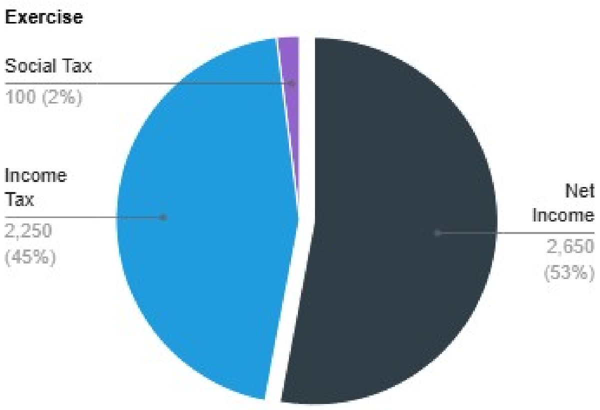
No taxes due.

Vesting

No taxes due.

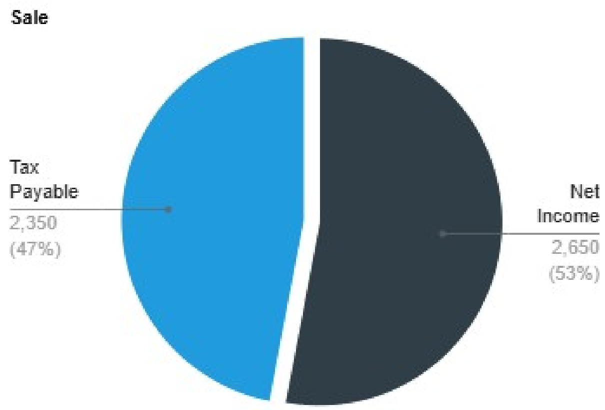
Exercise

Number of Options Exercised	100
Grant Price	GBP 100
Fair Market Value (FMV) of the shares on exercise	GBP 150
Taxable Income (100 x GBP 150) - (100 x GBP 100)	**GBP 5,000**
Social Tax Payable by you (GBP 5,000 x 2%)	GBP 100
Income Tax Payable by you (GBP 5,000 x 45%)	GBP 2,250
Total Tax Payable by you (GBP 2,250 + GBP 100)	**GBP 2,350**
Net Income (GBP 5,000 - GBP 2,350)	**GBP 2,650**



Sale

Number of shares Sold	100
Fair Market Value (FMV) of the shares on Sale	GBP 200
Sale Proceeds (100 x GBP 200)	GBP 20,000
Less: Acquisition Costs	
Amount Previously Taxed	**GBP 15,000**
Capital Gain	GBP 5,000
Tax Payable (GBP 5,000 x 47%)	**GBP 2,350**
Net Income (GBP 5,000 - GBP 2,350)	**GBP 2,650**



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

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