

Ireland - Tax Guide

Irish Sharesave (2024 onwards) - Tax Approved

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1. Introduction

The following is a summary of the tax treatment of a grant granted to you by Flutter Entertainment plc under the Irish Sharesave (2024 onwards) - Tax Approved (the "Plan"). This summary assumes that you have been resident in Ireland 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 Ireland apply to your specific situation. This information was last reviewed in July, 2024.

2. Overview

Grant	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• You are not subject to taxation on equity at this point.
Exercise	<ul style="list-style-type: none">• 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.
Sale	<ul style="list-style-type: none">• The date you sell Flutter Entertainment plc shares.• This event may generate additional income known as Capital Gain (CG), or a loss.

- Generally speaking, Capital Gain is the growth in value from exercise to sale.
- 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 8%.	Capital gains tax payable at a flat rate of 33%.
Employee social tax	No	No	Yes Uncapped flat rate of 4.1% after EUR 352 of income per week.	No
Income tax withholding	No	No	Yes	No
Employee social tax withholding	No	No	Yes	No
Employee tax reporting	No	No	No	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 8%.

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

Flutter Entertainment plc is responsible for reporting the income.

You will need to report:

- Any capital gains tax due on the sale of shares in Form 11 (and pay CGT due via Payslip A or B) to the tax authorities in the annual tax return, due by October 31.

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 40%.

Tax on dividends over foreign shares is payable at the employee's marginal rate of 20% or 40%, subject to any

available tax credit. PRSI of 4.1% and USC of up to 8% (for salary over EUR 70,044) also apply to dividend 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.

If the sale price of your shares is higher than their cost basis (broadly, the cost basis is equal to the fair market value of the shares at the time of exercise), the difference will be taxable as a capital gain, at a rate of 33%. If the sale price is lower than the cost basis of the shares, you may realize a capital loss.

Where chargeable gains are realized in the period January 1 to November 30, the capital gains tax is due for payment by December 15 of the same tax year. However, if the chargeable gains are realized in the period December 1 to December 31, the tax will be due for payment by January 31 of the following year. There is an annual exemption of EUR 1,270 per year from capital gain taxation.

Calculation of base cost

The FIFO (First-In, First-Out) principle is generally applied to determine which shares are sold when calculating the base costs on the sale of shares.

Where chargeable gains are realized in the period January 1 to November 30, the capital gains tax is due for payment by December 15 of the same tax year (payslip A). However, if the chargeable gains are realized in the period December 1 to December 31, the tax will be due for payment by January 31 of the following year (payslip B). There is an annual exemption of EUR 1,270 per year from capital gain taxation.

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

Grant of option with an exercise period over 7 years (long options)

If an option with an exercise period in excess of seven years is granted at less than market value, the employee will be liable for income tax, PRSI and USC at grant on any benefit that arises by reference to the grant of an option.

In this case, the employer will have to withhold any income tax, PRSI and USC arising on grant by the 14th of the month following the taxable event.

USC and Employee PRSI

There is no income tax charge on grant or exercise of an SAYE option; instead, capital gains tax is payable at the time of sale. However, USC and employee PRSI are still payable on the gain at exercise or purchase. References to income tax in this guide are references to USC.

Foreign asset reporting

A taxpayer who is not otherwise obliged to file a self-assessment tax return is not required to file such a return solely by virtue of opening a foreign account on the basis that the foreign account would be reportable to the Irish tax authorities under the provisions of the Common Reporting Standard (CRS), the Council Directive 2017/107/EU on Administrative Cooperation (DAC2) or the Foreign Account Tax Compliance Act (FATCA).

11. Sample tax calculation

This illustrative example assumes the following:

- Grant price of GBP 100.
- An income tax rate of 8%.
- Social taxes of 4.1%.
- Capital Gains Tax of 33%.

- This example does not take into account any annual Capital Gains Tax (CGT) exemptions which may be available.
- 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

Grant

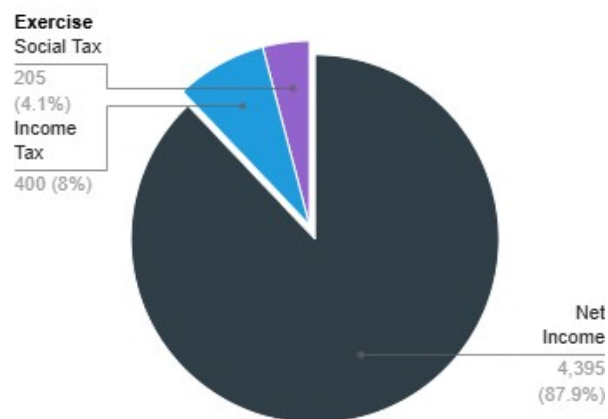
No taxes due.

Vesting

No taxes due.

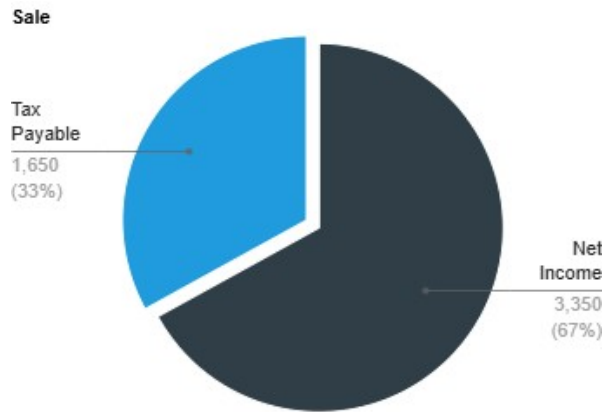
Exercise

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 Withheld (GBP 5,000 x 4.1%)	GBP 205
Income Tax Withheld (GBP 5,000 x 8%)	GBP 400
Total Tax Withheld (GBP 400 + GBP 205)	GBP 605
Net Income (GBP 5,000 - GBP 605)	GBP 4,395



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 33%)	GBP 1,650
Net Income (GBP 5,000 - GBP 1,650)	GBP 3,350



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

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