

This summary assumes that you only pay tax in one place. Different rules may apply if you pay tax in different places.

This summary is only a guide. It is limited to a general description of national tax laws and does not address various issues which may impact the tax result, including: local, city, regional, state or other provincial taxes and your own individual circumstances. We do not guarantee any particular tax result. Therefore, we recommend that you consult your own tax advisor regularly to determine your tax position.

The information provided is understood to be correct as of September 2025. Changes in legislation or practice after this date may affect the tax treatment.

Tax - Employee Notes - Your Shares: Gifted and Matched

Brazil	
When will I be taxed in relation to my plan benefits?	Purchase of Investment Shares: Contributions to purchase Investment Shares are deducted from post-tax salary. Award of Gifted and Matching Shares: No income tax. No social security. Unlocking of Gifted and Matching Shares: Income tax and social security on the market value. Sale by participant: Capital gains tax on increase in value since purchase of Investment Shares and since time of unlocking of Gifted and Matching Shares. No social security.
What is the maximum rate of income tax payable in relation to my plan benefits?	27.5% (2025) on ordinary income. Any change in tax rates usually takes effect from 1 January.
Income tax rates	Personal income tax rates range between 0% and 27.5% (progressive rates). For personal income, the maximum rate applies to annual income over approximately BRL55,980 (monthly income over BRL4,664.68). (2025)
Will my employer withhold income tax in relation to my plan benefits?	No - please see question “Do I have to report any income in relation to the plan to my local tax authority?” below regarding your tax reporting and payment responsibilities.
Are my plan benefits subject to social security contributions?	Purchase of Investment Shares: Yes – contributions to purchase shares will be taken from post-social security salary. Award of Gifted and Matching Shares: No. Unlocking of Gifted and Matching Shares: Yes.
Will my employer withhold social security contributions in relation to my plan benefits?	Not for unlocking of Gifted and Matching Shares - please see question “Do I have to report any income in relation to the plan to my local tax authority?” below regarding your tax reporting and payment responsibilities. Contributions to purchase shares will be taken from post-social security salary.
Employee social security	Employee social security (max rate): 14% (progressive rates from 7.5% to 14%).

This summary assumes that you only pay tax in one place. Different rules may apply if you pay tax in different places.

This summary is only a guide. It is limited to a general description of national tax laws and does not address various issues which may impact the tax result, including: local, city, regional, state or other provincial taxes and your own individual circumstances. We do not guarantee any particular tax result. Therefore, we recommend that you consult your own tax advisor regularly to determine your tax position.

The information provided is understood to be correct as of September 2025. Changes in legislation or practice after this date may affect the tax treatment.

Tax - Employee Notes - Your Shares: Gifted and Matched

Brazil	
	Employee social security (cap): the 14% rate applies to monthly income from BRL4,190.84 up to BRL8,157.41 (2025).
What is the maximum rate of capital gains tax?	15% (applicable to the disposal of foreign shares).
What is the maximum tax rate payable on dividends?	<p>15% fixed rate on dividends paid by foreign companies (applicable since 1 January 2024, under Law 14,754/23).</p> <p>If a decision is taken to pay dividends, then while you continue to hold shares in Your Shares, dividends are currently automatically reinvested to purchase further Rolls-Royce Ordinary Shares, which will also be held within Your Shares and will be immediately unlocked. You will be eligible to receive dividends within Your Shares on all Investment Shares but on Gifted and Matching Shares only once they unlock. Also, shares arising from reinvestment of dividends will themselves be eligible to receive future dividends.</p> <p>Reinvestment into ordinary shares: no income tax or social security,</p> <p>Sale of reinvested ordinary shares: Capital gains tax on increase in value since purchase. No social security.</p> <p>These taxes will not be collected by Rolls-Royce. Please see question “Do I have to report any income in relation to the plan to my local tax authority?” below regarding your tax reporting and payment responsibilities.</p>
Do I have to report any income in relation to the plan to my local tax authority?	<p>Yes - you will be responsible for reporting the amount and paying the tax through your annual Income Tax Return. You would also report and pay tax on proceeds of sale and dividends in the annual Income Tax Return. The monthly reporting of dividends payments under the "<i>carên-leão</i>" system was abolished from 1 January 2024.</p> <p>You are also required to report any foreign assets, if valued at USD 1,000,000 or more, to the Brazilian Central Bank as at 31 December.</p> <p>There is no specific filing in relation to share related incentives such as Your Shares.</p> <p>Report name:</p> <ul style="list-style-type: none">• annual Income Tax Return; and

This summary assumes that you only pay tax in one place. Different rules may apply if you pay tax in different places.

This summary is only a guide. It is limited to a general description of national tax laws and does not address various issues which may impact the tax result, including: local, city, regional, state or other provincial taxes and your own individual circumstances. We do not guarantee any particular tax result. Therefore, we recommend that you consult your own tax advisor regularly to determine your tax position.

The information provided is understood to be correct as of September 2025. Changes in legislation or practice after this date may affect the tax treatment.

Tax - Employee Notes - Your Shares: Gifted and Matched

Brazil	
	<ul style="list-style-type: none">• a foreign asset reporting is made electronically through the Central Bank website. <p>Tax period:</p> <ul style="list-style-type: none">• the tax year is 1 January to 31 December; and• foreign assets are reported annually based on the value of the assets on 31 December. <p>Reporting deadline:</p> <ul style="list-style-type: none">• the annual Income Tax Return must be filed by 31 May (30 May in 2025) of the following year. Returns must be filed either online on the tax authority's website or through the Filing Tax Return Program; and• the foreign asset report must be filed by 5 April. If the employee has foreign assets valued at USD100million or more, the additional quarterly reporting deadlines are 5 June, 5 September and 5 December. <p>Payment of tax: tax payments may be made in up to 8 monthly and successive instalments (if the tax due is less than BRL100, it must be paid in a single instalment). The first or single instalment must be paid by the reporting deadline, with additional instalments due by the last business day of each month.</p>