

Italy	Incentive Plan/LTIP
<p><b>When will I be taxed in relation to my plan benefits?</b></p>	<p><b>Grant:</b> No income tax. No social security.</p> <p><b>Vesting:</b> Income tax. No social security on conditional equity awards made under a discretionary plan.</p> <p><b>Transfer to participant:</b> No income tax. No social security.</p> <p><b>Sale by participant:</b> Capital gains tax on increase in value since vesting. No social security.</p>
<p><b>What is the maximum rate of income tax payable in relation to my plan benefits?</b></p>	<p>47.53% (2026) including maximum regional and municipal taxes. Any change in tax rates usually takes effect from 1 January.</p>
<p><b>Income tax rates</b></p>	<p>State income tax is levied at progressive tax rates on all income. Starting from fiscal year 2026 the following brackets apply:</p> <ul style="list-style-type: none"> <li>• EUR 0 - 28,000: 23%</li> <li>• EUR28,001 - 50,000: 33%</li> <li>• Over EUR50,000: 43%</li> </ul> <p>In addition:</p> <ul style="list-style-type: none"> <li>• regional taxes of up to 3.33% and municipal taxes of up to 1.2% may apply; and</li> <li>• for companies in the financial industry, a 10% 'additional' tax is levied on compensation paid in the form of bonuses and/or share awards to directors and executives that exceed the amount of fixed compensation (e.g. where fixed compensation is EUR1,000 and variable compensation EUR1,800, the amount of EUR800 is subject to the 10% additional tax). From 2026, exclusions apply.</li> </ul>
<p><b>Will my employer withhold income tax in relation to my plan benefits?</b></p>	<p>Yes</p> <p>Withholding can be complex.</p>
<p><b>Are my plan benefits subject to social security contributions?</b></p>	<p>If social security is payable (there is no social security on conditional equity awards made under a discretionary plan), both employer and employee social security contributions must be paid and the employer must withhold the employee's contribution.</p>
<p><b>Employee social security</b></p>	<p><b>Employee social security (max rate):</b> approximately 10%.</p> <ul style="list-style-type: none"> <li>• The actual rate depends on the employee's position in the company (worker, manager, executive) and the size and activity sector of the company.</li> <li>• Different rates and caps may apply to directors.</li> <li>• Social security funds include pension, unemployment, sickness, maternity, social mobility and other smaller funds.</li> </ul> <p><b>Employee social security (cap):</b> for employees with no social security record prior to 1 January 1996, pension fund contributions are capped at gross income of EUR120,607 (2025) (proposed cap of EUR122,295 in 2026). The same cap applies to non-employee directors.</p>
<p><b>What is the maximum rate of capital gains tax?</b></p>	<p>26%</p>

## Tax - Employee Notes



<b>What is the maximum tax rate payable on dividends?</b>	26%
<b>Do I have to report any income in relation to the plan to my local tax authority?</b>	<p>The employee must file an annual tax return to report all income, including all income under an incentive plan, any dividends and any capital gains. There is no specific filing in relation to equity related incentives.</p> <p>Foreign assets must also be reported to the tax authorities.</p> <p><b>Report name:</b> Annual Tax Return (<i>Modello Redditi PF</i>). Dividends and capital gains are reported in the Annual Tax Return (on Form RM and Form RT respectively). The foreign assets report is filed electronically on Form RW together with the individual's annual tax return. The tax return form and instructions can be found online. The tax return can be downloaded from the website <a href="#">here</a>. Alternatively, Form RW can be included in the simplified tax return (Form 730), as can the contents of Form RM and Form RT.</p> <p><b>Reporting deadline:</b> <i>Modello Redditi PF</i> must be filed by 31 October of the year following the tax period. Simplified tax return (Form 730) must be filed by 30 September of the year following the tax period.</p> <p><b>Payment of tax:</b> any unpaid tax is due by 30 June (tax balance and first advance payment) and 30 November (second advance payment) of the year following the relevant tax period.</p>

## Tax - Employee Notes



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; retention and holding periods; restrictions on the shares; clawback terms and periods; 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 9 February 2026. Changes in legislation or practice after this date may affect the tax treatment.

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