

France	Proposed Global Share Purchase and Match Plan
<p>When will I be taxed in relation to my plan benefits?</p>	<p>Purchased shares:</p> <p>Purchase: Income tax (plus exceptional tax surcharge), CSG and CRDS, and social security on any discount to the value at the time of purchase.</p> <p>Sale by participant: Capital gains tax (plus exceptional tax surcharge). No social security.</p> <p>Matching shares:</p> <p>Grant: No income tax. No social security.</p> <p>Vesting: Income tax (plus exceptional tax surcharge), CSG and CRDS and social security.</p> <p>Transfer to participant: No income tax. No social security.</p> <p>Sale by participant: Capital gains tax (plus exceptional tax surcharge). No social security.</p>
<p>What is the maximum rate of income tax payable in relation to my plan benefits?</p>	<p>45% (2026) plus exceptional tax surcharge and social taxes. Any change in tax rates usually takes effect from 1 January.</p>
<p>Income tax rates</p>	<p>Income tax rates are progressive up to 45%.</p> <p>Exceptional tax surcharge: an exceptional tax surcharge of 3% or 4% is imposed on the income of high earners. The 3% rate is levied on income over EUR250,000 for a single person or EUR500,000 for a married couple, and the 4% rate is levied on income over EUR500,000 for a single person and over EUR1million for a married couple.</p> <p>Differential tax for high earners: individuals whose income is over EUR250,000 for a single person or EUR500,000 for a married couple, should be taxed at a minimum of 20%. This new rule applies for revenues earned in 2025 onwards. A first down payment was due to be paid between 1 December and 15 December 2025; the balance will be paid during Spring 2026.</p> <p>CSG and CRDS: in addition, social taxes, CSG (<i>Contribution Sociale Généralisée</i>) and CRDS (<i>Contribution au Remboursement de la Dette Sociale</i>) are levied on gross income. Although a separate tax on income, the social taxes (sometimes called social surcharges or social contributions) are subject to employer withholding along with social security. Separate rates apply to employment income and investment income.</p>
<p>Will my employer withhold income tax in relation to my plan benefits?</p>	<p>Yes.</p>
<p>Are my plan benefits subject to social security contributions?</p>	<p>Yes, the employer must withhold CSG and CRDS, and the employee social security contributions.</p>

<p>Employee social security</p>	<p>Employee social security (max rate): the average standard rate is between 21.55% to 23% of the gross gain (including 9.2% CSG and 0.5% CRDS). Some contributions are capped, so the average effective rate decreases progressively. Most of the employee social charges (except 2.4% CSG and 0.5% CRDS) are deductible when computing the employee's income tax liability.</p> <p>Employee social security (cap): various caps apply to contributions. Any amount in excess of the annual threshold (EUR384,480 for 2026) is subject to an uncapped rate of 10.10% (including CSG and CRDS) of the gross compensation.</p>
<p>What is the maximum rate of capital gains tax?</p>	<p>Investment income, including capital gains, is subject to a flat tax rate, which in 2026 is 31.4% (made up of 12.8% income tax and 18.6% CSG and CRDS).</p> <p>The full amount of the capital gain would also be subject to the exceptional tax surcharge for high earners, of 3% or 4%.</p>
<p>What is the maximum tax rate payable on dividends?</p>	<p>Investment income, including dividends, is subject to a flat tax rate, which in 2026 is 31.4% (made up of 12.8% income tax and 18.6% CSG and CRDS).</p> <p>The full amount of the dividend would also be subject to the exceptional tax surcharge for high earners, of 3% or 4%.</p> <p>Subject to certain conditions, the participant can elect to be taxed at progressive income tax rates (plus 18.6% CSG and CRDS and the exceptional tax surcharge) instead of the flat rate tax.</p>
<p>Do I have to report any income in relation to the plan to my local tax authority?</p>	<p>The individual has an obligation to report all taxable income received during the year (including any taxable amount from a share plan, dividends received and any taxable capital gain) to the French tax authorities. PAYE withholding applies to most employment income but employees are responsible for paying any tax due on income from tax-qualified shares, which are not subject to PAYE withholding.</p> <p>Report name: the individual must file an annual French income tax return, Form 2042 (if applicable, the individual should also file Form 2047 for foreign income and Form 2074 for capital gains) generally by mid-May of the following year. Tax returns are filed jointly and the taxable income will be calculated based on marital status and the number of dependent children. If withholding has not been applied to dividends received by the individual, they are required, within the first 15 days of the month following the date of receipt, to report the dividends on form 2778-DIV-SD and to pay the withholding tax. The individual must report foreign shares (but not conditional rights to receive foreign shares) and bank accounts on Form 3916.</p> <p>All income returns must be filed electronically (for taxpayers with internet access). The tax return and other tax forms can be downloaded from the website here.</p> <p>Tax period: 1 January to 31 December.</p> <p>Reporting deadline: the income tax return filing date changes each year but is between mid-May and early June for income received during the previous tax year. Time extensions are available for online filing.</p> <p>Payment of tax: any additional taxes due must be paid following the issue of a final assessment issued by the tax authority, generally between September and December.</p>

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 25 March 2026. Changes in legislation or practice after this date may affect the tax treatment.

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