

Australia	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	47% (2024/25) including Medicare levy. Any change in tax rates usually takes effect from 1 July.
Income tax rates	Tax rates are progressive, with a maximum marginal rate of 45% applying to income over AUD190,000. The maximum marginal rate of tax is increased by the compulsory 2% Medicare levy.  The 2024/25 tax rates and income thresholds are:  • taxable income up to AUD18,200: Nil  • taxable income of AUD18,201 to AUD45,000: Nil plus 6% of the excess over AUD18,200  • taxable income of AUD45,001 to AUD135,000: AUD4,288 plus 30% of the excess over AUD45,000  • taxable income of AUD135,001 to AUD190,000: AUD31,288 plus 37% of the excess over AUD135,000  • taxable income from AUD190,001: AUD51,638 plus 45% of the excess over AUD190,000.  Note: Individuals may also be subject to the following payments through the income tax system:  • Medicare levy of 2% (see Employee social security below)  • Medicare levy surcharge of up to 1.5% (see Employee social security below); and  • Student loan repayment: income from share or cash-based awards may be subject to deductions in relation to compulsory repayment of student loans through
Employer income tax withholding	the income tax system. The repayment thresholds and rates are progressive and are adjusted annually. In 2024/25, for income over AUD159,664 the repayment rate is 10%. For employees, repayments on cash-based awards will generally be collected through income tax withholding.  Yes
Social security withholding	Yes Employee social security (Medicare levy and applicable surcharge) and employer social security (superannuation fund contributions, subject to caps). Employer withholding generally applies.
Employee social security	Employee social security (max rate): 2% for Medicare levy. An additional Medicare levy surcharge of up to 1.5% is payable for higher income employees (i.e. employees who have earnings of more than AUD97,000 per year if single or more than AUD194,000 in total as a household) if they do not hold appropriate private medical insurance. The taxable value at settlement of incentive plan awards forms part of taxable income for this purpose.  Employee social security (cap): no cap.
Employer social security	Employer social security (max rate): 11.5% of an employee's Ordinary Times Earning (OTE) is contributed by the employer into a complying Australian superannuation fund. The rate increased from 11% to 11.5% on 1 July 2024 and will increase to 12% on 1 July 2025. A cash payment (but not income under a share plan) will form part of OTE for superannuation purposes.  Employer social security (cap): maximum earnings base of AUD65,070 per quarter (applicable to the 2024/25 tax year).  Payroll taxes: if the employer company is subject to payroll tax, it must pay payroll tax in respect of share awards and cash payments granted to employees in all states and territories in Australia. Payroll tax is a state tax payable by an employer whose total Australian group wages exceed a specified exemption threshold for that state. For example, in New South Wales, payroll tax is payable by employers with total annual taxable wages in excess of AUD1,200,000 (unchanged for the 2024/25 fiscal year) at the rate of 5.45% on total wages. Payroll tax is payable on cash payments in the month that the payment is made; and on share awards on the fair market value of the award either in the year of grant or, where the employer elects, in the year of vesting/exercise/settlement (the employer does this by excluding the value of the share awards from its payroll tax return for the financial year in which the awards are granted). Where an employer has included the value of a share or option in its payroll tax return for the relevant financial year by the value of any previously declared share or option value. This reduction in the taxable wages would not apply in circumstances where the employee decided not to purchase the shares.



Tax reporting - Individual	The employee must file an individual annual tax return. The employer must provide the employee with a PAYG payment summary showing the payments the employer has made to them and the amounts withheld from those payments during a financial year (a payment summary is not required for amounts that are reported and finalised through Single Touch Payroll). Foreign income derived by Australian tax residents is generally liable to Australian tax and disclosable in the supplementary section to the annual income tax return.  Report name: Income Tax Return. The return can be filed online. A sample of the tax return can be downloaded from the Australian Taxation Office (ATO) website (here).  Tax period: 1 July to 30 June.  Reporting deadline: 31 October (or later if filing through a registered tax agent).  Payment of tax: any unpaid income tax is generally due 3 weeks after a tax assessment has been issued.
Tax reporting - Employing company	Yes  Report name: real time reporting of cash payments, Pay-As-You-Go (PAYG) withholding amounts and superannuation liability information through the Single Touch Payroll (STP) reporting system.  Reporting deadline: reporting is through the STP reporting system. The PAYG withheld amounts are pre-filled into the employer's business activity statement (BAS) from STP data. The employer must lodge its BAS by the 21st of the month immediately following the taxable event (if it is a monthly reporter) or by the 28th of the month immediately following the quarter in which the taxable event arose (if it is a quarterly reporter). Whether the employer is a monthly or quarterly reporter will depend on the size of the employing company. Employers only need to provide payment summaries to employees (by 14 July) or a payment summary annual report to the ATO (by 14 August) for amounts that are not reported through STP.  Payment of tax: see above.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual. However, whether the individual will be able to reclaim any taxes previously paid, will depend on the precise facts and the reasons for the malus/clawback.



Bahrain	
Taxable Moments	Payment of cash: No income tax. Social security may apply.
Income tax (maximum rate)	None
Income tax rates	There is no individual income tax in Bahrain.
Employer income tax withholding	No
Social security withholding	Yes, if the cash awards are treated as part of the employee's wages or a fixed bonus/benefit plan.
Employee social security	Employee social security (max rate): 8% for local employees and 1% for expatriates).  Employee social security (cap): the Social Insurance Organization (SIO) applies a cap on salaries of BHD4,000.  Note: generally there will be no social security on incentive plan income.
Employer social security	Employer social security (max rate): 16% (2024) for local employees (this rate will increase by 1% each year until it reaches 20% in 2028) and 3% for expatriates. Since 1 March 2024, employers also pay monthly contributions to the Social Insurance Organization (SIO) to fund the leaving indemnity of expatriate employees, at a rate of 4.2% of wages for the first three years from the employment start date and 8.4% of wages for subsequent years until end of service.  Employer social security (cap): the SIO applies a cap on salaries of BHD4,000. The regulations for the leaving indemnity do not mention a cap and it is likely that the salary cap does not apply to this contribution.  Note: generally, there will be no social security on incentive plan income.
Tax reporting - Individual	No Report name: not applicable. Tax period: not applicable. Reporting deadline: not applicable.
Tax reporting - Employing company	Yes, for social security obligations.  Report name: monthly social security form.  Tax period: monthly  Reporting deadline: monthly
Malus and Clawback - Individual	There is no direct personal taxation in Bahrain.



Belgium	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	54.5% (2025). Any change in tax rates usually takes effect from 1 January.
Income tax rates	Progressive rates apply with a maximum tax rate of 50%. Communal taxes of up to 9% are added to the income tax due, resulting in a maximum effective top rate of 54.5%.
Employer income tax withholding	Yes
Social security withholding	Yes
Employee social security	Employee social security (max rate): 13.07% Employee social security (cap): no cap. There is also a special security contribution which is capped at EUR731.28 per year for a family.
Employer social security	Employer social security (max rate): ordinary employer social security tax rates for the profit sector currently amount to 25% of total income. This percentage may be increased by additional special contributions. Reductions of employer social security taxes are available, such as the contribution on extra-legal pensions, contributions to the Business Closure Fund (FSO) and the solidarity contribution (CO2 contribution) for the use of a company car. As a result, the actual average percentage stands at around 27.5%. The applicable percentage may be reduced for some categories of employees.  Employer social security (cap): no cap.
Tax reporting - Individual	Yes, all Belgian residents are required to file an annual tax return. If the employee is responsible for withholding and paying SETT on the sale or purchase of shares, they will be required to file a separate return. Individuals must also report any foreign accounts.  Report name:  • Annual tax return. The form can be filed by post or online through the Tax-on-web portal.  • SETT return. The form can be filed by post (Inningscentrum Diverse Taksen, Koning Albert II-laan 33 bus 431, 1030 Brussel) or by email (CPIC.TAXDIV@minfin.fed.be).  Tax period:  • Annual tax return: the tax year is a calendar year.  • SETT return: the month in which the taxable moment occurred.  Reporting deadline:  • Annual tax return: generally filed by 30 June of the year following the tax year, although the actual date will be on the tax return. An extension is usually available if filing online. An assessment notice is sent by the tax authorities within six months of the following year and any tax due must be paid within two months after receipt of this notice.  • SETT return: the deadline for filing and payment in relation to SETT by an individual is the last working day of the second month following the month in which the taxable moment occurred.  Payment of tax: as above.



Tax reporting - Employing company	Yes, a Belgian subsidiary of a foreign-based group entity that grants equity-based incentives or other benefits-in-kind to employees of the Belgian subsidiary, is required to withhold Belgian salary tax on such benefits and also to fulfil reporting obligations and draw up fiscal slips.  Report name: salary statement (fiche 281.10 for employees and fiche 281.20 for company directors) in respect of the calendar tax year. A withholding return is filed monthly (or quarterly for smaller companies) on form 274. Social security is reported on the DMFA-declaration. All reporting is carried out electronically.  • Salary statements: Belcotax-on-web here  • Withholding return: Rv-on-web here  • DMFA-declaration: DmfA here  Reporting deadline: the annual salary statement must be filed before March. A copy of the form must also be given to employees to complete their tax return. Withholding reports must be filed by the 15th day of the month following taxable event. Social security reports are filed quarterly no later than the last day of the quarter (30 April, 31 July, 31 October and 31 January).  Payment of tax: payment of withheld tax and social security is generally made monthly (at the same time that the monthly report is filed).
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Brazil	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	27.5% (2024) 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).
Employer income tax withholding	Yes
Social security withholding	Yes
Employee social security	Employee social security (max rate): 14% (rates from 7.5% to 14%). Employee social security (cap): the 14% rate applies to monthly income from BRL4,000.04 up to BRL7,786.02 (2024).
Employer social security	Social security (max rate):     Social security contributions: combined rate up to 34.3%:     employer base social security contribution, assessed at a 20% rate (some companies pay this contribution based on gross revenue rather than payroll). If the company is a financial institution, there is an extra rate of 2.5% (total of 22.5%);     contribution to the Workers' Accident Insurance (SAT/RAT), adjusted by the Accident Prevention Factor (FAP), ranging from 0.5% to 6%, depending on the kind of activity performed by the company and the level of work accidents occurred in the company; and     contributions to third entities, at a total rate ranging from 2.5% to 5.8%, depending on the kind of activity performed by the company;     Severance pay fund (FGTS): 8% levied on all salary, bonuses, incentives and compensatory benefits paid or made available to employees.  Employer social security (cap): no cap.



Tax reporting - Individual	The employee will usually report to the Brazilian Federal Revenue Office on an annual income tax return. This would cover reporting on income that has been withheld, if paid and reported by the employer (e.g. where the costs are recharged). If shares under an incentive plan are granted directly by the foreign parent company with no recharge, the employee will be responsible for reporting the amount and paying the tax through their annual Income Tax Return. The employee 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 'carnê-leão' system was abolished from 1 January 2024.
	The employee is also required to report any foreign assets, if valued at USD1,000,000 or more, to the Brazilian Central Bank as at 31 December. Separate quarterly reporting applies to foreign assets valued at USD100,000,000 or more.
	There is no specific filing in relation to equity related incentives.
	Report name:
	annual Income Tax Return; and
	foreign asset reporting is made electronically through the Central Bank website.
	Tax period:
	• 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.
	Reporting deadline:
	the annual Income Tax Return must be filed by 31 May 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 USD100,000,000 or more, the additional quarterly reporting deadlines are 5 June, 5 September and 5 December.
	Payment of tax: see above.
Tax reporting - Employing company	Yes, if withholding is made on behalf of the employee, the employer must report the employees' incentive related income but the filing covers all employee benefits and is not specific to equity related incentives.
	<b>Report name:</b> the Brazilian paying source is required to file tax information through the online reporting system for tax, social security and labour obligations (eSocial) and through the online reporting of tax withholding and other information (EFD-REINF). For tax years up to 31 December 2024, the employer is required to file an annual withholding income tax form (DIRF) but this filing will no longer apply for tax years beginning 1 January 2025 onwards.
	<b>Reporting deadline</b> : from 1 January 2025, all filing of payroll information must take place monthly through eSocial and EFD-REINF. The DIRF report for the tax year ending 31 December 2024 must be filed by the end of the last business day of February 2025.
	Payment of tax:
	<ul> <li>withheld social security contributions must be paid until the 20th day of the month subsequent to the month to which the contributions refer; and</li> <li>withheld income tax must be paid until the last business day of the second ten-day period of the month following the month in which the triggering event occurred.</li> </ul>
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual. The individual may be able to claim a refund of taxes already paid but this is a complex procedure under Brazilian law and would likely be challenged by the Brazilian tax authorities.



Canada	
Taxable Moments	Payment of cash: Income tax and social security generally at time of receipt (provided that the moment of tax is not accelerated by the application of the Salary Deferral Arrangement (SDA) rules).
Income tax (maximum rate)	54.8% (2024). Any change in tax rates usually takes effect from 1 January.
Income tax rates	Canada operates a system of federal and provincial or territorial taxes. The top federal tax rate is 33% for income over CAD246,752 (2024). The highest combined federal and provincial/territorial rate is 54.8% in the province of Newfoundland and Labrador. In Quebec, the highest combined rate is 53.31% and in Ontario it is 53.53%. The rate of withholding varies by province and can be higher than the marginal rate (up to the maximum rate).
Employer income tax withholding	Yes
Social security withholding	Yes Employee social security. Employer social security. Employer must withhold the employee contribution.
Employee social security	Employee social security (max rate):  For share related and most other non-cash benefits, pension plan contributions (2024):  • Federal: 5.95% and 4.00% for CPP2;  • Quebec: 6.40%.  For most cash payments and benefits, combined pension plan contributions and employment insurance premiums (2024):  • Federal: 7.61%;  • Quebec: (up to approximately) 8.214% including Quebec parental insurance premiums.  Employee social security (cap):  Maximum amount of earnings subject to pension plan contributions (2024):  • Federal and Quebec: CAD68,500 with a basic exemption of CAD3,500. The maximum annual contribution to the plan is CAD3,867.50 (Federal) and CAD4,160 (Quebec). From 2024, a higher, second earnings ceiling of CAD73,200 will be implemented and used to determine second additional CPP contributions (CPP2). Pensionable earnings between CAD68,500 and CAD73,200 are subject to CPP2 contributions and the maximum contribution will be CAD188.00 each for employees and employers.  Maximum contribution for employment insurance (2024): the maximum insurable earnings are CAD61,500 and the maximum annual premium is:  • Federal: CAD1,049.12 (EI premium rate of 1.66%);  • Quebec: CAD834.24 plus CAD464.36 for parental insurance premiums.



Employer social security	Employer social security (max rate):
	For share related and most other non-cash benefits, pension plan contributions (2024):
	• Federal: 5.95% and 4.00% for CPP2;
	• Quebec: 6.40%.
	For most cash payments and benefits, combined pension plan contributions and employment insurance premiums (2024):
	• Federal: 8.27%;
	• Quebec: approximately 8.25% or 8.942% when Quebec parental insurance premiums are included.
	Employer social security (cap):
	Maximum amount of earnings subject to pension plan contributions (2024):
	• Federal and Quebec: CAD68,500 with a basic exemption of CAD3,500. The maximum contribution to the plan is CAD3,867.50 (Federal) and CAD4,160 (Quebec). From 2024, a higher, second earnings ceiling of CAD73,200 will be implemented and used to determine second additional CPP contributions (CPP2). Pensionable earnings between CAD68,500 and CAD73,200 are subject to CPP2 contributions and the maximum contribution will be CAD188.00 each for employees and employers
	Maximum contribution for employment insurance (2024):
	• <b>Federal</b> : CAD1,468.77;
	• Quebec: CAD1,167.94 plus CAD650.48 for parental insurance premiums.
	Payroll taxes: separate payroll taxes apply in some provinces:
	<ul> <li>Manitoba, Newfoundland and Labrador, Ontario and Quebec: employers are subject to payroll taxes which range from 1.95% to 4.3%;</li> </ul>
	• Quebec: employers with a payroll over CAD2million pay a 1% training levy;
	<ul> <li>Northwest Territories and Nunavut: employers withhold a payroll tax equal to 2% of employment earnings from employees' salaries.</li> </ul>
	Employers should obtain specific Canadian payroll advice relative to their particular circumstances.
Tax reporting - Individual	Yes, an employee is required to file an annual return and this would cover reporting on income that has been withheld, paid and reported by the employer. There is no specific filing in relation to equity related incentives.
	Individuals must report foreign property holdings in excess of CAD100,000 at any time during the year (Form T1135).
	<b>Report name</b> : Annual Tax Return (Form T1). The tax return can be filed online. The tax return can be downloaded from the website <u>here</u> . Foreign property is filed on Form T1135, the Foreign Income Verification Statement (and/or the Quebec equivalent, as applicable). The report can be obtained <u>here</u> .
	Tax period: 1 January to 31 December.
	Reporting deadline: tax returns and foreign income statement must be filed by 30 April.
	Payment of tax: any outstanding tax amount is due by 30 April.
Tax reporting - Employing company	The employer must report the employees' incentive related income on an annual basis. The filing covers all employee benefits and is not specific to equity related incentives. For certain types of employee option plans, additional reporting applies to 'non-qualified securities' (see 'Tax qualified plan' section, sub-heading 'Tax reduction for option plans').
	<b>Report name:</b> Annual employee remuneration return: Form T4 (or Relevé 1 in the case of Quebec employees). Form T4 is a summary of the remuneration paid to an employee, which will include any benefit amounts paid under an incentive plan. The return can be filed online. The return can be downloaded from the website <a href="here">here</a> . Non-qualified securities must be reported on the Information Return for Non-Qualified Securities on Schedule 59 (see 'Tax qualified plan' section).
	<b>Reporting deadline</b> : Award income is generally reported in Form T4 for the year of settlement (i.e. the calendar year in which the income from the award is received by the employee). Form T4 must be sent to the employee and filed with the relevant revenue authority by the last day of February of the year following the year of settlement.
	Payment of tax: withholding for income and social security amounts must be remitted monthly or in respect of such other period as is prescribed by the regulation.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not generally affect the moment of tax for the individual, except possibly in connection with the application of the SDA rules (see 'Other' section). It is possible that such an event could give rise to a capital loss to the relevant individual, which could not be applied against the income inclusion realised on the receipt of the shares.



Chile	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	40% (2024). Any change in tax rates usually affects income received from 1 January of the year following the enactment of the modification of the tax rate.
Income tax rates	Tax rates are progressive. Tax bands are expressed as Monthly Taxable Units (MTU) and are adjusted on a monthly basis. An MTU is equivalent to approximately USD72 (July 2024). Personal income up to MTU13.5 is exempt from tax and the maximum tax rate applies to monthly income above MTU310.
Employer income tax withholding	Yes
Social security withholding	Yes Both employer and employee social security applies. Employer must withhold the employee contribution.
Employee social security	<ul> <li>Employee social security (max rate calculated over the employee's monthly remuneration):</li> <li>pension fund contribution of 10% (plus fund management fees which currently vary between 0.49% and 1.44%);</li> <li>health insurance contribution of 7%;</li> <li>unemployment insurance of 0.6% in case of indefinite term employment contracts; and</li> <li>heavy works contribution of 1% or 2% (if applicable).</li> <li>Employee social security (cap): in all cases, the remuneration over which the deductions are made (calculation basis) is capped at a fixed amount expressed as unidades de fomento (UF) depending on the respective social security contribution. The UF is an index of the value of the Chilean peso, revised daily based on the variation of the Chilean consumer price index during the previous month, as determined by the Central Bank of Chile. The caps vary each year based on the increase of the Index of Real Remunerations, published by the National Statistics Institute.</li> <li>For 2024, the cap for pension fund, health insurance and heavy works contributions is UF84.3 (approximately USD3,401) and the cap for unemployment insurance is UF126.6 (approximately USD5,108).</li> </ul>
Employer social security	Employer social security (max rate calculated over the employee's monthly remuneration):  • insurance for work accident and professional diseases of 0.9%, plus an additional contribution of between 0% to 3.4% depending on the occupation risk;  • disability and survival insurance of 2.01%;  • unemployment insurance of 2.4% for indefinite term employment contracts and of 3% in the case of fixed term employment contracts;  • heavy works contribution of 1% or 2% (if applicable); and  • insurance for parents of children affected by a serious health condition (law No.21,010 and 21,063) of 0.03%.  Employer social security (cap): in all cases, the remuneration over which the deductions are made (calculation basis) is capped at a fixed amount expressed as UF (see 'Employee social security').  For 2024, the cap for insurance for work accidents and professional diseases, disability and survival insurance, the insurance for parents of children affected by a serious health condition and heavy works contribution is UF84.3 (approximately USD3,401); and the cap for unemployment insurance is UF126.6 (approximately USD5,108).



Tax reporting - Individual	An individual may be required to file a return, as discussed below.
	Report name:
	<ul> <li>Annual Tax Return (Tax Form No. 22): the employee is required to file an annual tax return if they have received salaries from more than one employer of income from sources other than salary which are subject to Personal Income Tax;</li> </ul>
	<ul> <li>Monthly Tax Return (Form No. 50): the employee is required to file a monthly return if the employee has received taxable income which has not been subject to income tax withholding by the employer, e.g. where there is no recharge to the local employer.</li> </ul>
	Capital gains and dividends are reported in the Annual Tax Return. Capital gains tax may be considered to be sporadic income if the taxpayer does not have any other income subject to first category tax (Corporate Income Tax), in which case a monthly tax return must be filed in the month following the realisation of the capital gain.
	The returns are usually filed online and can be downloaded from the website <u>here</u> .
	Tax period: 1 January to 31 December.
	Reporting deadline:
	<ul> <li>the Annual Tax Return must be filed by 30 April in the year following the year when the income is obtained;</li> </ul>
	<ul> <li>monthly returns (if required) must be filed within the first 12 days of the month following the month in which the income was obtained or the amounts wer withheld.</li> </ul>
	Payment of tax: any unpaid income tax is due by the date of filing the relevant tax return.
	<b>Foreign asset reporting</b> : the employee is required to issue a sworn statement listing any shares maintained abroad as well as foreign dividends and other foreign incom (through Form No. 1929). This form is filed annually by 30 June. Employees may register the investment, in the Registry of Foreign Investments kept by the IRS, in order to be entitled to tax credits for any taxes paid abroad. However, if Form No. 1929 is filed, the employees are entitled to tax credit even if the registration is no performed.
Tax reporting - Employing company	If plan benefits are paid through local payroll or if there is a recharge, the employer would be required to withhold, declare and pay the corresponding payroll tax.
	<b>Report name</b> : Monthly Tax Return (Tax Form No. 29) is filed with the Chilean tax authority. The return is generally filed online and can be downloaded from the websit <a href="here">here</a> . If the incentive plan income is subject to income tax withholding, the employer must also file Form No. 1887 to report the payment of, and withholding of income tax on, the incentive plan income.
	<b>Reporting deadline</b> : the monthly return must be filed within the first 12 days of the month following the month in which the amounts were withheld. The annu return must be filed by 28 March.
	Payment of tax: withheld tax and social security contributions are paid at the same time that the monthly report is filed.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



China	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	45% (2024).
Income tax rates	Income tax rates for comprehensive income are progressive. The maximum tax rate applies to yearly comprehensive income over CNY960,000.  The comprehensive income includes income from wages and salaries (including incentive plan income but not capital gains or dividends which fall outside comprehensive income), labour service remunerations, rewards of writers and royalties.
Employer income tax withholding	Yes
Social security withholding	Yes Employee social security. Employer social security. Employer must withhold the employee contribution.
Employee social security	Employee social security (max rate): there are different rates for pension, unemployment, medical, maternity, work-related injury and housing. The combined maximum rate for Beijing is 22.5% and the combined maximum rate for Shanghai is 17.5%.  Employee social security (cap): contribution base is capped at CNY33,891 per month in Beijing and CNY36,549 per month in Shanghai.  The percentage of social security benefits borne by employers and employees and the contribution base vary from city to city. The highest contribution base cap is in Shanghai. The contribution base cap usually changes during April to July for each year.
Employer social security	Employer social security (max rate): there are different rates for pension, unemployment, medical, maternity, work-related injury and housing. The combined maximum rate for Beijing is 40.2% and the combined maximum rate for Shanghai is 34.02%.  Employer social security (cap): contribution base is capped at CNY33,891 per employee per month in Beijing and CNY36,549 per employee per month in Shanghai. The percentage of social security benefits borne by employers and employees and the contribution base vary from city to city. The highest contribution base cap is in Shanghai. The contribution base cap usually changes during April to July for each year.
Tax reporting - Individual	Yes, an individual should file a tax return if any of the following applies:  • the individual receives comprehensive income (i.e. consolidating income from the following sources: wages and salaries (including incentive plan income), income from services, author's remuneration and royalties) from two or more sources and the balance of the comprehensive income after deducting special deductions exceeds CNY60,000;  • the income is received from one or more item of income from services, author's remuneration and royalties, and the balance of the comprehensive income after deducting special deductions exceeds CNY60,000;  • the amount of tax paid in advance during a tax year is less than the amount of tax payable on the comprehensive income received during the year; and/or  • if the taxpayer applies for tax refund.  There is no specific filling in relation to equity related incentives, although equity incentive income, received through a share plan which is registered by the employer under Circular 35, is taxed separately from comprehensive income and benefits from a special deduction under Circular 164 (see the discussion in the 'Tax-qualified plan' section below).  Report name: Annual Tax Return.  Tax period: 1 January to 31 December.  Reporting deadline: between 1 March and 30 June.



Tax reporting - Employing company	The employer must report the employees' incentive related income on the monthly tax filing, but the tax filing covers all employee benefits and is not specific to equity related incentives. Additionally, Notice 69 requires the reporting of grants under equity plans within 15 days after the month in which the awards were granted. The local employer should confirm the Notice 69 tax filing position with the competent tax authority as the practices and requirements differ between tax authorities. If a plan is already registered under Circular 35 (see below) additional reporting under Notice 69 may not be required.  The local employer may be required to report and withhold dividend tax and capital gains tax from the proceeds of the sale of shares by the participant but the practice of the tax authority in each city can be different. This should be clarified with the competent tax authority on a case-by-case basis.  Report name: monthly tax filing. The return can be filed online.  Reporting deadline: reports must be filed monthly and tax must be paid before the 15th day of the subsequent month.  Payment of tax: see above.  Registration: under Circular 35, a participant can benefit from preferential tax treatment if the share plan is registered by the employer with the local tax bureau prior to implementation in China. For more details on this preferential tax treatment, see the discussion in the 'Tax-qualified plan' section.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Colombia	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	39% (2024) for labour income. Any change in tax rates usually takes effect from 1 January.
Income tax rates	Individual income tax is schedular and is calculated depending on the source of the income (e.g. general income, pensions and dividends). The income tax rate for individuals is progressive (i.e. depends on the level of the income obtained by the employee during the financial year).  The maximum rate applies to income over TVU31,000. For fiscal year 2024, each tax value unit ( <i>Unidad de Valor Tributario</i> ) (TVU) is equivalent to COP47,065.  Labour income is subject to a maximum marginal income tax rate of 39%.
Employer income tax withholding	Yes
Social security withholding	Yes
Employee social security	Employee social security (max rate): the standard combined rate is 8% (4% for pension contributions and 4% for health contributions) which applies to employees who earn more than the minimum monthly salary and not more than 25 minimum monthly salaries. Employees with income equal to or higher than 4 minimum monthly salaries (COP5,200,000) will be subject to additional pension contributions of up to 2%. People who are independent (with no labour contract) will have to assume the full payment of social security contributions. Social security contributions increase every year in line with the minimum monthly wage (COP1,300,000 in 2024).  Employee social security (cap): the base on which social security contributions are calculated is capped at the equivalent of 25 minimum monthly mandatory salaries (COP32,500,000 in 2024). As a general rule, share plan income (non-salary benefits) are only included in the base for calculating social security if the share plan income exceeds 40% of the employee's salary income for the corresponding month (see 'Other' section for more information).
Employer social security	Employer social security (rates): total rate of 20.5% (12% for pension contributions and 8.5% for health contributions).  For employees who earn less than 10 minimum monthly mandatory salaries (COP13,000,000 in 2024), no employer health contribution is due. Employers are only required to pay the 12% pension contribution.  The employer may be required to pay a professional risks contribution at a rate between 0.348% and 8.700% depending on the type of insured activity.  Employer social security (cap): the base on which social security contributions are calculated is capped at the equivalent of 25 minimum monthly mandatory salaries (COP32,500,000 in 2024). As a general rule, social security will only be payable on share plan income if it exceeds 40% of the employee's salary income for the corresponding month (see 'Other' section for more information).  Payroll tax: employers are also subject to payroll taxes at a total rate of 9% (usually reduced to 4% for employees who earn less than 10 minimum monthly mandatory salaries).
Tax reporting - Individual	Yes, most employees will file a tax return. Individuals who hold assets abroad must file a special report, along with their tax return, reporting the assets and the value of the assets as of 31 December.  Report name: Annual Tax Return. The foreign assets report is Form 160 and can be found at the tax authority's website <a href="here">here</a> .  Tax period: 1 January to 31 December.  Reporting deadline: depends on the tax number of the individual but generally between August and October.  Payment of tax: any tax due must be paid by the due date for filing the return.



Tax reporting - Employing company	Yes
	<b>Report name</b> : all withholdings of tax and social security contributions must be reported on the employer's monthly Withholding Tax Return. The company must also file an Annual Tax Return.
	Reporting deadline: withheld tax is reported monthly. For corporate tax returns, deadlines are set by the government every year but usually:
	• large taxpayers: February;
	other taxpayers: April.
	Payment of tax: withheld tax is paid monthly.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Egypt	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	27.5% (2024). Any change in tax rates usually takes effect from 1 January.
Income tax rates	Tax rates are progressive. From 1 July 2023, a new maximum tax rate of 27.5% applies to annual income exceeding EGP1,200,000. Taxpayers whose income exceeds EGP700,000 in any tax year, progressively lose the right to make use of the lower tax brackets, which increases their effective tax rate.
Employer income tax withholding	Yes
Social security withholding	Yes (unless the contribution caps have already been met). Both employer and employee social security applies. Employer must withhold the employee contribution.
Employee social security	Employee social security (max rate): 11% Employee social security (cap): the minimum and maximum salary caps increase on 1 January of each year. In 2024, the minimum monthly salary cap is EGP2,000 and the maximum monthly salary cap is EGP12,600.  Note: if the shares are being provided to the employee free of charge or at a discount, then social security will payable at the taxable moment (unless the contribution caps have already been met). However, if the employee is purchasing the shares or is receiving free shares as a form of dividends based on shares they already own, then no social security deductions shall apply.
Employer social security	Employer social security (max rate): 18.75%  Managers and members of the board of directors (named on the commercial register of the company) are socially insured as employers and are subject to social insurance at a flat rate of 21% of the maximum wage (EGP12,600 in 2024).  Employer social security (cap): the minimum and maximum salary caps increase on 1 January of each year. In 2024, the minimum monthly salary cap is EGP2,000 and the maximum monthly salary cap is EGP12,600.  Note: if the shares are being provided to the employee free of charge or at a discount, then social security will payable at the taxable moment (unless the contribution caps have already been met). However, if the employee is purchasing the shares or is receiving free shares as a form of dividends based on shares they already own, then no social security deductions shall apply.
Tax reporting - Individual	Yes There is no specific filing for equity related incentives.  Report name: Annual Tax Return. Capital gains and dividends are reported on the same return. The return can be filed online. The return can be downloaded from the website <a href="https://example.com/here.">here.</a> Tax period: 1 January to 31 December.  Reporting deadline: the report must be filed by 31 March.  Payment of tax: any unpaid income tax (including tax on dividends and capital gains) is due by the date of filing the return.



Tax reporting - Employing company	Yes, the employer must report the employees' incentive related income but the filing covers all employee benefits and is not specific to equity related incentives.
	Report name: the local employer must file:
	monthly tax withholdings and reporting to the tax authorities;
	• annual filings with the Companies Department setting out the following information in respect of its employees: names, positions, nationalities and their total salary as well as the percentage of the salaries earned by its Egyptian employees.
	Tax returns can be filed online. The return can be downloaded from the website <u>here</u> .
	Reporting deadline:
	• prior to the 15th day of the month following settlement of the payments;
	• annual filing.
	Payment of tax: withheld tax and social security contributions are paid at the same time as the monthly report is filed.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Ethiopia	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	35% (2024/25). Any change in tax rates usually takes effect from 8 July.
Income tax rates	The maximum rate applies to income over ETB10,900 per month.
Employer income tax withholding	Yes
Social security withholding	Yes Employee and employer social security. Employer must withhold the employee contribution.
Employee social security	Employee social security (max rate): 7% Employee social security (cap): no cap.
Employer social security	Employer social security (max rate): 11% Employer social security (cap): no cap.  NB: Contributions by the employer to a pension fund in excess of 15% of the monthly employment income, are taxable.
Tax reporting - Individual	Individuals who receive employment income only, are not required to file personal income tax returns.  Individuals who receive income which is not subject to withholding, are classified as follows:  Category A: individuals whose annual turnover is above ETB1,000,000 must file tax returns and pay tax within four months after the end of the tax year;  Category B: individuals whose annual gross income is between ETB500,000 and ETB1,000,000 must file tax returns and pay tax within two months after the end of the tax year;  Category C: individuals whose annual gross income is below ETB500,000 must file tax returns and pay tax within one month after the end of the tax year.  There is no specific filing in relation to equity related incentives.  Report name: Personal income tax return. Tax returns must be filed online (here).  Tax period: the Ethiopian budgetary year runs from 8 July to 7 July.  Reporting deadline: the reporting deadline depends on the category of the taxpayer as set out above.
Tax reporting - Employing company	Yes The employer must report incentive related income but the filings are in relation to general employee benefits returns and are not specific to equity related incentives.  Report name: Monthly withholding returns. Tax returns must be filed online <a href="here">here</a> .  Reporting deadline: Monthly returns must be filed within one calendar month from the taxable event.  Payment of tax: PAYE taxes should be remitted to the Ministry of Revenue (MoR) on or before the 30th day of the month following the payroll month.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Finland	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	56.8% (2024) highest combined rate, including national, municipal and church tax. Any change in tax rates usually takes effect from 1 January.
Income tax rates	The tax rate for an individual is a combination of national tax, municipal tax and church tax (if applicable). In 2024, the top national tax rate is 44% and applies to annual income in excess of EUR150,000. Additional municipal taxes (from 4.4% to 10.8% of taxable income) depend upon the residence of the taxpayer. These national and municipal rates are applicable in mainland Finland, not the province of Åland, where the allocation of tax burden between the rates is different. Some residents also pay church tax of between 1% and 2.25%. The highest combined tax rate is 56.8%. In Helsinki, if the individual is a member of the Evangelical-Lutheran church, the maximum tax rate is currently 50.3%.
Employer income tax withholding	Yes
Social security withholding	Yes Employee social security. Employer social security. Employer must withhold the employee contribution.
Employee social security	Employee social security: 9.46% to 10.96% (combined amounts):  • Sickness insurance premium: combined 1.52% (daily allowance premium of 1.01% (0.00% if income is less than EUR16,499) and Medicare premium of 0.51%);  • Medicare premium on pension income and social benefits (not assessed for ordinary salary income subject to sickness insurance premium): 1.48%;  • Pension insurance contribution: 7.15% (aged 17 to 52 years or 63 to 67 years) and 8.65% (aged 53 to 62 years);  • Unemployment insurance contribution: 0.79% (employees aged 18 to 64).  Employee social security (cap): no cap.  Note: under specific conditions, share related income will only be subject to the Medicare premium of 1.48% (see 'Tax qualified plan' section).
Employer social security	<ul> <li>Employer social security: 20.35% (average combined amounts):</li> <li>Health insurance contribution: 1.16%;</li> <li>Pension insurance contribution: 17.34% (on average);</li> <li>Unemployment insurance contribution (employees aged 18 to 64): 0.27% for the first EUR2,337,000 of gross salaries' and 1.09% for the portion of the annual gross salaries exceeding EUR2,337,000;</li> <li>Group life insurance premium: 0.06% (on average);</li> <li>Accident Insurance premium: 0.7% (on average).</li> <li>Employer social security (cap): no cap.</li> <li>Note: under specific conditions, share related income will be exempt from employer social security (see 'Tax qualified plan' section).</li> </ul>



Tax reporting - Individual	Yes, the employee must file an annual return. There is no specific filing in relation to equity related incentives.
	The employee must report any foreign held assets to the tax authorities.
	<b>Report name</b> : pre-completed Annual Income Tax Return. Capital gains and dividends are reported on the same return. Foreign held assets are reported with the tax return. The return can be filed online or in paper form. The tax return can be downloaded from the website <a href="https://example.com/held/members/40/">held assets are reported with the tax return can be downloaded from the website</a>
	Tax period: Calendar year.
	<b>Reporting deadline</b> : typically at the beginning of May following the tax period. Deadline varies slightly every year. Certain groups of individuals have their deadline in April.
	Payment of tax: any unpaid income tax is due by the end of January following the end of tax period, if the taxpayer is to avoid any late payment interest. The final residual taxes based on the tax assessment are due by August-October or September-November following the end of tax period. There are two instalments if the amount of unpaid income tax exceeds EUR170. Capital gains tax and dividend tax are due by the same date. The due dates for any unpaid income taxes are individual and the dates are stated on the personal tax return document.
Tax reporting - Employing company	The employer must report the employees' incentive related income but the filing covers all employee benefits and is not specific to equity related incentives.
	<b>Report name</b> : since 1 January 2019, employers are required to report compensation (e.g. wages, fringe benefits, fees and other earned income) to the National Income Register ( <i>tulorekisteri</i> ), the electronic database of income information, located <u>here</u> . This report replaces the previous monthly and annual information returns. The employer must deliver a salary record payslip ( <i>palkkalaskelma</i> ) to employees by the date of payment of the compensation.
	For pre-2019 income, information on reporting can be found on this website <u>here</u> .
	Reporting deadline: the report to the National Income Register must be filed within 5 days of payment of the compensation.
	Payment of tax: withheld tax and social security contributions are generally paid by the 12th day of the month following the dates of payment of the compensation.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



France	
Transc	
Taxable Moments	Payment of cash: Income tax (plus exceptional tax surcharge), CSG and CRDS and social security.
Income tax (maximum rate)	45% (2024) plus exceptional tax surcharge and social taxes. Any change in tax rates usually takes effect from 1 January.
Income tax rates	Income tax rates are progressive up to 45%. <b>Exceptional tax surcharge:</b> 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. <b>CSG and CRDS:</b> 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.
Employer income tax withholding	Yes
Social security withholding	Yes, the employer must withhold CSG and CRDS, and the employee social security contributions.
Employee social security	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.  Employee social security (cap): various caps apply to contributions. Any amount in excess of the annual threshold (EUR370,944 for 2024) is subject to an uncapped rate of 10.10% (including CSG and CRDS) of the gross compensation.
Employer social security	Employer social security (max rate): the average social security contribution rate is between 45% and 50% of the gross gain. Remuneration paid by financial institutions is also subject to a tax on salaries (between 4.25% and 13.60%). The employer social security contributions are deductible for corporate income tax purposes.  Employer social security (cap): various caps apply. Any amount in excess of the annual threshold (EUR370,944 for 2024) is subject to an uncapped rate of 25%.
Tax reporting - Individual	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.  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.  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.  Tax period: 1 January to 31 December.  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 filling.  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.



Tax reporting - Employing company	The employer is required to report taxable income on the employee's payslip for the month in which the taxable event occurs and to withhold income tax and social security contributions (including CSG and CRDS) and pay the withheld amounts to the French tax authorities. To comply with the withholding obligations, foreign companies employing French tax residents directly (rather than through a French subsidiary) must register with the French tax authorities and may be required to appoint a withholding tax agent and set up a bank account in the SEPA zone (EU/EEA, Monaco, San Marino and Switzerland).  Additional reporting obligations apply to tax-qualified incentive plans which are not subject to withholding.  Report name: the monthly wage tax return, Déclaration Sociale Nominative (DSN). Tax-qualified options granted or exercised, and qualified free shares granted or vested, are also reported in the DSN.  DSN returns are filed online. The DSN return can be downloaded from the website here.  Reporting deadline: filing deadlines apply to the month following the relevant monthly payroll (references to employee numbers are to employees of the French employer):  • for employers with 50 employees or more: the DSN must be filed by the 5th day of the month,  • for employers with fewer than 50 employees: the DSN must be filed by the 15th day of the month.  Payment of tax: most employers pay tax and social security monthly (for the previous month). The due dates are:  • for employers with 50 employees or more: tax and social security must be paid by the 8th day of the month;  • for employers with fewer than 50 employees: tax and social security must be paid by the 18th day of the month;  • employers with fewer than 50 employees; tax and social security must be paid by the 18th day of the month;  • employers with fewer than 11 employees, have the option to pay taxes on a quarterly basis.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Germany	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	47.475% (2024) includes solidarity surcharge but excludes church taxes. Any change in tax rates usually takes effect from 1 January.
Income tax rates	Income tax rates are progressive with a top rate of 45%. In addition, depending on total income and individual circumstances, some taxpayers pay a solidarity surcharge (a tax on individual income tax) of up to 5.5%, which results in a combined maximum tax rate of 47.475%. Members of certain churches also pay a church surcharge of 8% or 9%, taking the maximum tax rate for some taxpayers to 51.525%.
Employer income tax withholding	Yes
Social security withholding	Yes Employee social security. Employer social security. Employer must withhold the employee contribution.
Employee social security	Employee social security (max rate): 21.05% (2024) (combined rates covering pension insurance, unemployment insurance, health insurance (including average additional contribution) and compulsory long-term care insurance ( <i>Pflegeversicherung</i> ) for employees without children).  Employee social security (cap): EUR90,600 (2024) (pension scheme and unemployment insurance) in the old Federal States (EUR89,400 in the new Federal States); EUR62,100 (2024) (health insurance and compulsory long-term insurance) in all Federal States. This is the annual limit of income subject to social security contributions; income exceeding the cap will not be subject to social security contributions.
Employer social security	Employer social security (max rate): 20.51% (2024) (combined rates covering pension insurance, unemployment insurance, health insurance (including average additional contribution), compulsory long-term care insurance ( <i>Pflegeversicherung</i> ) and the charge to the insolvency fund). Employers must also pay accident insurance. The contribution level depends on the industry/sector.  Employer social security (cap): EUR90,600 (2024) (pension scheme and unemployment insurance) in the old Federal States (EUR89,400 in the new Federal States); EUR62,100 (2024) (health insurance and compulsory long-term insurance) in all Federal States.
Tax reporting - Individual	Yes, the employee must file an annual return (generally, unless the employee only receives salary subject to wage tax withholding and has no other income). There is no specific filing in relation to equity related incentives.  Report name: Annual Tax Return. Capital gains and dividends are reported on attachments to the Annual Return. The return must be filed online. The tax return can be prepared using the tax authorities' 'elster' platform here.  Tax period: 1 January to 31 December.  Reporting deadline: 31 July (in respect of the prior calendar year). The deadline is extended to the end of February in the following year, if the return is prepared by a certified tax adviser.  Payment of tax: the due date for payment will be set by the tax authority (depending on the date of the final assessment).



Tax reporting - Employing company	The employer must report the employees' incentive related income but the filing covers all employee benefits and is not specific to equity related incentives.  Wage tax withholding returns and social security payments must be filed monthly.  Report name: monthly tax return (Lohnsteueranmeldung). The return must be filed electronically, using proprietary programs available by different providers or through the tax authorities' 'elster' platform here. German employers must also produce a wage tax certificate (Lohnsteuerbescheinigung) containing information about the calendar year income, as well as information on social security contributions. The wage tax certificate, which must include employee benefits, must be sent electronically to the tax authority at which the employer is registered, with a copy to the employee.  Reporting deadline: the monthly tax return is filed by the 10th of the month following the taxable event. Any exercises after the month-end are reported in the following monthly tax return. Social security withholdings are reported by the fifth last bank working day of the current month. Any exercises after this day are reported in the following monthly tax/social security report. The wage tax certificate must be filed by the last day in February after the end of the previous tax year.  Payment of tax: employers are required to pay wage tax withholdings to the tax authority by the 10th of the month following the taxable event. Social security
Malus and Clawback - Individual	withholdings are paid by the third last bank working day of the current month.  The existence of a malus or clawback clause does not affect the moment of tax for the individual.  Where malus/clawback is exercised and shares are re-transferred from the employee to the company, the employee incurs tax deductible expenses equal to the value of the transferred shares minus compensation (if any).



Hong Kong	
Taxable Moments	Payment of cash: Salaries tax and social security (MPF contribution).
Income tax (maximum rate)	17% (2024/25). Any change in tax rates usually takes effect from 1 April.
Income tax rates	There are two ways to compute the salaries tax in Hong Kong. Taxpayers can pay tax on their net chargeable income (assessable income less deductions and allowances) at progressive rates ranging from 2% to 17%, or at a flat rate of 15% on net income (assessable income less deductions), whichever is the lower.
Employer income tax withholding	No
Social security withholding	Yes (the Mandatory Provident Fund unless the cap has been met). Both employer and employee social security applies. Employer must withhold the employee contribution.
Employee social security	Employee social security (max rate): 5% Mandatory Provident Fund (MPF) contribution.  Employee social security (cap): HKD1,500 per month.  There are no social security taxes in Hong Kong. However, there is a requirement for both employers and employees to make contributions into the MPF, designed for retirement protection. An employee is required to contribute 5% of monthly income, which is matched by the employer. The maximum aggregated mandatory contribution is HKD3,000 per month. The employee's contribution is withheld at source from their monthly income.  Note: contributions into the MPF are paid on salary or cash income (up to the cap) and are not payable on equity plan income.
Employer social security	Employer social security (max rate): 5% Mandatory Provident Fund (MPF) contribution.  Employer social security (cap): HKD1,500 per month.  Note: contributions into the MPF are paid on salary or cash income (up to the cap) and are not payable on equity plan income.
Tax reporting - Individual	Yes  Report name: Individual Tax Return (BIR60). The assessable value of a share award will be included in the annual Employer's Return (Form IR56B), a copy of which must be delivered to the employee by the employer. A separate return (IR56F or IR56G) must be delivered to employees leaving employment or departing from Hong Kong. The return can be filed online.  Forms and information can be accessed through the Inland Revenue Department (IRD) website <a href="here">here</a> .  Tax period: 1 April to 31 March.  Reporting deadline: Individual Tax Returns are usually issued in early May of each year and must be lodged within 1 month (2 months if filing electronically for assessment year 2023/24) from the date of issue unless an extension request is submitted and approved by the IRD. If the individual does not receive the required tax return form, they must notify the IRD in writing about their assessable income within four months of the end of the tax year (i.e. by 31 July).  Payment of tax: tax will normally be paid in two instalments between January and April of the following year. The dates are notified by the Commissioner of Inland Revenue in an assessment notice. Estimated (provisional) tax payments are made during the current year. On departure from Hong Kong, the participant may elect for a deemed exercise of options or a deemed vesting of other awards. If an election is made, tax is paid based on the current share price and no later tax is due.



Tax reporting - Employing company	Yes, the employer is required to report grants of options and vesting. Although other types of share awards are not reported as gains realised under a share option plan, they should be reported under the category of perquisites (i.e. benefits) at the time the benefit is derived by the employees (e.g. on purchase for a share purchase plan).  Report name: Employer's Returns of Remuneration and Pensions (Form BIR56A) is issued to employers by the IRD on 1 April and must be filed along with the Annual Employer's Return (Form IR56B). The employer must report share awards (number and the fair market value) granted to the participant during the year of assessment in the annual Employer's Return. The filing date is usually 30 April, unless an extension request is submitted and approved by the IRD. A copy of the Employer's Return must be provided to the employee. The return can be filed online.
	Additional returns for employers:
	Commencement Notification Form (Form IR56E): the employer is required to disclose the number of share awards granted (but not yet exercised) to the participant on Form IR56E. The form is for new employees and has to be filed within 3 months of commencement of employment or assignment in Hong Kong.
	Cessation Notification Form (Form IR56F) to be filed one month before the date of termination of employment.
	• <b>Departure Notification Form (Form IR56G)</b> in the case of departure from Hong Kong permanently or for a period in excess of one month (the notification is not required for employees who are required to leave Hong Kong at frequent intervals in the course of their employment). Two copies of the form have to be filed one month before the anticipated departure date.
	Forms and information can be accessed through the Inland Revenue Department website <u>here</u> .
	Reporting deadline: see above.
	<b>Payment of tax</b> : usually the employer is not responsible for withholding and payment of tax. If the employee is about to leave Hong Kong, detailed compliance rules, including withholding requirements, apply.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Hungary	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	15% (2025). Any change in tax rates usually takes effect from 1 January.
Income tax rates	A flat tax of 15% is levied on most income.
Employer income tax withholding	Yes
Social security withholding	Yes Employee social security contributions and employer social contribution tax. Employer must withhold the employee social security contributions.
Employee social security	The type of social security tax (social security contributions or employee social contribution tax) payable by an employee in respect of equity incentive income, will depend on the employment structure and the nature of the plan.  As a general rule, foreign sourced income (unless there is a recharge or the local Hungarian employer acts as a paying agent) will be subject to employee social contribution tax, payable by the employee with no employer withholding. No social security contributions or employer social contribution tax will be payable.  Employee social security (max rate):  Social security contributions:  Rate: 18.5% (covers pension, health insurance and unemployment). The employee social security contributions are withheld by the employer.  Cap: no cap  Employee social contribution tax:  Rate: 13%  Cap: the social contribution tax, payable on investment income for an employee, is payable until the individual's income (including the value of the relevant award) exceeds 24 times the statutory monthly minimum wage, which is HUF290,800 per month in 2025.
Employer social security	Where equity incentive income is treated as foreign source income (unless there is a recharge or the local Hungarian employer acts as a paying agent) no employer social contribution tax will be payable (see 'Employee social security').  Employer social security (max rate): 13% social contribution tax.  Employer social security (cap): no cap.
Tax reporting - Individual	The employee must file an annual return. There is no specific filing in relation to equity related incentives.  Report name: Annual Tax Return. Capital gains and dividends are reported on the same return. The return can be filed online. The tax return can be downloaded from the website here.  Tax period: 1 January to 31 December.  Reporting deadline: the tax return is due to be filed by 20 May in the following tax year but taxpayers can request an extension, up to 20 November, from the tax authorities.  Payment of tax: taxpayers who have received income that is not subject to withholding, must generally make quarterly tax advance payments (for employment income) by the 12th day of the month following the end of the quarter. Income from capital gains and dividends should be reported in the annual tax return and any tax due paid when the tax return is filed.



Tax reporting - Employing company	The employer is not required to report unless it acts as the paying agent, which would include situations where there is a recharge of the equity plan costs from the parent company to the local employer and where a cash plan award is settled via local payroll. If applicable, the employer must report the employees' incentive related income but the filing covers all employee benefits and is not specific to equity related incentives.  Report name: Monthly Tax Report.  Reporting deadline: monthly payments and Monthly Tax Reports reporting are due by the 12th day of the month following taxable event.  Payment of tax: withheld tax and social security contributions are paid at the same time that the Monthly Tax Report is filed.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



India	
Taxable Moments	Payment of cash: Income tax. No social security.
Income tax (maximum rate)	42.74%/39% (new regime) (2024/25) including maximum surcharge and Health and Education Cess. Any change in tax rates usually takes effect from 1 April.
Income tax rates	Income tax payable at progressive rates up to 30%, adjusted up to 39% under the new tax regime, or up to 42.74% under the old tax regime. Following changes introduced in April 2023, the new tax regime (with no deductions/exemptions) is now the default regime, although taxpayers can elect to be taxed under the old tax regime. The maximum general effective tax rate (ETR) including the maximum surcharge and the Health and Education Cess is either:
	• new tax regime: 39% (maximum surcharge capped at 25%); or
	• old tax regime: 42.74% (maximum surcharge of 37%).
	Surcharge: in addition to income tax, taxpayers must contribute a surcharge on the income tax, which is calculated as follows:
	• exceeding INR5million up to INR10million: 10%
	• exceeding INR10million up to INR20million: 15%
	exceeding INR20million up to INR50million: 25%
	exceeding INR50million: 37% (old tax regime) or 25% (new tax regime).
	<b>Health and Education Cess</b> of 4% of the total income tax, plus surcharge, is also payable.
Employer income tax withholding	Yes
Social security withholding	No No
Employee social security	Employee social security (max rate): 12% Employee social security (cap): no cap. Note: social security is only paid on salary/wages and is not payable on incentive plan income.
Employer social security	Employer social security (max rate): 12%
Employer Social Security	Employer social security (cap): no cap.
	Note: social security is only paid on salary/wages and is not payable on incentive plan income.
Tax reporting - Individual	The employee must file an annual tax return. Equity related incentive income is included in the Statement of Perquisites (Form 12BA). The filing is not specific to equity related incentives.
	The employee must report all worldwide income and foreign assets to the relevant tax authority.
	Participants should receive a Tax Collected at Source (TCS) certificate from the Authorised Dealer Bank for TCS paid on outward remittances under the Liberalised Remittance Scheme (LRS).
	<b>Report name</b> : Income Tax Return. The specific tax return will depend on the employee's income. The employee should use the Tax Deducted at Source (TDS) certificate (Form 16) and Form 12BA (statement showing particulars of perquisites, other fringe benefits or amenities and profits in lieu of salary) provided by the employer to complete their annual tax return. Foreign assets and income are reported on Schedule FSI of Form ITR-2.
	For most individuals, digital filing of income tax returns is mandatory. To file online, individuals must register on the e-filing website of the Income Tax Department and, once registered, the filing process is also through the e-filing website here.
	Tax period: 1 April to 31 March.
	<b>Reporting deadline</b> : the employer must deliver Form 16 and Form 12BA to employees by 15 June following the end of the tax year, and individual tax returns must be filed by 31 July.
	Payment of tax: any unpaid tax must be paid on or before the due date for filing the income tax return.



Tax reporting - Employing company	The employer must report employees' equity related incentives in the Statement of Perquisites (Form 12BA). The filing covers all employee benefits and is not specific to equity related incentives.
	Report name: the employer must:
	• file quarterly Tax Deducted at Source (TDS) certificates (Form 24Q), reporting tax withheld to the TIN Facilitation Centres or online here; and
	<ul> <li>deliver to each employee the annual TDS certificate (Form 16) and Form 12BA to enable employees to complete their individual income tax returns. Employers are not required to deliver a Form 16 certificate to employees who earn below IRN250,000 and are not subject to income tax withholding.</li> </ul>
	Returns can be filed online and can be downloaded from the website <u>here</u> .
	Reporting deadline:
	<ul> <li>quarterly TDS certificates must be filed by 31 May (for the quarter ending 31 March); 31 July (for the quarter ending 30 June); 31 October (for the quarter ending 30 September); 31 January (for the quarter ending 31 December); and</li> </ul>
	Form 16 and Form 12BA must be issued to employees on or before 15 June following the end of the relevant tax year.
	Payment of tax: TDS (income tax withholdings) must be paid to the income tax authority by the 7th of the following month (e.g. TDS deducted by the employer in October must be deposited with the income tax authority on or before 7 November). Social security is not payable on incentive plan income. For wage income, social security contributions are reported monthly and must be remitted by the employer to the Employees' Pension Fund within 15 days of the close of every month (e.g. for January, the due date is 15 February).
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Indonesia	
Taxable Moments	Payment of cash: Income tax. No social security.
Income tax (maximum rate)	35% (2024). Any change in tax rates usually takes effect from 1 January.
Income tax rates	Tax rates are progressive. In 2024, the maximum tax rate applies to annual taxable income over IDR5Billion.
Employer income tax withholding	Yes
Social security withholding	No
Employee social security	<ul> <li>Employee social security (max rate):</li> <li>Manpower Social Security (Badan Penyelenggara Jaminan Sosial or BPJS Ketenagakerjaan), there are two rates applicable:</li> <li>Old-Age Scheme: 2%;</li> <li>Pension Security Scheme: 1%; and</li> <li>Healthcare Scheme (BPJS Kesehatan): 1%</li> <li>The contribution covers a family of five but additional family members may be covered for an additional premium.</li> <li>Employee social security (cap):</li> <li>Manpower Social Security: no cap for the old-age scheme, however, the maximum contribution to the Pension Security Scheme is 1% of IDR10,042,300 (IDR100,423) per month as of March 2024;</li> <li>Healthcare Scheme: maximum contribution is 1% of IDR12,000,000 (IDR120,000) per month.</li> </ul>
Employer social security	<ul> <li>Employer social security (max rate):</li> <li>Manpower Social Security (Badan Penyelenggara Jaminan Sosial Ketenagakerjaan), there are four rates applicable:</li> <li>Old-Age Scheme: 3.7%;</li> <li>Death Security Scheme: 0.3%;</li> <li>Workplace Security Scheme: 0.24% to 1.74% for employees that are not registered with Unemployment Security (i.e. a new form of security with a contribution that is borne by the government) and 0.10% to 1.60% for employees that are registered with Unemployment Security;</li> <li>Pension Security Scheme: 2%;</li> <li>Healthcare Scheme (BPJS Kesehatan): 4%.</li> <li>Employer social security (cap):</li> <li>Manpower Social Security: no cap for the old-age scheme, however, the maximum contribution to the Pension Security Scheme is 2% of IDR10,042,300 (IDR100,423) per month as of March 2024;</li> <li>Healthcare Scheme: maximum contribution is 4% of IDR12,000,000 (IDR480,000) per month.</li> </ul>



Tax reporting - Individual	There is no specific filing in relation to equity related incentives, the annual return must list all of the assets of the employee including their ownership of equity interests.  Report name: Annual Income Tax Return (Surat Pemberitahuan Pajak Tahunan) (SPT) 1770, SPT 1770 S or SPT 1770 SS, depending on the annual income of the employee.  The return can be filed online. The tax return can be downloaded from the website here.
	Tax period: 1 January to 31 December.  Reporting deadline: the annual tax return must be filed by 31 March.
	Payment of tax: by the end of March (before filing the tax return).
Tax reporting - Employing company	The employer must report the employees' incentive related income but the filing covers all employee benefits and is not specific to equity related incentives.  Report name: employers are required to:  issue a withholding Article 21 Income Tax receipt using Article 21 Income Tax e-SPT application;  pay withholding Article 21 Income Tax using a billing code with MAP Code 411121 and Payment Type Code 100; and  file a Periodic Article 21 Income Tax Return online or through a designated official Tax Application Service Provider.  In addition, the employer must deliver a tax certificate to employees annually.  The return can be downloaded and filed online from the website here.  Reporting deadline: the monthly report must be filed by the 20th day of the following month and tax withheld must be paid by the 10th day of the following month.  Payment of tax: see above.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Israel	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	50% (2024). Any change in tax rates usually takes effect from 1 January.
Income tax rates	Tax rates are progressive up to 47%. In addition, an individual whose annual income (from any source) exceeds ILS721,560 (2024) will pay an additional 3% surtax on any income over that amount. This takes the maximum income tax rate to 50%.
Employer income tax withholding	Yes
Social security withholding	Yes Employee social security. Employer social security. Employer must withhold the employee contribution.
Employee social security	Employee social security (max rate): 12% (combined rate for national insurance and health insurance). Employee social security (cap): maximum monthly compensation amount for social security tax payments is ILS49,030 (2024).
Employer social security	Employer social security (max rate): 7.6% Employer social security (cap): maximum monthly compensation amount for social security tax payments is ILS49,030 (2024).
Tax reporting - Individual	Yes (unless the employee is exempt under law). Additional reporting may be required if there is no withholding (e.g. on dividend payments or capital gains). There is no specific filing in relation to equity related incentives.  Report name: Annual Tax Return. Capital gains and dividends, for which no tax was withheld, will have to be reported on an additional form. The return can be filed online subject to certain conditions. The tax return and form can be downloaded from the Israel Tax Authority (ITA) website <a href="here">here</a> .  Tax period: 1 January to 31 December.  Reporting deadline: tax returns must be filed by 31 May following the calendar year (subject to certain possible extensions, including routine extensions approved by the ITA or specific extensions approved for lawyers and CPAs who represent clients and file tax returns on their behalf). Not all taxpayers are required to file annual tax returns as various exemptions apply. Taxpayers are required to report gains from the sale of marketable securities from which no tax was withheld on bi-annual reporting dates of 31 January and 31 July. Taxpayers are required to report dividends received when filing the tax return  Payment of tax: any unpaid income tax and/or dividend tax is due upon filing or as demanded by the ITA. A down-payment on account of any capital gains tax must be made on each of the bi-annual reporting dates (see above).



Tax reporting - Employing company	Yes, the employer is required to report incentive related income. There is a specific filing for equity related incentives (both tax qualified plans (trustee) and non-trustee plans).  Reports regarding grants: technically there are quarterly and annual filing requirements for share plans. The filings were suspended pending the introduction of an electronic filing system which is due to be in place from 1 January 2025:
	• Form 146 - Quarterly report: detailing grants made during the previous quarter and required to be filed within 120 days of the end of the quarter during which an award was granted: and
	• Form 156 - Annual report: detailing the grant activity and the status of any outstanding grants during the previous calendar year (filing date is 30 April).
	Reports regarding tax: an employer is required to file Form 102 (reporting income realised by the employees in accordance with Section 102 of the Israeli Income Tax Ordinance) with the ITA by the 16th day of each month. Such form shall include information regarding the salaries paid to employees (including any amounts paid or received under an incentive plan from which the employer is required to withhold tax) in the preceding month and tax amounts withheld from such salary payments. The withholding tax is remitted on the same date. In addition, the employer is required to record payments to employees and the tax withheld from such payments in Form 101 within 1 week from the payment date. By 31 March of each year, an employer is also required to file Form 126, detailing salaries paid and tax withheld with respect to the previous tax year. These forms are filed routinely online by the accounting team of the Israeli company.
	The employer must deliver the employee's annual report Form 106 (which provides information regarding annual salaries paid to the employee and the annual tax deducted from such payments), to employees by 31 March each year.
	Payment of tax: withheld tax and social security contributions are paid monthly.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Italy	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	47.53% (2024) including maximum regional and municipal taxes. Any change in tax rates usually takes effect from 1 January.
Income tax rates	State income tax is levied at progressive tax rates on all income. Starting from fiscal year 2024, the following brackets apply:  • EUR 0 - 28,000: 23%  • EUR28,001 - 50,000: 35%  • Over EUR50,000: 43%  In addition:  • regional taxes of up to 3.33% and municipal taxes of up to 1.2% may apply; and  • 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).
Employer income tax withholding	Yes
Social security withholding	Yes Employee social security. Employer social security. Employer must withhold the employee contribution.
Employee social security	<ul> <li>Employee social security (max rate): approximately 10%.</li> <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> <li>Employee social security (cap): for employees with no social security record prior to 1 January 1996, pension fund contributions are capped at gross income of EUR119,650 (2024). The same cap applies to non-employee directors.</li> </ul>
Employer social security	<ul> <li>Employer social security (max rate): approximately 30%.</li> <li>The actual rate depends on the employee's position in the company (worker, executive, manager) 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> <li>Employer social security (cap): for employees with no social security record prior to 1 January 1996, pension fund contributions are capped at gross income of EUR119,650 (2024). Minor contributions (e.g. unemployment, sickness, maternity, etc.) are not capped (approximately 3%).</li> </ul>



Tax reporting - Individual	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.
	Foreign assets must also be reported to the tax authorities.
	<b>Report name</b> : Annual Tax Return ( <i>Modello Redditi PF</i> ). 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 <u>here</u> . Starting from the tax return for 2023 (electronically filed in 2024), form RW can be included in the simplified tax return (form 730).
	<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.
	<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.
Tax reporting - Employing company	The employer must report the employees' incentive related income but the filing covers all employee benefits and is not specific to equity related incentives.
	Withholding returns and social security payments must be filed monthly.
	Report name: Annual Statement of Compensation (Certificazione Unica).
	The return can be filed online. The return can be downloaded from the website <u>here</u> .
	Reporting deadline:
	• Monthly: reporting should be made in the employees' monthly payslip (usually delivered on the 28th of the same month).
	• Annual: Annual Statement of Compensation to be delivered to the employee and submitted to Italian tax authorities by 16 March following the relevant tax period.
	Payment of tax: withheld tax and social security must be paid to the tax authorities, by the employer, by the 16th of the following month.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Japan	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	55.945% (2024). Any change in tax rates usually takes effect from 1 January.
Income tax rates	National income tax rates are progressive up to 45%. The maximum income tax rate of 55.945% includes local income tax of 10% and the 2011 earthquake recovery surcharge of 2.1%, which is assessed on the taxpayer's national income tax.
Employer income tax withholding	Yes, if the payment is paid through the local payroll.
Social security withholding	Yes, employee and employer contributions. Employer withholds employee contributions.
Employee social security	Employees pay contributions for health, nursing care, pensions and unemployment insurance. Various rates, caps, adjustments and exceptions apply, depending on factors including the location of the head office of the company, the size of the company, the kind of business conducted by the company and the insurance cover used by the company. The following rates apply where the employer's office is located in Tokyo or the head office makes a lump sum application at the Tokyo rate, and assumes the employees are general office workers (lower rate) or construction workers (higher rate).  Employee social security (max rate): for fiscal year 2024 (i.e. from 1 April 2024 to 31 March 2025) approximately:  15.54% (office)  15.64% (construction).  Employee social security (cap): various caps, adjustments and exceptions apply.
Employer social security	Employers pay contributions for health, nursing care, pensions, unemployment insurance and workers' accident compensation insurance. Various rates, caps, adjustments and exceptions apply, depending on factors including the location of the head office of the company, the size of the company, the kind of business conducted by the company and the insurance cover used by the company. The following rates apply where the employer's office is located in Tokyo or the head office makes a lump sum application at the Tokyo rate, and assumes the employer conducts general office business (lower rate) or construction business (higher rate).  Employer social security (max rate): for fiscal year 2024 (i.e. from 1 April 2024 to 31 March 2025), approximately:  • 16.55% (office)  • 17.40% (construction).  Employer social security (cap): various caps, adjustments and exceptions apply.
Tax reporting - Individual	Generally yes. If the plan benefits are paid through the local employer and are subject to Japanese withholding tax, employees resident in Japan whose annual gross salary receipt amount (including the amount of salaries other than the plan benefits) is JPY20million or less and whose income, other than salary income and retirement income, for that year is JPY200,000 or less, are not required to file annual tax returns.  There is no specific filing in relation to equity related incentives.  Individuals are required to report foreign held assets if those assets have a market value (or estimated value as an alternative) over JPY50million as of 31 December.  Report name:  • Annual Tax Return. The return can be filed online. The tax return can be downloaded from the website here;  • Foreign assets reports are filed physically or electronically on the Foreign Assets Report website (Kokugai Zaisan Cho-sho) here.  Tax period: 1 January to 31 December.  Reporting deadline: tax returns must be filed by 15 March of the subsequent year. Foreign asset reports must be filed by 30 June of the subsequent year.  Payment of tax: any unpaid income tax is due by the date of filing the tax return.



Tax reporting - Employing company	Yes, Japanese subsidiaries that are owned 50% or more by a foreign company and Japanese branches of foreign entities must file a statement to the national tax office if resident or non-resident directors or employees exercise stock options issued by the foreign parent entity or receive income as a result of stock-based incentives offered by that foreign entity. In the case of reports on non-resident directors or employees, reportable income is limited to Japanese sourced income.  Report name: Form 9(3) of Ordinance for Enforcement of the Income Tax Act. The return can be filed online. The return can be downloaded from the website here.  Reporting deadline: 31 March of the year following the receipt of an economic benefit (i.e. exercise, vesting or purchase).
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Korea, South	
Taxable Moments	Payment of cash: Income tax and social security (if any).
Income tax (maximum rate)	49.5% (2024) including local income tax. Any change in tax rates usually takes effect from 1 January.
Income tax rates	The maximum progressive tax rate is 45% which is payable on a tax base over KRW1,000million. Local income tax brings the top rate up to 49.5%.
Employer income tax withholding	Yes, if the plan benefits are paid through local payroll or there is a recharge.
Social security withholding	Yes, if the plan benefits are paid through local payroll or there is a recharge.
Employee social security	<b>Employee social security (max rate)</b> : 9.404% (if all components are applicable). Social security consists of national pension, national health insurance premium and employment insurance, each of which has different rates. The max rate above is the sum of all social security rates.
	<b>Employee social security (cap)</b> : monthly salary cap depends on component. Monthly salary cap for national pension and national health insurance premium are KRW 6,170,000 and KRW 119,625,106, respectively, and there is no monthly salary cap for the employment insurance.
Employer social security	<b>Employer social security (max rate)</b> : up to 10.254% (if all components are applicable), depending on number of employees. Plus industrial accident compensation insurance (ranges from 0.59% to 18.62% depending upon the industry).
	<b>Employer social security (cap)</b> : monthly salary cap depends on component. Monthly salary cap for national pension and national health insurance premium are KRW 6,170,000 and KRW 119,625,106, respectively, and there is no monthly cap for the employment insurance and industrial accident compensation insurance.
Tax reporting - Individual	Yes, if not already subject to withholding by employer, including any dividends and capital gains.
	Korean residents are required to report foreign held assets to the tax authority, if those assets have a value over the equivalent of KRW0.5billion in an offshore account (including bank accounts and brokerage accounts), with a foreign financial company as at the end of any month in any given year.
	Report name:  • Individual Comprehensive Annual Tax Return;
	Capital Gains Tax Return; and
	• foreign assets are reported on Form 45 - Report of Foreign Bank and Financial Accounts.
	Tax period: 1 January to 31 December.
	Reporting deadline:
	Individual Comprehensive Annual Tax Return: 31 May;
	Capital Gains Tax Return: 31 May; and
	Form 45 - Report of Foreign Bank and Financial Accounts: 30 June.
	<b>Payment of tax</b> : Class B income taxes can be declared and paid annually by the individual or monthly through a licensed taxpayers' association. If a tax return is required, tax is paid by 31 May of the following year.



Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.
	Payment of tax: employers are required to pay withheld tax and social security insurance contributions to the relevant tax authority by the 10th day of the following month.
	• Transaction Statement of Overseas Share-based Compensation: 10 March of the year following taxation. This reporting is applicable to taxable events on or after 1 January 2024 and the first reporting deadline will be 10 March 2025.
	Monthly Withholding Tax Return: 10th day of the following month. The employer is required to perform a year-end payroll tax settlement by 10 March of the year following taxation; and
	Reporting deadline:
	Transaction Statement of Overseas Share-based Compensation.
	Monthly Withholding Tax Return; and
	Report name:
	New share based compensation reporting came into effect on 1 January 2024. The report covers details of the grant, exercise and payment of share-based compensation; the expected income due to the grant, exercise or payment; and details of the Korean resident officers and employees receiving the share based compensation.
Tax reporting - Employing company	Yes



Kuwait	
Taxable Moments	Payment of cash: No income tax. Social security.
Income tax (maximum rate)	None
Income tax rates	There is no personal income tax in Kuwait.
Employer income tax withholding	No
Social security withholding	Yes, for Kuwaiti employees, both employer and employee social security applies. For foreign employees, terminal indemnity payments may apply.  There is no requirement for the employer to withhold the employee contribution.
Employee social security	Under the Social Securities Laws, monthly salary received by employees in the private and oil sectors is divided into:  • Basic Salary: the total wage received by an employee as salary under the Labour Law of the Private Sector No. 6/2010, up to a maximum amount of KWD1,500; and  • Complementary Salary: the amount of monthly salary exceeding KWD1,500 up to a maximum amount of KWD1,250.  Employee social security (max rate): 10.5% of monthly salary divided as follows:  • 5% of Basic Salary and Complementary Salary for the Old-age, Disability, Sickness and Death Fund;  • 2.5% of Basic Salary and Complementary Salary for the Retirement Pensions Increment Fund;  • 0.5% of Basic Salary and Complementary Salary for the Unemployment Insurance Fund (paid by employees not exceeding 60 years of age); and  • 2.5% of Basic Salary for the Financial Remuneration Fund (suspended after 18 years of contributions).  Employee social security (cap): the maximum employee contribution is KWD257.50 per month (calculated on the basis of 8% of monthly salary up to a ceiling of KWD2,750 and 2.5% of monthly salary up to a ceiling of KWD1,500).  There are no social security obligations for expatriate workers (except GCC citizens). Foreign and national employees are generally entitled to end of service indemnity payments.
Employer social security	Employer social security (max rate): 11.5% of monthly salary, divided as follows:  10% of Basic Salary and Complementary Salary for the Old-age, Disability, Sickness and Death Fund;  1% of Basic Salary and Complementary Salary for the Retirement Pensions Increment Fund;  0.5% of Basic Salary and Complementary Salary for the Unemployment Insurance Fund.  Employer social security (cap): capped at monthly salary of KWD2,750. The maximum employer contribution is KWD316.25 per month.
Tax reporting - Individual	None
Tax reporting - Employing company	The employer must file an annual return. There is no requirement to report employee income.  Report name: Annual Tax Accounts.  Reporting deadline: within 3 months and 15 days of Fiscal year end.  Payment of tax: social security contributions are paid monthly.
Malus and Clawback - Individual	There is no direct personal taxation in Kuwait.



Lebanon	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	25% (2024). Any change in tax rates usually takes effect from 1 January.
Income tax rates	Rates are progressive from 2% to 25%.
Employer income tax withholding	Yes
Social security withholding	Yes
Employee social security	Employee social security (max rate): 3% (medical scheme contribution).  Employee social security (cap): earnings caps apply and the current cap should be checked as the amounts are affected by the prevailing LBP/USD exchange rate.
Employer social security	Employer social security (max rate):  • Family scheme: 6%;  • Medical scheme: 8%; and  • Termination Indemnity scheme: 8.5%  Employer social security (cap): earnings caps apply (family scheme and medical scheme only) and the current cap should be checked as the amounts are affected by the prevailing LBP/USD exchange rate.
Tax reporting - Individual	Yes, if the individual has income which has not been withheld by the employer. There is no specific filing for equity related incentives  Report name: Annual Tax Return.  Tax period: 1 January to 31 December.  Reporting deadline: the deadline for filing the tax return is 31 March of the following year.  Payment of tax: the deadline for the payment of tax is the same as the reporting deadline.
Tax reporting - Employing company	The employer must report the employees' incentive related income but the filing covers all employee benefits and is not specific to equity related incentives.  Report name:  • Annual Declaration in respect of employees; and  • payroll returns.  Reporting deadline: the Annual Declaration is due by 28 February of the following year.  Payroll taxes must be withheld monthly and reported to the authorities on a quarterly basis during the first 15 days of the month following the end of the quarter.  Payment of tax: the deadline for the payment of tax is the same as the reporting deadline.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Malaysia	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	30% (2025). Any change in tax rates usually takes effect from 1 January.
Income tax rates	Tax rates are progressive from 1% to 30%. The top rate of tax applies to income over MYR2million.
Employer income tax withholding	Yes
Social security withholding	Yes, SOCSO and Employees Provident Fund (EPF) contributions are payable, if the cash award constitutes wages.
Employee social security	Employees' Provident Fund (EPF) is a compulsory pension scheme.
	Contributions by employee: 11%. For employees aged 60 and above, the contribution is reduced to 5.5% (permanent residents) or 0% (Malaysian citizens). EPF payments are not compulsory for expatriates and their employers.
	SOCSO offers two insurance schemes: the Employment Injury Scheme (EIS) and the Invalidity Scheme (IS) which cover Malaysian citizens and permanent residents only. The rate of the employer's contribution is 1.75% of the employee's monthly wage for both schemes (1.25% for EIS and 0.5% for IS) while the employee contributes 0.5% to the IS only. The contributions are based on the employee's monthly wages and are capped at a maximum of MYR104.15 for the employer and MYR29.75 for the employee.
Employer social security	Employees' Provident Fund (EPF) is a compulsory pension scheme.  Contributions by employers:  13% (for employees earning MYR5,000 and below a month); and  12% (for employees earning above MYR5,000 a month).  For employees aged 60 and above, the contribution by employers is reduced from 6% to 4% (for Malaysian citizens) and from 13% to 6.5% (for permanent residents earning MYR5,000 and below a month) or from 12% to 6% (for permanent residents earning above MYR5,000 a month). EPF payments are not compulsory for expatriates and their employers.  Note: generally, there is no EPF payment in relation to equity-based awards, as EPF is only payable on wages. To ensure that the share income under a particular plan does not constitute wages for the purposes of the EPF Act, the employer can seek a confirmation from the EPF Board.  SOCSO offers two insurance schemes: the Employment Injury Scheme (EIS) and the Invalidity Scheme (IS) which cover Malaysian citizens and permanent residents only. The rate of the employer's contribution is 1.75% of the employee's monthly wage for both schemes (1.25% for EIS and 0.5% for IS) while the employee contributes 0.5% to the IS only. The contributions are based on the employee's monthly wages and are capped at a maximum of MYR104.15 for the employer and MYR29.75 for the employee. The employer makes a Second Category contribution to EIS only (capped at MYR74.40 per month) for employees who are not eligible to be covered under the IS.
Tax reporting - Individual	Yes, the employee must report the taxable amount in the annual tax return. An employee may elect (in writing) to pay the total tax due on share related income through their income tax return in the year following the year of assessment (i.e. the year the shares are settled) instead of having the tax withheld by the employer. If the employee makes this election, they will be responsible for paying the total tax due upon filing of their tax return in the year following the year of assessment.  Report name: Annual Tax Return (Forms B/BE/M). The return can be filed online. The tax return can be downloaded from the website here.  Tax period: 1 January to 31 December.  Reporting deadline: Form BE/M (employment and other personal income) should be filed by 30 April of the following year and Form B (for individuals who have business income in addition to employment and personal income) should be filed by 30 June of the following year.  Payment of tax: any unpaid income tax is due and payable in the following year.



Tax reporting - Employing company	Yes, the employer must report the employees' incentive related income (share awards) in a specific filing obligation with regard to equity incentive plans. Details of the filing obligation are set out below.
	<b>Report name</b> : Annual Accounts. The return can be filed online. The return can be downloaded from the website <u>here</u> .
	Reporting deadline: within 7 months of fiscal year end.
	Payment of tax: the employer withholds in the month of award settlement. Tax is paid by the 15th of the month following the month of settlement.
	<b>Employee income reporting</b> : the employer declares to the Malaysian Inland Revenue Board (MIRB) on Annual Statement of Remuneration (Form EA), all income and benefits earned by the employee for the prior calendar year. A copy of Form EA must be given to each participant by the end of February in the following year.
	<b>Equity reporting</b> : the local employer must complete Form BT/MSSP/2012 (the employer share plan notification form) following a share plan grant as follows:
	Appendix A: to notify the MIRB about the launch of an employee share plan within 30 days of the expiry of the period of acceptance of the offer;
	Appendix B: to notify the MIRB of the names of participants who have elected to join the plan (within the same time frame as Appendix A). This Appendix should be completed every year and is filed with Appendix C; and
	<ul> <li>Appendix C: details of employees who have exercised options/acquired shares during the year. This is an annual filing and although there is no specific deadline it should be filed as soon as possible after the taxable moment. MIRB has previously recommended that Appendix C is completed at the end of February which coincides with the timing of the statutory reporting requirements of Form EA (assuming the taxable moment has occurred).</li> </ul>
	If the equity awards are granted to employees of more than one Malaysian entity, a separate filing should be made by each Malaysian entity as they are separate employers. The filings are made to MIRB by the local employer(s) or by a tax agent.
	The return can be filed online. The return can be downloaded from the website <u>here</u> .
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Netherlands	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	49.50% (2024). Any change in tax rates usually takes effect from 1 January.
Income tax rates	Income is divided into three boxes and each is taxed differently.  Box 1 covers employment income (including income received under an employee incentive plan) and business profits of self-employed persons. Income in Box 1 is taxed at progressive rates up to 49.50% for income over EUR75,518 (2024). There are effectively two brackets:  • one of 36.97% which includes national/employee social security (see 'Employee social security' section) for income through EUR75,518; and  • the 49.50% rate that applies over that amount.  In certain cases a surcharge applies. For example, a 'special rate' is to be applied on stock-based compensation. This is not an explicit rate in a table but a combination of the ordinary income tax withholding rates and an additional uplift percentage, because of a reduction of the individual tax discount. The 'special rate' percentage that should be applied will depend on the employee's previous year's gross income. The resulting maximum withholding rate is 56.01% (49.5% + 6.51%). This percentage applies to earnings between EUR75,518 and EUR134,930 for employees under the retirement age. For annual income over EUR134,930 there is no surcharge and the standard rate of 49.50% applies.  Box 2 covers income (capital gains and dividends) from a substantial interest, at least 5% of the total shares or of a class of shares, in a company. From 2024, two rate brackets will apply:  • 24.5% on the first EUR 67,000 of income; and  • 33% above that.  Box 3 covers income from savings and investments. Net assets (including shares acquired under an incentive plan minus liabilities) are subject to taxation under Box 3, the actual income (including dividend income) or capital gain realised is not taxed but a notional income is deemed to be derived from the net assets (assets less liabilities). The reference date for the value of the net assets is 1 January of the year concerned. The notional income on shares held is 6.04 (1.03% for bank savings accounts). This income is taxed at a flat rate of 36% (2024). Taxa
Employer income tax withholding	Yes (for income under Box 1).
Social security withholding	Yes Employee social security. Employer social security. Employer must withhold the employee contribution.
Employee social security	<b>Employee social security (max rate)</b> : national insurance premium contributions are levied at 27.65% and are withheld at the same time as wage tax (therefore, no additional withholdings for national insurance premiums are required on top of the applicable income tax rate). The national insurance premiums are incorporated in the lowest income tax bracket (in 2024, up to and including EUR38,098), leading to a total withholding of 36.97% (2024). In addition, every employee is required to have a health insurance policy and to pay a nominal premium to their insurance company. <b>Employee social security (cap)</b> : the maximum amount of national insurance contributions in 2024 is EUR10,534 per year (i.e. EUR38,098 x 27.65%).



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Employer social security	Employer social security (max rate):
	• Employee insurance premiums: premiums are calculated on the basis of an employee's gross salary. Usually, the following employee insurance premiums will be due (up to an annual income level of approximately EUR71,628 (2024)):
	<ul> <li>Wet werk en inkomen naar arbeidsvermogen (Capacity for Work and Income Act) premium (WAO/WIA). A differentiated premium applies, depending on the size of the employer (calculated on the basis of the wages paid by the employer). Small sized companies will pay a premium of 6.18% (excluding a 0.5% surcharge for childcare provisions), medium sized and large sized employers a premium of 7.54%. The employer also pays a sector premium depending on the type of industry in which it operates; and</li> </ul>
	<ul> <li>Werkloosheidswet (Unemployment Act) premium (WW) of 2.64% for all employees with an indefinite period of time contract and fixed working hours; and 7.64% for all other (flexible) contracts;</li> </ul>
	• Zorgverzekeringswet (Healthcare Insurance Act) premium (ZVW): generally, the employer pays a premium of (in principle) 6.57% up to an annual income level of approximately EUR71,628 (2024).
	<b>Employer social security (cap)</b> : premiums are assessed on employee's salary up to a maximum annual income level of approximately EUR71,628 (2024).
Tax reporting - Individual	Yes, income tax is payable on the value of the shares awarded under an incentive plan. Tax on income in Box 1 (employment income) is withheld and paid by the employer. Tax on income in Box 2 (income from a substantial interest) and Box 3 (income from savings and investments) is payable through the individual's tax return. The employee must report all income which, under certain circumstances, may include capital gains, in their income tax return (Box 1, 2 and 3 income). Withheld income tax (i.e. Box 1) can be credited against any other income tax payable by the individual.
	<b>Report name</b> : Annual Income Tax Return ( aangifte inkomstenbelasting). The return can be filed online. The tax return can be downloaded from the website here. Please note, the URL for this website can change from year to year. The general site through which the filing can be made is here.
	Tax period: 1 January to 31 December.
	Reporting deadline: 1 May of the following year (extensions are available).
	Payment of tax: any unpaid tax is due within 6 weeks after the date of issuance of the relevant (preliminary) income tax assessment.
Tax reporting - Employing company	The employer must report the employees' incentive related income but the filing covers all employee benefits and is not specific to equity related incentives.  Wage withholding returns and social security payments must be filed monthly.
	<b>Report name</b> : wage withholding return ( <i>aangifte loonheffingen</i> ). The return can be filed online. The return can be downloaded from the website <u>here</u> . Please note, the URL for this website can change from year to year. The general site through which the filing can be made is <u>here</u> .
	<b>Reporting deadline:</b> the reporting and paying deadline of Box 1 withholding tax will be within one month after the wage period during which the relevant taxable moment occurred. Any taxable moments occurring after the end of the fiscal year will be reported in the following annual tax report.
	Payment of tax: payment deadlines for withholdings are as set out above.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



New Zealand	
Taxable Moments	Payment of cash: Income tax and social security (ACC).
Income tax (maximum rate)	39% (2024). Any change in tax rates usually takes effect from 1 April (31 July in 2024).
Income tax rates	The New Zealand tax year starts on 1 April but the following new tax thresholds took effect on 31 July 2024 (composite tax rates will be used for full year income tax calculations) (figures in NZD):  • from 0 to 15,600: 10.5%  • from 15.601 to 53,500: 17.5%  • from 53,501 to 78,101: 30%  • from 78,101 to 180,000: 33%  • over 180,000: 39%.  Note: income from share or cash based awards may be subject to deductions in relation to compulsory repayment of student loans through the income tax system, at a rate of 12% for every NZD1 earned over the repayment threshold. For the 2025 tax year, the repayment threshold is NZD24,128. For employees, such repayments will generally be collected through income tax withholding.
Employer income tax withholding	Yes
Social security withholding	Yes Employee ACC levy.
Employee social security	Employee social security (max rate): ACC levy: 1.6% (2024/25).  Employee social security (cap): ACC levy is payable on income over the minimum liable income level of NZD142,283 per year (2024/25 tax year).  Note: the ACC levy is not payable in respect of benefits derived under an employee share plan.
Employer social security	Employer social security (max rate): an employer's ACC levy is determined according to the industry or risk classification of the employer and the level of earnings of employees.  Employer social security (cap): no cap.  Superannuation: employers must also contribute to KiwiSaver for employees who are KiwiSaver members. The minimum rate for contributions is 3%. KiwiSaver is a voluntary retirement savings scheme and is separate from the ACC levy (social security). If an employer has employees who belong to a superannuation scheme (such as KiwiSaver) and the employer pays employer contributions to the scheme, Employer Superannuation Contribution Tax (ESCT) is deducted from the employer superannuation cash contributions paid into the employee's KiwiSaver or superannuation account.  Note: the ACC levy and Kiwi Saver contributions are not payable in respect of benefits derived under an employee share plan.



Tax reporting - Individual	Yes, if the individual has income which has not been subject to employer withholding and if the employee is required to report foreign assets. There is no specific filing in relation to equity related incentives.
	<b>Report name</b> : Annual Individual Tax Return (IR3). Dividends are reported on the same return. The return can be filed online. The tax return can be downloaded from the website <a href="https://example.com/here-populated">here</a> . The New Zealand tax office is in the process of phasing out the use of IR3 forms and progressively moving towards online returns filing using annual pre-populated tax statements.
	Employees may also be required to report information about foreign shares held to the New Zealand tax office under the foreign investment fund (FIF) regime. This is are annual obligation. There are a number of possible exemptions to this FIF disclosure requirement, which can be affected by the employee's individual circumstances (including, for example, where the total value of foreign shares held by the individual does not exceed NZD50,000). There are different disclosure forms depending or which calculation method the employee has applied in respect of their overseas shareholding. Where the default calculation is used (the "fair dividend rate" method), the applicable form is IR447.
	Tax period: 1 April to 31 March.
	Reporting deadline: tax returns must be filed by 7 July (extended to 31 March of the following year, if the employee has a tax agent).
	Payment of tax: if an individual has additional tax to pay, the due date is 7 February following the end of the tax year (extended to 7 April if the employee has a tax agent or accountant). If an individual had residual income tax (RIT) in the previous tax year over NZD2,500, they will pay provisional tax the following year. Payment of provisional tax is generally paid in three instalments, with the third instalment due by 7 May. Dividend tax forms part of an individual's RIT and must be paid at the same time as any RIT payments. An employee's deemed income on an overseas shareholding under the FIF rules will also form part of their overseas income for the purposes of the IR3 form. This may result in an annual assessment of tax in respect of the overseas shareholding.
Tax reporting - Employing company	Yes, employers are required to disclose the taxable value of benefits that employees receive under employee share plans, whether or not the employer applies withholding. The filing covers all employee benefits and is not specific to equity related incentives.
	<b>Report name</b> : the payday reporting system requires employers to report employee information electronically (from payday compatible software or through myIR) if the employer's annual PAYE and employers' superannuation tax (ESCT) is NZD50,000 or more. Employers with a payroll below NZD50,000 may file using paper forms. Online filing is made by registering for a 'myIR' secure online services account at the website <a href="here">here</a> .
	<b>Reporting deadline</b> : filing and payment responsibilities for salary and wage deductions differ, depending on the employer's gross annual PAYE (including ESCT) payments:
	<ul> <li>once a month for employers with less than NZD500,000 PAYE (including ESCT);</li> </ul>
	• twice a month for employers with NZD500,000 PAYE (including ESCT) or more.
	For equity awards, the filing deadline is the taxable event (the 'share scheme taxing date'). Employee information relating to equity awards will generally be reported on a payday basis:
	• for employers who report once a month: treating the date that is the 20th working day after the share scheme taxing date as the payday; or
	• for employers who report twice a month: treating the 15th of the month as the payday if the 20th working day after the share scheme taxing date falls between the 1st and 15th of a month; or
	• treating the last day of the month as the payday, if the 20th working day after the share scheme taxing date falls between the 16th and the end of a month.
	Payment of tax: the return must be filed within 2 days of the payday and payments (if applicable) are made:
	• for companies filing once a month: payments must be made by the 20th day of the month following the month in which the pay deductions are made; and
	<ul> <li>for companies filing twice a month: the first filing must be made by the 20th day of the month in which the pay deductions are made and the second payment by the 5th day of the following month.</li> </ul>
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual. If a malus or clawback clause is applied, it is not expected that this wi have any tax effect in respect of unvested or vested awards. In respect of foreign shares acquired upon exercise or vesting, if a malus or clawback clause is applied there may be tax consequences for the individual, depending upon whether they are subject to the FIF regime (noted above) and the particular FIF calculation method adopted by the individual.



Norway	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	39.6% (2024) excluding social security tax. Any change in tax rates usually takes effect from 1 January.
Income tax rates	The ordinary tax rate is 22% which covers all taxable income. For certain financial entities, the tax rate is 25%.  A further state tax on salary income is assessed on earned income exceeding certain thresholds. The 2024 thresholds are:  on income between NOK208,050 and NOK292,849: 1.7%  on income between NOK292,850 and NOK669,999: 4.0%;  on income between NOK670,000 and NOK937,899: 13.6%;  on income between NOK937,900 and NOK1,349,999: 16.6%;  on income exceeding NOK1,350,000: 17.6%.
Employer income tax withholding	Yes
Social security withholding	Yes Employee social security. Employer social security. Employer must withhold the employee contribution.
Employee social security	Employee social security (max rate): 7.8% (2024). Employee social security (cap): no cap.
Employer social security	Employer social security (max rate): 19.1% (2024) (for entities subject to finance tax the max rate is 24.1%).  Employer social security (cap): no cap. The general maximum rate for employer social security contributions is 14.1%, but an additional 5% is imposed on salary payments which exceed a threshold of NOK850,000 (2024).
Tax reporting - Individual	An employee is required to file an annual tax return, if the pre-recorded tax return they have received is wrong or incomplete, or if they have received income which has not been taxed under the PAYE system and is not included in the pre-recorded tax return.  There is no specific filing in relation to equity related incentives.  Report name: Annual Tax Return (RF-1030). Capital gains and dividends are reported on the same return or as an attachment in the Form RF-1159. The return can be filed online. The tax return can be downloaded from the website here.  Tax period: 1 January to 31 December.  Reporting deadline: tax returns must be filed by 30 April.  Payment of tax: any unpaid taxes are due by 20 August. If the unpaid tax exceeds NOK1,000, the payment will be made in two instalments, the first on 20 August and the second on 24 September. If the individual receives the tax statement on 15 August or later, the first and second instalments will be due 3 and 8 weeks, respectively, after receipt of the tax statement. Capital gains tax and dividend tax must be paid by 31 May to avoid accumulating interest.



Tax reporting - Employing company	The employer must report the employees' incentive related income but the filing covers all employee benefits and is not specific to equity related incentives.
	Report name:
	A-Report for monthly withholdings and remuneration; and
	Annual salary record summary to employees.
	The returns must be filed online and can be downloaded from the website <u>here</u> .
	<b>Reporting deadline:</b> withholding returns and social security payments must be filed monthly. The company must also include any taxable benefits from incentive related income, as payment-in-kind in the A-Reports, which must be provided to the tax authorities by the 5th of every month. The employer must deliver a salary record summary to employees by 1 February.
	Payment of tax: the company must withhold income tax and social security payments, and pay to the tax authorities on the 15th of every second month (beginning in March).
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Oman	
Taxable Moments	Payment of cash: No income tax. No social security.
Income tax (maximum rate)	None
Income tax rates	There is no individual income tax in Oman.
Employer income tax withholding	No
Social security withholding	No
Employee social security	<ul> <li>Employee social security (max rate): 8%, made up of:         <ul> <li>a social insurance contribution of 7% of the employee's gross salary (social insurance for pension fund contribution: old age, disability and non-occupational death and injuries); and</li> <li>1% of monthly salary to the job security scheme.</li> </ul> </li> <li>The levies apply to Omani nationals only.</li> <li>Employee social security (cap): no cap.</li> </ul>
Employer social security	<ul> <li>Employer social security (max rate): social insurance contribution is 12.5% of Omani employees' gross salary. Made up of:</li> <li>10.5% (pension fund and contributions towards insurance for work related old age, disability and non-occupational injuries);</li> <li>1% salary (contribution against occupational illnesses and injuries); and</li> <li>1% monthly salary (job security scheme).</li> <li>Employer social security (cap): no cap.</li> </ul>
Tax reporting - Individual	Not applicable.
Tax reporting - Employing company	There is no reporting obligation on the local company in Oman because no tax or social security is payable in relation to plan benefits.
Malus and Clawback - Individual	Not applicable.



Philippines	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	35% (2024). Any change in tax rates usually takes effect from 1 January.
Income tax rates	Tax rates are progressive. The maximum tax rate applies to annual taxable income over PHP8,000,000.
Employer income tax withholding	Yes
Social security withholding	Yes Both employer and employee social security applies. Employer must withhold the employee contribution.
Employee social security	<ul> <li>Employee social security (max rate):</li> <li>Social Security System (SSS): 4.5% of the monthly salary credit;</li> <li>Philippine Health Insurance Corporation (PHIC): 5% of the monthly basic salary (equally shared by the employee and employer) (Philhealth Circular No. 2020-0050);</li> <li>Home Development Mutual Fund (HDMF): 2% of the monthly fund salary.</li> <li>Employee social security (cap): monthly caps are:</li> <li>SSS: PHP1,350 (2024) for those with maximum monthly salary credit of PHP29,750 or more;</li> <li>PHIC: PHP5,000 (equally shared by the employee and employer) (Philhealth Circular No. 2020-0005);</li> <li>HDMF: PHP200 (maximum fund salary increased to PHP10,000 per HMDF) (Circular No. 460 effective February 2024).</li> </ul>
Employer social security	<ul> <li>Employer social security (max rate):</li> <li>Social Security System (SSS): 9.5% of the employee's monthly salary credit; (Social Security Commission Resolution No. 751-s.2022 dated 25 November 2022; effective 1 January 2023);</li> <li>Philippine Health Insurance Corporation (PHIC): 5% of the monthly basic salary (equally shared by the employee and employer) (PhilHealth Circular No. 2020-0050);</li> <li>Home Development Mutual Fund (HDMF): 2% of the monthly fund salary.</li> <li>Employer social security (cap): monthly caps per employee are:</li> <li>SSS: PHP2,880 (2024) for those with maximum monthly salary credit of PHP29,750 or more;</li> <li>PHIC: PHP5,000 (PhilHealth Circular No. 2020-0005);</li> <li>HDMF: PHP200 (maximum fund salary increased to PHP10,000 per HMDF) (Circular No. 460 effective February 2024).</li> </ul>
Tax reporting - Individual	Yes, unless all tax liabilities have been withheld or paid by the employer. If the cost of an equity plan has not been recharged to the local employer, there is no withholding and the individual will be required to declare the income from the plan in the annual income tax return.  There is no specific filing in relation to equity related incentives.  Report name: Annual Income Tax Return. Capital gains and dividends are reported on the same return. The return can be filed online. The tax return can be downloaded from the website <a href="here">here</a> .  Tax period: 1 January to 31 December.  Reporting deadline: the report must be filed by15 April in the year following the taxable period.  Payment of tax: any unpaid tax (including tax on dividends and capital gains) is generally due at the time of filing.



Tax reporting - Employing company	Yes, the employer must report the employees' incentive related income if the payment has been made through the local employer or there has been a recharge. The grant/award of a share incentive is reported separately.
	Report name: if the employer has withheld income tax, the following reports must be filed by the employer:
	Monthly Remittance Return of Income Taxes Withheld: BIR Form 1601-C;
	Annual Information Return of Income Taxes Withheld on Compensation: BIR Form 1604-C; and
	Certificate of Compensation Payment/Tax Withheld: BIR Form 2316.
	The local employer must report the grant/award of a share incentive to the Revenue District Office where it is registered within 30 days from the grant/award and on or before the 10th day of the month following the month of exercise/vest. There is no specific form.
	The returns can be filed online. The BIR returns can be downloaded from the website <u>here</u> .
	Reporting deadline:
	Monthly Remittance Returns for income tax withholding are generally filed within 10 days of the following month;
	• the Annual Information Return must be submitted to the Bureau of Internal Revenue (BIR) by 31 January for the previous year;
	• each employee must be provided with a Certificate of Compensation Payment/Tax Withheld by 31 January for the previous year;
	<ul> <li>duplicates of the employees' Certificate of Compensation must be submitted to the BIR by 28 February; and</li> </ul>
	• the filing date for reporting the grant/award of a share incentive is stated above.
	Payment of tax: withheld income tax is paid at the same time that the monthly report is filed
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Poland	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	32% (2024). Any change in tax rates usually takes effect from 1 January.
Income tax rates	Tax rates are progressive (12% to 32%). The maximum tax rate applies to annual taxable income over PLN120,000. Solidarity tax of 4% applies to annual income over PLN1million.
Employer income tax withholding	Yes
Social security withholding	Yes
Employee social security	<b>Employee social security and Health Insurance (max rate)</b> : contribution rates of 13.71% apply to salaries up to the cap of PLN234,720 (2024) and contribution rates of 2.45% apply to salaries above this cap.
	The employee also pays a 9% compulsory health insurance contribution which is uncapped and cannot be deducted.
	Employee social security (cap): see above.
Employer social security	<b>Employer social security (max rate)</b> : contribution rates of 20.48% to 22.14% apply to salaries up to the cap of PLN234,720 (2024) and contribution rates of 4.22% to 5.88% apply to salaries above this cap.
	In exceptional cases, the above maximum limits may be increased with respect to individual employers.
	Employer social security (cap): see above.
Tax reporting - Individual	Yes, the employee must report any income from awards, dividends and from the sale of shares in their annual tax return. In the case of awards subject to progressive tax rates, participants may be required to pay a tax advance by the 20th day of the month following the month when they receive the proceeds (e.g. on vesting for an RSU, on the acquisition of shares at discount under a share purchase plan and on the payment of cash for a cash plan award).
	<b>Report name</b> : Annual Tax Return (Form PIT-36 or PIT-38). The return can be filed online. The tax return forms can be downloaded from the website <a href="here">here</a> . The solidarity tax must be reported in a separate tax return.
	Tax period: 1 January to 31 December.
	Reporting deadline: tax returns must be filed by 30 April of the following year.
	Payment of tax: if there is a positive difference between the annual tax due and total amount of advance payments made during the tax year, the employee must pay the tax by 30 April of the following year.
Tax reporting - Employing company	Tax reporting obligations for the employing company will arise only if income received under the plan is classified as employment income. If required, the employer must report the employees' plan related income, together with the report covering all other employee benefits (it is specific to equity related incentives).
	<b>Report name</b> : income paid to, and tax advances withheld for, each employee are reported annually on Form PIT-11. Additionally, tax advances withheld for employees are reported annually on Form PIT-4R.
	PIT-11 and PIT-4R must be filed online to the competent tax office. The return can be downloaded from the website <a href="https://example.com/heres/heres/">here</a> .
	Reporting deadline:
	<ul> <li>For PIT-4R and PIT-11 (submitted to tax office): by 31 January in the year following the reporting year;</li> <li>For delivery of PIT-11 (to employees): by the end of February in the year following the reporting year.</li> </ul>
	Payment of tax: the employer is required to remit the full amount of the tax withheld during each month, by the 20th day of the following month.
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Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Qatar	
Taxable Moments	Payment of cash: No income tax. No social security.
Income tax (maximum rate)	None
Income tax rates	There is no individual income tax in Qatar.
Employer income tax withholding	No
Social security withholding	No
Employee social security	Employee social security (max rate): an employee who is a Qatari national and has a pension scheme, must contribute 5% of their salary (i.e. monthly basic salary plus the social allowance as provided for under the Civil Service Law) where the employer is a participating employer in the Qatar pension scheme. An employee who is a GCC national and is subject to a retirement/social allowance scheme in their home country must make a financial contribution, as stipulated by the law of the home country of the employee, where the employer is a participating employer in the Qatar pension scheme.  Employee social security (cap): no cap.  Note: income received under an incentive plan award will not be considered to be 'salary' for the purposes set out above.
Employer social security	Employer social security (max rate): for employees who are Qatari nationals, the employer must contribute 10% of the employee's salary (i.e. monthly basic salary plus the social allowance as provided for under the Civil Service Law) where the employer is a participating employer in the Qatar pension scheme. If the employee is a GCC national and is subject to a retirement/social allowance scheme in their home country, then the employer must contribute 10% of basic salary where the employer is a participating employer in the Qatar pension scheme.  Employer social security (cap): no cap.  Note: income received under an incentive plan award will not be considered to be 'salary' for the purposes set out above.
Tax reporting - Individual	Not applicable.
Tax reporting - Employing company	Yes Report name: Annual Accounts Reporting deadline: within 4 months of Fiscal year end. Payment of tax: see above.
Malus and Clawback - Individual	As there are no applicable taxes payable by the individual, the existence of a malus or clawback clause is not relevant to the moment of tax for the individual.



Russia	
Taxable Moments	Alert: due to the state, entity and individual sanctions levied as a result of Russia's invasion of Ukraine, companies are urged to exercise caution in relation to their incentive and reward plans in that region generally and relating to Russia and Belarus specifically. Detailed advice is recommended before proceeding.  Payment of cash: Income tax. Employer social security if the employer pays in cash.
Income tax (maximum rate)	15% (2024). Any change in tax rates usually takes effect from 1 January.
Income tax rates	Progressive rates apply. In 2024, annual income is taxed:  • up to RUB5million: 13%  • over RUB5million: 15%.
Employer income tax withholding	Yes
Social security withholding	No, there is no employee social security.
Employee social security	Employee social security (max rate): none Employee social security (cap): not applicable.
Employer social security	Employer social security (max rate):  Social Fund of Russia: a flat rate of 30%, capped at RUB2,225,000 (2024) per year and 15.1% above the cap.  An accident insurance contribution of between 0.2% and 8.5% of total wages is also levied, the amount depending on the industry of the employer.  Employer social security (cap): capped as described above.  Note: Employer social security contributions would be payable if the local employer delivers the shares or pays cash or otherwise participates in the implementation of an incentive plan. There is no employee social security and employer contributions are paid from the local employer's own funds and are not withheld from remuneration paid to the participants (if any).
Tax reporting - Individual	An employee is required to file a tax return if the local employer is not obliged to act as the tax agent (i.e. it does not withhold the income tax).  There is no specific filing in relation to equity related incentives.  The employee must report foreign accounts, opened with the bank or other financial organisations, to the tax authorities within 1 month after opening/changing details/closing of the account.  Report name: Annual Tax Return (for tax reporting) and Annual Report on cash and other financial assets transactions (for reporting accounts). The return/report can be filed online once the employee has registered with the personal taxpayer office. The tax return/report can be downloaded from the website <a href="here">here</a> .  Tax period: 1 January to 31 December.  Reporting deadline: Tax returns must be filed by 30 April. Payment is due by 15 July after the end of the tax period when the income was received. Foreign accounts must be reported within one month of opening or closing and cash transactions of the account must be reported by 1 June each year or within 1 month after closing the account.



Tax reporting - Employing company	The employer must report the employees' incentive related income but the filing covers all employee benefits and is not specific to equity related incentives.  Report name: Form 6-NDFL - Report amounts of personal income tax calculated and withheld by the tax agent. The report can be filed both in paper and electronically, although electronic filing is obligatory in most cases (e.g. for companies which pay income to more than 10 individuals). The report can be downloaded from the website here.  Reporting deadline: the last day of the month following the end of the reporting period, except for the yearly report, which is to be filed by 1 March after the end of the tax period.  Tax agent: if the Russian employer is recognised as the tax agent in relation to plan awards (i.e. it has a withholding obligation), it will be required to report the awards to the Russian tax authorities as part of its payroll reporting requirements. Updated form of report on the amounts of personal income tax calculated and withheld by the tax agent (Form 6-NDFL) must be finalised by Russian tax agents and produced by no later than 1 March of the year following the tax year. If the local Russian employer is not the tax agent (i.e. it does not pay income under the incentive plan in cash or in kind) there will be no Russian payroll reporting requirements.
	<b>Social security contributions</b> : the employer must report its social security contributions not later than 30 calendar days following the quarterly report. The employer must pay social security contributions on a monthly basis, not later than the 15th day after the end of the month. <b>Note</b> : there are no employee social security contributions.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Saudi Arabia	
Taxable Moments	Payment of cash: No income tax. No social security.
Income tax (maximum rate)	None
Income tax rates	There is no individual income tax in Saudi Arabia.
Employer income tax withholding	No
Social security withholding	No
Employee social security	Employee social security (max rate): none, although contributions towards occupational hazards insurance are paid by employers for all employees and contributions towards pension schemes are paid by employers and employees, where the employee is a Saudi national. Contributions are based on only basic wage plus housing allowance (if any).  Employee social security (cap): no cap.
Employer social security	Employer social security (max rate): none, although contributions towards occupational hazards insurance are paid by employers for all employees and contributions towards pension schemes are paid by employers and employees, where the employee is a Saudi national. Contributions are based on only basic wage plus housing allowance (if any).  Employer social security (cap): no cap.
Tax reporting - Individual	Not applicable.
Tax reporting - Employing company	The local employer will be required to report the expenses that it incurs in relation to its employees.  Report name: Annual Corporate Income Tax Return.  Reporting deadline: within 120 days from end of fiscal year.  Payment of tax: see above.
Malus and Clawback - Individual	There is no direct personal taxation in Saudi Arabia.



Singapore	
Taxable Moments	Payment of cash: Income tax and social security (i.e. CPF contributions) when the cash amounts become due and payable to employees.
Income tax (maximum rate)	24% (2024). Any change in tax rates usually takes effect from 1 January.
Income tax rates	Tax rates are progressive. The maximum tax rate applies to annual taxable income over SGD1,000,000.
Employer income tax withholding	Usually, no withholding by employers.
Social security withholding	Yes (Central Provident Fund (CPF) contributions for payment in cash. Generally only applicable for Singapore citizens and Singapore permanent residents). Employer and employee CPF contributions. Employer must withhold the employee contribution.
Employee social security	Employee social security (max rate): the 20% CPF contribution is applicable to cash remuneration only and is not applicable if the relevant awards are not cash-settled. Lower CPF contribution rates apply for employees over 55 years of age. CPF contributions are only payable in respect of Singapore Citizens and Singapore Permanent Residents.  Employee social security (cap): CPF contributions are subject to a cap on ordinary wages (CPF Monthly Salary Ceiling) at SGD6,800 per month (2024). The CPF Monthly Salary Ceiling will increase to SGD7,400 on 1 January 2025 and to SGD8,000 on 1 January 2026. The cap on CPF contributions in respect of additional wages (e.g. bonus payments) is SGD102,000 per year minus the total ordinary wages subject to CPF contributions in the same year.
Employer social security	Employer social security (max rate): the 17% CPF contribution is applicable to cash remuneration only and is not applicable if the relevant awards are not cash-settled. Lower CPF contribution rates apply for employees over 55 years of age. CPF contributions are only payable in respect of Singapore Citizens and Singapore Permanent Residents.  Employer social security (cap): CPF contributions are subject to a cap on ordinary wages (CPF Monthly Salary Ceiling) at SGD6,800 per month (2024). The CPF Monthly Salary Ceiling will increase to SGD7,400 on 1 January 2025 and to SGD8,000 on 1 January 2026. The cap on CPF contributions in respect of additional wages (e.g. bonus payments) is SGD102,000 per year minus the total ordinary wages subject to CPF contributions in the same year.
Tax reporting - Individual	Yes There is no specific filing in relation to equity related incentives but equity incentive income must be included within the annual tax return.  Report name: Annual Tax Return to the Inland Revenue Authority of Singapore (IRAS) (Form B1 and appendices). Most taxpayers file their tax return online through the IRAS e-services portal. A paper Form B1 will only be sent to individual taxpayers who request one. Usually, the employer will have reported employees' income directly to the IRAS and the income will be reflected on the electronic tax return.  Tax period: 1 January to 31 December of the preceding year.  Reporting deadline: 15 April (18 April if filed electronically).  Payment of tax: any income tax is due within one month after service of the Notice of Assessment issued by the IRAS.



Tax reporting - Employing company	Yes
	Report name: Return of Employee's Remuneration (Form IR8A and appendices).
	Tax period: 1 January to 31 December of the preceding year.
	Reporting deadline: 1 March.
	The local employer is required to include the gains from awards in the annual Return of Employee's Remuneration. This is made up of Form IR8A and accompanying appendices, including Appendix 8B which is specifically required to be completed for employees who derived gains or profits from Employee Stock Option Plans or other forms of Employee Share Ownership Plans. The return must be completed and issued to the employee by 1 March each year (reporting all remuneration of the employee for the preceding calendar year), and the employee is required to include the information in the Form IR8A (and accompanying appendices) in their Annual Tax Return to the IRAS, unless the local employer has arranged with the IRAS for such information to be transmitted directly to the IRAS.
	Most employers in Singapore are under the Auto-Inclusion Scheme (AIS) for Employment Income. Under the AIS, employers will submit their employees' income information directly to the IRAS electronically and such income information will be reflected on their employees' electronic Annual Tax Return (and automatically included in their income tax assessment).
	Separate rules apply to an employee who is ceasing employment with their local employer and is neither a Singapore citizen nor a Singapore permanent resident; or a Singapore permanent resident leaving Singapore permanently. These rules are discussed in the 'Other' tax issues section.
	<b>Payment of tax</b> : CPF contributions are due at the end of the month. Employers have a grace period of 14 days to pay. If the 14th day falls on a Saturday, Sunday or public holiday, the employer can pay by the next working day.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



South Africa	
Taxable Moments	Accrual of cash amount: Income tax and social security.
Income tax (maximum rate)	45% (2024/25). Any change in tax rates usually takes effect from 1 March.
Income tax rates	Tax rates are progressive. The tax rates from 1 March 2024 to 28 February 2025 are:  • ZAR1 to 237,100: 18% (of taxable income)  • ZAR237,101 to 370,500: 26%  • ZAR370,501 to 512,800: 31%  • ZAR512,801 to 673,000: 36%  • ZAR673,001 to 857,900: 39%  • ZAR857,901 to 1,817,000: 41%  • ZAR1,817,001 and above: 45%.
Employer income tax withholding	Yes
Social security withholding	Yes Both employer and employee social security applies. Employer must withhold the employee contribution.
Employee social security	Employee social security (max rate): 1% Unemployment Insurance Fund (UIF).  Employee social security (cap): capped at ZAR212,544 remuneration per year or ZAR17,712 per month (the cap is unchanged since 1 June 2021).  Note: South Africa does not have a formal social security system but requires contributions to the UIF (employer and employee) and payment of the Skills Development Levy (SDL) (employer only). For the purposes of this table, 'social security' refers to these contributions and payments.
Employer social security	Employer social security (max rate): 1% UIF and 1% SDL. SDL is levied on the total amount of remuneration paid/payable (including overtime payments, leave pay, bonuses, commissions and lump sum payments). Employers with an annual payroll below ZAR500,000 are exempt from SDL.  Employer social security (cap): UIF is capped at ZAR212,544 remuneration per year or ZAR17,712 per month per employee (the cap is unchanged since 1 June 2021). There is no cap for SDL.  Note: South Africa does not have a formal social security system but requires contributions to the UIF (employer and employee) and payment of SDL (employer only). For the purposes of this table, 'social security' refers to these contributions and payments.
Tax reporting - Individual	An employee is required to file an annual tax return (and in certain circumstances, provisional tax returns).  There is no specific filing in relation to equity related incentives.  Report name: Annual Tax Return. Capital gains and dividends are reported on the same return. The return can be filed online by the employee registering for e-filing on the website here.  Tax period: 1 March to 28/29 February.  Reporting deadline: fixed each year by government notice but generally at the end of September (if submitted in hard copy) or by the end of November (if electronically filed).  Payment of tax: a payment may be due once an assessment has been issued by the South African Revenue Service (SARS).



Tax reporting - Employing company	The employer must report the employees' incentive related income but the filing covers all employee benefits and is not specific to equity related incentives. However, the employer must apply for a directive from SARS on the tax payable under an incentive plan.  Report name:
	• For awards settled in shares or in cash linked to shares, the local subsidiary must obtain a directive with respect to the amount of taxes to be paid. The directive must be sought in writing (or electronically) by the local employer to SARS. The application is made by completing an IRP3(s) form and submitting it to SARS. The form sets out the information required and any relevant information regarding the directive sought may be attached to such application form. If the directive is sought electronically it will take approximately one week and if done in writing this could take approximately four weeks; and
	Monthly returns and payments of withholding for tax and social security.
	The returns can be filed online by registering for e-Filing on the website <u>here</u> .
	Reporting deadline: monthly returns must be filed by the seventh day of the month following the month during which the relevant amount was withheld.
	Payment of tax: withheld employee tax and social security are paid monthly at the same time as the filing of the monthly return.
Malus and Clawback - Individual	A malus or clawback clause may affect the tax treatment if it, among other things, prevents the participant from freely disposing of the shares at market value, in which case the shares will not be deemed to vest for tax purposes until, among other things, the restriction ceases to have effect.



Spain	
Taxable Moments	Payment of cash: Personal income tax (PIT) and social security.
Income tax (maximum rate)	54% in the Valencian Community (2024). Any change in tax rates usually takes effect from 1 January.
Income tax rates	The marginal tax rate for an individual depends on the autonomous region where the taxpayer habitually resides. Currently (2024), the maximum marginal rate in Madrid is 45%, in Catalonia the maximum marginal rate is 50% and, in the Valencian Community, the maximum marginal rate is 54%.  The Spanish state PIT withholding rates which currently range from 19% to 47%. The amounts withheld and paid to the Treasury by the employer are an advance
	payment of the employee's final PIT liability, which can be lower or higher, depending on the tax rate in the region where the employee resides.  The difference between the amount withheld by the employer and the final tax liability to be paid by the employee or to be refunded by the tax authorities, if the amounts withheld are higher than the employee's final tax liability, is settled by the employee through the filing of a tax return in April to June of the following year.
Employer income tax withholding	Yes
Social security withholding	Yes Employee social security. Employer social security. Employer must withhold the employee contribution and pay both employer and employee contributions to the Spanish social security authorities (General Social Security Treasury).
Employee social security	Employee social security (max rate): 6.47% Employee social security (cap): the maximum amount which is subject to social security contributions each month is EUR4,720.50 (applicable for 2024).
Employer social security	Employer social security (max rate): approximately 32% (30.5% social security contribution plus a variable rate for occupational accidents and professional illness, which depends on the particular sector/industry in which the company operates).  Employer social security (cap): the maximum amount which is subject to social security contributions each month is EUR4,720.50 (applicable for 2024).



Tax reporting - Individual	An employee is required to file an annual tax return.
	There is no specific filing in relation to equity related incentives. Such income will be included in the Annual PIT Return as remuneration-in-kind, capital gain or savings income.
	Report name:
	Annual PIT Return (Form 100);
	<ul> <li>Wealth tax (if applicable) is reported on Form 714 for both tax residents and non-tax residents in Spain; and</li> </ul>
	• Tax on Large Fortunes (if applicable) is reported on Form 718 for both tax residents and non-tax residents in Spain.
	Tax forms can be downloaded from the Spanish Tax Authorities' website <u>here</u> .
	Tax period: 1 January to 31 December.
	<b>Reporting deadline</b> : generally, 30 June for both Form 100 and Form 714 and 31 July for Form 718. In general terms, the return should be filed between April and the end of June or July (as applicable) of the year following the year during which the employee receives the income.
	The employee may also be required to file Form 720 regarding assets held outside of Spain, if the value of each asset type (shares, insurance, annuities and cryptocurrencies) is at least EUR50,000. Subsequent declarations are required if the value of a group of assets increases by more than EUR20,000 or the assets are sold or cancelled. This tax form can be filed electronically through the Spanish Tax Authorities' website <a href="here">here</a> , between 1 January and 31 March following the end of each tax year, in general terms.
	<b>Payment of tax</b> : any unpaid income tax, capital gains tax and dividend tax, must be paid by the date of filing the tax return. Withholdings that have been (or should have been) made by the employer may be deducted from the PIT due.
Tax reporting - Employing company	The employer must report the employees' incentive related income but the filing covers all employee benefits and remuneration and is not specific to equity related incentives.
	Withholding returns and social security payments must be filed on a monthly or quarterly basis.
	<b>Report name</b> : PIT withholding tax return (Form 111 and Form 190). Other tax forms and information can be downloaded from the Spanish Tax Authority website here.
	<b>Reporting deadline</b> : the employer is obliged to declare the withholdings/payments on account of the employee's PIT on a monthly or quarterly tax form (Form 111) within the first 20 days of the month following the end of the corresponding quarter/month. The company is also obliged to file an annual summary form (Form 190) by 31 January detailing all the withholdings and payments on account made regarding its employees in the previous year.
	Payment of tax: withheld tax and social security contributions are paid at the same time that the monthly report is filed.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Taiwan	
Taxable Moments	Payment of cash: Income tax and social security. (NLI, LPF and NHI and/or NHI supplementary premiums may be payable depending on the structure of the plan).
Income tax (maximum rate)	40% (2024). Any change in tax rates usually takes effect from 1 January.
Income tax rates	Under the regular tax rules, progressive rates of tax apply. The maximum tax rate applies to income over TWD4.98million (exclusive).  Under the Alternative Minimum Tax system (AMT), the taxpayer is required to pay the higher of the tax due under the regular tax rules and AMT tax. AMT tax is a fixed 20% rate and is calculated on the basis of:  • general Taiwan sourced net income; plus  • foreign sourced income (FSI), if the FSI exceeds TWD1million; plus  • certain additional (non-general and non-FSI) qualified items, either Taiwan or foreign sourced income; less  • a fixed deduction of TWD7.5million.
Employer income tax withholding	Yes, a cash payment is likely to be treated as remuneration and subject to employer withholding if the payment is made through the local employing company, subject to the structure of the plan and the involvement, if any, of the local employing company, it will likely be treated as a 'taxable bonus' or 'other income'. If it is treated as other income, it is not subject to employer withholding. But if an award is classified as 'taxable bonuses' by the local tax authorities, the local employing company will have payroll withholding obligations on the proportion of the award that is borne by the local employing company (e.g. via a recharge). If the local employing company does not bear the costs of the award, and the award is not considered as part of local employment remuneration, it will have no withholding obligations.  There is no clear guidance under relevant tax regulation whether cash plan income is 'foreign-sourced' or 'Taiwan-sourced' and, if it is Taiwan-sourced, then whether it is a 'taxable bonus' (wage) or 'other income' (non-wage). Tax officials have expressed different opinions as to the characterisation of cash plan income and whether withholding applies. The tax authority may treat the cash plan income as 'remuneration for work' given by the foreign parent company on behalf of the local employing company and may qualify the cash plan income as 'Taiwan sourced wage income' subject to withholding.  It would be prudent to apply for a private tax ruling to confirm the applicable tax position.
Social security withholding	Yes, if the payment is made by the local employing company, social security (NLI, LPF, NHI and NHI supplementary premium) will be payable and employer withholding will apply.
Employee social security	<ul> <li>Employee social security (max rate): contributions are levied for National Labor Insurance (NLI), Labor Pension Fund (LPF) and National Health Insurance (NHI). NHI applies to all persons in general, while NLI and LPF apply to labor/workers only. NHI supplementary premiums may also be payable.</li> <li>NLI, LPF and NHI: contributions are paid by the employee, based on monthly insured salaries capped at various levels.</li> <li>NHI supplementary premium: NHI supplementary premiums are payable by employees and employers on non-regular payments (e.g. bonus or incentive payments). The employee NHI supplementary premium is 2.11% of the non-regular pay exceeding four times of the insured salary range on an accumulated annual basis. NHI supplementary premium is also payable on a single non-regular payment over four times the insured salary range up to TWD10 million (NHI supplementary premium is not paid on the amount over TWD10million).</li> <li>Employee social security (cap): NHI additional premium is capped on each single non-regular payment of TWD10million (i.e. NHI supplementary premium is not paid on the amount over TWD10million).</li> </ul>



Employer social security	<b>Employer social security (max rate)</b> : contributions are levied for NLI, LPF and NHI. NHI applies to all persons in general, while NLI and LPF apply to labor/workers only. NHI supplementary premiums may also be payable.
	<ul> <li>NLI, LPF and NHI: contributions are paid by the employer, based on monthly insured salaries capped at various levels;</li> </ul>
	• LPF: in applying the LPF contribution above, the employer is required to pay a 6% contribution, based on LPF progressive rated levels determined in accordance with the actual monthly salaries of the employees;
	• NHI supplementary premium: 2.11% NHI supplementary premium would be payable by the employer on bonus and incentive payments (including a discretionary cash payment if the payment is made by the employer). NHI supplementary premium is payable on the difference between the employees' total monthly taxable salaries and the employees' total monthly insured level salaries.
	<b>Employer social security (cap)</b> : NHI supplementary premium is capped on each non-regular single payment of TWD10 million (i.e. NHI supplementary premiums are not paid on any amount over TWD10 million).
Tax reporting - Individual	Yes
	There is no specific filing in relation to equity related incentives.
	<b>Report name</b> : Annual Tax Return. Capital gains and dividends are reported on the same return. The return can be filed online. The tax return can be downloaded from the website <u>here</u> .
	Tax period: 1 January to 31 December.
	Reporting deadline: the report is normally required to be filed by 31 May.
	Payment of tax: any unpaid tax is due by the date of filing the tax return. Capital gains tax and dividend tax must be paid at the same date.
Tax reporting - Employing company	Yes
	The employer must report the employees' incentive related income but the filing covers all employee benefits and is not specific to equity related incentives.
	<b>Report name</b> : if the share award income is treated as other income it should be reported via non-withholding tax statements. If the award income is treated as taxable bonuses, it may be subjected to withholding and this must be reported via withholding tax statements.
	<b>Reporting deadline:</b> for resident employees, the local Taiwanese employer will have monthly payroll reporting obligations. Withholding tax statements and non-withholding tax statements should be filed with the tax office before 31 January of the year following settlement or payment. A copy of the withholding or non-withholding statement must be given to employees by 10 February. If there is a national holiday for more than 3 consecutive days in January, the deadline for filing the tax statements will be extended to 5 February (tax office) and 15 February (employees).
	<b>Payment of tax</b> : withheld tax and social security contributions are paid at the same time that the monthly report is filed, normally by the 10th day of the next month for withholding tax and the next month-end for social security.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Thailand	
Taxable Moments	Payment of cash: Income tax. No social security.
Income tax (maximum rate)	35% (2025). Any change in tax rates usually takes effect from 1 January.
Income tax rates	Progressive rates of tax apply. The maximum tax rate applies to net assessable income over THB5million.
Employer income tax withholding	Yes
Social security withholding	No (social security is not payable on incentive plan income).
Employee social security	Employee social security (max rate): 5% social contribution. Employee social security (cap): social security is payable on regular income only, at an amount equal to 5% of salary up to a maximum contribution of THB750 per month.  Note: there is no social security payable on irregular income such as incentive plan income.
Employer social security	Employer social security (max rate): 5% social contribution.  Employer social security (cap): social security is payable on regular income only, at an amount equal to 5% of salary up to a maximum contribution of THB750 per month.  Note: there is no social security payable on irregular income such as incentive plan income.
Tax reporting - Individual	Yes There is no specific filing in relation to equity related incentives.  Report name: Annual Personal Income Tax Return (PND.90 or PND.91). Capital gains and dividends are reported on the same return. Returns can be downloaded and filed through the Revenue Department website <a href="here">here</a> .  Tax period: 1 January to 31 December.  Reporting deadline: the tax return is filed by 31 March of the following year for paper filing or 8 April of the following year for electronic filing.  Payment of tax: the balance of any tax due (including tax on capital gains and dividends) for a calendar year, is payable at the time of filing the annual personal income tax return.
Tax reporting - Employing company	Yes, the employer must report the employees' incentive related income but the filing covers all employee benefits and is not specific to equity related incentives.  Report name: Withholding Tax Return (PND.1), Annual Withholding Tax Return (PND.1.Kor) and Social Security Contribution Form. The returns must be filed online. The returns can be downloaded and filed through the Revenue Department website <a href="https://example.com/here.">here.</a> . The employer must deliver a salary record form (Certificate of Withholding Tax) to employees by 15 February of the following year.  Reporting deadline: the Withholding Tax Return (PND.1) and the Social Security Contribution Form must be filed electronically by the 15th day of the following month and payment is due at the time of filing. The Annual Withholding Tax Return (PND.1 Kor) must be filed electronically by 8 March of the following year.  Payment of tax: withheld tax and social security contributions are paid at the same time that the relevant monthly report is filed.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Türkiye	
Taxable Moments	Payment of cash: Income tax and social security.
Income tax (maximum rate)	40% (2024). Any change in tax rates usually takes effect from 1 January.
Income tax rates	Progressive rates of tax apply. The maximum tax rate applies to income over TRY3,000,000. Remuneration paid through payroll is subject to stamp duty at a rate of 0.759%.  Personal income tax rates are determined under the Law on Income Tax numbered 193, which was amended on 30 December 2023. The salary income brackets and tax rates (2024) are:  • taxable income up to TRY110,000: 15%;  • income over TRY110,000 and up to TRY230,000: 20%;  • income over TRY230,000 and up to TRY580,000 (non-salary income) / TRY870,000 (salary income): 27%;
	<ul> <li>income over TRY580,000 (non-salary income) / TRY870,000 (salary income) and up to TRY3,000,000: 35%;</li> <li>income over TRY3,000,000: 40%.</li> <li>Tax payable through payroll each month will be reduced by the income tax and stamp tax exemption amounts. The tax exempt amount is the amount corresponding to the tax which would be due on the minimum wage amount (TRY2,550.32 on 1 January 2024 but the figure changes frequently).</li> </ul>
Employer income tax withholding	Yes
Social security withholding	Yes
Employee social security	Employee social security (max rate): 15% (social security of 14% plus unemployment insurance of 1%). Employee social security (cap): the maximum salary base for premiums changes regularly. On 1 January 2024, it was based on a maximum daily salary of TRY5,000.63 (maximum TRY150,018.90 per month).
Employer social security	Employer social security (max rate): 27% (ranges between 21.5% to 27%). The actual rate will depend on the relevant industry.  Employer social security (cap): the maximum salary base for premiums changes regularly. On 1 January 2024, it was based on a maximum daily salary of TRY5,000.63 (maximum TRY150,018.90 per month).
Tax reporting - Individual	An employee is required to file an annual return.  There is no specific filing in relation to equity related incentives.  Report name: Annual Tax Return. The tax return can be filed online and downloaded from the website here.  Tax period: 1 January to 31 December.  Reporting deadline: tax returns must be filed between 1 March and 31 March of the following year.  Payment of tax: the balance of tax due must be paid in two equal instalments in March and June.
Tax reporting - Employing company	The employer must report the employees' incentive related income but the filing covers all employee benefits and is not specific to equity related incentives.  Report name: monthly tax declaration. The tax declaration can be filed online and downloaded from the website here.  Reporting deadline: monthly income tax withholding return and social security return must be submitted by the 23rd of the following month.  Payment of tax: monthly income tax withholding return and social security return must be paid by the 26th of the following month.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



United Arab Emirates	
Taxable Moments	Payment of cash: No income tax. Social security (if applicable).
Income tax (maximum rate)	None
Income tax rates	There is no personal income tax.
Employer income tax withholding	No
Social security withholding	Yes, if social security is applicable.
Employee social security	<b>Employee social security (max rate)</b> : 5% for UAE national employees, where applicable. From 2023, employees are required to contribute to an unemployment scheme. For employees earning more than AED16,000, the minimum contribution is AED10 per month.
	<b>Employee social security (cap)</b> : payable on the employee's Contribution Calculation Salary (CCS), with a deemed maximum CCS amount of AED50,000 per month. Federal Law No. 7 of 1999 for Pension and social security does not explicitly state whether bonus payment or share awards should form part of an employees' salary on which social security contributions are payable. For the avoidance of doubt, a provision could be included in the plan documents stating that incentive awards do not form part of the employee's wages on which social security contributions are payable.
	Social security is only payable in relation to UAE and GCC nationals (GCC means Gulf Corporation Council and includes the UAE, Kingdom of Saudi Arabia, Kuwait, Qatar, Bahrain and Oman). For GCC nationals working in the UAE, employee contributions are determined in accordance with the social security regulations of their home country.
Employer social security	<b>Employer social security (max rate)</b> : 12.5% (15% in Abu Dhabi) for UAE national employees, where applicable. The Dubai International Financial Centre (DIFC) has introduced a mandatory employer savings scheme (to replace the statutory end-of-service gratuity payment regime) for non-UAE and other GCC nationals. Employers are required to make monthly contributions of 5.83% or 8.33% of the employee's basic salary into the savings scheme (the actual rate depends on the employee's length of service). If the employer is already making contributions to a regulated benefit scheme which provides benefits in excess of the above contributions, it is exempt from the new requirement.
	<b>Employer social security (cap)</b> : payable on the employee's Contribution Calculation Salary (CCS), with a deemed maximum CCS amount of AED50,000 per month. Federal Law No. 7 of 1999 for Pension and social security does not explicitly state whether bonus payment or share awards should form part of an employees' salary on which social security contributions are payable. For the avoidance of doubt, a provision could be included in the plan documents stating that incentive awards do not form part of the employee's wages on which social security contributions are payable.
	Social security is only payable in relation to UAE and GCC nationals (GCC means Gulf Corporation Council and includes the UAE, Kingdom of Saudi Arabia, Kuwait, Qatar, Bahrain and Oman). For GCC nationals working in the UAE, employee contributions are determined in accordance with the social security regulations of their home country.
Tax reporting - Individual	No Report name: not applicable. Tax period: not applicable. Reporting deadline: not applicable.
Tax reporting - Employing company	Generally, there are no relevant employer reporting requirements.  Report name: not applicable.  Tax period: 1 January to 31 December  Reporting deadline: not applicable.
Malus and Clawback - Individual	There is no direct personal taxation in UAE.



United States	
Taxable Moments	Payment of cash: assuming no deferral of compensation (or compliance with, or exemption from, Section 409A, if applicable), income tax and FICA taxes.
Income tax (maximum rate)	37% (2024). Any change in tax rates usually takes effect from 1 January.
Income tax rates	Progressive tax rates apply. The maximum income tax rate applies to income over USD609,350 (single taxpayer for 2024) and USD731,200 (married filing jointly for 2024). In addition, state and/or local (municipal) taxes may also be payable on income and/or investments.
Employer income tax withholding	Yes
Social security withholding	Yes, employer and employee FICA (social security tax and Medicare tax). Employer must withhold employee's portion.
Employee social security	<ul> <li>Employee FICA:</li> <li>Social security tax: 6.2% on employee's wages up to 'wage base';</li> <li>Medicare tax: 1.45% of employee's wages; and</li> <li>additional 0.9% Medicare tax (for a total of 2.35%) on wages above certain thresholds (e.g. USD250,000 for 'married filing jointly' taking into account both the employee's and spouse's wages). The employer withholds the additional Medicare tax (if relevant). Although the applicability of the additional Medicare tax is determined based on the filing status of the individual and includes the spouse's wages (if any), the tax withholding is applied to the employee's wages in excess of USD200,000 regardless of whether the employee files their tax return as single, married filing jointly or married filing separately, and without consideration to the spouse's wages.</li> <li>Employee FICA (cap): social security tax is capped on wages up to 'wage base' (USD168,600 for 2024); and no upper earnings limit for Medicare tax or additional Medicare tax.</li> </ul>
Employer social security	<ul> <li>Employer FICA:</li> <li>Social security tax: 6.2% on employee's wages up to 'wage base'; and</li> <li>Medicare tax: 1.45% on employee's total wages.</li> <li>Employer FICA (cap): social security tax is capped at 'wage base' (USD168,600 for 2024); and no upper earnings limit for Medicare tax.</li> <li>Unemployment tax: 6% capped at 'wage base' (USD7,000 for 2024). Only employers pay the tax and it cannot be deducted from employees' wages.</li> </ul>
Tax reporting - Individual	An employee is required to file a federal tax return. There is no separate filing in relation to equity related incentives.  The employee should report foreign assets by 15 April to the IRS on Form 8938 (FATCA) and to the office of Financial Crimes Enforcement Network (FinCEN) on Form 114 (FBAR).  Report name: U.S. Individual Income Tax Return (Form 1040). Capital gains and dividends are reported on the same return. The return can be filed online. The tax return can be downloaded from the website here. The employer will provide employees with a copy of the Form W-2 (Wage and Tax Statement) and (if applicable) the additional information returns for tax-qualified Section 422 incentive stock options (Form 3921) and Section 423 employee stock plan purchases (Form 3922) by 31 January of the following year.  Tax period: 1 January to 31 December.  Reporting deadline: 15 April, with an extension until 15 October.  Payment of tax: any unpaid federal tax is due by 15 April and no extension is available for payment. If the individual has significant income which is not subject to withholding, they are generally required to make quarterly payments (15 April, 15 June, 15 September and 15 January) of estimated tax due.  State tax: employees may also be required to file state and/or local (municipal) tax returns and make payments of state and/or local (municipal) tax on income.



Tax reporting - Employing company	The employer must report the employees' incentive related income but the filing covers all employee benefits and is not specific to equity related incentives. Separate tax-qualified share reporting applies, as noted below.
	Information returns for employees:
	Report name: Form W-2 for ordinary income;
	Reporting deadline: 31 January.
	Withholding, Social Security and Medicare tax remittance: income, social security and Medicare taxes withheld must be deposited by electronic funds transfer (EFT) using the Electronic Federal Tax Payment System (EFTPS). Employers are required to deposit taxes withheld on a semi-weekly or monthly basis, depending on the employer's aggregate tax withholding during a lookback period. In addition, if an employer accumulates more than USD100,000 of withheld taxes on any day, the taxes must be deposited on the next business day (see IRS Publication 15 here for additional information). The amount of taxes withheld are reflected on the employee's Form W-2.
	Tax-qualified share reporting: information returns must be made available to the employee (by 31 January) and to the IRS (by 28 February if filing by paper or by 31 March if filing electronically) for tax-qualified Section 422 incentive stock options (Form 3921) and Section 423 employee stock plan purchases (Form 3922).
	State tax: employers may also be required to file state and/or local (municipal) tax returns and withhold and pay state and/or local (municipal) tax on employee income.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual. If malus or clawback are applied then, in theory, all or most of the taxes paid can usually be reclaimed through the individual's tax returns, although whether the participant can be made completely whole through a tax deduction or tax credit for a repayment made after the tax year of the initial payment may depend on the facts and circumstances. The refund process can be challenging and may not result in a full refund to the individual.



Vietnam	
Taxable Moments	Payment of cash: Personal Income Tax (PIT) on salary/remuneration. No social security.
Income tax (maximum rate)	35% (2024). Any change in tax rates usually takes effect from 1 January.
Income tax rates	Progressive rates of tax between 5% and 35% apply. The maximum rate of tax applies to income above VND960,000,000 per year.  The following offerings to employees will be considered income from salary/remuneration, as the case may be:  • the discount offered on the option price/subscription price/purchase price/exercise price;  • the value of free matching shares;  • the value of free shares/RSUs.  Upon sale of awarded shares, this income will be subject to personal income tax at the following rates:  • if they are tax resident in Vietnam, the value of free awarded shares/the discount will be taxed at the normal progressive rates of up to 35%;  • if they are tax non-resident, the value of free awarded shares/the discount will be taxed at 20%.  Income tax bands 2024 (VND per year):  • From 0 to 60,000,000: 5%  • Over 60,000,000 to 120,000,000: 10%  • Over 120,000,000 to 216,000,000: 15%  • Over 216,000,000 to 384,000,000: 20%  • Over 384,000,000 to 624,000,000: 30%  • Above 960,000,000: 35%.
Employer income tax withholding	Yes
Social security withholding	No No
Employee social security	Employee social security (max rate):



Employer social security	Employer social security (max rate):
	<b>Social insurance</b> : 17.5% (Vietnamese and expatriate). For an employer who is operating in an industry with a high risk of occupational accidents and diseases, and is qualified to apply for a lower rate, the social insurance rate is 17.3% (subject to approval from the Vietnamese Ministry of Labor, Invalids and Social Affairs).
	Health insurance: 3% (Vietnamese and expatriate).
	Unemployment insurance: 1% (Vietnamese national).
	Employer social security (cap):
	<ul> <li>social insurance contributions are capped at 20 times the Basic Salary;</li> </ul>
	<ul> <li>health insurance contributions are capped at 20 times the Basic Salary; and</li> </ul>
	<ul> <li>unemployment insurance contributions are capped at 20 times the Regional Minimum Salary.</li> </ul>
	<b>Note</b> : there is no social security paid on share plan income.
Tax reporting - Individual	An employee is required to file an annual tax return. The local employer, as authorised by the employees, will file an annual tax return no later than 31 March. There is no specific filing in relation to equity related incentives.
	Report name: Annual Tax Return. The tax return can be filed online. The tax return can be downloaded from the website here.
	Tax period: 1 January to 31 December.
	Reporting deadline: tax returns must be filed no later than 31 March.
	Payment of tax: income tax on salary/remuneration is generally paid by the employer but any additional tax must be paid by the reporting deadline.
Tax reporting - Employing company	The employer must report the employees' incentive related income but the filing covers all employee benefits and is not specific to equity related incentives. The local employer is required to withhold, declare and pay personal income tax on its employees' behalf.
	The local employer must declare and pay personal income tax on behalf of an employee who has received dividends in the form of shares or a bonus in the form of shares on the employee's sale of the shares. As all proceeds of sale and dividends must be repatriated through the foreign currency account (the Account) which the local employer opens and maintains to implement the Plan, the local employer can discharge its withholding obligations before it transfers payments from the Account into the employees' bank accounts in Vietnam.
	<b>Report name</b> : monthly report. The return must be filed online. The return can be downloaded from the website <u>here</u> .
	Reporting deadline: withholding returns must be filed monthly by the 20th day of each month.
	<b>Payment of tax</b> : withheld tax is paid at the same time that the monthly report is filed. Social security contributions are paid no later than the last day of each month. Capital gains tax and dividend tax are paid within 10 days from the date of the taxable event.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



Zambia		
Taxable Moments	Payment of cash: Income tax and social security.	
Income tax (maximum rate)	37% (2024). Any change in tax rates usually takes effect from 1 January.	
Income tax rates	Progressive rates of tax apply. The maximum tax rate in the table below applies to monthly income over ZMW9,200 (2024):  • the first ZMW5,100: 0%;  • ZMW5,101 to ZMW7,100: 20%;  • ZMW7,101 to ZMW9,200: 30%;  • over ZMW9,200: 37%.	
Employer income tax withholding	Yes	
Social security withholding	Yes Employee social security. Employer social security. Employer withholds employee contribution.	
Employee social security	<ul> <li>Employee social security (max rate):</li> <li>National Pension Scheme Authority (NAPSA): 5% (the total NAPSA contribution is 10% of an employee's monthly earnings, broken down into a 5% contribution from the employer and a 5% contribution from the employee);</li> <li>National Health Insurance Contributions (NHIC): 1% of basic salary.</li> <li>Employee social security (cap):</li> <li>NAPSA: the monthly maximum contribution is set annually. In 2024, the monthly cap is ZMW1,490.80.</li> <li>NHIC: no cap.</li> </ul>	
Employer social security	<ul> <li>Employer social security (max rate): <ul> <li>NAPSA: 5% (the total NAPSA contribution is 10% of an employee's monthly earnings, broken down into a 5% contribution from the employer and a 5% contribution from the employee);</li> <li>NHIC: 1% of basic salary.</li> </ul> </li> <li>Employer social security (cap): <ul> <li>NAPSA: the monthly maximum contribution is set annually. In 2024, the monthly cap is ZMW1,490.80.</li> <li>NHIC: no cap.</li> </ul> </li> <li>Payroll taxes: there are no additional payroll taxes, however, additional payroll deductions must be made, including a personal levy of ZMW7.5 per year.</li> </ul>	



Tax reporting - Individual	Yes. There is no specific filing in relation to equity related incentives.  Report name: Personal Income Tax Return. For individuals who receive income that is not subject to PAYE withholding, provisional tax must be paid, in advance, in instalments (10 April, 10 July, 10 October and 10 January). A filing of the estimated provisional tax return must be filed by 31 March (electronic return) or 5 March (manual return) of the relevant charge year. A return can be filed electronically through the 'TaxOnline' website or manually at any Zambia Revenue Authority (ZRA) tax office.  Tax period: 1 January to 31 December  Reporting deadline: the income tax return must be filed no later than 21 June following the end of the charge year.  Payment of tax: see above.
Tax reporting - Employing company	Yes. The employer must report the employees' incentive related income but the filing covers all employee benefits and is not specific to equity related incentives.  Report name: monthly returns. Filing income tax online with the ZRA is done through the ZRA TaxOnline Portal here.  Reporting deadline: monthly returns must be filed by the 10th day of the following month.  Payment of tax: PAYE and social security contributions are paid at the same time that the monthly return is filed.
Malus and Clawback - Individual	The existence of a malus or clawback clause does not affect the moment of tax for the individual.



This summary assumes that the participants are subject only to local taxes at all relevant times. Different rules may apply if the participants are subject to multiple taxing jurisdictions at any relevant time.

This summary is only a guide. It is limited to a general description of national tax laws and does not address local, city, regional, state or other provincial tax laws that may apply to the participants.

The tax position will depend on each participant's individual circumstances. We do not warrant any particular tax result. Therefore we recommend that participants consult their own tax advisor regularly to determine their individual tax position.

The exact structure of an award is crucial to the way that award is taxed. The tax treatment can be affected by many factors including retention/holding periods and clawback. Different clawback terms and different restrictions on shares may impact the tax treatment. If companies want detailed and specific tax advice for their plans, then local counsel need to know the exact detail of how the specific plans work. The database can only give generalised tax advice.

The information provided is understood to be correct as of 20 December 2024. Changes in legislation or practice after this date may affect the tax treatment.

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