

## France Employee Tax Guide

### MyShare: Free Shares

#### Introduction

The following is a summary of the tax treatment of an award made to you by Anglo American plc under the MyShare: Free Shares (the "Plan"). This summary assumes that you have been resident in France during the lifecycle of the award.

The tax treatment as explained herein is intended as a guide only. It is limited to a general description of the national tax laws, and is not intended to address city, regional, or other local tax laws that may be applicable to you. It may not apply to your particular tax or financial situation, and we are not in a position to assure you of any particular tax result. Therefore, we recommend that you consult with your own independent tax advisor regularly to determine the consequences of taking or not taking any action concerning your shares, and to determine how the tax or other laws in France apply to your specific situation. This information was last reviewed in March, 2026.

#### Overview

##### Award

- An award is a promise to receive Anglo American plc shares in the future.
- You must accept your award at your broker.
- You are **not subject to taxation on equity** at this point.

##### Vesting

- The date when you receive Anglo American plc shares.
- You **are subject to taxation on equity** at this point.
- Taxable income is calculated based on the fair market value (FMV) of the shares.
- The FMV is the closing stock price of the last trading day before the vest date.
- **Anglo American plc is responsible for reporting the income.**
- You are also **responsible for reporting the income.**

##### Sale

- The date you sell Anglo American plc shares.
- This event may generate additional income known as Capital Gain (CG), or a loss.
- Generally speaking, Capital Gain is the growth in value from vest to sale.
- If there is a **Capital Gain** on the sale of shares, tax is due in the tax year of sale.
- You are responsible for calculating the tax and reporting this capital gain.

#### Will I pay tax when I am granted an award under the Plan?

You will not have to pay any tax at the time you are granted an award under the Plan.

#### Will I pay tax when my award vests?

When your award vests, income tax will be triggered on the market value of the shares at the time of vesting at rates of up to 45%.

#### What about any social taxes?

You will also be required to pay the following taxes:

- **Uncapped Old-Age Insurance** : When you receive your shares, you will be required to pay Uncapped Old-Age Insurance on the market value of the shares at a rate of 0.4%.

- **Generalized Social Contribution:** When you receive your shares, you will be required to pay Generalized Social Contribution on the market value of the shares at a rate of 9.2%.
- **Social Debt Repayment Contribution:** When you receive your shares, you will be required to pay Social Debt Repayment Contribution on the market value of the shares at a rate of 0.5%.
- **Capped Old-age insurance:** For earnings up to EUR 48,060 per year, you will be required to pay Capped Old-age insurance on the market value of the shares when you receive these shares at a rate of 6.9%.
- **Supplementary pension scheme (AGIRC-ARRCO):** For earnings up to EUR 384,480 per year, you will be required to pay Supplementary pension scheme (AGIRC-ARRCO) on the market value of the shares when you receive these shares at a rate up to 8.64%.
- **General balance contribution:** For earnings up to EUR 384,480 per year, you will be required to pay General balance contribution on the market value of the shares when you receive these shares at a rate up to 1.08%.
- **Technical balance contribution:** For earnings up to EUR 384,480 per year, you will be required to pay Technical balance contribution on the market value of the shares when you receive these shares at a rate of 0.14%.
- **APEC unemployment insurance :** For earnings up to EUR 192,240 per year, you will be required to pay APEC unemployment insurance on the market value of the shares when you receive these shares at a rate of 0.024%.

### Will the company withhold any taxes from awards?

Anglo American plc will deduct and withhold tax on your behalf.

Any variance between the amount of tax withheld and your actual tax liability will be your responsibility.

### How will any benefits under the Plan be reported?

You will need to report:

- Any income tax due on vesting of the shares in Form 2042 to the tax authorities in the annual tax return.
- Any capital gains tax due on the sale of shares in Annual Tax return (Form 2042 and, if applicable, also Form 2047) to the tax authorities in the annual tax return.

### Will I have to pay any tax on any dividends paid on the shares?

A dividend is a right to participate in the company's profits, at the discretion of the board of directors.

Any dividends you receive will be taxed at a rate of 31.4%.

For dividends paid to individuals by a foreign company that is subject to a foreign tax equivalent to French corporate income tax, the individual is subject to tax on the gross dividend at a rate of 12.8%, plus social contributions on income from assets at a rate of 18.6%, i.e., a total rate of 31.4% (since January 1, 2026).

Unless the institution in the European Union (or Iceland, Norway or Liechtenstein) paying the dividend has been mandated to do so, the dividend must be declared by the individual using Form N°2778-DIV-SD no later than the 15th of the month following the month in which the dividend is paid in order to pay the withholding tax of 12.8% as an advance payment on the tax due in the following year. Dividend income should also be reported on Form N°2047 and Form N°2042.

However, the individual can, instead of the rate of 12.8%, opt for all investment income (including dividends and capital gains) to be subject to progressive income tax rates (from the year following the year in which the dividend is paid). Social contributions on income from assets (at a rate of 18.6%) remain payable. If the individual opts for investment income to be taxed at progressive income tax rates, where the foreign company is incorporated in a country that is a member of the European Union or in a country that has signed an administrative assistance agreement with France to combat fraud and tax evasion (which includes the United States and the United Kingdom), 40% of the dividends may be deducted from the taxable base, subject to certain conditions being satisfied. If the taxpayer opts for the progressive scale, any tax overpayment is refunded. The taxes levied in the country of origin, if any, are deducted from this income.

High income households may be required to pay the exceptional 3% or 4% and, since January 1, 2025, if applicable, the differential contribution for high income households.

Please note that where foreign withholding tax applies on the gross dividend, an international tax treaty may apply to provide for the elimination of double taxation by means of a tax credit.

### Will I pay any tax when I sell my shares?

As the calculation of capital gains can be complex and may be subject to certain exemptions, we recommend that you consult your personal financial/tax advisor.

If the sale price of your shares is higher than their cost basis (broadly, the cost basis is equal to the fair market value of the shares at the time of vesting), the difference will be taxable as a capital gain, at a rate of 31.4%. If the sale price is lower than the cost basis of the shares, you may realize a capital loss.

Prior to the enactment of the Finance Act 2025, any gains realized from the sale of the shares were, in principle, taxable under the French capital gains tax regime (i.e., at a flat income tax rate of 12.8% plus social contributions on assets income at a current rate of 18.6%) unless, in view of the conditions under which the sale was carried out, the gains were deemed to have been acquired not by virtue of the seller as an investor but in consideration of his salaried duties within the company. In this case, the gains were subject to income tax as salary income for the year of sale (at rates up to 45%). In any case, the exceptional 3% or 4% contribution payable by high income households (based on reference income tax) could apply.

Note: taxpayers may opt for gains taxable under the capital gains tax regime to be taxed at progressive income tax rates instead of the flat 12.8% rate. Social contributions on income from assets remain payable where the individual opts for capital gains to be taxed at progressive income tax rates.

The tax regime of the 'net gain' arising from shares acquired by employees has been modified by the Finance Act 2025 for the sale of shares on or after February 15, 2025. This tax framework applies to any net gain realized on shares which is acquired by an employee in return for his duties as an employee or manager. A few additional changes have been made by the Finance Act 2026.

On July 23, 2025, the French tax authorities released guidance on its interpretation of the scope and the taxation rules of the specific tax regime introduced by Finance Act 2025. This guidance was subject to a public consultation that closed on October 22, 2025. The French tax authorities have noted that its interpretation published to date can be relied upon until such time that any additional guidance is published. To date, the guidance has not been amended, and the final version has not yet been released.

Pursuant to this guidance, the French tax authorities have noted that the gain subject to the specific tax regime corresponds to the net gain derived from the disposal, sale, conversion, or leasing of the shares. Therefore, the application of the specific tax regime depends on the conditions under which the gain is realized upon disposal, sale, conversion, or leasing and not on the terms and conditions of grant, acquisition or subscription of shares. The French tax administration thus specifies that the acquisition of shares by an employee at a discount to market value does not necessarily mean that the net gain resulting from shares fall within scope of the specific tax regime introduced by Finance Act 2025.

The tax authorities have also commented that it is necessary to consider if the gain realized upon the sale of shares is acquired as a result of the employment duties of the individual.

This is assessed in particular with regard to:

- the achievement of performance levels, either by the company or by the investment made by other investors in the company,
- the fact that, for example, shares are disposed pursuant to contractual transfer provisions (i.e., drag-along or tag-along provisions or compulsory transfer provisions upon the employee's termination of employment with the issuer group) or any mechanism that allows the employee to realize a benefit on sale (for example, a ratchet mechanism).

The gain resulting from the acquisition or subscription of shares at a price lower than their fair market value on the date of acquisition or subscription is not included in the scope of the specific taxation regime introduced by Finance Act 2025.

This summary assumes that any gain realized upon the sale of shares is taxable as a capital gain. However, the tax treatment for gains realized upon the sale of shares should be reviewed on a case-by-case basis.

For completeness, however, the tax treatment of gains that do fall within the scope of the tax framework introduced by Finance Act 2025 is the note below titled 'Tax framework introduced by Finance Act 2025 where the net gain realized upon the disposalsale, conversion, or leasing of shares is acquired by an employee in return for their duties as an employee or manager'.

### **Capital Gains**

When you sell your shares, the local company will not withhold any taxes on the gains. You should report any gain or loss arising in your tax return for the tax year in which the sale took place.

---

## Additional Information

### Deduction of Social Taxes

For purposes of calculating the employee's income tax liability on the award, social security contributions and a portion of the CSG is deductible from the gross income received from the awards. The tax-deductible portion of the CSG contribution is 6.8% and the remaining share (2.4%) is not deductible.

### Employee social security rates

Gains obtained under a non-qualified share plan are subject to normal social contributions on salaried income.

Employee social contributions apply as follows:

#### 1. Uncapped social contributions:

- **Uncapped Old-age Insurance (Assurance vieillesse déplafonnée)** – 0.4%
- **Generalized Social Contribution (CSG)** – 9.2%
- **Social Debt Repayment Contribution (CRDS)** – 0.5%

CSG (Generalized Social) and CRDS (Social Debt Repayment) contributions are due at flat rates of 9.2% and 0.5% on 98.25% of gross income up to EUR 192,240 per year and 100% of gross income exceeding EUR 192,240 per year.

#### 2. Capped social contributions:

- **Capped Old-age insurance (Assurance vieillesse plafonnée)** - 6.9% capped at EUR 48,060 per year.
- **Supplementary pension scheme (AGIRC-ARRCO)** - 3.15% capped at EUR 48,060 per year; 8.64% for salaries between EUR 48,060 and EUR 384,480 per year.
- **General balance contribution (contribution d'équilibre general - CEG)** – 0.86% capped at EUR 48,060 per year; 1.08% for salaries between EUR 48,060 and EUR 384,480 per year.
- **Technical balance contribution (contribution d'équilibre technique - CET)** – 0.14% capped at EUR 384,480 per year. Although due on all income up to EUR 384,480 per year, the technical balance contribution (contribution d'équilibre technique or CET) is only payable if the employee's gross salary income exceeds EUR 48,060 per year.
- **APEC unemployment insurance** – 0.024% capped at earnings of EUR 192,240 per year. APEC unemployment insurance contributions are only payable by executive employees.

Note: the social tax rates and thresholds displayed in this summary are the rates and thresholds applicable in all French departments except Bas-Rhin, Haut-Rhin and Moselle. Please note that different contribution rates may be applicable in Bas-Rhin, Haut-Rhin and Moselle.

### Non-French tax residents

For non-French tax residents, subject to international conventions on double taxation, the income tax due on French-source income as salaries has to be withheld and remitted to the tax authorities by the 15th of the month following the end of the calendar quarter of the taxable event. The tax is calculated by income bracket at rates of 0%, 12% and 20% according to an annual scale.

### Additional contributions payable by high income households

The gains derived from the acquisition of the shares under a non-qualified plan are subject to income tax at progressive rates or as capital gains plus, if applicable, the exceptional 3% or 4% contribution payable by high income households (i.e., where reference tax income exceeds EUR 250,000 for single taxpayers or EUR 500,000 for joint taxpayers).

This contribution, which is not withheld by the employer and is instead payable by the employee, may be due on higher income received during a tax year as follows:

- For single filers: 3% tax applies to reference tax income between EUR 250,000 and EUR 500,000 and 4% to reference tax income above EUR 500,000.
- For couples subject to joint taxation: 3% tax applies to reference tax income between EUR 500,000 and EUR 1,000,000 and 4% to reference tax income above EUR 1,000,000.

Note that this special contribution applies to the “reference tax income” calculated by the tax authorities on the basis of the income declared for the tax household.

Moreover, since January 1, 2025, the differential contribution (Contribution Différentielle sur les Hauts Revenus or CDHR) for high income households created by Finance Act 2025 and amended by Finance Act 2026 may also apply. This contribution is designed to ensure a minimum effective tax rate of 20% on reference tax income for high income households (i.e., where reference tax income exceeds EUR 250,000 for single taxpayers or EUR 500,000 for joint taxpayers). The contribution is equal to the difference between this minimum taxation of 20% and the sum of taxes actually paid during the year, which includes income tax, withholding taxes, and the 3% or 4% contribution on high incomes.

### **Income tax withholding rates**

The employer must deduct income tax at source at the rate sent to him by the tax authorities for the employee (known as “personal rate” and corresponding to the employee’s average tax rate) or, failing that, the rate resulting from the application of a default rate scale (known as the “neutral rate” ranging from 0.5% on a monthly income base of between EUR 1,635 and EUR 1,698 to 43% on a monthly income base equal or greater than EUR 55,558).

The employer should ensure that the correct amount of taxes are paid in a tax period.

### **Impact of the 2025 Finance Act**

The 2025 Finance Act introduced a new regime applicable for the ‘net gain’ realized from shares that are acquired by an individual in connection with the function as an employee of the issuing company (or a related company).

Under this new regime, as a default, the ‘net gain’ realized on shares, that is acquired by the employee in connection with the performance of his or her duties within the issuing company (or a related company), is subject to the progressive income tax rates that are applicable to employment income. However, subject to conditions being met, a portion of the ‘net gain’ may be taxable as a capital gain.

On July 23, 2025, the French tax authorities released guidance on its interpretation of the scope and the taxation rules of the specific tax regime introduced by Finance Act 2025. This guidance was subject to a public consultation that closed on October 22, 2025. The French tax authorities have noted that its interpretation published to date can be relied upon until such time that any additional guidance is published. To date, the guidance has not been amended, and the final version has not yet been released.

Pursuant to this guidance, the French tax authorities have noted that the gain subject to the specific tax regime corresponds to the net gain derived from the disposal, sale, conversion, or leasing of the shares. Therefore, the application of the specific tax regime depends on the conditions under which the gain is realized upon disposal, sale, conversion, or leasing and not on the terms and conditions of grant, acquisition or subscription of shares. The French tax authorities thus specifies that the acquisition of shares at a price lower than the market value at acquisition does not necessarily mean that the net gain resulting from shares fall within the scope of the specific tax regime.

The gain resulting from the acquisition or subscription of shares at a price lower than their fair market value on the date of acquisition or subscription is not included in the scope of the specific taxation regime introduced by Finance Act 2025. This gain (known as “acquisition gain”) may be taxed as a salary (i.e. to income tax at the progressive scale) if the conditions under which it is realized reveal that it is obtained in consideration of the salaried duties of the employee within the company.

### **Employee and employer social security contributions**

Since the Finance Act for 2025, amended by the Social Security Financing Act, “the net gain arising from shares” subscribed or acquired by employees in connection with the performance of their duties within the issuer company (or a subsidiary of the issuer company) is excluded from social security contributions and CSG-CRDS contributions (that regular salary payments are subject to) if the two conditions set out by the law, for a portion of the gain, to be taxed as capital gain are met. If these conditions are not met, the net gain is treated as a salary for the payments of the social contributions.

On July 23, 2025, the French tax authorities released guidance on its interpretation of the scope and the taxation rules of the specific tax regime introduced by Finance Act 2025. This guidance was subject to a public consultation that closed on October 22, 2025. The French tax authorities have noted that its interpretation published to date can be relied upon until such time that any additional guidance is published. To date, the guidance has not been amended, and the final version has not yet been released.

Pursuant to this guidance, the French tax authorities have noted that the gain subject to the specific tax regime corresponds to the net gain derived from the disposal, sale, conversion, or leasing of the shares. Therefore, the application of the specific tax regime depends on the conditions under which the gain is realized upon disposal, sale, conversion, or leasing and not on the terms and conditions of grant, acquisition or subscription of shares. The French tax authorities thus specifies that the acquisition of shares at a price lower than the market value at acquisition does not necessarily mean that the net gain resulting from shares fall within the scope of the specific tax regime.

The gain resulting from the acquisition or subscription of shares at a price lower than their fair market value on the date of acquisition or subscription is not included in the scope of the specific taxation regime introduced by Finance Act 2025.

On this basis this summary assumes that the 'net gain arising from shares' means the net gain realized upon disposal of the shares and so the social security exemption introduced by the 2025 French Finance Act only applies to this gain and not to the acquisition gain. Consequently, this summary sets out that the acquisition gain could be subject to social security contributions and CSG-CRDS contributions (that regular salary payments are subject to).

### **Tax framework introduced by Finance Act 2025 where the net gain realized upon the disposal, sale, conversion, or leasing of shares is acquired by an employee in return for his duties as an employee or manager**

When the net gain is realized by the employee in connection with the performance of his or her duties within the issuing company (or any company in which the latter holds a portion of the capital share or any company holding a portion of issuing company's capital share), it is subject to the progressive income tax rates that are applicable to employment income.

However, a portion of the net gain could be taxed as a capital gain (rather than employment income) if the following conditions are met:

- the shares present a risk of losing the price paid to acquire or subscribe to them and,
- they have been held continuously for 2 years or more.

Where both of the conditions above are satisfied, the portion of the gain on sale which is not exceeding a ceiling determined according to a financial performance ratio of the issuing company during the period the shares are held by the employee is taxed as a capital gain at a flat rate of 31.4% (including income tax at a flat rate of 12.8% plus social contributions on income from assets at 18.6% (CSG at a rate of 10.6%, CRDS at a rate of 0.5% and the "prélèvement de solidarité" at a rate of 7.5%)). These new rates apply starting with the taxation of income for the year 2025. The financial performance ratio of the issuing company is determined by reference to the following formula: value of the shares at the acquisition or subscription date x 3 x [the fair market value of the issuing company on the date the shares are sold by the employee / the fair market value of the issuing company on the date the shares are acquired or subscribed by the employee (or awarded in case of free shares)] – value of the shares at the acquisition or subscription date. This ceiling is reduced by the amount of dividends distributed to the employee or the sums paid as a result of a reduction or amortization of capital.

Note however that the taxpayer may opt for capital gains to be taxed at progressive income tax rates instead of the flat 12.8% rate. Social contributions on income from assets (at a rate of 18.6%) remain payable where the individual opts for capital gains to be taxed at progressive income tax rates.

Any portion of the gain on sale that exceeds this ceiling is taxed as salary income (and subject to progressive income tax at rates up to 45%) and subject to a specific 10% employee social contribution.

The taxation of the net gain (as capital gain and as salary) occurs in principle on the year during which the shares are sold. Nevertheless, the taxation as capital gain can be deferred in case of a share exchange in the context of a merger, spin-off, consolidation or contribution of shares to a company subject to corporate tax. The same applies to gains exceeding the ceiling when they are reinvested by the employee in the acquisition or subscription of shares of the company or an affiliated company.

If the holding period condition is not satisfied, the net gain is taxed as a salary when the shares are sold. If either of the two conditions is not satisfied, the net gain is subject to social contributions as a salary (social security contributions and CSG-CRDS at a rate of 9.7%).

Irrespective of whether the gain (or any portion of the gain) is taxed as employment income or as a capital gain, the exceptional 3% or 4% contribution payable by high income households (i.e., where reference tax income exceeds EUR 250,000 for single taxpayers or EUR 500,000 for joint taxpayers) may also apply to gain on sale.

Moreover, since January 1, 2025, the differential contribution (Contribution Différentielle sur les Hauts Revenus or CDHR) for high income households created by Finance Act 2025 and amended by the Finance Act 2026 may also apply. This contribution is designed to ensure a minimum effective tax rate of 20% on reference tax income for high income households (i.e., where reference tax income exceeds EUR 250,000 for single taxpayers or EUR 500,000 for joint taxpayers). The contribution is equal to the difference between this minimum taxation of 20% and the sum of taxes actually paid during the year, which includes income tax, withholding taxes, and the 3% or 4% contribution on high incomes.

These rules apply to the sale of shares issued by a foreign company when the individual is a French tax resident. However, this principle may be subject to derogation under international agreements.

---

## Sample tax calculation

The following is an example of the tax implications upon vesting of shares and subsequent sale of shares under the Plan. This example assumes:

- You were in France the whole time from grant to vest of the MyShare: Free Shares award.
- Even though the maximum income tax rate applicable is 45%, an income tax withholding rate of 43% is applied in the following example.
- Social taxes of 10.1%.
- Capital Gains Tax of 31.4%.
- This example does not take into account any annual Capital Gains Tax (CGT) exemptions which may be available.
- This illustration does not take into account any capped social tax amount.
- Tax calculation is based on the currency in which the shares are traded and any subsequent currency conversion has not been applied.

## Tax implications

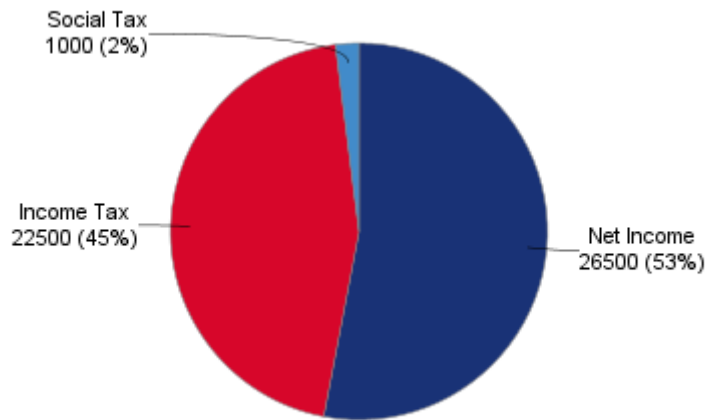
### Award

No taxes due.

### Vesting

Number of Shares Vested	5000
Fair Market Value (FMV) of the shares on Vesting	GBP 10
Taxable Income (5000 x GBP 10)	<b>GBP 50,000</b>
Social Tax Withheld (GBP 50,000 x 10.1%)	GBP 5,050
Income Tax Withheld (GBP 50,000 x 43%)	GBP 21,500
<b>Total Tax Withheld (GBP 21,500 + GBP 5,050)</b>	<b>GBP 26,550</b>
Net Income (GBP 50,000 - GBP 26,550)	<b>GBP 23,450</b>

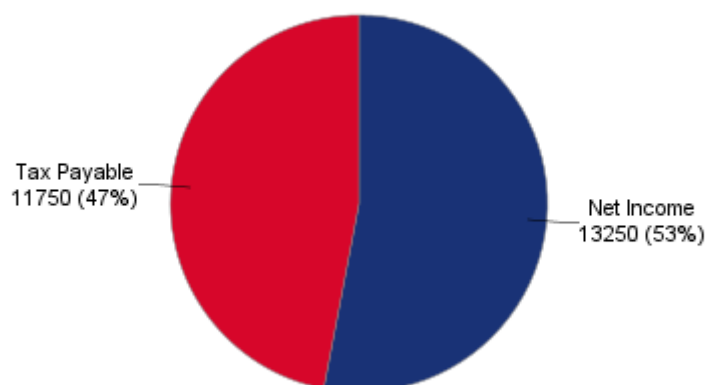
### Vesting



### Sale

Number of shares sold	5000
Fair Market Value (FMV) of the shares on sale	GBP 15
Sale Proceeds (5000 x GBP 15)	GBP 75,000
<b>Less: Acquisition Costs</b>	
Amount previously taxed	<b>GBP 50,000</b>
Capital Gain	GBP 25,000
<b>Tax Payable (GBP 25,000 x 31.4%)</b>	<b><u>GBP 7,850</u></b>
Net Income (GBP 25,000 - GBP 7,850)	<b>GBP 17,150</b>

### Sale



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

The share price used in this example is for illustration purposes only and does not necessarily reflect Anglo American's current share price.

**INFORMATION MADE AVAILABLE BY MORGAN STANLEY SMITH BARNEY LLC, [MEMBER SIPC](#), AND ITS AFFILIATES (“MORGAN STANLEY AT WORK”) ON THIS SITE IS FOR INFORMATIONAL PURPOSES ONLY AND DOES NOT CONSTITUTE LEGAL OR TAX ADVICE.** You should always consult with and rely on your own legal and/or tax advisor(s) as Morgan Stanley at Work does not provide legal or tax advice and the information is not tailored to the specific situations of your company or your employees.

The information is sourced from third parties, may not be current and is subject to change without notice. Morgan Stanley at Work makes no representations or warranties concerning the accuracy, completeness or timeliness of the information and is not implying an affiliation, sponsorship or endorsement with/of any third parties or views expressed by such parties.

Any views expressed in the information are solely those of the third-party source. Morgan Stanley at Work shall have no liability arising out of, or in connection with, the information, including any loss caused by use of, or reliance on, the information.

All information made available by Morgan Stanley at Work is subject to the terms of the written agreement entered into between Morgan Stanley at Work and your company.