

# Switzerland - Tax Guide

## Employee Share Purchase Plan

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### 1. Introduction

The following is a summary of the tax treatment of an award made to you by Seagate Technology Holdings PLC under the Employee Share Purchase Plan (the "Plan"). This summary assumes that you have been resident in Switzerland 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 Switzerland apply to your specific situation. This information was last reviewed in September, 2025.

### 2. Overview

#### Award

- It allows you to purchase Seagate Technology Holdings PLC shares at a discount.
- You are **not subject to taxation on equity** at this point.

#### Purchase

- You will **be subject to tax** at this point.
- The taxable amount is calculated based upon the market value of the shares at the date of purchase less the price paid for the shares.
- **Seagate Technology Holdings PLC is responsible for reporting the income.**
- You are also **responsible for reporting the income.**

#### Sale

- The date you sell Seagate Technology Holdings PLC shares.
- You are **not subject to taxation on equity** at this point.

### 3. Tax Treatment

	Award	Purchase	Sale
Action required	No action required.	Pay any taxes due. Report the income on tax return.	No action required.
Income tax / Capital gains tax	No	Income tax payable at rates up to 11.5%.	No

<b>Employee social tax</b>	No	Yes <b>Old-age Insurance (AHV):</b> Uncapped flat rate of 4.35%. <b>Disability Insurance (IV):</b> Uncapped flat rate of 0.7%. <b>Unemployment Insurance (ALV):</b> Flat rate of 1.1% capped at earnings of CHF 148,200 of income per year. <b>Maternity/Military (EO):</b> Uncapped flat rate of 0.25%.	No
<b>Employer's social tax</b>	No	Yes <b>Old-age Insurance (AHV):</b> Uncapped flat rate of 4.35%. <b>Disability Insurance (IV):</b> Uncapped flat rate of 0.7%. <b>Maternity/Military Insurance (EO):</b> Uncapped flat rate of 0.25%. <b>Unemployment Insurance:</b> Flat rate of 1.1% capped at earnings of CHF 148,200 of income per year.	No
<b>Income tax withholding</b>	No	No	No
<b>Employee social tax withholding</b>	No	Yes	No
<b>Employee tax reporting</b>	No	Yes	No
<b>Employer tax reporting</b>	Yes	Yes	No
<b>Tax return deadline</b>	By March 31 of the following tax year		
<b>What documents do I need for my taxes</b>	N/A	N/A	N/A
<b>Foreign asset reporting</b>	<p>You should report any foreign assets to the Tax Authorities (on Form Annual Tax Return) by March 31.</p> <p>Swiss residents are subject to an annual Cantonal and Municipal wealth tax on all investments held abroad (including financial investments such as shares and cash) that exceed a threshold amount. This wealth tax is assessed as part of the annual tax return.</p> <p>All cantons and municipalities levy a net wealth tax at progressive rates, ranging from 0.13% to 1%. The exact rate and threshold varies among Cantons and Municipalities. No net wealth tax is imposed at the federal level. The average cantonal threshold is CHF 100,000.</p> <p>Net wealth tax is calculated on an annual basis on the fair market value of the investment at December 31 of the relevant year.</p> <p>Any vested, exercised or purchased shares held are subject to Swiss net wealth tax and will need to be disclosed in the annual tax return (based on the value of the shares as of 31 December). Unvested RSUs and unexercised options are not subject to Swiss net wealth tax but should be disclosed in the tax return without a tax relevant value.</p>		

**Income tax** - The rates set out in this guide are marginal rates. In the event that you are required to pay income tax on the value of your award, the amount of income tax you pay will depend on your marginal tax rate. Generally, the more you earn, the higher your marginal income tax rate.

#### 4. Will I pay tax when I am granted an award under the ESPP?

You will not have to pay any tax when you are granted a right to acquire shares under the ESPP.

#### 5. Will I pay tax when I receive my shares?

##### Income Taxes

When the shares are purchased, you will be required to pay income tax on the difference between the purchase price and the market value of the shares at that time at rates of up to 11.5%.

In addition to Federal tax, cantonal taxes may apply. In Genève, for example, you will be required to pay income tax at a flat rate of 29.07%.

Please be aware that no withholding for income tax will be applied if you are a Swiss national or a resident with a C permit. However, if you hold a B permit or are a cross-border employee, any income tax (and church tax if applicable) will be withheld and paid to the tax authorities on your behalf.

### **Social Taxes**

You will also be required to pay the following taxes:

- **Old-age Insurance (AHV):** When the shares are purchased, you will be required to pay social taxes on the difference between the purchase price and the market value of the shares on purchase at a rate of 4.35%.
- **Disability Insurance (IV):** When the shares are purchased, you will be required to pay social taxes on the difference between the purchase price and the market value of the shares on purchase at a rate of 0.7%.
- **Unemployment Insurance (ALV):** For earnings up to CHF 148,200 per year, you will be required to pay social taxes on the difference between the purchase price and the market value of the shares on purchase at a rate of 1.1%.
- **Maternity/Military (EO):** When the shares are purchased, you will be required to pay social taxes on the difference between the purchase price and the market value of the shares on purchase at a rate of 0.25%.

Any social security will be withheld by your employer.

### **Payment Method**

Seagate Technology Holdings PLC will deduct and withhold employee social tax on your behalf.

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

The local company will not withhold income tax on the award and it will be your duty to report and pay income tax due under the ESPP in your tax return.

## **6. How will any benefits under the ESPP be reported?**

You will need to report:

- Any income tax due on purchase of the shares to the tax authorities in the annual tax return, due by March 31. Annual tax returns are generally due by March 31. If the employee has to file an annual tax return, then any benefits have to be reported. Swiss citizens and permit C holders (and persons married to one) need to file a tax return each year. All other foreign employees residing in Switzerland whose gross salary exceeds CHF 120,000 per year (CHF 500,000 in Geneva) are obliged to file a tax return for their worldwide income and assets. In addition, a tax return has to be filed even if gross salary does not exceed CHF 120,000 per year (CHF 500,000 in Geneva) but there are additional sources of income or additional assets. However, in most cantons this is only for the additional income or assets.

## **7. 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 rates up to 11.5%.

Dividends are subject to federal tax at rates up to 11.5%. In addition, cantonal and municipal taxes also apply on dividends.

## **8. Will I pay any tax when I sell my shares?**

You will not have to pay any tax on the sale of the shares.

## **9. Additional Information**

### **Social contributions**

Your employer and you each pay up to 6.4% of the amount recognised as taxable income, consisting of:

- 4.35% AHV (pension contributions)
- 0.7% IV (disability insurance)
- 0.25% EO (insurance in respect loss of income in case of maternity or military service)
- 1.1% ALV: unemployment insurance (capped at CHF 148,200)

### **Income tax**

The income tax rates are composed of Federal rates, Cantonal rates and Municipal rates. The federal rate is added to Cantonal and Municipal rates which vary, depending on where the employee resides as well as his or her marital status. Taxes are calculated based on specific figures for specific cantons and municipalities. The federal income tax rate depends on the income

level (and marital status). For the highest income bracket the federal rate is 11.5%.

The various cantonal and municipal taxes are also levied at progressive rates, which can vary significantly between different Cantons and Municipalities. In addition, cantonal and municipal net wealth taxes are levied at a Cantonal and Municipal level, depending on the individual's denomination, church tax may also apply.

### **Withholding**

There is no withholding for income tax for Swiss nationals, residents with a C permit, and those married to Swiss nationals or residents with a C permit. Swiss residents with a B or other permit are subject to withholding on income tax and, in most cantons, church tax if applicable. If income tax withholding applies, the employer is also required to make monthly or quarterly reports of wages and wage tax deductions to the tax authority. The frequency can also be determined by agreeing a ruling with the cantonal tax authorities. Social security will be withheld for all employees (regardless of permit status) by the local company and paid on a quarterly basis.

### **Reporting**

The Swiss employer must issue the salary statement (Lohnausweis) to employees by 31 January, which shows the grant of awards and the income realised at exercise, vesting or purchase. The details must be provided on an additional page. There is a general duty on the employer to file a copy of the salary statement directly with the Cantonal tax authority in certain Cantons but not all.

### **Wealth tax**

All cantons and municipalities levy net wealth tax on worldwide assets at progressive rates, ranging from 0.13% to 1%. The exact amount varies among Cantons and Municipalities. No net wealth tax is imposed at the federal level.

Any vested, exercised or purchased shares held are subject to Swiss net wealth tax and will need to be disclosed in the annual tax return (based on the value of the shares as of 31 December). Unvested RSUs and unexercised options are not subject to Swiss net wealth tax but should be disclosed in the tax return without a tax relevant value.

### **Withholding in respect of non-residents**

A flat tax rate applies to equity compensation income where grants are made in Switzerland and the tax relevant event takes place abroad (with a prorated portion taxable in Switzerland). The former Swiss employer has an obligation to withhold any income tax. This flat tax rate will be 11.5% for federal tax purposes. The additional cantonal/communal flat rates vary from canton to canton.

In case a part of the income is apportioned to a foreign country, a statement showing the computation of the apportionment will also have to be provided by the employer, showing details of the number of days spent in Switzerland and abroad.

### **Taxable value**

Where the shares acquired are subject to a sale restriction, although the point of taxation is still the purchase (share purchase plan), grant (restricted stock plan), vesting (restricted stock units) or exercise (stock options) date (as applicable), the restriction may impact the basis for calculating the income tax and social security (if applicable) at the time of taxation. A discount on the unrestricted fair market value of the shares subject to a restriction or blocking period can be applied for the purposes of calculating the taxable amount at the time of purchase. The discount may be calculated on the following basis:

<b>Restriction / Blocking Period</b>	<b>Cumulative discount (%)</b>
1 year	5.660
2 years	11.000
3 years	16.038
4 years	20.791
5 years	25.274
6 years	29.504
7 years	33.494
8 years	37.259
9 years	40.810
10 years	44.161

For incomplete years, the discount is applied pro-rata temporis but in order to be eligible to receive the discount the shares have to remain blocked until the end of the blocking period (i.e. no earlier distribution is generally permitted). If an employee is allowed to dispose of or sell the shares before the end of the blocking period, the difference between the non-discounted value and the discounted value is treated as taxable income in the year of early termination of the blocking period.

### **Foreign asset reporting**

You are required to report any cash or share accounts held in a foreign institution. The information must be submitted to the Tax

Authorities (on Form Annual Tax Return) by March 31.

Swiss residents are subject to an annual Cantonal and Municipal wealth tax on all investments held abroad (including financial investments such as shares and cash) that exceed a threshold amount. This wealth tax is assessed as part of the annual tax return.

All cantons and municipalities levy a net wealth tax at progressive rates, ranging from 0.13% to 1%. The exact rate and threshold varies among Cantons and Municipalities. No net wealth tax is imposed at the federal level. The average cantonal threshold is CHF 100,000.

Net wealth tax is calculated on an annual basis on the fair market value of the investment at December 31 of the relevant year.

Any vested, exercised or purchased shares held are subject to Swiss net wealth tax and will need to be disclosed in the annual tax return (based on the value of the shares as of 31 December). Unvested RSUs and unexercised options are not subject to Swiss net wealth tax but should be disclosed in the tax return without a tax relevant value.

## 10. Sample tax calculation

This illustrative example assumes the following:

- Purchase price of USD 70.
- Income tax withholding will be calculated on the taxable compensation after social tax has been deducted.
- An income tax rate of 11.5%.
- Federal social taxes of 5.3%.
- 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

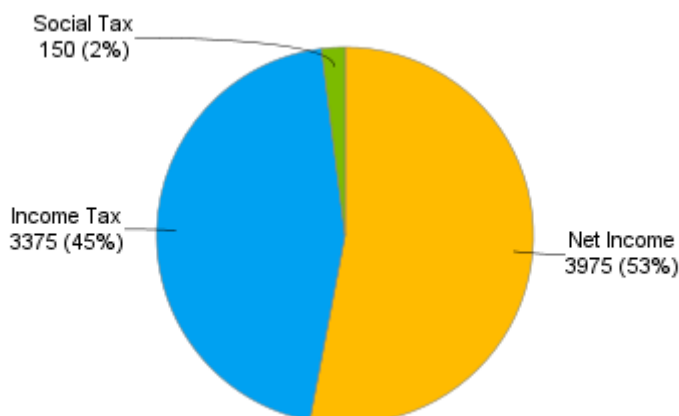
### Award

No taxes due.

### Purchase

Number of Shares Purchased	100
Purchase Price	USD 70
Fair Market Value (FMV) of the shares on Purchase	USD 80
Taxable Income (100 x USD 80) - (100 x USD 70)	<b>USD 1,000</b>
Federal Social Tax Withheld (USD 1,000 x 5.3%)	USD 53
Federal Income Tax Payable by you ((USD 1,000 - USD 53) x 11.5%)	USD 108.91
<b>Total Tax Payable (USD 108.91 + USD 53)</b>	<b>USD 161.91</b>
Net Income (USD 1,000 - USD 161.91)	<b>USD 838.10</b>

### Vesting



### Sale

No taxes due.

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

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