

**April 2025** 



# Restricted Stock Units Employee Information Supplements for Non-U.S. Jurisdictions Table of Contents

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### **ARGENTINA**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). 1 by Thermo Fisher Scientific Inc. (the "Company") under the Thermo Fisher Scientific Inc. Amended and Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>1</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

TAX	
Grant	No taxation.
Vesting	You will be subject to taxation on the date(s) the RSUs vest and you acquire shares.
Taxable Amount	The fair market value of the shares on the date of vesting.
Nature of Taxable Amount	Employment compensation.
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	Yes (to the extent the applicable contribution ceiling has not been exceeded).
Are Other Taxes Payable?	Personal Assets Tax. The Company shares and proceeds realized from the sale of shares are considered computable assets for personal asset tax purposes. The tax is not applicable if the annual value of your computable assets is under a certain threshold (currently ARS 100,000,000, subject to annual adjustment).
	Bank Tax. If you deposit the proceeds from the sale of shares into a bank account in Argentina or transfer the proceeds from an account in Argentina after receipt, you may be subject to a tax on bank debits and credits (the "Bank Tax"). If applicable, the Bank Tax is generally withheld by the relevant bank or financial institution.
	Stamp Tax. A stamp tax may apply upon your execution of any documents related to the Plan. If applicable, the rate and the term for payment will depend on the particular jurisdiction where you reside, and it is payable by you and/or the other party to the document.
	You should consult with your personal tax advisor to determine your obligations with respect to other taxes that may be due.

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	
Is Income Tax Withheld?	Yes.
Are Employee Social Insurance Contributions Withheld?	Yes (to the extent the applicable contribution ceiling has not been exceeded).
Are Other Taxes Withheld?	No.

Reporting	
Does the Taxable Amount Need to be Reported?	Your employer will report the taxable amount recognized upon share acquisition as taxable income to the Federal Tax Administration on Forms 744 and 1357.

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will report the payment as taxable income to the local tax authorities and withhold income tax and social insurance contributions (to the extent the applicable contribution ceiling has not been exceeded).

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you will be subject to additional taxation on any gain you realize.
	The taxable capital gain will equal the difference between the sale proceeds and your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition). Capital gains tax is payable at a flat rate of 15% on gains from all sources.
	If you sell Company shares acquired under the Plan at a price that is less than your cost basis in the shares, you will realize a capital loss. Capital losses may be offset from capital gains realized from similar equity transactions (i.e., from certain non-Argentine source gains only) in the same tax year and during the following five (5) years.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You are required to report certain information regarding any income from your participation in the Plan each year to the Argentine tax authorities on your annual tax return and pay any applicable taxes due. Tax filings are made electronically using the Federal Tax Administration website (www.afip.gob.ar).
	Tax filing deadlines are determined on a yearly basis. Filing extensions are not applicable under Argentine regulations and late filings will trigger interest and penalties. You should consult with your personal tax advisor for assistance with complying with the applicable reporting requirements.
	Tax returns are required to be filed on or before June 30 of the following year. This deadline, however, may be modified on a yearly basis.
Dividends	You are required to report certain information regarding any dividends received each year to the Argentine tax authorities on your annual tax return. Tax filing deadlines are determined on a yearly basis. Filing extensions are not applicable under Argentine regulations and late filings will trigger interest and penalties. You should consult with your personal tax advisor for assistance with complying with the applicable reporting requirements.
	Tax returns are required to be filed on or before June 30 of the following year. This deadline, however, may be modified on a yearly basis.
Sale of Shares	You are required to report certain information regarding income obtained from the sale of shares each year to the Argentine tax authorities on your annual tax return. Tax filing deadlines are determined on a yearly basis. Filing extensions are not applicable under Argentine regulations and late filings will trigger interest and penalties. You should consult with your personal tax advisor for assistance with complying with the applicable reporting requirements.
	Tax returns are required to be filed on or before June 30 of the following year. This deadline, however, may be modified on a yearly basis.

OTHER INFORMATION	
Foreign Asset/Account Reporting	You are required to report certain information regarding any Company shares you hold as of December 31 each year to the Argentine tax authorities on your annual tax return. You should consult with your personal tax advisor for assistance with complying with the applicable reporting requirements.
Exchange Control	Provided you are not required to purchase foreign currency and remit funds out of Argentina to acquire Company shares under the Plan, local exchange control restrictions would not apply. However, if so required, you personally are responsible for complying with all Argentine currency

	exchange regulations, approvals and reporting requirements. Exchange control requirements in Argentina are subject to change; you should consult with your personal advisor regarding any obligations you have under the Plan.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



### **AUSTRALIA**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). 2 by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>2</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

TAX	
Grant	Equity awards granted under the Plan are regarded as an Employee Share Scheme ("ESS") interest. In general, as it is understood that your equity award will be subject to a real risk of forfeiture at the time of grant, your award will not be subject to tax at grant, but when an "ESS deferred taxing point" occurs, as described below.
Vesting	Generally your ESS deferred taxing point occurs when your RSUs vest and are settled in shares. <sup>3</sup> Note that if you sell the underlying shares within 30 days of the original ESS deferred taxing point, the ESS deferred taxing point will shift to the date
	you sell the shares (the "30-day rule").
Taxable Amount	Typically, the fair market value of the shares on the date of vesting.  However, if the 30-day rule applies, the taxable amount will equal the sale proceeds (or market value if you do not dispose of the shares in an arm's length transaction. <sup>4</sup> ) less any incidental costs of disposal.
Nature of Taxable Amount	Employment compensation.
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	Yes.
Are Other Taxes Payable?	No.

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	
Is Income Tax Withheld?	No, assuming you provided your tax file number to your employer. You personally will be responsible for paying the applicable taxes directly to the Australian Tax Office ("ATO").
Are Employee Social Insurance Contributions Withheld?	No, assuming you provided your tax file number to your employer. You personally will be responsible for paying the applicable taxes directly to the ATO.
Are Other Taxes Withheld?	Not applicable.

<sup>&</sup>lt;sup>3</sup> This supplement assumes the underlying shares are not subject to any genuine restrictions on disposal.
<sup>4</sup> If you sell your shares on a recognized stock exchange, this will generally be considered an arm's length transaction.

### Reporting Does the Taxable Amount Yes. The Company will provide you (no later than July 14 after the *Need to be Reported?* relevant tax year ending June 30) and the Commissioner of Taxation (no later than August 14 after the end of the tax year) with a statement containing certain information about your award for the income tax year when the ESS deferred taxing point occurs (typically, the tax year in which your RSUs vest), including an estimate of the market value of the shares. Note that if you sell the shares within 30 days of the original ESS deferred taxing point, as described above, the taxable amount will not be based on the market value of the shares on the date of vesting (as reported by your employer), but on the sale proceeds (or market value on the date of sale if you do not dispose of the shares in an arm's length transaction) less any incidental costs of disposal. Thus, it will be your responsibility to calculate the taxable amount at sale in order to remit applicable taxes due.

	DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.	
	Your employer will report the payment as taxable income to the local tax authorities and withhold income tax and social insurance contributions.	

	DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.	
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.	

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you may be subject to additional taxation on any gain you realize, unless you

dispose of the shares within 30 days after the original ESS deferred taxing point (in which case your tax treatment will be limited to the tax consequences described above).

If you dispose of the shares more than 30 days after the original ESS deferred taxing point, you will be subject to capital gains tax to the extent that the sale proceeds (or market value if you do not dispose of the shares in an arm's length transaction) exceed your cost basis in the shares. Your cost basis in the shares will generally be equal to the market value of the shares at the ESS deferred taxing point (which will usually be the vesting date) plus any incidental costs of disposal.

The amount of any capital gain you realize must be included in your assessable income for the year in which the shares are sold. However, if you hold the shares for at least one (1) year prior to sale (excluding the dates you acquired and sold the shares), you may discount the capital gain to be included in your assessable income by fifty-percent (50%). If the sale proceeds (or market value if you do not dispose of the shares in an arm's length transaction) are lower than your cost basis in the shares sold, you will realize a capital loss. Capital losses may be used to offset capital gains realized in the current tax year or in any subsequent tax year, but may not be used to offset other types of income (e.g., salary or wage income).

The calculation of capital gains (losses) at the time of sale is complex and you should consult with your personal tax advisor.

#### Taxation in the U.S.

Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

### YOUR TAX REPORTING AND PAYMENT OBLIGATIONS

### Vesting

You will receive an ESS Statement by July 14 after the end of the tax year (ending June 30) in which the ESS deferred taxing point happens. The Company will also lodge an ESS Annual Report with the ATO by August 14 of that year.

The assessable amount should be included in Box F of the ESS Statement. Once the Company lodges the ESS Annual Report, the amount shown in Box F of your ESS Statement may be pre-filled into Box F of item 12 of your Tax Return for Individuals.

You should ensure that the amount included in Box F of Item 12 of your tax return is correct based on your personal circumstances.

Your tax return is generally due by October 31. However, if you appoint a tax agent prior to that date, you may be entitled to an extension in line with the tax agent's lodgment program.

If you do not appoint a tax agent, your tax payment is generally due by November 21. If you appoint a tax agent, your payment will be due in line with the tax agent's lodgment program.

Dividends	You should include the amount of any dividends received in item 20 (Foreign Source income and foreign assets or property) of the supplementary section of your tax return for the tax year ending June 30 in which the Company pays the dividend.
	Your tax return is generally due by October 31. However, if you appoint a tax agent prior to that date, you may be entitled to an extension in line with the tax agent's lodgment program.
	If you do not appoint a tax agent, your tax payment is generally due by November 21. If you appoint a tax agent, your payment will be due in line with the tax agent's lodgment program.
Sale of Shares	You should include the correct amount of any capital gains in item 18 of your tax return.
	Your tax return is generally due by October 31. However, if you appoint a tax agent prior to that date, you may be entitled to an extension in line with the tax agent's lodgment program.
	If you do not appoint a tax agent, your tax payment is generally due by November 21. If you appoint a tax agent, your payment will be due in line with the tax agent's lodgment program.

	OTHER INFORMATION	
Foreign Asset/Account Reporting	None.	
Exchange Control	Exchange control reporting is required for cash transactions exceeding AUD 10,000 and international fund transfers. The Australian bank assisting with the transactions will file the report for you. If an Australian bank is not involved in the transfer, you will have to file the report yourself.	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.	



### **AUSTRIA**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs") <sup>5</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc. Amended and Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>5</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.	
Taxable Amount	The fair market value of the shares on the date of vesting.	
Nature of Taxable Amount	Employment income.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	Yes (to the extent the applicable contribution ceiling has not been exceeded). The contributions include contributions to the fund for the promotion of house building and to the chamber of employees.	
Are Other Taxes Payable?	No.	

COMPANY/E	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	Yes.	
Are Employee Social Insurance Contributions Withheld?	Yes (to the extent the applicable contribution ceiling has not been exceeded).	
Are Other Taxes Withheld?	Not applicable.	
Reporting		
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the taxable amount as taxable income on the <i>Lohnzettel</i> to the tax authorities by January 31 of the year following the year in which the taxable event occurs. This deadline is extended until the end of February if the <i>Lohnzettel</i> is submitted electronically.	

	DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.	
	Your employer will report the payment as taxable income to the local tax authorities and withhold income tax and social insurance contributions (to the extent the applicable contribution ceiling has not been exceeded).	

DIVIDENDS	
Taxation in Your Country	Subject to a limited exemption, dividends paid on the Company shares you acquire under the Plan will be subject to tax at a flat rate or, upon application, at progressive income tax rates.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell your Company shares, you will be subject to additional taxation on any gain you realize, subject to a limited exemption. The taxable amount will equal the difference between the sale proceeds and your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition).
	If you sell Company shares acquired under the Plan at a price which is less than your cost basis in the shares, you will realize a capital loss. Capital losses may be offset from capital gains realized in the same tax year.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	None.
Dividends	You are personally responsible for reporting the dividend in your annual tax return unless an exemption applies.
	The income tax return must be filed electronically by June 30 of the following year using the form E1. If electronic filing is not possible, the form E1 must be filed by April 30 of the following year.
	The filing period can be extended by filing an informal written request with the tax authorities. If you engage a professional tax advisor, the filing period can be extended to April 30 of the second year following the year of the tax liability.

Sale of Shares	You are personally responsible for reporting the income in your annual tax return unless an exemption applies.
	The income tax return must be filed electronically by June 30 of the following year using the form E1 and annexes. If electronic filing is not possible, the form E1 and annexes must be filed by April 30 of the following year.
	The filing period can be extended by filing an informal written request with the tax authorities. If you engage a professional tax advisor, the filing period can be extended to April 30 of the second year following the year of the tax liability.

OTHER INFORMATION	
Foreign Asset/Account Reporting	None.
Exchange Control	If you hold securities (including shares acquired under the Plan) or cash (including proceeds from the sale of shares) outside of Austria, you may be subject to reporting obligations to the Austrian National Bank. If the value of the shares meets or exceeds a certain threshold, you must report the securities held on a quarterly basis to the Austrian National Bank as of the last day of the quarter, on or before the 15th day of the month following the end of the calendar quarter. Where the cash amounts held outside of Austria meets or exceeds a certain threshold, monthly reporting obligations apply as explained in the next paragraph.
	If you sell your shares, or receive any cash dividends, you may have exchange control obligations if you hold the cash proceeds outside of Austria. If the transaction volume of all your accounts abroad meets or exceeds a certain threshold, you must report to the Austrian National Bank the movements and balances of all accounts on a monthly basis, as of the last day of the month, on or before the 15th day of the following month, on the prescribed forms .These forms can be found under the reporting code AWBET and are:
	TRANS AKBOWK for the sale of stock without an ISIN/WK code TRANS AKBMWK for the sale of stock with an ISIN/WK code TRANS GEWOWK for dividends without an ISIN/WK code TRANS GEWMWK for dividends with an ISIN/WK code  You should consult with your personal tax advisor to determine your
	personal reporting obligations.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your

Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.
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### **BELGIUM**

### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). by Thermo Fisher Scientific Inc. (the "Company") under the Thermo Fisher Scientific Inc. Amended and Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

The tax consequences described in this supplement are based, in part, on the absence of an arrangement for the Company to charge the costs of the awards to your employing entity (referred to as a "recharge arrangement") or for the employing entity to expense the cost of awards on its local books (referred to as the "local award accounting treatment"). In the event of any change to the recharge arrangement or the local award accounting treatment, the taxation and related requirements of awards granted to you may be different than those described in this supplement. The Company expressly reserves the right to implement, modify or terminate a recharge arrangement with your employing entity or modify the local award accounting treatment at any time.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>6</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.
Taxable Amount	The fair market value of the shares on the date of vesting.
Nature of Taxable Amount	Employment compensation.
Is Income Tax Payable?	Yes, at your marginal income tax rate (includes local surcharge).
Are Employee Social Insurance Contributions Payable?	Likely, yes.
Are Other Taxes Payable?	Annual Securities Accounts Tax. An annual securities accounts tax may be payable if the total average value of securities held in a Belgian or foreign securities account (e.g., shares acquired under the Plan) exceeds a certain threshold on four reference dates within the relevant reporting period (i.e., December 31, March 31, June 30 and September 30). In such case, the tax will be due on the value of the qualifying securities held in such account. You should consult with your personal tax advisor regarding the application of this tax.

COMPANY	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	Yes.	
Are Employee Social Insurance Contributions Withheld?	Yes, if applicable.	
Are Other Taxes Withheld?	No.	
Reporting		
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the taxable amount on your annual Form 281.10 to the Federale Overheidsdienst Financiën.	

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable income tax and social insurance contributions.

	DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares, net of United States ("U.S.") withholding tax, will as a matter of principle be subject to tax in your country.	
Taxation in the U.S.	Any dividends paid will be subject to U.S. federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit.	

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell your Company shares, you typically will not be subject to taxation on any gain you realize.
	Depending on the facts and circumstances, however, when you sell your shares, a Belgian stock exchange tax may be payable, as described below.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You personally will be responsible for reporting the taxable amount in your annual personal income tax return, which is due in the summer of the year following the year of the taxable event. You may request a filing extension with your competent tax office.
	If additional taxes are due, because the wage tax withheld at source was not sufficient to cover your final income tax liability, you are required to pay the same within a period of two (2) months following the date on which your tax assessment form is issued.

Dividends	Unless a Belgian bank already has withheld the applicable Belgian withholding taxes, you personally will be responsible for reporting the dividend amount (net of U.S. withholding tax) in your annual personal income tax return, which is due in the summer of the year following the year of the taxable event. You may request a filing extension with your competent tax office.  If additional taxes are due, you are required to pay the same within a period of two (2) months following the date on which your tax assessment form is issued.
Sale of Shares	Generally none.
	However, a Belgian stock exchange tax may be payable when you sell your shares. If applicable, you personally will be responsible for filing the stock exchange tax return and paying the stock exchange tax due by the end of the second (2nd) month following the month you sell the shares, unless the stock exchange tax is paid by the financial intermediary involved in the sale of the shares.
	You should consult with your personal tax advisor on the application of the

	OTHER INFORMATION	
Foreign Asset/Account Reporting	You are required to report any security or bank account (including brokerage accounts) you maintain outside of Belgium on your annual tax return. The first time you report the foreign security and/or bank account on your annual income tax return you will have to provide the National Bank of Belgium Central Contact Point with the account number, the name of the bank and the country in which the account was opened in a separate form. The form, as well as additional information on how to complete it, can be found on the website of the National Bank of Belgium (www.nbb.be) under the caption Kredietcentrales / Centrales des crédits.  Please consult with your personal tax advisor regarding the specific requirements applicable to you.	
Exchange Control	None.	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.	



### **BRAZIL**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>7</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

The tax consequences described in this supplement are based, in part, on the absence of an arrangement for the Company to charge the costs of the awards to your employing entity (referred to as a "recharge arrangement") or for the employing entity to expense the cost of awards on its local books (referred to as the "local award accounting treatment"). In the event of any change to the recharge arrangement or the local award accounting treatment, the taxation and related requirements of awards granted to you may be different than those described in this supplement. The Company expressly reserves the right to implement, modify or terminate a recharge arrangement with your employing entity or modify the local award accounting treatment at any time.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>7</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.	
Taxable Amount	The fair market value of the shares on the date of vesting.	
Nature of Taxable Amount	Employment compensation.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	No. 8	
Are Other Taxes Payable?	No.	

COMPANY	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	No.	
Are Employee Social Insurance Contributions Withheld?	Not applicable. <sup>2</sup>	
Are Other Taxes Withheld?	Not applicable.	
Reporting		
Does the Taxable Amount Need to be Reported?	Your employer will not be subject to any reporting obligations in connection with your participation in the Plan.	
	However, if your employer determines that it is required to report the income recognized in connection with your award, it will report the income in accordance with applicable law.	

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<sup>&</sup>lt;sup>8</sup> It is currently uncertain if social insurance contributions are due on equity award income. If the Company determines that social insurance contributions are due in connection with your award, your employer will withhold social insurance contributions (to the extent the applicable contribution ceiling has not been exceeded).

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will neither report the payment to the local tax authorities nor withhold tax from the payment. It will be your responsibility to report the payment and remit the income tax due.

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.
	You are personally responsible for reporting the dividend amount and paying any local country tax due on the dividends paid on your shares, as described below.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. Currently, Brazil and the U.S. do not have a tax treaty in place. Nevertheless, Brazil officially recognized the so-called "reciprocity of tax treatment" with the U.S. (Declaratory Act # 28/2000), which allows the offsetting of income tax paid in the U.S. against the tax due in Brazil.

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you will be subject to capital gains tax at a flat rate on any gain realized. The taxable gain will equal the difference between the sale proceeds and the average cost of acquisition of shares (if you hold no other Company shares, the average cost of acquisition will be the fair market value of the shares on the date of acquisition). Please note that the laws related to the sale of shares changed effective for any shares sold on or after January 1, 2024. In addition to providing for tax at a flat rate instead of progressive rates, the new rules eliminated the exemption for sales up to BRL 35,000 per month.
	If you repatriate the proceeds from the sale of shares to Brazil and convert the funds into local currency, you will be subject to the Tax on Financial Transactions.
	You should consult with your personal tax advisor prior to acquiring or selling Company shares.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR 1	YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You have to fill in the federal tax pay slip ( <i>Carnê Leão</i> system) in order to calculate the tax due on foreign-source income and pay it prior to the last day of the month following the taxable event.	
	If the value of the shares you receive under the Plan exceeds BRL 1,000, you must report the shares acquired in the assets and rights section of the annual Natural Person Income Tax Return ("DIRPF").	
	The DIRPF deadline typically is the last business day of April. It is not possible to obtain a tax filing deadline extension.	
Dividends	You are personally responsible for reporting any dividends you receive and paying any applicable taxes on your annual tax return (DIRPF) in the year following the dividend payment. Please note that you may not be required to pay any additional tax on the dividends as the tax withheld in the U.S. may be used as a credit against any taxes due in Brazil.	
	The DIRPF deadline typically is the last business day of April. It is not possible to obtain a tax filing deadline extension.	
Sale of Shares	You will be responsible for reporting any capital gains (losses) you recognize from the sale of shares and paying any taxes due on such gains on your annual tax return (DIRPF) in the year following the sale.	
	You must report the sale proceeds in the DIRPF for the year of sale and report a downward adjustment of the shares you own to the extent the shares sold were previously reported in the prior year's DIRPF.	
	The DIRPF deadline typically is the last business day of April. It is not possible to obtain a tax filing deadline extension.	

	OTHER INFORMATION	
Foreign Asset/Account Reporting	You must report income recognized in connection with the award on the DIRPF (as described above).	
Exchange Control	A declaration of assets and rights held outside of Brazil may need to be filed once a year with the Central Bank of Brazil if assets or rights with an aggregate value exceeding USD 1,000,000 are held on December 31 of each year. Shares acquired under the Plan that are held outside of Brazil (e.g., in a non-Brazilian brokerage account) are among the assets and rights that must be reported. If the aggregate value exceeds USD 100,000,000 at the end of each quarter, the declaration has to be filed on the month following the end of each quarter.	
	You should consult with your personal financial advisor for further details regarding this requirement.	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty	

applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the
complexity of these laws, your heirs should consult with a personal tax or financial advisor.



### **BULGARIA**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>9</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc. Amended and Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>9</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.	
Taxable Amount	The fair market value of the shares on the date of vesting.	
Nature of Taxable Amount	Likely employment income.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	Yes, social and health insurance contributions (to the extent the applicable monthly ceiling has not yet been exceeded).	
Are Other Taxes Payable?	No.	

COMPAN	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	Withholding	
Is Income Tax Withheld?	Yes.	
Are Employee Social Insurance Contributions Withheld?	Yes (to the extent the applicable monthly ceiling has not yet been exceeded).	
Are Other Taxes Withheld?	Not applicable.	
Reporting	Reporting	
Does the Taxable Amount Need to be Reported?	Your employer will report the taxable amount and remit applicable taxes due on the taxable amount to the local tax authorities.	

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to income tax and social insurance contributions (to the the applicable monthly ceiling has not yet been exceeded) on the cash payment at vesting.
	Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable income tax and social insurance

contributions (to the extent the applicable monthly ceiling has not yet been
exceeded).

	DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.	
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.	

SALE OF SHARES	
Taxation in Your Country	When you sell shares acquired under the Plan, you may be subject to taxation on any gain you realize. The total taxable amount is calculated by aggregating all profits from securities transactions realized during the year and subtracting all losses from such transactions during the same year. The resulting amount, if positive, is included in your annual taxable income and is subject to personal income tax at a flat rate. The profits or loss on each separate transaction in securities would equal the difference between the sale proceeds and the acquisition price of the securities. The acquisition price in this case should be the fair market value of the shares at acquisition since you will be subject to tax when you acquire the shares.
	You should consult with your personal tax advisor prior to acquiring or selling Company shares.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You should report the acquisition of the shares in your annual tax return for the year of acquisition and in any subsequent annual tax return as long as you own those shares. The income is to be reported in your annual tax return for the respective year (by filling in the relevant appendix) which is to be filed between January 10 and April 30 of the next calendar year.

Dividends	You will have to report as taxable income the amount of any dividend on the Company's shares declared to you. The income is to be reported in your annual tax return for the respective year (by filling in the relevant appendix) which is to be filed between January 10 and April 30 of the next calendar year.
Sale of Shares	You will have to report as taxable income the annual amount of any capital gain from sales of securities (calculated as above described). The income is to be reported in your annual tax return for the respective year (by filling in the relevant appendix) which is to be filed between January 10 and April 30 of the next calendar year.

OTHER INFORMATION	
Foreign Asset/Account Reporting	None.
Exchange Control	You may be required to file statistical forms with the Bulgarian National Bank regarding your receivables in bank accounts abroad, as well as securities held abroad which have been acquired without using the services of a local broker (e.g., shares acquired under the Plan), if the total sum of all such receivables and securities equals or exceeds certain threshold. You should consult your legal advisor to ensure compliance with applicable requirements.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



### CANADA

(English Version)

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>10</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>10</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

### **IMPORTANT INFORMATION**

In addition to any other applicable restrictions on resale and transfer, shares acquired under the Plan may be subject to certain restrictions on resale imposed by Canadian provincial securities laws. You are permitted to sell shares acquired pursuant to the Plan through the designated broker appointed under the Plan, provided the sale of the shares acquired pursuant to the Plan takes place outside of Canada through the facilities of a stock exchange on which the shares are listed.

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.
Taxable Amount	The fair market value of the shares on the date of vesting.
Nature of Taxable Amount	Employment compensation.
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	Yes, you will be subject to Canada Pension Plan ("CPP") contributions (or Quebec Pension Plan ("QPP") contributions, if you reside in Quebec), on the taxable amount (to the extent the applicable contribution ceiling has not been exceeded).
Are Other Taxes Payable?	No.

COMPANY/E	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	Yes.	
Are Employee Social Insurance Contributions Withheld?	Yes (to the extent the applicable contribution ceiling has not been exceeded).	
Are Other Taxes Withheld?	Not applicable.	
Reporting	Reporting	
Does the Taxable Amount Need to be Reported?	Your employer will report the taxable amount as taxable income to the Canada Revenue Agency ("CRA") on Form T4 and if applicable, to Revenu Quebec ("RQ") on Form RL-1. A copy of Form T4 (Form RL-1)	

will be provided to you by the end of February of the	year following
the year in which the taxable event occurs.	

	DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent is credited to your account and paid to you on vesting of your RSUs, you will be subject to income tax and CPP/QPP and Employment Insurance ("EI") (and Quebec Parental Insurance Plan "QPIP", if you reside in Quebec) contributions (to the extent the applicable contribution ceiling has not already been exceeded) on any dividend equivalents.  Your employer will report the payment as taxable income to the CRA on Form T4 and if applicable, to RQ on Form RL-1 and withhold income tax and CPP/QPP and EI/QPIP contributions (to the extent the applicable contribution ceiling has not already been exceeded). A copy of Form T4 (Form RL-1) will be provided to you by the end of February of the year following the year in which the taxable event occurs. You also must report this income on your personal income tax return for the year in which the taxable event occurs.	

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell any shares acquired under the Plan, you will be subject to additional taxation on any gain you realize. The taxable amount will generally be one-half (50%) of the difference between the sale proceeds and the adjusted cost base ("ACB") of your shares. If you do not own (and have never owned) other shares of the Company the ACB will generally be the fair market value of the shares on the date of acquisition. However, if you own (or have owned) other Company shares acquired

	inside and/or outside of the Plan, your ACB will generally be the average cost of all of your Company shares of the same class.  If your sale proceeds are lower than your ACB of the shares sold, you will be a state of the shares sold.
	generally realize a capital loss. One-half (50%) of any capital loss may be used to offset taxable capital gains in the same calendar year, the three (3) preceding calendar years, or in subsequent years, but cannot be used to offset other types of income (e.g., salary/wages).
	You should consult your personal tax advisor for additional information regarding the calculation of any gain or loss attributable to the sale of your shares.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR	YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You personally must report the taxable amount on your Canadian T1 personal income tax return (and Quebec TP-1-V personal income tax return, if you reside in Quebec) and pay any additional tax owed by April 30 of the following year.	
Dividends	You personally must report the dividends on your Canadian T1 personal income tax return (and Quebec TP-1-V personal income tax return, if you reside in Quebec) and pay any tax owed by April 30 of the following year.	
Sale of Shares	You personally must report the gain (or loss) on your Canadian T1 personal income tax return (and Quebec TP-1-V personal income tax return, if you reside in Quebec) and pay any tax owed by April 30 of the following year.	

	OTHER INFORMATION	
Foreign Asset/Account Reporting	Specified foreign property, including shares acquired under the Plan and certain awards granted under the Plan, must be reported on Form T1135 (Foreign Income Verification Statement) if the total cost of such foreign property exceeds CAD 100,000 at any time during the year.	
	If the CAD 100,000 cost threshold is exceeded by other specified foreign property held, your awards must be reported as well, generally at a nil cost. When Company shares are acquired, their cost generally is the ACB of the shares.	
	The Form T1135 must be filed by April 30 of the following year. You should consult with your personal tax advisor for further details regarding this requirement.	

Exchange Control	None.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



# Supplément d'information à l'intention des employés : unités d'actions assujetties à des restrictions

### **CANADA**

(French-Canadian Version)

#### **APERÇU**

Le présent supplément a pour objectif de vous fournir un résumé des conséquences fiscales et de certaines autres questions liées à l'octroi d'unités d'actions assujetties à des restrictions (*Restricted Stock Units*, cidessous « RSU »).<sup>11</sup> par **Thermo Fisher Scientific Inc.** (la « Société ») en vertu du **Plan d'intéressement en actions 2013 tel que modifié et mis à jour de Thermo Fisher Scientific Inc.** (*Amended and Restated 2013 Stock Incentive Plan*) ou de tout plan de de rémunération en actions qui lui a précédé (ci-après désigné individuellement le « Plan »).

Le présent supplément se fonde sur les lois fiscales en vigueur dans votre pays en avril 2025.

Les lois fiscales sont souvent complexes et changent fréquemment. Par conséquent, vous devez consulter votre conseiller fiscal pour obtenir des informations à jour et des conseils supplémentaires concernant vos obligations et responsabilités fiscales découlant de l'octroi et de l'acquisition de vos RSU, de l'émission d'actions de la Société, du paiement de tout dividende sur ces actions, et de la vente d'actions de la Société acquises en vertu du Plan.

Veuillez noter que le présent supplément comprend des informations de nature générale et ne traite pas de toutes les lois, règles et réglementations qui peuvent s'appliquer. Il peut ne pas s'appliquer à votre situation fiscale ou financière particulière, et la Société n'est pas en mesure de vous garantir un résultat fiscal particulier. Les informations contenues aux présentes supposent que les RSU seront réglées en actions et que les actions seront émises dès que cela sera possible du point de vue administratif après la date d'acquisition. Si des dividendes sont payés sur des actions, on suppose qu'ils seront versés sur un compte de courtage extraterritorial (c'est-à-dire qu'ils ne seront pas payés par une banque de votre pays ou versés sur un compte dans votre pays). Pour savoir comment les lois fiscales ou autres de votre pays s'appliquent à votre situation particulière, consultez un conseiller professionnel compétent.

Si vous êtes un citoyen ou un résident d'un autre pays ou si vous changez d'emploi et/ou de lieu de résidence après que les RSU vous ont été octroyées, ou si vous n'êtes plus activement employé au moment de l'événement imposable, les informations contenues aux présentes peuvent ne pas s'appliquer à vous.

Ce document fait partie d'un prospectus couvrant les valeurs mobilières qui ont été enregistrées auprès de la U.S. Securities and Exchange Commission aux termes de la *Loi sur les valeurs mobilières de 1933*, comme modifiée.

<sup>&</sup>lt;sup>11</sup> Les RSU sont une promesse non capitalisée et non garantie d'émission d'actions de la Société en votre faveur sans frais à une date future. Sauf indication contraire, toute référence, aux présentes, aux RSU renvoie également aux unités d'actions assujetties à des restrictions dont l'acquisition est basée sur la performance (« PSU »).

# **INFORMATIONS IMPORTANTES**

Outre les autres restrictions applicables à la revente et au transfert, les actions acquises dans le cadre du Plan peuvent être soumises à certaines restrictions relatives à la revente prévues par les lois provinciales canadiennes sur les valeurs mobilières. Vous êtes autorisé à vendre les actions acquises dans le cadre du Plan par l'entremise d'un courtier désigné nommé en vertu du Plan, pourvu que la vente des actions acquises dans le cadre du Plan ait lieu à l'extérieur du Canada dans les installations d'une bourse à laquelle lesdites actions sont cotées.

IMPÔT	
Octroi / Attribution (Grant)	Aucune imposition.
Acquisition (Vesting)	À la date ou aux dates où les RSU sont acquises, vous serez assujetti à l'impôt.
Montant imposable	La juste valeur marchande des actions à la date d'acquisition.
Nature du montant imposable	Rémunération liée à un emploi.
De l'impôt sur le revenu est-il exigible?	Oui.
Des cotisations de sécurité sociale sont- elles exigibles?	Oui, vous serez assujetti aux cotisations au Régime de pensions du Canada (le « RPC ») (ou au Régime de rentes du Québec [le « RRQ »], si vous résidez au Québec) sur le montant imposable (dans la mesure où le plafond de cotisation applicable n'a pas été dépassé).
D'autres taxes sont- elles exigibles?	Non.

RETENUE ET D	RETENUE ET DÉCLARATION D'IMPÔT PAR LA SOCIÉTÉ/L'EMPLOYEUR	
Retenues		
L'impôt sur le revenu fait-il l'objet d'une retenue?	Oui.	
Les cotisations de sécurité sociale font- elles l'objet d'une retenue?	Oui (dans la mesure où le plafond de cotisation applicable n'a pas été dépassé).	
D'autres taxes font- elles l'objet d'une retenue?	Non applicable.	
Déclaration		
Le montant	Votre employeur déclarera le montant imposable comme revenu	

# RETENUE ET DÉCLARATION D'IMPÔT PAR LA SOCIÉTÉ/L'EMPLOYEUR

imposable doit-il être déclaré?

imposable à l'Agence du revenu du Canada (l'« ARC ») sur le formulaire T4 et, le cas échéant, à Revenu Québec (« RQ ») sur le formulaire RL-1. Un exemplaire du formulaire T4 (et du formulaire RL-1, le cas échéant) vous sera fourni avant la fin du mois de février de l'année qui suit l'année de l'événement imposable.

### **ÉQUIVALENTS DE DIVIDENDES**

Traitement fiscal (paiement en espèces par l'intermédiaire d'un courtier) Si un dividende est déclaré avant l'acquisition et qu'un équivalent de dividende est crédité sur votre compte et vous est payé lors de l'acquisition de vos RSU, vous serez assujetti à l'impôt sur le revenu et aux cotisations au Régime de pensions du Canada (le « RPC ») ou au Régime de rentes du Québec (le « RRQ ») et à l'assurance-emploi (l'« AE ») (et au Régime québécois d'assurance parentale, ou « RQAP », si vous résidez au Québec), dans la mesure où le plafond de cotisation applicable n'a pas déjà été dépassé, à l'égard de tous les équivalents de dividende.

Votre employeur déclarera le paiement comme revenu imposable à l'ARC sur le formulaire T4 et, le cas échéant, au RQ sur le formulaire RL-1, et il retiendra l'impôt sur le revenu et les cotisations au RPC ou au RRQ et à l'AE et au RQAP, le cas échéant, dans la mesure où le plafond de cotisation applicable n'a pas déjà été dépassé. Un exemplaire du formulaire T4 (et du formulaire RL-1, le cas échéant) vous sera fourni avant la fin du mois de février de l'année qui suit l'année de l'événement imposable. Vous devez également déclarer ces revenus dans votre déclaration d'impôt sur le revenu des personnes physiques pour l'année au cours de laquelle l'événement imposable s'est produit.

	DIVIDENDES	
Imposition dans votre pays	Si vous acquérez des actions de la Société et qu'un dividende est ensuite déclaré sur les actions, tout dividende payé au titre des actions sera assujetti à l'impôt dans votre pays.	
Imposition aux États- Unis	Tout dividende payé sera soumis à la retenue à la source de l'impôt fédéral américain. En tant que résident d'un pays avec lequel les États-Unis ont conclu une convention fiscale, vous pouvez bénéficier d'un taux réduit de retenue à la source de l'impôt fédéral américain sur ces dividendes. Pour que vous puissiez bénéficier des avantages de cette convention fiscale, vous devez avoir dûment rempli le formulaire de l'Internal Revenue Service des États-Unis (W-8BEN) et celui-ci doit figurer dans les dossiers du courtier auprès duquel vos actions de la Société sont déposées. Vous pouvez également bénéficier d'un crédit d'impôt dans votre pays au titre de l'impôt fédéral américain retenu à la source. Veuillez consulter votre conseiller fiscal pour savoir si vous êtes admissible à un tel crédit d'impôt.	

VENTE D'ACTIONS	
Imposition dans votre pays	Si vous vendez les actions que vous avez acquises dans le cadre du Plan, vous devrez payer un impôt supplémentaire à l'égard des gains que vous avez réalisés à l'occasion de cette vente. Le montant imposable correspond généralement à la moitié (50 %) de la différence entre le produit de la vente et le prix de base rajusté (le « PBR ») de vos actions. Si vous ne possédez pas (et n'avez jamais possédé) d'autres actions de la Société, le PBR correspondra généralement à la juste valeur marchande des actions à la date d'acquisition. Toutefois, si vous possédez (ou avez déjà possédé) d'autres actions de la Société acquises dans le cadre du Plan ou non, le PBR correspondra généralement au coût moyen de toutes vos actions de la Société de la même catégorie.
	Si le produit de la vente est inférieur au PBR des actions vendues, vous subirez généralement une perte en capital. La moitié (50 %) de toute perte en capital peut être utilisée pour compenser des gains en capital imposables au cours de la même année civile, des trois (3) années civiles précédentes ou des années suivantes, mais ne peut pas être utilisée pour compenser d'autres types de revenus (par exemple, un salaire).
	Vous devriez consulter votre conseiller fiscal pour obtenir de plus amples informations concernant le calcul de tout gain ou perte attribuable à la vente de vos actions.
Imposition aux États- Unis	Si vous n'êtes pas résident fiscal américain et que vous avez fourni à la Société et/ou au courtier un formulaire W-8BEN attestant de votre statut de personne non américaine (non-U.S. person), vous ne serez pas assujetti à l'impôt aux États-Unis sur les gains que vous réaliserez lors de la vente des actions acquises dans le cadre du Plan. Si vous n'avez pas fourni de formulaire W-8BEN, le courtier effectuera une retenue à la source sur vos gains au taux de 24 %.

VOS OBLIGATIONS DE DÉCLARATION ET DE PAIEMENT DE L'IMPÔT	
Acquisition	Vous devez vous-même déclarer le montant imposable dans le formulaire T1 de déclaration de revenus des particuliers du Canada (et dans le formulaire TP-1-V de déclaration de revenus des particuliers du Québec, si vous résidez au Québec) et payer tout impôt supplémentaire dû au plus tard le 30 avril de l'année suivante.
Dividendes	Vous devez vous-même déclarer les dividendes que vous avez reçus dans le formulaire T1 de déclaration de revenus des particuliers du Canada (et dans le formulaire TP-1-V de déclaration de revenus des particuliers du Québec, si vous résidez au Québec) et payer tout impôt dû au plus tard le 30 avril de l'année suivante.
Vente d'actions	Vous devez vous-même déclarer vos gains (ou pertes) dans le formulaire T1 de déclaration de revenus des particuliers du Canada (et dans le formulaire TP-1-V de déclaration de revenus des particuliers du

# VOS OBLIGATIONS DE DÉCLARATION ET DE PAIEMENT DE L'IMPÔT

Québec, si vous résidez au Québec) et payer tout impôt dû au plus tard le 30 avril de l'année suivante.

AUTRES RENSEIGNEMENTS	
Déclaration des avoirs et des comptes étrangers	Les biens étrangers déterminés, y compris les actions acquises et certaines attributions octroyées dans le cadre du Plan, doivent être déclarés sur le formulaire T1135 (« Bilan de vérification du revenu étranger ») si le coût total de ces biens étrangers dépasse 100 000 \$ CA à tout moment de l'année.
	Si le seuil de coût de 100 000 \$ CA est dépassé en raison de la détention par vous d'autres biens étrangers déterminés, vos attributions doivent également être déclarées, généralement à un coût nul. Lorsque des actions de la Société sont acquises, leur coût correspond généralement à leur PBR.
	Le formulaire T1135 doit être déposé au plus tard le 30 avril de l'année suivante. Veuillez consulter votre conseiller fiscal pour obtenir davantage de renseignements au sujet de cette exigence.
Contrôle des changes	Aucun.
Impôt américain sur les successions	Veuillez noter que l'impôt américain sur les successions peut être prélevé au moment du décès si vous détenez des actions de la Société (et certaines attributions) à ce moment-là. Selon la loi américaine sur l'impôt sur les successions, en ce qui concerne les successions des personnes qui ne sont pas des citoyens des États-Unis et qui résident en dehors des États-Unis (les « étrangers non-résidents »), une déclaration d'impôt sur les successions doit être déposée si la succession brute dépasse 60 000 \$ US, bien que les conséquences soient différentes si une convention fiscale sur l'impôt sur les successions s'applique. L'actif brut de la succession d'un étranger non-résident se compose uniquement de ses actifs situés aux États-Unis, qui dans votre cas comprendront vos actions de la Société (et certaines attributions octroyées dans le cadre du Plan). En raison de la complexité de ces lois, vos héritiers devraient consulter un conseiller fiscal ou financier.



## CHILE

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>12</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan .

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

The tax consequences described in this supplement are based, in part, on the absence of an arrangement for the Company to charge the costs of the awards to your employing entity (referred to as a "recharge arrangement") or for the employing entity to expense the cost of awards on its local books (referred to as the "local award accounting treatment"). In the event of any change to the recharge arrangement or the local award accounting treatment, the taxation and related requirements of awards granted to you may be different than those described in this supplement. The Company expressly reserves the right to implement, modify or terminate a recharge arrangement with your employing entity or modify the local award accounting treatment at any time.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>12</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.
Taxable Amount	The fair market value of the shares at vesting.
Nature of Taxable Amount	Additional remuneration.
Is Income Tax Payable?	Yes (Secondary Category Tax).
Are Employee Social Insurance Contributions Payable?	Yes (to the extent the applicable contribution ceiling has not been exceeded).
Are Other Taxes Payable?	No.

COMPANY/E	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	Withholding	
Is Income Tax Withheld?	No.	
Are Employee Social Insurance Contributions Withheld?	No.	
Are Other Taxes Withheld?	Not applicable.	
Reporting	Reporting	
Does the Taxable Amount Need to be Reported?	No. Your employer will not report the taxable amount as income to the tax authorities.	

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will neither report the payment to the local tax authorities nor withhold tax from the payment. It will be your responsibility to report the payment and remit the taxes due.

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be entitled to a credit against your country's taxes due on the dividends for the U.S. federal tax withheld at source provided you registered your shares in the Foreign Investment Register with the Chilean Internal Revenue Service ("CIRS") (see below for additional details). You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	When you sell shares acquired under the Plan, you will be subject to tax on any additional gain you realize. The taxable amount likely will be the difference between the sale proceeds and your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition).
	However, if you did not register your offshore investment with the CIRS, as described below, there is a risk that you will be taxed on the entire sale proceeds.
	If the sale proceeds are lower than your cost basis in the shares sold, you may be able to use this capital loss to offset capital gains realized from the sale of other shares (i.e., shares of the Company or of other companies) in the same calendar year, but not in future calendar years.
	You should consult with your personal tax advisor when you sell your shares to determine the tax implications at that time.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You are personally required to report the taxable income and pay any applicable tax on the monthly tax return on Form 29 within the first 12.13 days of the month following purchase to the CIRS.

 $<sup>^{13}</sup>$  This deadline may be extended to the 20th of the month if you pay the tax due via the portal web of the CIRS.

Dividends	You are personally responsible for reporting the dividend amount and pay any applicable tax on annual Form 22, which is due by April 30 of the year following the dividend payment.
Sale of Shares	You are personally responsible for reporting the capital gain as taxable income and pay any applicable tax on annual Form 22, which is due by April 30 of the year following the sale of the shares.

	OTHER INFORMATION
Foreign Asset/Account Reporting	The CIRS requires all taxpayers to provide information annually regarding (i) the results of investments held abroad and (ii) any taxes paid abroad which the taxpayers will use as credit against Chilean income tax. The sworn statements disclosing this information (or Formularios) must be reported on Form 1929 and submitted electronically through the CIRS website (www.sii.cl) before July 1 of each year, depending on the assets and/or taxes being reported.  If you fail to meet the above requirements, you may be ineligible to receive certain foreign tax credits. Given these requirements are subject to change, you should consult with your personal tax advisor to determine your reporting obligations to the CIRS.
Exchange Control	You may receive foreign currency abroad as a result of the acquisition of shares and freely decide whether to repatriate such currency to Chile or keep it abroad. However, if you repatriate currency, and such amounts exceed USD 10,000, the proceeds must be remitted using the formal exchange market. It is not necessary to convert the repatriated funds into Chilean currency.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



### **CHINA**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>14</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>14</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	You will be subject to tax when the RSUs vest and shares are issued to you.	
Taxable Amount	The fair market value of the shares issued to you at vesting.	
Nature of Taxable Amount	Comprehensive income. 15	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	Unlikely. 16	
Are Other Taxes Payable?	No.	

COMPANY	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	Withholding	
Is Income Tax Withheld?	Yes.	
Are Employee Social Insurance Contributions Withheld?	Unlikely.	
Are Other Taxes Withheld?	Not applicable.	
Reporting	Reporting	
Does the Taxable Amount Need to be Reported?	In general, your employer will report the taxable amount to the competent tax bureau.	

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs

<sup>&</sup>lt;sup>15</sup> Comprehensive income includes salary and wages, labor remuneration, author's remuneration and royalties. Please note that if the RSU income qualifies for preferential tax treatment under Notice 164, your employer will apply the preferential tax formula when calculating the applicable withholding on the RSU income. Notice 164 is set to expire at the end of 2027.

<sup>&</sup>lt;sup>16</sup> If the taxable amount is classified as salary income (i.e., a type of comprehensive income), such amount may be taken into consideration when determining your average monthly salary for the calendar year in which the taxable event occurred for purposes of calculating social insurance contributions due (to the extent the applicable contribution ceiling has not been exceeded).

vest, you will be subject to income tax, but likely not social insurance contributions, on the cash payment at vesting.
Your employer will report the payment as taxable income to the competent tax authorities and withhold the applicable income tax.

	DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country if you are a PRC national. Foreigners who have not stayed in China more than 6 years (183 days or more each year) are not subject to tax in China on the dividends as they are foreign-sourced income.	
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.	

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you will be subject to additional taxation on any capital gains if you are a PRC national.
	The taxable gain will equal the difference between the sale proceeds and your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition).
	If you are required to immediately sell the shares issued to you upon RSU vesting, there should be little or no capital gains tax due at sale.
	If you sell Company shares acquired under the Plan at a price which is less than your cost basis in the shares, you will realize a capital loss. Capital losses cannot be offset from any capital gain or other income.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

١	YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You do not have a reporting obligation upon vesting.  However, independent of any filing obligation of your employer, you also may be required to file an annual income tax return to the tax authority between March 1 and June 30 of the following tax year, if you receive comprehensive income from two or more payors and the annual comprehensive income minus allowed deductions exceeds RMB 60,000, or you receive one or more income items from labor remunerations, author's remunerations or royalties and the annual comprehensive income minus allowed deductions exceeds RMB 60,000, or if you have any underpaid or overpaid tax.	
Dividends	If you are subject to PRC tax on your dividends, you are required to report the dividends (as foreign-sourced income) in your annual tax return, which is due between March 1 and June 30 of the following year.	
Sale of Shares	If you are subject to PRC tax on any additional gain upon the sale of your shares, you personally will be responsible for reporting any capital gain you recognize from the sale of shares and paying any applicable taxes due on such gain. You are required to complete the China tax filing for the capital gain derived from the sale of Company shares acquired under the Plan (as foreign-sourced income) between March 1 and June 30 of the following year.	

	OTHER INFORMATION	
Foreign Asset/Account Reporting	Not applicable.	
Exchange Control	If you are a PRC national, you are required to repatriate all dividends paid on shares and proceeds realized from the sale of Company shares to China. Under local law, repatriation of the funds will need to be effected by the Company through a dedicated bank account established with a bank in China that is approved by the State Administration of Foreign Exchange ("SAFE") into which the funds will be deposited prior to being delivered to your personal bank account in China.	
	You may be subject to other exchange control restrictions based on the specific SAFE approval obtained by the Company.	
	Please see your award agreement for further information on exchange control requirements applicable to your participation in the Plan.	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the	

complexity of these laws, your heirs should consult with a personal tax or
financial advisor.



## **COLOMBIA**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>17</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>17</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest you will be subject to taxation.
Taxable Amount	The fair market value of the shares issued on the date of vesting.
Nature of Taxable Amount	Labor income.
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	No, provided the RSUs are characterized as non-salary benefits. 18 and the total non-salary benefits you receive in the month the shares are acquired do not exceed 40% of your total monthly remuneration. Otherwise, the excess will be subject to social insurance contributions (to the extent that the applicable contribution ceiling has not been exceeded).
Are Other Taxes Payable?	No.

COMPANY/E	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	Yes.	
Are Employee Social Insurance Contributions Withheld?	Only if applicable, as described above.	
Are Other Taxes Withheld?	Not applicable.	
Reporting		
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the applied income tax withholding to the local tax authorities in the calendar month following the month in which the taxable event occurs. It will also report the income tax withholding and taxable income in the annual electronic media report filed by the end of April of the year following the year the taxable event occurs.	
	Furthermore, your employer will issue a Certificate of Income and Tax Withholdings to you including the taxable amount, typically, by the end of February of the year following the year the taxable event occurs.	

 $<sup>^{\</sup>rm 18}$  The RSUs likely will be classified as non-salary benefits.

If applicable, your employer must also remit any social insurance withholding to the entities of the Social Protection in the month of the taxable event, through an automatic contribution calculation sheet.

	DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to income tax on the cash payment at vesting.	
	Your employer will report the payment as taxable income to the local tax authorities and withhold income tax and social insurance contributions (if applicable and, in such case, to the extent the contribution ceiling has not been exceeded).	

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.
	You are personally responsible for reporting the dividend in your annual income tax return (as described below) and paying any local country tax or contribution to the social security system due on the dividends paid on your shares, as described below.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be entitled to a credit against your country's taxes due on the dividends for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell your Company shares, you will be subject to additional taxation on any gain you realize. The taxable amount will equal the difference between the sale proceeds and your cost basis in the shares. The cost basis in the shares is the fair market value of the shares at acquisition plus tax adjustments, which is a percentage similar to inflation and determined by the Government annually.
	Whether income qualifies as capital gain or ordinary income depends on how long you hold the shares. If you sell the shares within two (2) years of the date you acquire the shares, the gain will be treated as ordinary income and taxed at progressive income tax rates. If you hold the shares for two (2) years or more before sale, the gain will be treated as capital gain subject to tax at a flat rate (currently 15%).

	You personally will be responsible for reporting the taxable gain on your annual income tax return and paying any associated tax liability to the Colombian government and contributions to the social security system, as described below.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR 1	AX REPORTING AND PAYMENT OBLIGATIONS
Vesting	You are required to report the taxable amount and pay any applicable taxes when you file your annual income tax return (No. 210), which is due on the dates set by the Government (typically between August and October) of the year following the taxable event.
	If you file your income tax return late, late filing sanctions and late payment interest are triggered.
Dividends	You are required to report the dividend amount and pay any applicable taxes when you file your annual income tax return (No. 210), which is due on the dates set by the Government (typically between August and October) of the year following the taxable event.  If you file your income tax return late, late filing sanctions and late payment interest are triggered.
Sale of Shares	You are required to report the taxable amount (as either capital gain or ordinary income) and pay any applicable taxes when you file your annual income tax return (No. 210), which is due on the dates set by the Government (typically between August and October) of the year following the taxable event.
	If you file your income tax return late, late filing sanctions and late payment interest are triggered.

OTHER INFORMATION	
Foreign Asset/Account Reporting	You must file an annual informative return with the local tax authority regarding the assets you hold abroad, which includes any Company shares acquired under the Plan (for every year you hold the shares). This obligation is only applicable if the value of the assets held abroad exceeds 2,000 Tax Units.
Exchange Control	Your investments in shares outside of Colombia (including Company shares you acquire under the Plan) are subject to registration before the Central Bank ( <i>Banco de la República</i> ) as foreign investment held abroad, regardless of value.

	In addition, all payments related to the liquidation of such investments must be transferred through the Colombian foreign exchange market (e.g. local banks), which includes the obligation of correctly completing and filing the appropriate foreign exchange form (declaración de cambio).
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



# **COSTA RICA**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>19</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>19</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.	
Taxable Amount	The fair market value of the shares on the date of vesting.	
Nature of Taxable Amount	Benefit-in-kind	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	No.	
Are Other Taxes Payable?	No.	

COMPANY	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	Yes.	
Are Employee Social Insurance Contributions Withheld?	Not applicable.	
Are Other Taxes Withheld?	Not applicable.	
Reporting	Reporting	
Does the Taxable Amount Need to be Reported?	Your employer will report the taxable amount as taxable income to the local tax authorities ( <i>Ministerio de Hacienda, Dirección General de Tributación</i> ) by filing Form D-103 in the relevant month as well as on Form D-152 on an annual basis.	

	DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to income tax on the cash payment at vesting.	
	Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable income tax.	

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, you will not be subject to tax in Costa Rica on any dividends paid with respect to the shares.
Taxation in the U.S.	However, any dividends paid will be subject to United States ("U.S.") federal tax withholding at source.

	SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you will not be subject to additional taxation on any gain you recognize because any such gain should be treated as foreign sourced.	
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.	

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	None, as your employer is required to withhold and report the applicable taxes, as described above.
Dividends	Not applicable.
Sale of Shares	Not applicable.

OTHER INFORMATION	
Foreign Asset/Account Reporting	None.
Exchange Control	None.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the

complexity of these laws, your heirs should consult with a personal tax or
financial advisor.



## **CROATIA**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>20</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

The tax consequences described in this supplement are based, in part, on the absence of an arrangement for the Company to charge the costs of the awards to your employing entity (referred to as a "recharge arrangement"). In the event of any change to the recharge arrangement with your employer, the taxation and related requirements of awards granted to you may be different than those described in this supplement. The Company expressly reserves the right to implement, modify or terminate a recharge arrangement with your employing entity at any time.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>20</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.
Taxable Amount	The fair market value of the shares on the date of vesting.
Nature of Taxable Amount	Uncertain. Either capital income or other income in kind. 21
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	Possibly.
Are Other Taxes Payable?	No.

COMPANY	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
ls Income Tax Withheld?	No.	
Are Employee Social Insurance Contributions Withheld?	No.	
Are Other Taxes Withheld?	Not applicable.	
Reporting		
Does the Taxable Amount Need to be Reported?	Your employer will not report the taxable amount to the local tax authorities.	

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to income tax, pension contributions (at the rate

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<sup>&</sup>lt;sup>21</sup> Regardless of the characterization of the income, the value of the shares may be treated as net income subject to gross-up with the amount of income tax and city surtax due on the net income amount. In such case, it is possible that after the gross income is derived, the total amount of taxes due would exceed the fair market value of the shares. *You should consult your tax adviser about how to calculate the taxable amount upon vesting of the RSUs in Croatia*.

DIVIDEND EQUIVALENTS	
	of 10%) and city surtax on the cash payment at vesting. Your employer likely will not report the payment and instead you personally will be responsible for reporting the payment as taxable income and paying the applicable taxes.

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you will be subject to additional taxation to the extent that the sale proceeds exceed your cost basis in the shares (i.e., the income realized when the shares were issued at vesting), unless you hold the shares for more than two (2) years. If you hold the shares acquired at vesting for more than two (2) years, you will not be subject to capital gains tax.
	If the sale proceeds are lower than your cost basis in the shares sold, you will realize a capital loss, provided that the shares were acquired after 1 January 2016 and the capital loss occurs within two (2) years of the date the shares were acquired. Such capital losses may be used to offset only capital gains realized in the same calendar year. You may not carry forward any capital losses that remain after offsetting capital gains.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You personally will be responsible for reporting the taxable amount and paying any applicable tax due directly to the local tax authorities.
Dividends	You personally are responsible for reporting the dividend amount and paying any tax due on the dividends paid on your shares.
Sale of Shares	You will be personally responsible for reporting any capital gains (losses) you recognize from the sale of shares and paying any applicable taxes due on such gains.

OTHER INFORMATION	
Exchange Control	Croatian residents must report any foreign investments (including Company shares acquired under the Plan) to the Croatian National Bank for statistical purposes. Exchange control regulations change frequently and without notice, you should consult your legal advisor to ensure compliance with current regulations.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>22</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

The tax consequences described in this supplement are based, in part, on the absence of an arrangement for the Company to charge the costs of the awards to your employing entity (referred to as a "recharge arrangement"). In the event of any change to the recharge arrangement with your employer, the taxation and related requirements of awards granted to you may be different than those described in this supplement. The Company expressly reserves the right to implement, modify or terminate a recharge arrangement with your employing entity at any time.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>22</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

### **IMPORTANT INFORMATION**

The taxation of equity awards in Cyprus is uncertain, as there are no specific tax rulings dealing with employee share plans and equity awards. For purposes of the information contained herein, the discussion assumes the award is characterized as a benefit in kind. You should consult with your personal tax advisor to determine the tax treatment in your particular circumstance.

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest and you acquire shares, you may be subject to taxation.
Taxable Amount	The fair market value of the shares on the date of vesting.
Nature of Taxable Amount	Benefit in kind.
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	No.
Are Other Taxes Payable?	No.

TAX WITHHOLDING AND REPORTING	
Withholding	
Is Income Tax Withheld?	Likely, no.
Are Employee Social Insurance Contributions Withheld?	Not applicable.
Are Other Taxes Withheld?	Not applicable.
Reporting	
Does the Taxable Amount Need to be Reported?	Your employer will not be subject to any tax reporting obligations in connection with your participation in the Plan.

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and the terms of your RSUs provide for a dividend equivalent to be credited to your account, you will be subject to income tax on any dividend equivalents paid to you at vesting of your RSUs. Your employer will likely not report the payment as taxable income to the local tax authorities or withhold income tax. Instead, you personally are responsible for reporting the taxable amount and paying applicable taxes directly to the local tax authorities.

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to special defense tax in your country. You personally are responsible for reporting the dividend amount and paying any local country tax due on the dividends paid on your shares.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	When you sell any Company shares acquired under the Plan, the proceeds from the sale of shares may be exempt from tax in Cyprus.
	You should consult with your personal tax advisor to determine the tax treatment in your particular circumstance, as taxation is uncertain in Cyprus.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

OTHER INFORMATION	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



## CZECH REPUBLIC

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>23</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

The tax consequences described in this supplement are based, in part, on the absence of an arrangement for the Company to charge the costs of the awards to your employing entity (referred to as a "recharge arrangement") or for the employing entity to expense the cost of awards on its local books (referred to as the "local award accounting treatment"). In the event of any change to the recharge arrangement or the local award accounting treatment, the taxation and related requirements of awards granted to you may be different than those described in this supplement. The Company expressly reserves the right to implement, modify or terminate a recharge arrangement with your employing entity or modify the local award accounting treatment at any time.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>23</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

## **IMPORTANT NOTE**

The taxation of equity awards was amended effective as of April 1, 2025. Please note there is currently no guidance and some aspects of the legislation are uncertain. The information in this supplement represents our current understanding of the amended legislation.

	TAX	
Grant	No taxation.	
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.	
Taxable Amount	The fair market value of the shares on the date of vesting.	
Nature of Taxable Amount	Employment compensation.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	No.	
Are Other Taxes Payable?	No.	

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	
Is Income Tax Withheld?	No.
Are Employee Social Insurance Contributions Withheld?	Not applicable.
Are Other Taxes Withheld?	Not applicable.
Reporting	
Does the Taxable Amount Need to be Reported?	No.

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will neither report the payment to the local tax authorities nor withhold tax from the payment. It will be your responsibility to report the payment in your annual personal income tax return and pay any tax due directly to the local tax authorities.

	DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.	
	You are personally responsible for reporting the dividend amount in your annual personal income tax return and paying any local country tax due on the dividends paid on your shares, as described below.	
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.	

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you will not be subject to taxation on any gain you recognize (i.e., the excess of the sale proceeds over your cost basis in the shares) provided that you have held the shares for more than three (3) years or your gross annual gain from the sale of shares (and other securities) does not exceed a certain threshold.
	If you have held the shares for three (3) years or less at the time of sale and your gross annual gain from the sale of shares (and other securities) exceeds the threshold, you will be subject to tax at a rate of 15% or 23% to the extent that the sale proceeds exceed your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition).
	You will be personally responsible for reporting any capital gains you realize from the sale of shares in your annual personal income tax return and paying any applicable taxes due on such gains, if any, as described below.

Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.
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YOUR T	AX REPORTING AND PAYMENT OBLIGATIONS
Vesting	You will be required to report the taxable amount as employment income and pay any applicable taxes in your annual personal income tax return, which is due by April 1 of the year following the taxable event. The deadline may be extended until May 1, if the tax return is submitted electronically, or until July 1 if the tax return is submitted by an authorized tax advisor or an attorney.  The tax return should be submitted on the form prescribed by the tax authorities.
Dividends	You will be required to report any dividends and pay any applicable taxes in your annual personal income tax return, which is due by April 1 of the year following the taxable event. The deadline may be extended until May 1, if the tax return is submitted electronically, or until July 1 if the tax return is submitted by an authorized tax advisor or an attorney. The tax return should be submitted on the form prescribed by the tax authorities.
Sale of Shares	You will be obliged to include the income from sales of shares and pay any applicable taxes (unless they are exempt from tax) in your yearly personal income tax return, which is due by April 1 of the year following the taxable event. The deadline may be extended until May 1, if the tax return is submitted electronically, or until July 1 if the tax return is submitted by an authorized tax advisor or an attorney. The tax return should be submitted on the form prescribed by the tax authorities.

OTHER INFORMATION	
Foreign Asset/Account Reporting	None.
Exchange Control	You may be required to notify the Czech National Bank that you acquired shares under the Plan and/or that you maintain a foreign account. Such notification will be required if the aggregate value of your foreign direct investments is CZK 2,500,000 or more, you have a certain threshold of foreign financial assets, or you are specifically requested to do so by the Czech National Bank. You should consult with your personal financial advisor regarding your reporting requirements.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside

outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



## **DENMARK**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>24</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>24</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.
No Deferral

	TAX	
Grant	No taxation.	
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.	
Taxable Amount	The fair market value of the shares on the date of vesting.	
Nature of Taxable Amount	Employment compensation.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	No. Your RSUs do not trigger additional social insurance contributions in addition to those already payable if you are subject to the Danish social security scheme.	
Are Other Taxes Payable?	Church Tax. If you are a member of the National Church of Denmark, church tax will be imposed at the applicable municipal rate.	
	<u>Labor Market Contributions</u> . You personally will be responsible for paying any Labor Market Contributions due to the local tax authorities.	

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	
Is Income Tax Withheld?	No.
Are Employee Social Insurance Contributions Withheld?	Not applicable.
Are Other Taxes Withheld?	No.
Reporting	
Does the Taxable Amount Need to be Reported?	Yes. Your employer will have two separate reporting requirements: (i) when your RSUs vest, your employer will report the taxable amount as income to the income register ("elndkomst") of the Skattestyrelsen; and (ii) when you receive the shares, your employer also will report the following to the Skattestyrelsen: number of shares acquired, the acquisition date, the acquisition price (including any trading costs known to your employer), the identity of the shares, i.e., ISIN number (if such number is given), and the name of the issuing company.

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will likely report the payment as taxable income to the local tax authorities and likely withhold the applicable income tax and social insurance contributions.

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

	SALE OF SHARES	
Taxation in Your Country	When you sell shares acquired under the Plan, you will be subject to capital gains (i.e., share income) tax to the extent that the sale proceeds exceed your cost basis in the shares (generally, the fair market value of the shares on the date of vesting). Share income tax is imposed at varying rates (up to 42%), depending on the amount of share income (including dividends) that you realize during the year and your tax filing status.	
	If you sell Company shares acquired under the Plan at a price that is less than your cost basis in the shares, you will realize a capital loss. Capital losses on listed shares may be deducted only against share income from other listed shares to the extent that the Danish tax authorities are informed of the acquisition of the shares, including the identity, number, time of acquisition and the price of the shares, no later than at the time of filing the tax return related to the year in which the shares were acquired.	
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.	

No Deferral

YOUR	YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	If the taxable amount does not appear on your annual tax return (based on your employer's reporting or if you have not declared the income in your preliminary income assessment), you must update the tax return online through the Danish tax authorities website ( <a href="www.tastelv.skat.dk">www.tastelv.skat.dk</a> ) no later than May 1 or July 1 (depending on whether you are filing an ordinary or extended tax return) in the year following the taxable event.	
	However, payment of taxes after December 31 in the relevant tax year (i.e., the year of the taxable event) will result in interest being due.	
	If payment is made after July 1 of the year following the income year of vesting, you will pay a percentage surcharge calculated based on the residual tax in addition to interest.	
Dividends	You are personally responsible for reporting the dividend amount and paying any local country tax due on the dividends paid on your shares by July 1 of the year following the declaration of the dividend.	
	You may (i) make a voluntary payment of taxes online through the Danish tax authorities website ( <a href="www.tastelv.skat.dk">www.tastelv.skat.dk</a> ) or (ii) choose to pay the taxes through your regular income tax by including it in your preliminary income assessment or (iii) update your annual tax return online through the Danish tax authorities website no later than May 1 or July 1 (depending on whether you are filing an ordinary or extended tax return) in the year following the declaration of the dividend. However, payment of taxes after December 31 in the relevant tax year (i.e., the year dividend was declared) will result in interest being due.	
	If payment is made after July 1 of the year following the income year of the dividend payment, you pay a percentage surcharge calculated based on the residual tax in addition to interest.	
Sale of Shares	You are personally responsible for declaring any capital gains (losses) you realize upon the sale of shares and paying applicable taxes.  You may (i) make a voluntary payment of taxes online through the Danish tax authorities website ( <a href="www.tastelv.skat.dk">www.tastelv.skat.dk</a> ) or (ii) choose to pay the taxes through your regular income tax by including it in your preliminary income assessment or (iii) update your annual tax return online through the Danish tax authorities website no later than May 1 or July 1 (depending on whether you are filing an ordinary or extended tax return) in the year following the sale of the shares. However, payment of taxes after December 31 in the relevant tax year (i.e., the year you sell the shares) will result in interest being due.  If payment is made after July 1 of the year following the income year where the shares are sold, you will pay a percentage surcharge calculated based on the residual tax in addition to interest.  The calculation of capital gains (losses) at the time of sale is complex and you should consult with your personal tax advisor.	

	OTHER INFORMATION
Foreign Asset/Account Reporting	The requirement to report certain information to the Danish Tax Administration via Form V or K was eliminated effective January 1, 2019. However, you must still report the foreign bank/broker accounts and their deposits, and shares held in a foreign bank or broker in your tax return under the section on foreign affairs and income.
Exchange Control	None.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



### **FINLAND**

(Vests 1 year or more from Date of Grant)

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>25</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>25</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.	
Taxable Amount	The fair market value of the shares on the date of vesting.	
Nature of Taxable Amount	Additional salary.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	Yes (health insurance premiums only) <sup>26</sup>	
Are Other Taxes Payable?	Church Tax. If you are a member of the Finnish Evangelical Lutheran or Orthodox church, church tax will be due on income in excess of the applicable annual threshold.	

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	
Is Income Tax Withheld?	Yes.
	You are required to provide your employer with a withholding card specifying the rate at which your employer should withhold income tax. If you do not provide your employer with a withholding card, your employer will withhold income tax at the default maximum rate.
Are Employee Social Insurance Contributions Withheld?	Yes.
Are Other Taxes Withheld?	Yes, if applicable.
Reporting	
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the taxable amount as taxable income and related withholdings to the Incomes Register (i) by the 5 <sup>th</sup> day of the month following the month in which the taxable event occurs, if you only receive non-monetary benefits; or (ii) by the 5 <sup>th</sup> calendar day

<sup>&</sup>lt;sup>26</sup> This supplement assumes that your RSU vests one (1) year or more from the date of grant. Should a portion of your RSU vest before the first (1st) anniversary of the grant date, the taxable amount at RSU vesting will be subject to other social insurance contributions in addition to health insurance premiums (i.e., similar to social insurance contributions that would be payable on ordinary salary).

<sup>1</sup> Year Vest

after the payment date if you receive monetary payment (e.g., cash)	
in addition to the non-monetary benefits.	

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to income tax, all social insurance contributions, including unemployment premiums and employment pension premiums, and church tax (if applicable) on the cash payment at vesting.
	Your employer will report the payment as taxable income to the local tax authorities and withhold income tax, social insurance contributions, and church tax (if applicable).

	DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.	
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.	

	SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you may be subject to additional taxation on any gain you realize to the extent the gain exceeds your personal annual exemption amount for the tax year. Your capital gains tax rate will depend upon the amount of your capital income for the tax year. The tax rate for capital income is 30% up to EUR 30,000 and 34% for the capital income exceeding EUR 30,000.	
	The taxable gain generally will equal the difference between the sale proceeds and your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition). The cost basis of the shares sold is generally calculated on a "First In, First Out" basis, which means that where you acquired shares on different dates and not all of the shares are being sold, the shares that were acquired on earlier dates are deemed to be sold first, unless demonstrated otherwise. Alternatively, you may calculate the taxable gain as the difference between the sale proceeds and	

	20% of the sale proceeds (40% of the sale proceeds if the shares are held at least 10 years). If you sell Company shares acquired under the Plan at a price that is less than your cost basis in the shares, you will realize a capital loss. Capital losses may be offset against, primarily, any capital gain and, secondarily, other capital income, realized in the same tax year and during the following five (5) years.
	The calculation of capital gains (losses) at the time of sale is complex and you should consult with your personal tax advisor.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOU TA	YOU TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You must review your pre-completed tax return sent to you by the Tax Administration (typically in March or April) to confirm that the taxable amount has been reported. If you find any errors or omissions, you must make the necessary corrections electronically or by sending specific paper forms to the local tax authorities. Filing deadlines are determined individually, but typically are in May. In addition, if any residual tax is payable, the due dates are typically between August and November.	
Dividends	You are personally responsible for reporting the dividend amount in your personal tax return when you receive the pre-completed tax return from the Tax Administration and paying any taxes due. Filing deadlines are determined individually, but typically are in May. The due dates for the payment of any residual tax are typically between August and November.	
Sale of Shares	You are personally responsible for reporting any capital gains (losses) you recognize from the sale of shares in your personal tax return when you receive the pre-completed tax return from the Tax Administration and paying any taxes due. Filing deadlines are determined individually, but typically are in May. The due dates for the payment of any residual tax are typically between August and November.	

OTHER INFORMATION	
Foreign Asset/Account Reporting	There are no specific reporting requirements with respect to foreign assets/accounts.
	However, please note that you must check your pre-completed tax return to confirm that the ownership of shares and other securities (foreign or domestic) are correctly reported. If you find any errors or omissions, you

	must make the necessary corrections electronically or by sending specific paper forms to the local tax authorities.
Exchange Control	None.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



### **FINLAND**

(Vests prior to the 1 year anniversary of the Date of Grant)

### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>27</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>27</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted. Vest Before 1 Year

	TAX	
Grant	No taxation.	
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.	
Taxable Amount	The fair market value of the shares on the date of vesting.	
Nature of Taxable Amount	Additional salary.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	Yes. <sup>28</sup>	
Are Other Taxes Payable?	<u>Church Tax</u> . If you are a member of the Finnish Evangelical Lutheran or Orthodox church, church tax will be due on income in excess of the applicable annual threshold.	

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	
Is Income Tax Withheld?	Yes.
	You are required to provide your employer with a withholding card specifying the rate at which your employer should withhold income tax. If you do not provide your employer with a withholding card, your employer will withhold income tax at the default maximum rate.
Are Employee Social Insurance Contributions Withheld?	Yes.
Are Other Taxes Withheld?	Yes, if applicable.
Reporting	
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the taxable amount as taxable income and related withholdings to the Incomes Register (i) by the 5th day of the month following the month in which the taxable event occurs, if you only receive non-monetary benefits; or (ii) by the 5th calendar day

<sup>&</sup>lt;sup>28</sup> This supplement assumes that your RSU vests before the first (1st) anniversary of the grant date. Thus, in addition to health insurance premiums, other social insurance contributions will be due on the taxable amount (i.e., similar to social insurance contributions that would be payable on ordinary salary).

after the payment date if you receive monetary payment (e.g., cash) in addition to the non-monetary benefits.

	DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to income tax, all social insurance contributions, including unemployment premiums and employment pension premiums, and church tax (if applicable) on the cash payment at vesting.	
	Your employer will report the payment as taxable income to the local tax authorities and withhold income tax, social insurance contributions, and church tax (if applicable).	

	DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.	
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.	

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you may be subject to additional taxation on any gain you realize to the extent the gain exceeds your personal annual exemption amount for the tax year. Your capital gains tax rate will depend upon the amount of your capital income for the tax year. The tax rate for capital income is 30% up to EUR 30,000 and 34% for the capital income exceeding EUR 30,000.
	The taxable gain generally will equal the difference between the sale proceeds and your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition). The cost basis of the shares sold is generally calculated on a "First In, First Out" basis, which means that where you acquired shares on different dates and not all of the shares are being sold, the shares that were acquired on earlier dates are deemed to be sold first, unless demonstrated otherwise. Alternatively, you may calculate the taxable gain as the difference between the sale proceeds and

	20% of the sale proceeds (40% of the sale proceeds if the shares are held at least 10 years). If you sell Company shares acquired under the Plan at a price that is less than your cost basis in the shares, you will realize a capital loss. Capital losses may be offset against, primarily, any capital gain and, secondarily, other capital income, realized in the same tax year and during the following five (5) years.
	The calculation of capital gains (losses) at the time of sale is complex and you should consult with your personal tax advisor.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOU TA	YOU TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You must review your pre-completed tax return sent to you by the Tax Administration (typically in March or April) to confirm that the taxable amount has been reported. If you find any errors or omissions, you must make the necessary corrections electronically or by sending specific paper forms to the local tax authorities. Filing deadlines are determined individually, but typically are in May. In addition, if any residual tax is payable, the due dates are typically between August and November.	
Dividends	You are personally responsible for reporting the dividend amount in your personal tax return when you receive the pre-completed tax return from the Tax Administration and paying any taxes due. Filing deadlines are determined individually, but typically are in May. The due dates for the payment of any residual tax are typically between August and November.	
Sale of Shares	You are personally responsible for reporting any capital gains (losses) you recognize from the sale of shares in your personal tax return when you receive the pre-completed tax return from the Tax Administration and paying any taxes due. Filing deadlines are determined individually, but typically are in May. The due dates for the payment of any residual tax are typically between August and November.	

OTHER INFORMATION	
Foreign Asset/Account Reporting	There are no specific reporting requirements with respect to foreign assets/accounts.
	However, please note that you must check your pre-completed tax return to confirm that the ownership of shares and other securities (foreign or domestic) are correctly reported. If you find any errors or omissions, you

	must make the necessary corrections electronically or by sending specific paper forms to the local tax authorities.
Exchange Control	None.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



### **FRANCE**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>29</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country on April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>29</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

#### **GENERAL INFORMATION**

The RSUs described herein **are not eligible** for the French specific tax and social regime provided by Sections L. 225-197-1 to L. 225-197-5 and Sections L. 22-10-59 to L. 22-10-60 of the French Commercial Code, as amended. 30

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.
Taxable Amount	The fair market value of the shares on the date of vesting, after deduction of tax-deductible social security contributions.
Nature of Taxable Amount	Employment income.
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	Yes.
Are Other Taxes Payable?	Surtax on High Income: An additional surtax applies on all types of income, including the income at vesting and capital gain, if your total income exceeds certain thresholds. If these thresholds are met for income received in the current year, but were not met for income received in the two (2) prior tax years, you may be eligible for a surtax reduction. You should consult with your personal tax advisor regarding the applicability of the surtax to you.
	<u>Differential Contribution on High Income</u> : If your global taxable income, including the taxable amount and any capital gains, exceeds a certain threshold, you will be subject to a minimum effective tax rate of 20%. You should consult with your personal tax advisor regarding the applicability of this tax to you.

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	
Is Income Tax Withheld?	Yes.

<sup>&</sup>lt;sup>30</sup> The French Commercial Code references are effective as of January 1, 2021. Please note that the tax and social treatment of your RSUs described herein is applicable for prior year income deriving from these RSUs. The rules could be modified as the Finance Bills are typically voted at the very end of December of each year.

Non-Qualified Awards

Are Employee Social Insurance Contributions Withheld?	Yes.
Are Other Taxes Withheld?	No.
Reporting	
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the taxable amount on your monthly payroll slip to the tax authorities and the corresponding monthly nominative social declaration (DSN).

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable social security contributions and income tax. It will be your responsibility to remit income taxes due.

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, you will be subject to a flat tax rate of 30% ("Prélèvement Forfaitaire Unique"), which includes income tax and social taxes, on any dividends paid with respect to the shares. An election to apply progressive income tax rates in your annual income tax return may be available (in this case, a specific rebate may apply for income tax purpose). You should discuss the opportunity to elect progressive tax treatment with your personal tax advisor or your local tax office. If you elect to apply progressive income tax rates, 6.8% of the 17.2% social taxes will be tax deductible.  Any dividends received may also be subject to surtax, if applicable.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You may also be entitled to a tax credit in your country for

<sup>&</sup>lt;sup>31</sup> The election, if made, will apply to all investment income. The election does not allow you to apply progressive income tax rates to only certain types of income.

Non-Qualified Awards

the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

	SALE OF SHARES	
Taxation in Your Country	When you sell shares acquired under the Plan, you will realize a capital gain (or loss) on the difference between the RSU income recognized at the time the shares are delivered to you and the sale proceeds.	
	Capital gain will be taxed at a combined rate of 30%. This 30% rate includes income tax at a flat rate of 12.8% and additional social taxes at a combined rate of 17.2% (without taking into account any rebates). An election to apply progressive income tax rates in your annual income tax return may be available. You should discuss the opportunity to elect progressive tax treatment with your personal tax advisor or your local tax office. <sup>32</sup> If you elect to apply progressive income tax rates, 6.8% of the 17.2% social taxes will be tax deductible.	
	If the net sale price of the shares is less than the RSU income recognized at the time the shares are delivered to you, you will realize a capital loss. This capital loss can be offset against capital gain on the sale of securities realized by you and your household during the same year or during the following ten (10) years. A capital loss cannot be offset against other types of income.	
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.	

Υ	YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You should confirm that the taxable amount is properly reported on your annual income tax return, Form N° 2042 (or any applicable Form at the time of the reporting), which is due in May/June of the year following the taxable event, make any necessary corrections, and pay any difference between the amount withheld by your employer and the actual tax due.  You also are responsible for reporting and paying any surtax due directly to	
	the tax authorities.	
Dividends	Unless the shares are held by a French broker or bank, you may be required to file a tax return and pay advance income tax as well as additional social taxes, directly to the tax office within 15 days of the month following the receipt of the dividends.	

<sup>&</sup>lt;sup>32</sup> The election, if made, will apply to all investment income. The election does not allow you to apply progressive income tax rates to only certain types of income.

	In addition, the dividends (and taxes paid) must be reported on Form $N^{\circ}$ 2778-DIV-SD (or any applicable Form at the time of the reporting) in the year following receipt of the dividends.
	You also must report the dividends and taxes paid in your annual income tax return due in May/June of the corresponding year. You will have to report the dividends on Form N° 2047 (for foreign-sourced income) (or any applicable Form at the time of the reporting) as well as on Form N° 2042.
	You should consult your personal tax advisor regarding the applicability of the advance reporting and income and social tax payment to your situation.
Sale of Shares	You must report any capital gain or loss on your annual income tax return, Form N° 2042 (or any applicable Form at the time of the reporting), due in May/June of the year following the sale of the shares.
	Any capital gain or loss also must be reported in the Form N° 2074 for capital gain/loss realized in the corresponding year.

	OTHER INFORMATION	
Foreign Asset/Account Reporting	You must report annually any shares and bank accounts you hold outside France, including the accounts that were opened, held, used and/or closed during the tax year, to the French tax authorities, on an annual basis on a special Form N° 3916, together with your personal income tax return. Failure to report triggers a significant penalty.	
Exchange Control	The value of any cash or securities imported to or exported from France without the use of a financial institution must be reported to the customs and excise authorities when the value of such cash or securities is equal to or greater than a certain amount. You should consult with your personal financial advisor for further details regarding this requirement.	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.	



## **GEORGIA**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>33</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of August 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>33</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	You will be subject to taxation on the date(s) the RSUs vest and shares are issued to you.	
Taxable Amount	The fair market value of the shares on the date of vesting.	
Nature of Taxable Amount	Employment income.	
Is Income Tax Payable?	Yes.	
Are Social Insurance Contributions Payable?	Yes, if you are a are part of the pension scheme, you will be subject to mandatory pension contribution at a rate of 2% on the taxable amount.	
Are Other Taxes Payable?	No.	

COMPAN	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	Yes.	
Are Employee Social Insurance Contributions Withheld?	Yes.	
Are Other Taxes Withheld?	Not applicable.	
Reporting		
Does the Taxable Amount Need to be Reported?	Your local employer will report the taxable amount at vesting as income to you to the tax authorities.	

	DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.	
	Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable income tax and social insurance contributions.	

	DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will not be subject to tax in your country.	
Taxation in the U.S.	Further, any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.	

	SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you will not be subject to taxation on any gains recognized.	
	There is low risk that tax authorities may still apply 20% income tax on the gains. However, tax exemption shall still apply if you sell the shares at least after two (2) years from its acquisition.	
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will need to perform U.S. back-up withholding on the gain and withhold tax at a rate of 24%.	

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	Not applicable.
Dividends	Not applicable.
Sale of Shares	Not applicable.

OTHER INFORMATION	
Foreign Asset/Account Reporting	None.
Exchange Control	None.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S.

### OTHER INFORMATION

estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



## **GERMANY**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). 34 by Thermo Fisher Scientific Inc. (the "Company") under the Thermo Fisher Scientific Inc. Amended and Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>34</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.	
Taxable Amount	The fair market value of the shares on the date of vesting. <sup>35</sup>	
Nature of Taxable Amount	Employment compensation.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	Yes (to the extent the applicable contribution ceiling has not been exceeded).	
Are Other Taxes Payable?	Solidarity Surcharge. A solidarity surcharge may be assessed on the amount of your income tax liability.	
	Church Tax. You may be subject to church tax on the amount of your income tax liability, depending on the tax district in which you reside and whether you are a registered member of a church.	

COMPANY/E	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	Yes.	
Are Employee Social Insurance Contributions Withheld?	Yes (to the extent the applicable contribution ceiling has not been exceeded).	
Are Other Taxes Withheld?	Yes, as applicable.	
Reporting		
Does the Taxable Amount Need to be Reported?	Your employer will report the taxable amount, as well as the taxes due, and withhold and remit the taxes to the responsible authorities in connection with the filing of the monthly wage tax return (Lohnsteuer-Anmeldung) and the "Beitragsnachweis" for social insurance contribution purposes. After the end of the calendar year, your	

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<sup>&</sup>lt;sup>35</sup> Up to a certain threshold per year of aggregate award income may be exempt from taxation (EUR 2,000 as of January 1, 2024) if awards are granted under the Plan to all employees. In addition, a special formula (the "one-fifth rule") may apply that may result in favorable tax treatment if (i) the award is subject to time-vesting based on employment and has been granted as an incentive for future services, (ii) the period between grant and vest is more than one (1) year, and (iii) within this period, you remain employed with the same employer. However, the one-fifth rule has no benefit if you are subject to tax at the maximum marginal rate on your regular wages. You should consult with your personal tax advisor regarding the availability of such exemption and/or special formula.

em	oyer will provide you with your wage tax certificate, in which the	
tax	ole amount will be included.	

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting. The cash payment will be taxed in the same manner as the RSUs described in the Tax section above.

	DIVIDENDS	
Taxation in Your Country	You will be subject to taxation at a flat rate of 25% (plus solidarity surcharge and church tax, if applicable) on any dividends you receive on the Company shares you acquire under the Plan. If the flat tax rate exceeds your personal income tax rate, you may elect a personal assessment to apply your personal income tax rate instead of the flat rate. The income from any dividends you receive is subject to an annual lump sum deduction (EUR 1,000 for individuals and EUR 2,000 for married couples filing jointly) applicable to all investment income (including capital gains from the sale of shares) for the relevant tax year.	
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.	

SALE OF SHARES	
Taxation in Your Country	Depending on when you acquired the shares, you may be subject to additional taxation on any gain you realize when you sell your shares. The capital gain will equal the difference between the sale proceeds and your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition).
	Shares acquired prior to January 1, 2009
	If you sell shares that were acquired prior to January 1, 2009, any gain you realize upon sale will likely be exempt from capital gains tax because you have held the shares for longer than one (1) year.
	Shares acquired on or after January 1, 2009

If you sell shares that were acquired on or after January 1, 2009, the gain will be subject to tax at a flat rate of 25% (plus solidarity surcharge and church tax, if applicable, on the flat tax owed). If the flat rate exceeds your personal income tax rate, you may elect a personal assessment to apply your personal income tax rate.

Any gains you realize from the sale of Company shares is subject to an annual lump sum deduction (EUR 1,000 for individuals and EUR 2,000 for married couples filing jointly) applicable to all investment income (including any dividends you receive on the Company shares) for the relevant tax year.

However, flat rate taxation does not apply and the capital gain will be subject to taxation according to the partial income procedure if:

- 1. you own 1% or more of the Company's stated capital (or have owned 1% or more at any time in the last five (5) years); or
- 2. the shares are held as business assets (which is rather unlikely in the case of shares acquired as a result of settlement of RSUs granted under the Plan).

If the net sale price of the shares is less than the fair market value of shares on the date of acquisition, you will realize a capital loss. This capital loss can be offset against capital gain on the sale of other shares (if any) realized by you during the same calendar year or during the following years. A capital loss cannot be offset against other types of income (including income from capital investment other than capital gains realized from the sale of shares).

You will be responsible for declaring any capital gain (or loss) you realize upon the sale of shares and paying applicable taxes.

#### Taxation in the U.S.

Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

## YOUR TAX REPORTING AND PAYMENT OBLIGATIONS

## Vesting

Depending on your personal situation, you might be required to file an income tax return in Germany.

The due date for filing your income tax return is typically July 31 of the year following the calendar year in which the taxable event occurred. If the income tax return is filed by a tax advisor, the deadline for filing the income tax return is automatically extended until the last day of February of the second year following the calendar year in which the taxable event occurred. For the 2024 calendar year, the due date for filing an income tax return by a tax advisor has been extended to April 30, 2026. Generally, you must pay the income tax assessed within a month following the receipt of a tax assessment notice. For further information on whether you are required to file an income tax return, you should contact the responsible tax office or your personal tax adviser.

Dividends	You must report the dividends as taxable income in your annual income tax return and pay the applicable tax directly to the local tax authorities, unless the flat rate tax was withheld by a German bank or financial institution where you have deposited the shares.
	The due date for filing your income tax return is typically July 31 of the year following the calendar year in which the taxable event occurred. If the income tax return is filed by a tax advisor, the deadline for filing the income tax return is automatically extended until the last day of February of the second year following the calendar year in which the taxable event occurred. For the 2024 calendar year, the due date for filing an income tax return by a tax advisor has been extended to April 30, 2026. Generally, you must pay the income tax assessed within a month following the receipt of a tax assessment notice. For further information on whether you are required to file an income tax return, you should contact the responsible tax office or your personal tax adviser.
Sale of Shares	You must report any taxable gain arising upon the sale or disposition of the Company shares you acquire under the Plan in your annual income tax return and pay the applicable tax directly to the local tax authorities, unless the flat rate tax is withheld by a German bank or financial institution where you have deposited the shares.
	The due date for filing your income tax return is typically July 31 of the year following the calendar year in which the taxable event occurred. If the income tax return is filed by a tax advisor, the deadline for filing the income tax return is automatically extended until the last day of February of the second year following the calendar year in which the taxable event occurred. For the 2024 calendar year, the due date for filing an income tax return by a tax advisor has been extended to April 30, 2026. Generally, you must pay the income tax assessed within a month following the receipt of a tax assessment notice. For further information on whether you are required to file an income tax return, you should contact the responsible tax office or your personal tax adviser.

OTHER INFORMATION	
Foreign Asset/Account Reporting	If your acquisition of shares under the Plan leads to a so-called qualified participation at any point during the calendar year, you may need to report the acquisition when you file your tax return for the relevant year. A qualified participation occurs only if (i) you own at least 1% of the Company and the value of the shares acquired exceeds EUR 150,000. <sup>36</sup> or (ii) you hold Company shares exceeding 10% of the Company's total common stock.
Exchange Control	Cross-border payments in excess of a certain threshold (EUR 50,000 as of January 1, 2025) must be reported to the German Federal Bank (Bundesbank). If you receive a payment in excess of this amount (including

<sup>36</sup> If the Company shares are not listed on a recognized stock exchange, reporting is required if the value of the shares exceeds EUR 150,000, regardless of whether such individuals hold less than 1% of the Company.

if you acquire shares with a value in excess of this amount or sell shares via a foreign broker, bank or service provider and receive proceeds in excess of this amount) and/or if the Company withholds shares with a value in excess of the threshold to recover taxes due by you in connection with the Plan, you must report the payment to Bundesbank, either electronically using the "General Statistics Reporting Portal" ("Allgemeines Meldeportal Statistik") available on the Bundesbank website (www.bundesbank.de) or via such other method (e.g., by email or telephone) as is permitted or required by Bundesbank. The report must be submitted monthly or within other such timing as is permitted or required by Bundesbank. Please note that you may not be required to report the acquisition of shares in excess of this amount if your employer bears the costs of the awards via a recharge arrangement.

#### **U.S. Estate Tax**

You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



### **GREECE**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>37</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>37</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

TAX	
Grant	No taxation.
Vesting	No taxation. <sup>38</sup>
Taxable Amount	Not applicable.
Nature of Taxable Amount	Not applicable.
Is Income Tax Payable?	Not applicable.
Are Employee Social Insurance Contributions Payable?	Yes (to the extent the applicable contribution ceiling has not been exceeded). <sup>39</sup>
Are Other Taxes Payable?	No.

COMPANY	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	Not applicable.	
Are Employee Social Insurance Contributions Withheld?	Yes (to the extent the applicable contribution ceiling has not been exceeded). 40	
Are Other Taxes Withheld?	Not applicable.	
Reporting		
Does the Taxable Amount Need to be Reported?	Your employer will report to the tax authorities the value of your shares. <sup>41</sup> by virtue of the emolument e-reporting for the month in which the shares are issued to you. In addition, your employer will provide a special emolument certificate to you reporting the number and value of the shares issued to you.	

<sup>21</sup> 

<sup>&</sup>lt;sup>38</sup> Under a new favorable tax regime applicable as of January 1, 2020, RSUs are not subject to tax until the shares are sold. A tax exemption (from employment income tax) applies on the condition that the acquisition of shares is subject to the attainment of a specific goal or the occurrence of a specific event (e.g., vesting). The new legislation applies to RSUs that vest on or after January 1, 2020 irrespective of the grant date. Please consult with your personal tax advisor for more information.

<sup>&</sup>lt;sup>39</sup> It is unclear whether social insurance contributions are due under the new favorable tax regime deferring taxation until sale of the shares.

<sup>&</sup>lt;sup>40</sup> It is unclear whether social insurance contributions are due under the new favorable tax regime deferring taxation until sale of the shares.

 $<sup>^{\</sup>rm 41}$  Based on the closing price of the Company shares.

	DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.	
	Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable income tax and social insurance contributions (to the extent the applicable contribution ceiling has not been exceeded).	

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you will be subject to capital gains tax based on the closing price of the Company shares at vesting. 42
	You also will be subject to a transfer tax on the gross sale proceeds.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

<sup>&</sup>lt;sup>42</sup> If you own more than 0.5% of the Company's shares, you will be subject to capital gains tax on the entire sale proceeds. **[FOR PRIVATE COMPANIES ONLY:** In the case of non-listed shares, no participation threshold applies, and you will be subject to capital gains tax on the higher of (i) the value of the Company's net assets per share (i.e., the current value of all assets minus liabilities divided by the number of the Company's shares) at the time the shares are issued to the employee and (ii) the sale price per share.]

YO	YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	None.	
Dividends	You are personally responsible for reporting the dividend amount and paying any local country tax due on the dividends paid on your shares by completing and filing the E1 form in your annual income tax return by June 30 of the following tax year. Individual filing extensions are not available.	
	The applicable tax should be paid in three equal installments. The first installment is due prior to the last business day of July, the second is due prior to the last business day of September, and the third is due prior to the last business day of November.	
Sale of Shares	You will be responsible for reporting any capital gain arising upon the sale of shares and paying any applicable taxes due on such gain in your annual income tax return by completing and filing the E1 form by June 30 of the following tax year. Individual filing extensions are not available.	
	The applicable tax should be paid in three equal installments. The first installment is due prior to the last business day of July, the second is due prior to the last business day of September, and the third is due prior to the last business day of November.	
	You also will be responsible for reporting and paying the transfer tax on the gross sale proceeds if the sale is executed by a foreign broker. The deadline is the fifteenth day of the month following the month of sale.	
	Transfer tax on the sale of shares shall be paid by virtue of a special transfer tax return to be filed by the end of the month following the sale.	

	OTHER INFORMATION	
Foreign Asset/Account Reporting	The reporting of foreign assets (including shares and other investments) is your own obligation and takes place through your annual tax return.	
Exchange Control	None.	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.	



#### **HONG KONG**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>43</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>43</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

#### **GENERAL INFORMATION**

Important Warning. The Plan, your equity award agreement and other related documentation (the "Plan Documentation") have not been reviewed by any regulatory authority in Hong Kong. As a result, you should exercise caution in relation to the grant of your equity award and the acquisition of Company shares pursuant to such award. If you are in any doubt about any of the contents of the Plan Documentation, you should obtain independent professional advice. The grant of the equity award and the Company shares issued under the Plan pursuant to the award are not a public offer of securities and are available only for certain eligible employees of the Company and its affiliates. The Plan Documentation has not been prepared in accordance with and is not intended to constitute a "prospectus" for a public offering of securities under the applicable securities legislation in Hong Kong. The Plan Documentation is intended only for the personal use of certain eligible employees and the Company and its affiliates and may not be distributed to any other person.

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.
Taxable Amount	The fair market value of the shares on the date of vesting.
Nature of Taxable Amount	Employment compensation.
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	No.
Are Other Taxes Payable?	No.

COMPANY	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	No.	
Are Employee Social Insurance Contributions Withheld?	Not applicable.	
Are Other Taxes Withheld?	Not applicable.	

Reporting	
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the taxable amount to the Inland Revenue Department ("IRD") as part of the annual Employer's Return of Remuneration and Pensions (Form IR56B). Your employer will subsequently provide a copy of the filed Form IR56B to you for your records.

	DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to both income tax and Mandatory Provident Fund contributions on the cash payment at vesting.  Your employer will report the payment as taxable income to the local tax authorities, but will not withhold any tax. You personally will be responsible for paying any tax due directly to the local tax authorities.	

DIVIDENDS	
Taxation in Your Country	If you acquire Company shares and a dividend is subsequently declared on the Company's shares, you will not be subject to tax in your country on any dividends paid with respect to the shares.
Taxation in the U.S.	However, any dividends paid will be subject to United States ("U.S.") federal tax withholding at source.

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you will not be subject to tax on any gain you recognize.
	If you sell Company shares acquired under the Plan at a price which is less than your cost basis in the shares, you will realize a capital loss. Capital losses cannot be offset from any income taxable in Hong Kong.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

## YOUR TAX REPORTING AND PAYMENT OBLIGATIONS

Vesting	You will be issued an individual tax return (Form BIR60) directly from the IRD in April or May. All employment income, including the taxable amount, should be reported on this tax return for the year of the taxable event. The deadline for submitting the individual tax return is one month from receipt if the taxpayer files a physical copy of the return and does not solely own any unincorporated business during the year of assessment. There is an automatic extension of one month for taxpayers who are filing their return electronically.
	Electronic filing of the tax return is available if you are an eTax Account holder and satisfy certain conditions.
	You can apply for a tax return filing extension in writing to the IRD before the filing deadline.
	Based on your individual tax return and the reporting made by your employer, the IRD will issue a salaries tax assessment to you with the amount of tax payable for that particular year of assessment and the deadline for payment(s).
Dividends	None.
Sale of Shares	None.

OTHER INFORMATION	
Foreign Asset/Account Reporting	None.
Exchange Control	None.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



## **HUNGARY**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). 44 by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>44</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	You will be subject to tax when the RSUs vest and shares are issued to you.	
Taxable Amount	The fair market value of the shares issued to you at vesting.	
	However, because you are required to pay social contribution tax, your taxable amount is equal to 89% of the fair market value of the shares at vesting.	
Nature of Taxable Amount	Employment compensation.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	Yes.	
Are Other Taxes Payable?	No.	

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	
Is Income Tax Withheld?	No.
Are Employee Social Insurance Contributions Withheld?	No.
Are Other Taxes Withheld?	Not applicable.
Reporting	
Does the Taxable Amount Need to be Reported?	No.

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will neither report the payment to the local tax authorities nor withhold tax from the payment. It will be your responsibility to remit the taxes due by the 12th day of the month following the end of the quarter

in which the taxable event occurs (but if the deadline falls on a non-
business day, the due date is the next business day), while the tax return
must be filed by May 20 of the year following the taxable event.

	DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.	
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. For dividends received prior to January 1, 2024, you may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. <sup>45</sup> You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.	

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you will be subject to capital gains tax at a flat rate to the extent that the sale proceeds exceed your cost basis in the shares (generally, the fair market value of the shares on the date the shares were acquired). 46
	If the sale proceeds are less than your cost basis in the shares, you will realize a capital loss. Capital losses incurred in the subject fiscal year and the preceding two (2) fiscal years may be used to offset capital gains in the subject fiscal year.
	The calculation of capital gains (losses) at the time of sale is complex and you should consult with your personal tax advisor on this issue.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

<sup>&</sup>lt;sup>45</sup> The treaty between the U.S. and Hungary, which regulates certain aspects of the taxation consequences of income detailed in this supplement, was concluded in 1979 and terminated with effect from January 1, 2024. Therefore, the reduced rate of U.S. federal tax withholding on dividends no longer applies. Please also note that in the absence of the treaty, the foreign tax credit in Hungary is capped and 5% personal income tax should still be payable on dividends received from a foreign source.

<sup>&</sup>lt;sup>46</sup> If you own shares of other publicly traded companies, the taxable amount will be based on the total gains / losses of all publicly traded share transactions in a given tax year.

YOUR	YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You are required to report the taxable amount as income to you in your personal tax return, which must be filed by May 20 of the year following the taxable event.	
	You personally will be responsible for paying any tax due directly to the local tax authorities by the 12th calendar day of the month following the end of the quarter in which the taxable event occurs (but if the deadline falls on a non-business day, the due date is the next business day).	
	You should keep all receipts in connection with any transaction for five (5) years, as these receipts must be presented to the Hungarian tax authorities upon request.	
Dividends	You personally will be responsible for reporting the taxable amount as income to you, and paying any taxes due, in your personal tax return, which must be filed by May 20 of the year following the dividend payment.	
	You personally will be responsible for paying any tax due directly to the local tax authorities by the 12th calendar day of the month following the end of the quarter in which the taxable event occurs (but if the deadline falls on a non-business day, the due date is the next business day).	
	You should keep all receipts in connection with any transaction for five (5) years, as these receipts must be presented to the Hungarian tax authorities upon request.	
Sale of Shares	You personally will be responsible for reporting any capital gains (losses) and paying any taxes due on such gains, in your personal tax return, which must be filed by May 20 of the year following the sale of the shares.	
	You personally will be responsible for paying any tax due directly to the local tax authorities by the 12th calendar day of the month following the end of the quarter in which the taxable event occurs (but if the deadline falls on a non-business day, the due date is the next business day).	
	You should keep all receipts in connection with any transaction for five (5) years, as these receipts must be presented to the Hungarian tax authorities upon request.	

OTHER INFORMATION	
Foreign Asset/Account Reporting	None.
Exchange Control	None.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty

applies, the consequences will differ. The gross estate of a non-resident
alien consists only of assets located in the U.S., which will include your
Company shares (and certain awards granted under the Plan). Due to the
complexity of these laws, your heirs should consult with a personal tax or
financial advisor.



#### **INDIA**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>47</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>47</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX
Grant	No taxation.
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject taxation.
Taxable Amount	The fair market value of the shares on the date of vesting.  For Indian tax purposes, the fair market value of the shares will be based on a valuation prepared by a Category 1 SEBI licensed Merchan Bank.
Nature of Taxable Amount	Employment benefits.
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	No.
Are Other Taxes Payable?	Education and Health cess. Education and health cess at 4% will be due on the income tax payable plus surcharge.
	Surcharge. Taxable income exceeding INR 5 million up to INR 1 million will be subject to a 10% surcharge. A 15% surcharge applies for taxable income exceeding INR 10 million up to INR 20 million. A 25 surcharge applies for taxable income exceeding INR 20 million up to INR 50 million. A 37% surcharge applies for taxable income exceeding INR 50 million.
	Effective as of April 1, 2023, the surcharge is capped at 25% if you opt for the new tax regime or do not make an election. If you opt t remain under the old tax regime, the maximum surcharge is 37%.

COMPANY/EI	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	Yes.	
Are Employee Social Insurance Contributions Withheld?	Not applicable.	
Are Other Taxes Withheld?	Yes (Education and health cess and surcharge).	
Reporting		
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the taxable amount as taxable income to the local tax authorities on Form 24Q (quarterly statement of tax withholding). In addition, your employer will report the taxable	

amount to you on Form 12BA attached to Form 16, by Jur	e 15
following the fiscal year end (March 31) in which the taxable	event
occurs.	

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to income tax (including education and health cess and, if applicable, surcharge) on the cash payment at vesting.
	Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable income tax, education and health cess and surcharge.

	DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.	
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.	

SALE OF SHARES	
Taxation in Your Country	When you sell shares acquired under the Plan, you will be subject to capital gains tax to the extent that the sale proceeds exceed your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition as determined by a Category 1 SEBI licensed Merchant Bank).
	If you hold the shares acquired under the Plan for more than 24 months, you will be taxed at the more favorable long-term capital gains tax rate of 12.5% (plus health and education cess and, if applicable, surcharge). In case of long-term capital gains, you may be eligible to certain deductions based on specified reinvestments, subject to prescribed conditions.
	If you hold the shares for 24 months or less, you will be taxed at your marginal income tax rate (plus education and health cess and, if applicable, surcharge).

	If your sale proceeds are lower than your cost basis in the shares, you will realize a loss. Capital losses (short-term or long-term) may be offset against other capital gains of the same nature ( <i>i.e.</i> , short-term or long-term) that you realize in the same tax year or in any subsequent tax year up to a maximum period of 8 years. Long-term capital loss cannot be set off against short-term capital gains. Income tax returns ("ITR") are required to be filed by the due date in order to be eligible to carry forward capital losses, if any.  The calculation of capital gains (losses) at the time of sale is complex and
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

	YOUR TAX REPORTING AND PAYMENT OBLIGATIONS
Vesting	You are required to report the taxable income in your ITR based on the amount reported by your employer in Form 16 and pay any additional tax due.  Any shares held/sold during the period are to be reported in the ITR, in Schedule Foreign Assets, as described below.  The deadline for filing the ITR is July 31.
Dividends	You are personally responsible for reporting the dividend amount and paying any local country tax due on the dividends paid on your shares.  Tax on dividend is payable under the Advance Tax System during the fiscal year (i.e., April 1 – March 31) in four (4) instalments, as follows:  • On or before June 15 – not less than 15% of the tax payable for the year;  • On or before September 15 – not less than 45% of the tax payable for the year, reduced by the amount paid in the earlier instalment;  • On or before December 15 – not less than 75% of the tax payable for the year, reduced by the amount paid in the earlier instalments; and  • On or before March 15 – the whole amount of the tax payable for the year, reduced by the amount paid in the earlier instalments.  Payments are due pursuant to the above schedule based on the date that you receive a dividend. For example, if you receive the dividend in October, you must pay not less than 75% of the tax due on such dividend by December 15 and the remaining tax due by the applicable dates. If you fail to pay the required amount of tax on the dividend according to the above schedule, you will be liable for interest at a rate of 1% per month on the amount of the underpayment.

	In addition, you are required to report any dividends in the ITR under "Income from Other Sources."
	You may be entitled to claim a credit for any foreign tax withheld or paid on your dividends in the ITR, in which case, prior to filing the ITR, you must file Form 67 to report the withholding tax and the foreign tax credit being claimed.
	The deadline for filing the ITR is July 31.
Sale of Shares	You will be responsible for reporting and paying any tax resulting from the sale of shares.
	Capital gains tax is payable under the Advance Tax System during the fiscal year (i.e., April 1 – March 31) in four (4) instalments, as follows:
	<ul> <li>On or before June 15 – not less than 15% of the tax payable for the year;</li> </ul>
	<ul> <li>On or before September 15 – not less than 45% of the tax payable for the year, reduced by the amount paid in the earlier instalment;</li> <li>On or before December 15 – not less than 75% of the tax payable for the year, reduced by the amount paid in the earlier instalment; and</li> </ul>
	<ul> <li>On or before March 15 – the whole amount of the tax payable for the year, reduced by the amount paid in the earlier instalments.</li> <li>Payments are due pursuant to the above schedule based on the date that you realize a capital gain. For example, if you realize a capital gain in</li> </ul>
	October, you must pay not less than 75% of the tax due on such capital gain by December 15 and the remaining tax due by the applicable dates. If you fail to pay the required amount of capital gains tax according to the above schedule, you will be liable for interest at a rate of 1% per month on the amount of the underpayment.
	In addition, you are required to report any capital gain/loss in your ITR under "Income from Capital Gains".
	You must also report any shares held at any time during the applicable calendar year in Schedule Foreign Assets in the ITR.
	The deadline for filing the ITR is July 31.

OTHER INFORMATION	
Foreign Asset/Account Reporting	You are required to declare your foreign bank accounts and any foreign financial assets (including shares held outside India) in your annual tax return.
	As the reporting rules are stringent, you should consult with your personal tax or legal advisor regarding this reporting obligation.
Exchange Control	You are required to repatriate the cash proceeds received upon the sale of shares and receipt of any dividends and convert such proceeds into local currency within specified timeframes as required under applicable

	regulations. You also are required to retain the foreign inward remittance certificate as evidence of repatriation.  As exchange control regulations can change frequently and without notice, you should consult your personal tax or legal advisor before selling your shares to ensure compliance with current regulations.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



## **INDONESIA**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>48</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

The tax consequences described in this supplement are based, in part, on the absence of an arrangement for the Company to charge the costs of the awards to your employing entity (referred to as a "recharge arrangement") or for the employing entity to expense the cost of awards on its local books (referred to as the "local award accounting treatment"). In the event of any change to the recharge arrangement or the local award accounting treatment, the taxation and related requirements of awards granted to you may be different than those described in this supplement. The Company expressly reserves the right to implement, modify or terminate a recharge arrangement with your employing entity or modify the local award accounting treatment at any time.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>48</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.	
Taxable Amount	The fair market value of the shares on the date of vesting.	
Nature of Taxable Amount	Employment compensation.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	No.	
Are Other Taxes Payable?	No.	

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING		
Withholding		
Is Income Tax Withheld?	No.	
Are Employee Social Insurance Contributions Withheld?	Not applicable.	
Are Other Taxes Withheld?	Not applicable.	
Reporting	Reporting	
Does the Taxable Amount Need to be Reported?	No. Your employer will not report the taxable amount as taxable income to the tax authorities.	

	DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.	
	Your employer will neither report the payment to the local tax authorities nor withhold tax from the payment. It will be your responsibility to report the payment and remit the taxes due.	

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country. You may also need to check if you are entitled to any exemption on the dividend in your country.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired at vesting under the Plan, you will be subject to additional taxation on any gain you recognize.
	The taxable gain will equal the difference between the sale proceeds and your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition). Capital gains tax is payable at your marginal income tax rate.
	If you sell Company shares acquired under the Plan at a price which is less than your cost basis in the shares, you will realize a capital loss. Capital losses may be offset from any capital gain realized in the same tax year.
	Note that share identification rules may affect the cost basis (and, therefore, any taxable capital gain or allowable loss) for the purposes of calculating your capital gains tax liability. These rules are complex and their impact will vary according to your personal circumstances.
	The calculation of capital gains (losses) at the time of sale is complex and you should consult with your personal tax advisor.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR T	YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You must report the taxable amount and pay applicable taxes in your annual tax return (Form 1770), which must be filed with your local tax office (kantor pelayanan pajak) where you are registered by the end of the third month of the year following the taxable event.	
	You may extend the deadline to report your annual individual income tax return by up to two months by filing a written notification to the Director General of Tax, together with a tentative tax calculation and the payment of tax based on the tentative calculation.	
Dividends	You must report the income from any dividends and pay applicable taxes in your annual tax return (Form 1770), which must be filed with your local tax office ( <i>kantor pelayanan pajak</i> ) where you are registered by the end of the third month of the year following the dividend payment.	
	You may extend the deadline to report your annual individual income tax return by up to two months by filing a written notification to the Director General of Tax, together with a tentative tax calculation and the payment of tax based on the tentative calculation.	
Sale of Shares	You must report any gains (losses) from the sale of shares and pay applicable taxes in your annual tax return (Form 1770), which must be filed with your local tax office (kantor pelayanan pajak) where you are registered by the end of the third month of the year following the sale of your shares.	
	You may extend the deadline to report your annual individual income tax return by up to two months by filing a written notification to the Director General of Tax, together with a tentative tax calculation and the payment of tax based on the tentative calculation.	

OTHER INFORMATION	
Foreign Asset/Account Reporting	You have the obligation to report your worldwide assets (including foreign accounts and Company shares acquired under the Plan) in your annual individual income tax return.
Exchange Control	In general, no exchange control approvals are required in Indonesia. However, foreign exchange activity is subject to certain reporting requirements. For foreign currency transactions exceeding USD 25,000, the underlying document of that transaction will have to be submitted to the relevant local bank.
	If there is a change of position of any the foreign asset you hold (including shares acquired under the Plan), you must report this change in position (i.e., sale of shares) to the Bank of Indonesia no later than the 15th day of the month following the change in position.
	If you repatriate funds (e.g., proceeds from the sale of shares) into Indonesia, the Indonesian bank through which the transaction is made will submit a report of the transaction to the Bank of Indonesia.

	For transactions of USD 10,000 or more (or its equivalent in other currency), a more detailed description of the transaction must be included in the report and you may be required to provide information about the transaction to the bank in order to complete the transaction.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



## **IRELAND**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>49</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>49</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.
Taxable Amount	The fair market value of the shares on the date of vesting.
Nature of Taxable Amount	Employment compensation.
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	Yes (employee Pay-Related Social Insurance ("PRSI") contributions).
Are Other Taxes Payable?	Yes (Universal Social Charge ("USC")).

COMPANY	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	Yes.	
Are Employee Social Insurance Contributions Withheld?	Yes.	
Are Other Taxes Withheld?	Yes.	
Reporting		
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the taxable amount to Irish Revenue through payroll. Your employer will also report the taxable event to Irish Revenue on Form ESA on or before March 31 in the year following the taxable event.	
	In addition, you will receive an end of year statement from Irish Revenue, which contains details of your taxable income, including your award income, as well as income tax, USC and employee PRSI withheld by your employer and remitted to Irish Revenue. You can access the end of year statement through the Irish Revenue online facility "myAccount."	

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable income tax, USC and PRSI.

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you will be subject to additional taxation on any gain you realize to the extent the gain exceeds your annual exemption amount for the tax year (currently EUR 1,270). Capital gains are currently taxed at a rate of 33%.
	The taxable gain will equal the difference between the sale proceeds and your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition). The cost basis of the shares sold is generally calculated on a "First In, First Out" basis, which means that where you acquired shares on different dates and not all of the shares are being sold, the shares that were acquired on earlier dates are deemed to be sold first.
	If you sell Company shares acquired under the Plan at a price that is less than your cost basis in the shares, you will realize a capital loss. Generally, capital losses may be offset from capital gains realized in the tax year of sale or any subsequent tax year.
	Different rules apply where you acquire and sell Company shares within a four-week period. You should consult with your personal tax advisor prior to acquiring or selling Company shares.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	None.
Dividends	You must report any dividends on a tax return (Form 11), which is due by October 31 in the year following the tax year in which the dividends were paid and pay any applicable taxes due.
Sale of Shares	You personally will be responsible for reporting any capital gains or losses you recognize from the sale of shares and paying any applicable taxes due on such gain. Any capital gains tax must be paid by December 15 if the sale takes place in the period from January 1 to November 30 and by the following January 31 where the sale takes place in December. The sale of shares should be reported on your annual tax return for the tax year in which the shares are sold.
	A tax return is due October 31 in the year following the tax year in which the sale of the shares occurs.
	Details of the relevant tax return on which the gain or loss must be reported can be found on the Revenue's website at ( <a href="www.revenue.ie/en/gains-gifts-and-inheritance/transfering-an-asset/when-and-how-do-you-pay-and-file-cgt.aspx">www.revenue.ie/en/gains-gifts-and-inheritance/transfering-an-asset/when-and-how-do-you-pay-and-file-cgt.aspx</a> ).

OTHER INFORMATION	
Other Reporting	If you are a director, shadow director. or secretary of an Irish affiliate of the Company, you will not be subject to the notification requirements under the Companies Act, 2014 unless your shareholding interests meet or exceed 1% of the Company's voting share capital.
Exchange Control	None.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.

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<sup>&</sup>lt;sup>1</sup> A shadow director is an individual who is not on the board of directors of the Irish subsidiary but has sufficient control so that the board of directors of the Irish subsidiary acts in accordance with his/her instruction.



## **ISRAEL**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>50</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>50</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted. Non-Trustee Track

## **IMPORTANT TAX INFORMATION**

The information in this supplement applies to equity awards that have been granted under the "non-trustee route" of Section 102 of the Israel Income Tax Ordinance (New Version), 1961 ("Section 102") to employees of a subsidiary in Israel.

TAX	
Grant	No taxation.
Vesting	No taxation.
	You will not be subject to taxation until you sell your Company shares acquired upon vesting. Please see the Sale of Shares section below for further details.

	DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.	
	Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable income tax and social insurance contributions (to the extent the applicable contribution ceiling has not been exceeded).	

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	The difference between the sale proceeds and the acquisition costs (e.g., the price paid to acquire the shares, if any, plus any transactional expenses

Non-Trustee Track

	incurred in connection with the sale) will be taxed as ordinary income and subject to income tax at your personal marginal rate and social insurance contributions (to the extent the applicable contribution ceiling has not been exceeded).  In addition, a surtax may be imposed if your income is in excess of the applicable annual threshold.  Lastly, if you cease to be a resident of Israel, your assets (including the awards and any shares acquired under the Plan) will be deemed to be sold and you will be subject to tax on the deemed sale proceeds (the "Exit Tax"). However, payment of the Exit Tax may be deferred until the actual sale of the shares. The Israeli Tax Authority may treat the portion that vested while you were a resident of Israel differently from the portion that vests after you cease to be a resident of Israel. Please consult with your personal tax advisor regarding the tax treatment of your awards and your shares if you cease to be a resident of Israel.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

COMPANY/	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING		
Withholding			
Is Tax Withheld?	Yes. Your employer will withhold income tax, surtax (if applicable), and social insurance contributions (to the extent the applicable contribution ceiling has not been exceeded) and remit to the tax authorities when you sell your Company shares.		
	Your employer likely will not withhold the Exit Tax; however, it reserves the right to do so in the event it determines it is required to do so.		
Reporting	Reporting		
Does Your Participation in the Plan Need to be Reported?	As of January 1, 2025, your employer will report the details of equity award grants within a quarter, no later than 120 days from the end of each quarter on Form 146. In addition, your employer will report the details of share acquisitions and sales by April 30 of the following year on Form 156. For reportable events in 2024 only, the deadline for the annual report has been extended to September 30, 2025.		

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	None.

Dividends	You must report the income realized from the dividends in a tax report filed with the ITA by April 30 of each year, for any amounts realized in the reported year. In addition, if your annual income or the dividend income or the combination of both exceeds a threshold (currently 723,000 NIS), you will be required to file a tax return. It with the ITA by April 30 of the year following the year during which the income was realized (generally, the year of sale). The annual tax return may be submitted by the ITA electronic system or via hard copy. It may be possible to obtain an extension of the tax filing deadline.
Sale of Shares	If your annual income or the gain from the sale of your shares or the combination of both exceeds a threshold (currently <b>723,000</b> NIS), you will be required to file a tax return. <sup>52</sup> with the ITA by April 30 of the year following the year during which the income was realized (generally, the year of sale). The annual tax return may be submitted by the ITA electronic system or via hard copy. It may be possible to obtain an extension of the tax filing deadline.

	OTHER INFORMATION	
Foreign Asset/Account Reporting	None.	
Exchange Control	None.	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.	

 $<sup>^{\</sup>rm 51}\,\rm There$  may be additional conditions for filing an annual return.

<sup>52</sup> There may be additional conditions for filing an annual return. Non-Trustee Track



## **ITALY**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>53</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>53</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted. Not Broad-Based Award

	TAX	
Grant	No taxation.	
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.	
Taxable Amount	The fair market value of the shares at the date you acquire them.  For Italian income tax purposes, the fair market value of the shares at the date you acquire them is equal to the average price of the shares over the month immediately preceding and including the acquisition date.	
Nature of Taxable Amount	Employment income.	
Is Income Tax Payable?	Yes (including regional and municipal surcharges).	
Are Employee Social Insurance Contributions Payable?	No.	
Are Other Taxes Payable?	Foreign Financial Assets Tax. The value of your foreign assets (including shares acquired under the Plan) may be subject to a foreign financial assets tax at a rate of 0.2% (or 0.4% if the foreign financial assets are held in a country having a privileged tax treatment identified by a Decree of the Ministry of Finance (which does not include the U.S.). You should consult with your personal tax advisor for additional information about the foreign financial assets tax.	

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING Withholding	
Are Employee Social Insurance Contributions Withheld?	Not applicable.
Are Other Taxes Withheld?	No.
Reporting	
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the taxable amount, included in your aggregate employment income, on Modello CU and send the report to you by March 16 of the year following the year in which the taxable event occurs as well as digitally file the same with the tax authorities by the same deadline. In addition, your employer will report your

Not Broad-Based Award

aggregate employment income, including the equity award income, on Form 770, which has to be filed annually by the end of October of the year following the year in which the taxable event occurs. The above deadlines may be subject to change.

# Tax Treatment (Paid in Cash via Broker) If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax and social insurance contributions (to the extent the applicable contribution ceiling has not been exceeded) on the cash payment at vesting. Your employer will report the payment as employment taxable income to the local tax authorities and withhold the applicable income tax and social insurance contributions (to the extent the applicable contribution ceiling has not been exceeded).

DIVIDENDS		
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.	
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You should consult with your personal tax advisor regarding the availability of such a credit.	

SALE OF SHARES		
Taxation in Your Country	When you subsequently sell shares acquired under the Plan, you will be subject to capital gains tax to the extent that the sale proceeds exceed your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition, as defined for Italian tax purposes). Capital gains tax will be due at a flat rate of 26%. The taxable amount will equal the difference between the sale price and the purchase price. If the shares have already been subject to tax as employment income at purchase (those attributable to the portion of the discount exceeding EUR 2,065) or upon a Sale Triggering Taxation, the taxable amount will equal the difference between the sale price and the sum of the purchase price and the amount already subject to taxation as employment income.	

	In calculating the capital gain, you may subtract any expenses incurred to produce the gain, except interest, and losses from the sale of shareholdings or capital investments. Capital losses may be used to offset capital gains in the same year or in the subsequent four (4) years, but cannot be used to offset other types of income.  The calculation of capital gains (losses) at the time of sale is complex you should consult with your personal tax advisor.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS		
Vesting	None.	
Dividends	Unless local country tax has already been withheld by a withholding agent, you are personally responsible for reporting the dividends on your annual tax return, Section RM ( <i>Modello Unico, Quadro RM</i> ). The due date for filing the income tax return online by you or via an authorized intermediary is November 30. The due date for the income tax payment is June 30 (or July 30 with application of 0.4% interest surcharge). The above deadlines may be subject to change.	
Sale of Shares	You are personally responsible for reporting any capital gains on your annual tax return, Section RT ( <i>Modello Unico, Quadro RT</i> ) and paying any applicable taxes due. The due date for filing the income tax return online or via an authorized intermediary is November 30. The due date for the income tax payment is June 30 (or July 30 with application of 0.4% interest surcharge). The above deadlines may be subject to change.	

OTHER INFORMATION		
Foreign Asset/Account Reporting	To the extent that you hold investments abroad or foreign financial assets that may generate taxable income in Italy (such as the Company shares you acquire under the Plan) during the calendar year, you are required to report them on your annual tax return (UNICO Form, RW Schedule), or on a special form if no tax return is due and pay the foreign financial assets tax. The tax is assessed at the end of the calendar year or on the last day the shares are held (in such case, or when the shares are acquired during the course of the year, the tax is levied in proportion to the number of days the shares are held over the calendar year). No tax payment duties arise if the amount of the foreign financial assets tax calculated on all financial assets held abroad does not exceed a certain threshold.	

Not Broad-Based Award

Exchange Control	None.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



### **JAPAN**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>54</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>54</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

TAX	
Grant	No taxation.
Vesting	You will be subject to tax when the RSUs vest and shares are issued to you.
Taxable Amount	The fair market value of the shares issued to you at vesting.
Nature of Taxable Amount	Remuneration income.
Is Income Tax Payable?	Yes (both national tax and local inhabitants tax).
Are Employee Social Insurance Contributions Payable?	No.
Are Other Taxes Payable?	Special Income Tax for Reconstruction. Until December 31, 2037, a special 2.1% surtax to fund reconstruction after the East Japan tsunami disaster will be applied to the national tax portion of your tax liability (including the national tax liability due on income and capital gains realized under the Plan).
	Exit Tax. An "exit tax" will be imposed on Japanese nationals and certain long-term residents who leave Japan with assets of JPY 100 million or more. Securities, such as shares acquired under the Plan, are among the assets subject to this exit tax.
	You should consult with your personal tax advisor regarding any other taxes due.

COMPANY/E	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	No.	
Are Employee Social Insurance Contributions Withheld?	Not applicable.	
Are Other Taxes Withheld?	No.	
Reporting		
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the taxable amount as taxable income to the Japanese tax authorities on Form 9(3) by March 31 of each year with respect to income during the prior calendar year.	

	DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.	
	Your employer will neither report the payment to the local tax authorities nor withhold tax from the payment. It will be your responsibility to report the payment and pay the taxes due.	

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

	SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you may be subject to additional taxation on any gain you recognize.	
	The taxable gain will equal the difference between the sale proceeds and your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition). This amount generally will be subject to taxation at a flat rate of 20.315% (consisting of national level individual tax and local level inhabitants tax), plus Special Income Tax for Reconstruction on the national level individual income tax amount, applicable through December 31, 2037.	
	If you sell Company shares acquired under the Plan at a price that is less than your cost basis in the shares, you will realize a capital loss. Capital losses may be offset from any capital gain of other listed companies' shares realized in the same tax year. If the Company shares are sold through a Japanese stockbroker, the capital loss may be offset from dividends of other listed companies' shares realized in the same tax year in addition to any capital gain of other listed companies' shares, and any capital loss	

	remaining after offsetting them can be utilized during the following three (3) years.  The calculation of capital gains (losses) at the time of sale is complex and you should consult with your personal tax advisor.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

,	YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You personally will be responsible for paying any applicable tax due through the authorized bank to the national tax office governing your address at the time you file your personal income tax return (the "Tax Office") by March 15 of the year following the calendar year of the taxable event (the "Due Date"). You will be also responsible for filing your personal income tax return by the Due Date.  An extension of the filing deadline generally is not allowed.	
Dividends	You are personally responsible for reporting the dividend amount and paying any local country tax due on the dividends paid on your shares to the Tax Office by the Due Date.	
Sale of Shares	You are personally responsible for reporting any taxable gain arising upon the sale of Company shares and paying the applicable tax through the authorized bank to the Tax Office by the Due Date.	

OTHER INFORMATION	
Foreign Asset/Account Reporting	If you hold foreign assets (including shares acquired under the Plan) with a total net fair market value exceeding JPY 50 million as of December 31 of each year, you are required to report such assets to the Tax Office by June 30 of the following year.
	You should consult with your personal tax advisor to determine your reporting obligations.
Exchange Control	If you acquire shares valued at more than JPY 100 million in a single transaction, you must file a Securities Acquisition Report with the Ministry of Finance through the Bank of Japan within 20 days after the acquisition of the shares.
	You should consult with your personal tax advisor to determine your reporting obligations.

### **U.S. Estate Tax**

You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



### **KENYA**

### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>55</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

The tax consequences described in this supplement are based, in part, on the absence of an arrangement for the Company to charge the costs of the awards to your employing entity (referred to as a "recharge arrangement"). In the event of any change to the recharge arrangement with your employer, the taxation and related requirements of awards granted to you may be different than those described in this supplement. The Company expressly reserves the right to implement, modify or terminate a recharge arrangement with your employing entity at any time.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>55</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.	
Taxable Amount	The fair market value of the shares on the date of vesting.	
Nature of Taxable Amount	Employment compensation.	
Is Income Tax Payable?	Yes, at your marginal income tax rate.	
Are Employee Social Insurance Contributions Payable?	No.	
Are Other Taxes Payable?	No.	

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING			
Withholding			
Is Income Tax Withheld?	No. However, if your employer determines that it is required to withhold tax in connection with your RSUs, it will withhold tax, as applicable under local law.		
Are Employee Social Insurance Contributions Withheld?	Not applicable.		
Are Other Taxes Withheld?	Not applicable.		
Reporting	Reporting		
Does the Taxable Amount Need to be Reported?	No. However, if your employer determines that it is required to report the income recognized in connection with your RSUs, it will report the income to the tax authorities, as applicable under local law.		

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to income tax on the cash payment at vesting. Your employer will not be subject to any reporting obligations in connection with your participation in the Plan. Instead, you personally will be responsible for reporting the payment and paying the applicable taxes.

	DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares may be subject to tax in your country.	
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.	

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell shares you acquired under the Plan, you will not be subject to taxation.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You personally will be responsible for reporting this amount under the Tax Procedure Act, you are required to complete and submit a tax registration application to the Commissioner of Income Tax within 30 days of the date on which your RSUs vest. The registration should be completed through the online portal "I TAX."
Dividends	You personally will be responsible for reporting the dividend amount as taxable income to local tax authorities and paying the applicable taxes.
Sale of Shares	Not applicable.

OTHER INFORMATION	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident

# **OTHER INFORMATION**

alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



# **LITHUANIA**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>56</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

The tax consequences described in this supplement are based, in part, on the absence of an arrangement for the Company to charge the costs of the awards to your employing entity (referred to as a "recharge arrangement") or for the employing entity to expense the cost of awards on its local books (referred to as the "local award accounting treatment"). In the event of any change to the recharge arrangement or the local award accounting treatment, the taxation and related requirements of awards granted to you may be different than those described in this supplement. The Company expressly reserves the right to implement, modify or terminate a recharge arrangement with your employing entity or modify the local award accounting treatment at any time.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>56</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.	
Taxable Amount	The fair market value of the shares on the date of vesting.	
Nature of Taxable Amount	Employment compensation.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	No.	
Are Other Taxes Payable?	No.	

COMPANY	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	No.	
Are Employee Social Insurance Contributions Withheld?	Not applicable.	
Are Other Taxes Withheld?	Not applicable.	
Reporting		
Does the Taxable Amount Need to be Reported?	No. Your employer will not be subject to any reporting obligations in connection with your participation in the Plan.	

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will neither report the payment to the local tax authorities nor withhold tax from the payment. It will be your responsibility to report the payment in your annual personal income tax return and remit the taxes due.

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you will be subject to taxation on any gain to the extent the sale proceeds exceed your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition), provided that your total capital gains received from the sale of securities during the year exceeds your annual exempt amount. Capital gains are taxed at either a 15% or 20% tax rate depending on the amount of your annual income.
	If you sell Company shares acquired under the Plan at a price which is less than your cost basis in the shares, you will realize a capital loss. Capital losses may be offset from any capital gain realized in the same tax year.
	Please note that share identification rules may affect the cost basis (and, therefore, any taxable capital gain or allowable loss) for the purposes of calculating your capital gains tax liability.
	The calculation of capital gains (losses) at the time of sale is complex and you should consult with your personal tax advisor.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You must report the taxable amount in your annual personal income tax return (Form No GPM311) and pay any applicable taxes due.

	The due date for filing your income tax return online (and paying any tax due) is May 1 of the year following the tax year in which the taxable event occurred.  Tax filing deadline extensions are not available.
Dividends	You must report any dividends received in your annual personal income tax return (Form No GPM311) and pay any applicable taxes due. You will be entitled to a tax credit for the U.S. tax withheld at source. A statement supporting the gross amount of dividends received and tax withheld in the U.S. should be included with your tax return.
	The due date for filing your income tax return online (and paying any tax due) is May 1 of the year following the tax year in which the taxable event occurred.
	Tax filing deadline extensions are not available.
Sale of Shares	You must report any capital gains (losses) you recognize from the sale of shares in your annual personal income tax return (Form No GPM311) and pay any applicable taxes due on the gains.
	The due date for filing your income tax return online (and paying any tax due) is May 1 of the year following the tax year in which the taxable event occurred.
	Tax filing deadline extensions are not available.

	OTHER INFORMATION	
Foreign Asset/Account Reporting	You may be required. <sup>57</sup> to file an Annual Asset Return of the Individual (Family) in Form No. FR0001 with respect to assets held outside of Lithuania ( <i>i.e.</i> , Company shares) and a foreign account report <sup>58</sup> You should consult with your personal tax advisor regarding your reporting obligations.	
Exchange Control	None.	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.	

<sup>&</sup>lt;sup>57</sup> You are required to file this return only if you (i) hold certain job positions established by the law or (ii) donate to political parties or political campaigners.

<sup>&</sup>lt;sup>58</sup> You are required to file this return only if you open an account in a foreign financial institution and annual turnover in the account exceeds EUR 15,000.



# **MEXICO**

### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>59</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

The tax consequences described in this supplement are based, in part, on the existence of an arrangement for the Company to charge the costs of the awards to your employing entity (referred to as a "recharge arrangement") or for the employing entity to expense the cost of awards on its local books (referred to as the "local award accounting treatment"). In the event of any change to the recharge arrangement or the local award accounting treatment, the taxation and related requirements of awards granted to you may be different than those described in this supplement. The Company expressly reserves the right to implement, modify or terminate a recharge arrangement with your employing entity or modify the local award accounting treatment at any time.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>59</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted. Recharge

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.
Taxable Amount	The fair market value of the shares on the date of vesting.
Nature of Taxable Amount	Income from dependent personal services.
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	Yes (to the extent the applicable contribution ceiling has not been exceeded).
Are Other Taxes Payable?	No.

COMPANY/	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	Yes.	
Are Employee Social Insurance Contributions Withheld?	Yes (to the extent the applicable contribution ceiling has not been exceeded).	
Are Other Taxes Withheld?	Not applicable.	
Reporting	Reporting	
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report that taxable amount and the related tax withholdings electronically on a monthly and annual basis to the tax authorities. In addition, your employer will issue to you a Payroll Digital Tax Receipt.	

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable income tax and social insurance

contributions (to the extent the applicable contribution ceiling has not
been exceeded).

	DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.	
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.	

	SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you will be subject to taxation on any gain you recognize.	
	Generally, the taxable gain will equal the difference between the sale proceeds and your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition).	
	To determine your annual tax liability, the following method shall apply: the taxable gain is calculated separately for each asset type (such as Company shares), and then divided by the number of years such asset was held, up to a maximum of 20 years. One year's worth of taxable gain (or 1/20th, if you held your shares more than 20 years) is taxed in the same manner as your regular salary. The balance of the gain (or 19/20ths of the gain if you held your shares more than 20 years) is subject to tax at either your effective rate of tax in the year of sale or, at your election, your average effective tax rate over the five (5) year period ending with the year of sale.	
	If you sell Company shares acquired under the Plan at a price that is less than your cost basis in the shares, you will realize a capital loss. Capital losses may be offset from any capital gain, dividend, rental or other capital income realized in the same tax year and during the following three (3) years, but cannot be used to offset compensation income. Please note that share identification rules may affect the cost basis (and, therefore, any taxable capital gain or allowable loss) for the purposes of calculating your capital gains tax liability.	
	These rules are complex and their impact will vary according to your personal circumstances. You should consult with your personal tax advisor prior to acquiring or selling Company shares.	

Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.
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YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You must report the taxable amount in your annual income tax return no later than April 30 of the following year.
	Tax returns are filed through the website of the Mexican Tax Administration Service ( <a href="www.sat.gob.mx">www.sat.gob.mx</a> ). No filing extension can be requested. However, if the payment of taxes is made after the deadline but before an audit, fines and sanctions are unlikely to be applied.
Dividends	You will be personally responsible for reporting any dividends no later than the 17th day of the month following the month of the dividend payment and paying the applicable tax due. In addition, you must report any dividends in your annual income tax return for purposes of your personal gross income calculation no later than April 30 of the following year.
	Tax returns are filed through the website of the Mexican Tax Administration Service ( <a href="www.sat.gob.mx">www.sat.gob.mx</a> ). No filing extension can be requested. However, if the payment of taxes is made after the deadline but before an audit, fines and sanctions are unlikely to be applied.
Sale of Shares	When you sell your shares, you must report any capital gains or losses in your annual income tax return and pay any additional taxes no later than April 30 of the following year. Tax returns are filed through the website of the Mexican Tax Administration Service ( <a href="www.sat.gob.mx">www.sat.gob.mx</a> ). No filing extension can be requested. However, if the payment of taxes is made after the deadline but before an audit, fines and sanctions are unlikely to be applied.
	You will be subject to a 20% tax on the <i>gross sale proceeds</i> ( <i>i.e.</i> , total sale price of the shares) if your revenue came from a Mexican source, <sup>60</sup> which must be remitted within 15 days, unless you elect to apply the optional net basis tax treatment by securing a tax opinion (" <i>Dictamen Fiscal</i> ") prepared by a registered certified public accountant ("CPA"). <sup>61</sup> This 20% tax constitutes an estimated advance payment towards your annual tax liability. There is no specific form for this payment, but additional guidance

<sup>&</sup>lt;sup>60</sup> Generally, the income will be considered to come from a Mexican source if the Company that issued the shares or securities is a Mexican resident or when more than 50% of the accounting value of said shares derives directly or indirectly from real property located in Mexico

<sup>&</sup>lt;sup>61</sup> If you elect to apply the optional tax regime, the taxable gain will be subject to net tax treatment at marginal rates. The taxable gain is determined by subtracting the original cost of acquisition (adjusted for inflation) from the sale proceeds. This calculation must be supported by the *Dictamen Fiscal* mentioned above, which must be provided to the tax authorities under the following procedure: (i) a tax report notice ("Aviso de Presentación de Dictamen"), signed by you and the CPA, must be filed with the tax office corresponding to your tax domicile no later than the 10th day of the calendar month following the date of sale of your shares, and (ii) the *Dictamen Fiscal*, indicating the actual cost basis of the shares to be sold and the gain at sale, must be filed within 30 business days following the date on which the tax return is due (i.e., within 15 days of the date of sale).

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can be found here: <a href="www.sat.gob.mx/declaracion/26984/declaracion-mensual-en-el-servicio-de-declaraciones-y-pagos">www.sat.gob.mx/declaracion/26984/declaracion-mensual-en-el-servicio-de-declaraciones-y-pagos</a>.

However, if the shares are traded through a Stock Exchange Market recognized in terms of the Mexican Securities Law (e.g., International Quotation System (Sistema Internacional de Cotizaciones, SIC) of the Mexico Stock Bourse (BMV), the New York Stock Exchange, or Nasdaq), the gain on sale of shares will instead be subject to tax at a flat rate of 10%.

	OTHER INFORMATION	
Foreign Asset/Account Reporting	None.	
Exchange Control	None.	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.	



# **NETHERLANDS**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>62</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>62</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest, you will be subject to taxation.
Taxable Amount	The fair market value of the shares on the date of vesting.
Nature of Taxable Amount	Employment compensation.
Is Income Tax Payable?	Yes (wage tax as an advance levy to income tax).
Are Employee Social Insurance Contributions Payable?	Yes (to the extent the applicable contribution ceiling has not been exceeded).
Are Other Taxes Payable?	Investment Yield Tax (so-called Box 3 taxation). You may be subject to an investment yield tax at a flat rate, based on the net value of all the taxable assets you own (including the shares you acquire under the Plan or any proceeds from the sale of such shares) as of January 1 of the calendar year after the acquisition of the shares, to the extent the value of such assets exceeds the annual exempt amount.

COMPANY	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	Withholding	
Is Income Tax Withheld?	Yes (wage tax as an advance levy to income tax).	
Are Employee Social Insurance Contributions Withheld?	Yes (to the extent the applicable contribution ceiling has not been exceeded).	
Are Other Taxes Withheld?	No.	
Reporting	Reporting	
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the taxable amount you realize at the time you acquire your shares in the monthly wage tax return filed electronically with the local tax authorities and on your annual salary statement.	

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs

vest, you will be subject to tax on the cash payment at the time of the actual payment.
Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable wage tax and social insurance contributions (to the extent the applicable contribution ceiling has not been exceeded).

	DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, you will not be subject to tax in the Netherlands on any dividends paid with respect to the shares (assuming you own less than 5% of any class of the Company's issued share capital, and no so-called "lucrative interest". 63). Dividends may be taxable under the Investment Yield Tax (Box 3 taxation) described above. However, it may be possible to offset any United States ("U.S.") dividend tax paid against the Box 3 tax due.	
Taxation in the U.S.	However, any dividends paid will be subject to U.S. federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit.	

	SALE OF SHARES	
Taxation in Your Country	When you sell the shares acquired under the Plan, you will not be subject to additional taxation on any gain you realize (assuming you own less than 5% of any class of the Company's issued share capital, and no so-called "lucrative interest"). Any capital losses incurred on the sale of shares are not tax deductible.  However, you may be subject to tax under the Investment Yield (Box 3)	
	taxation on the proceeds from the sale of your shares, as described above.	
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.	

to determine whether you own any "lucrative interests."

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<sup>&</sup>lt;sup>63</sup> A "lucrative interest" is defined as a share, claim or similar economic right obtained by a taxpayer which is regarded as a reward for his or her activities carried out for certain affiliated persons. Certain shares representing a leveraged structure and/or carrying specific management conditions could be regarded as "lucrative interests" and taxed as such. You should consult with your personal advisor

YOUR '	YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You must report the taxable amount (as part of your wages) in your annual income tax return, which is due by May 1. After the acquisition date, you may have to report the value of your shares (or the cash amounts received in case of sale of the shares) in your annual income tax return for the Investment Yield Tax (Box 3 taxation) as described above, in case they are still in your possession as of January 1 of the relevant calendar year. The foregoing could be different if you own 5% or more of any class of the Company's issued share capital, or a so-called "lucrative interest" as described above.  The annual income tax return for a certain year is normally due by May 1 of the subsequent year, but filing extensions may be obtained upon request.	
Dividends	You may be required to report any dividends you receive under the Investment Yield Tax (Box 3 taxation), as described above, if they are still in your possession as of January 1 of the relevant calendar year. The foregoing could be different if you own 5% or more of any class of the Company's issued share capital, or a so-called "lucrative interest" as described above. It may be possible to set off (U.S.) dividend tax paid against the Box 3 tax due, provided additional requirements are met.	
	The annual income tax return for a certain year is normally due by May 1 of the subsequent year, but filing extensions may be obtained upon request.	
Sale of Shares	You may be required to report the value of any proceeds from the sale of shares that are still in your possession as of January 1 under the Investment Yield Tax (Box 3), as described above, if it is still in your possession as of January 1 of the relevant calendar year. The foregoing could be different if you own 5% or more of any class of the Company's issued share capital, or a so-called "lucrative interest" as described above.	
	The annual income tax return for a certain year is normally due by May 1 of the subsequent year, but filing extensions may be obtained upon request.	

	OTHER INFORMATION	
Foreign Asset/Account Reporting	None.	
Exchange Control	None.	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the	

complexity of these laws, your heirs should consult with a personal tax or
financial advisor.



# **NEW ZEALAND**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>64</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>64</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.	
Taxable Amount	The fair market value of the shares on the date of vesting.	
Nature of Taxable Amount	Employment-related income.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	No.	
Are Other Taxes Payable?	Foreign Investment Fund. You may be subject to Foreign Investment Fund ("FIF") rules if the total cost of your overseas investments (including Company shares acquired under the Plan) exceeds NZD 50,000. Please see the information in the Sale of Shares section below and consult with your personal tax advisor to determine whether the FIF rules apply to you and your shares acquired under the Plan.	

COMPANY	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING		
Withholding	Withholding		
Is Income Tax Withheld?	No. <sup>65</sup>		
Are Employee Social Insurance Contributions Withheld?	Not applicable.		
Are Other Taxes Withheld?	No.		
Reporting	Reporting		
Does the Taxable Amount Need to be Reported?	Your employer will report the taxable amount as income to you to the Inland Revenue as part of its employment income information reporting obligations.		

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<sup>&</sup>lt;sup>65</sup> Your employer and you may choose (but are not required) to subject to PAYE withholding the taxable amount on the date of the taxable event.

# **DIVIDEND EQUIVALENTS**

# Tax Treatment (Paid in Cash via Broker)

If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax and accident compensation contributions on the cash payment at vesting.

Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable income tax and accident compensation contributions. If your employer fails to do so, you will need to report the income and pay the tax.

	DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country, unless the FIF rules apply. If applicable, You are personally responsible for reporting and paying any local country tax.	
	Please see the information in the Sale of Shares section below and consult with your personal tax advisor to determine whether the FIF rules apply to you and your shares acquired under the Plan.	
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source, including where the FIF rules apply. Please see the information in the Sale of Shares section below and consult with your personal tax advisor regarding the availability of such a credit.	

SALE OF SHARES	
Taxation in Your Country	You may be subject to tax when you sell Company shares acquired under the Plan to the extent that the sale proceeds exceed your cost basis in the Company shares (which will be the fair market value of the shares on the date of vesting), depending on whether FIF rules or certain revenue account property rules apply. If applicable, You are personally responsible for reporting and paying any local country tax.  FIF Rules
	The FIF rules will apply if the total cost of all FIF interests you hold (including any Company shares) exceeds NZD 50,000. If the FIF rules apply, all of your FIF interests are treated on a pooled basis and you should be able to apply the fair dividend rate method ("FDR"). Under FDR, annual FIF income is deemed to be 5% of the "opening value" of your pooled FIF interests for

the applicable tax year (i.e., the aggregate market value of FIF interests held on April 1 in the tax year ending on the following March 31). If your actual return is less than 5% of the opening value of your pooled FIF interests for the applicable tax year calculated under FDR, you should be able to elect to change the calculation method applied so that you are taxed on the actual gains (if any) from your FIF interests.

Where the FIF rules apply, in most cases, they will operate as a code, and the revenue account property rules discussed below will not apply to any gain upon sale (and any dividends received will not be separately taxable).

### **Revenue Account Property Rules**

Under the revenue account property rules, you may be subject to tax on the gain on the disposal of the Company shares if you are considered to be a habitual trader in securities, or the Company shares are acquired for the purpose of selling or otherwise disposing of them. If you sell your Company shares immediately or shortly after acquisition, the tax authorities are more likely to interpret that the Company shares were acquired for the purpose of sale and, therefore, any gain you realize may be subject to tax. If, on the other hand, you hold the shares for one (1) year or more, you should be able to successfully assert that you had an investment motive in acquiring the Company shares and any gain you realize will likely not be subject to tax; however, the New Zealand Income Tax Act does not specify how long Company shares must be held before sale to avoid taxation.

Due to the complexity regarding the tax treatment of any gain realized upon the sale or other disposition of the Company shares, you should consult with your personal tax advisor prior to sale.

#### Taxation in the U.S.

Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

# YOUR TAX REPORTING AND PAYMENT OBLIGATIONS

### **Vesting**

You personally will be responsible for paying any tax due directly to the local tax authorities.

In some circumstances, you may be required to or may opt to pay provisional tax in relation to the income arising from the taxable event.

If you are not already a provisional taxpayer, then if:

 your residual income tax ("RIT") liability is less than NZD 60,000 in the tax year you derive the taxable amount, there is no requirement to pay provisional tax for the tax year but the RIT must be paid on or before the relevant terminal tax date. Otherwise, you will be exposed to Inland Revenue use-of-money interest ("UOMI") from the terminal tax date. For a taxpayer with a March 31 tax year end, the terminal tax date is generally the following February 7; or

 your RIT for the tax year in which you derive the taxable amount is NZD 60,000 or more, you will need to pay the tax due on the RIT by the third provisional tax instalment date for the tax year (generally May 7 following the March 31 tax year end). Otherwise, you will be exposed to UOMI from the third instalment date.

If you are already a provisional taxpayer and use the standard method then if:

- your RIT for the tax year in which you derive the taxable amount is less than NZD 60,000 you should meet the criteria for the use-ofmoney interest safe harbour, meaning you will not be exposed to UOMI if you pay your RIT in full by the terminal tax date. However you could still be exposed to late payment penalties for failing to pay provisional tax on the instalment dates; or
- your RIT for the tax year in which you derive the taxable amount is NZD 60,000 or more, you will need to ensure the full tax due on the taxable amount (taking into account any provisional tax payments on the first two instalment dates based on the 5% uplift on the prior year's RIT) is paid by the third instalment date. Otherwise UOMI will be charged from the third instalment date.

You will need to consult with your tax advisor if you use a different provisional tax method.

Because your employer will report the taxable amount to Inland Revenue, you should not have any reporting or return filing obligation. In April or May following the end of the relevant tax year, you should receive your income tax assessment (through MyIR) detailing the tax due on the award (and any other further tax due). If this does not happen, however, you will still need to report the income by July 7 following the end of the relevant tax year and pay the tax due through an IR3. Unless you have a tax agent or receive a filing extension, and subject to any provisional tax obligations, you will be required to pay the tax due by February 7 of the following year.

#### **Dividends**

If the FIF rules do not apply, you will be required to report any dividend amount (before tax) over NZD 200. This can be done by notifying Inland Revenue of the income through the income tax assessment process in MyIR, or filing an IR3 individual tax return form (through MyIR or on paper).

You must file your IR3 form by July 7 following the relevant March 31 tax year end unless you have a tax agent or receive a filing extension. If you have previously filed an IR3 form, Inland Revenue will contact you in relation to completing the return for the relevant tax year.

You should consult with your personal tax advisor to determine if you need to file an IR3 form.

Unless you have a tax agent or receive a filing extension, and subject to any provisional tax obligations, you will be required to pay the tax due by February 7 of the following year.

#### Sale of Shares

If the FIF rules apply you will be required to report FIF income in affected income years as described above and to file an IR3 form. You must file your

IR3 form by July 7 following the relevant March 31 tax year end unless you have a tax agent or receive a filing extension. If you have previously filed an IR3 form, Inland Revenue will contact you in relation to completing the return for the relevant tax year.
If the revenue account property rules apply and your gain on the sale of shares exceeds NZD 200, you must notify Inland Revenue of the gain through the income tax assessment process in MyIR or file an IR3 form (as above).
You should consult with your personal tax advisor to determine if you need to file an IR3 form.
Unless you have a tax agent or receive a filing extension, and subject to any provisional tax obligations, you will be required to pay the tax due by February 7 of the following year.

	OTHER INFORMATION	
Foreign Asset/Account Reporting	Yes, FIF interests (including Company shares acquired under the Plan, if applicable) must be declared in your annual tax return.	
Exchange Control	None.	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.	



# **NORWAY**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>66</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>66</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.
Taxable Amount	The fair market value of the shares on the date of vesting. <sup>67</sup>
Nature of Taxable Amount	Employment compensation.
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	Yes.
Are Other Taxes Payable?	Wealth Tax. You will be subject to wealth tax on any shares held a year-end. Generally, the taxable amount is based on the fair marke value of the shares on January 1 of the year following the relevant tax year. You are required to report shares held on your annual tax return and are personally responsible for paying any wealth tax due.
	Under specific conditions, an exemption from wealth tax may be available for RSUs. You should consult with your personal tax adviso regarding any wealth tax due.
	Exit Tax. You may be subject to income tax and/or capital gains tax of the awards and/or shares held at the time of emigration if you emigrate from Norway. You should consult with your personal tax advisor regarding your tax obligations if you are emigrating from Norway.

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	
Is Income Tax Withheld?	Yes.
Are Employee Social Insurance Contributions Withheld?	Yes.
Are Other Taxes Withheld?	No. You personally will be responsible for paying any other taxes due directly to the local tax authorities.

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<sup>&</sup>lt;sup>67</sup> You may be able to apportion the taxable amount over the period between the grant date and the acquisition date (rather than calculating the taxable amount as if it was generated in the year of acquisition), which may reduce the effective income tax rate that applies to such income. *Please consult with your personal tax advisor for further details*.

Reporting	
Does the Taxable Amount Need to be Reported?	Your employer will report the taxable amount as taxable income at the time of the taxable event to the tax authorities on the "a-meldingen".

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable income tax and social insurance contributions.

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country. You may be able to deduct an allowance from the taxable amount of the dividend, as described under "Sale of Shares" below.
	You are personally responsible for reporting the dividend amount and paying any local country tax due on the dividends paid on your shares. You must therefore report the dividend amount in the annual tax return.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell the shares acquired under the Plan, you will be subject to capital gains tax at a flat rate to the extent that the sale proceeds exceed your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition).
	However, you may be able to deduct an allowance ("skjerming") when determining the amount of the taxable gain. The allowance is calculated on a share-by-share basis, and the allowance for each share is equal to the fair market value of the shares at the time of acquisition, multiplied by a risk-

	free interest rate. Any part of the calculated allowance in one year exceeding the dividend distributed on this share is added to the cost basis and included in the cost basis for calculating the allowance the following year. You should consult your personal tax advisor for additional information about this allowance.
	If the sale proceeds are lower than your cost basis in the shares sold, you will realize a capital loss. Capital losses may be deducted from gains from other sources.
	You will be personally responsible for reporting any capital gains (losses) you realize from the sale of shares and paying any applicable taxes due. You must therefore report the capital gains (losses) in the annual tax return.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	The award income will be pre-completed in the tax return as employment income. However, if the information is incorrect or missing, you should make the changes directly in your tax return. The deadline for submitting the tax return is 30 April. You could file for an extended deadline before 30 April in Form RF-1115.
Dividends	Dividends are regarded as capital income and will not be pre-completed by your employer in your tax return. You therefore have to insert the relevant amounts concerning dividends directly in your tax return. The deadline for submitting the tax return is 30 April. You could file for an extended deadline before 30 April in Form RF-1115.
Sale of Shares	The amounts concerning Sale of Shares are regarded as capital income and will not be pre-completed by your employer in your tax return. If the relevant information is not prefilled in your tax return you have to insert the relevant amounts concerning Sale of Shares directly in your tax return and submit the form RF-1159, which is an appendix to the tax return. The deadline for submitting the tax return is 30 April. You could file for an extended deadline before 30 April in Form RF-1115.

OTHER INFORMATION	
Foreign Asset/Account Reporting	You may be subject to foreign asset reporting as part of your ordinary tax return.
	Norwegian banks, financial institutions, limited companies etc. must report certain information to the Tax Administration. Such information may then be pre-completed in your tax return. However, if you have traded, or are

	the owner of, financial instruments (e.g., Company shares) not precompleted in the tax return, you must enter this information in Form RF-1159, which is an appendix to the tax return.
Exchange Control	In general, you should not be subject to any foreign exchange requirements in connection with your acquisition or sale of Company shares under the Plan, except normal reporting requirements to the Norwegian Currency Registry. If the transfer of funds into or out of Norway is made through a Norwegian bank, the bank will make the registration.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



### **PERU**

### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>68</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>68</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.
Taxable Amount	The fair market value of the shares on the date of vesting.
Nature of Taxable Amount	Employment compensation.
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	Yes.
Are Other Taxes Payable?	No.

COMPANY/	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	Yes.	
Are Employee Social Insurance Contributions Withheld?	Yes.	
Are Other Taxes Withheld?	Not applicable.	
Reporting	Reporting	
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the tax withheld from the taxable amount on the Electronic Payroll to the Peruvian Tax Administration.	

	DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.	
	Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable income tax and social insurance contributions (including pension contributions).	

DIVIDENDS	
Taxation in Your Country	If you acquire Company shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country at your marginal income tax rate.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be entitled to a credit against your country's taxes due on the dividends for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

	SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you will be subject to additional taxation on any gain you realize, at your marginal income tax rate. The taxable gain will equal the difference between the sale proceeds and your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition).	
	If you sell Company shares acquired under the Plan at a price that is less than your cost basis in the shares, you will realize a loss. Foreign capital losses can only be offset against other foreign source income (e.g., dividends, capital gains, interest); if a foreign capital loss remains, it cannot be carried forward to future tax years.	
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.	

١	YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	None.	
Dividends	You are required to report any dividends you receive in your annual Income Tax return online, which will usually be due in March or April (the exact date depends on the last digit of your tax register number and on a schedule published by the Tax Administration around every December or January).	
	You must obtain a tax register number ("RUC") and have access to your own online account with the Tax Administration (SUNAT). The tax form to be used will also be published months before the due date for filing.	
Sale of Shares	You are required to report any capital gains arising from the sale of your shares in your annual Income Tax return online, which will usually be due in March or April of every year (the exact date depends on the last digit of	

your tax register number and on a schedule published by the Tax Administration around every December or January).
You must obtain a tax register number ("RUC") and have access to your own online account with the Tax Administration (SUNAT). The tax form to be used will also be published months before the due date for filing.

	OTHER INFORMATION	
Foreign Asset/Account Reporting	None.	
Exchange Control	None.	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.	



### **PHILIPPINES**

### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>69</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

The tax consequences described in this supplement are based, in part, on the existence of an arrangement for the Company to charge the costs of the awards to your employing entity (referred to as a "recharge arrangement") or for the employing entity to expense the cost of awards on its local books (referred to as the "local award accounting treatment"). In the event of any change to the recharge arrangement or the local award accounting treatment, the taxation and related requirements of awards granted to you may be different than those described in this supplement. The Company expressly reserves the right to implement, modify or terminate a recharge arrangement with your employing entity or modify the local award accounting treatment at any time.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>69</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.
Taxable Amount	The fair market value. <sup>70</sup> of the shares on the date of vesting.
Nature of Taxable Amount	Employment compensation.
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	Yes (to the extent the applicable contribution ceiling has not been exceeded).
Are Other Taxes Payable?	No.

COMPANY	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	Yes.	
Are Employee Social Insurance Contributions Withheld?	Yes (to the extent the applicable contribution ceiling has not been exceeded).	
Are Other Taxes Withheld?	Not applicable.	
Reporting	Reporting	
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the taxable amount as taxable income to you to the tax authorities. Your employer also will send to you a Certificate of Compensation Payment (BIR Form No. 2316) reporting your employment compensation, including equity award income.	

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<sup>&</sup>lt;sup>70</sup> The fair market value of a share of stock of a foreign corporation is defined as: (a) the actual selling price as shown in the sales confirmation receipt issued by the member of the stock exchange through which the sale was effected, if the shares were traded through a stock exchange; (b) its highest closing price as reported by the relevant stock exchange on the day of the taxable event, or the highest closing price on the date nearest to the date of the taxable event; if no shares were traded on the date of the taxable event; or (c) its book value based on the audited financial statements, where the shares are not traded and listed on a stock exchange.

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will neither report the payment to the local tax authorities nor withhold tax from the payment. It will be your responsibility to report the payment and remit the taxes due, as discussed in the Tax Withholding and Reporting section above.

	DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.	
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.	

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you will be subject to additional taxation on any gain you recognize at capital gains tax rates.
	The taxable gain will equal the difference between the sale proceeds and your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition). If you hold the shares for more than 12 months, you will only be taxed on 50% of the gain realized. If you hold the shares 12 months or less, you will be taxed on the entire gain.
	If you sell Company shares acquired under the Plan at a price which is less than your cost basis in the shares, you will realize a capital loss. You should consult with your personal tax advisor to determine whether you can obtain a credit for any capital losses you realize in connection with the sale of shares.
	The calculation of capital gains (losses) at the time of sale is complex and you should consult with your personal tax advisor.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S.

person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a
Form W-8BEN, the broker will perform U.S. back-up withholding on the
gain at a rate of 24%.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	None.
Dividends	You must report your dividend income in your Annual Income Tax Return (BIR Form No. 1700), which must be submitted to the tax authorities on or before April 15 of the following year, and pay any applicable taxes due. Tax filing deadline extensions generally are not available.
Sale of Shares	You must report any gains (losses) you recognize from the sale of shares in your Annual Income Tax Return (BIR Form No. 1700), which must be submitted to the tax authorities on or before April 15 of the following year, and pay any applicable taxes due. Tax filing deadline extensions generally are not available.

	OTHER INFORMATION	
Foreign Asset/Account Reporting	None.	
Exchange Control	None.	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.	



### **POLAND**

### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>71</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>71</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

This supplement assumes that your award <u>is eligible for tax deferral</u>. <sup>72</sup> You should consult with your personal advisor regarding the tax treatment of your award.

TAX	
Grant	No taxation.
Vesting	No taxation.

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash via broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will neither report the payment to the local tax authorities nor withhold tax from the payment. It will be your responsibility to report the payment and remit the taxes due. Generally, you should pay the tax due by the end of April of the following year in your annual tax return (PT-36).

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.
Taxation in the U.S.	Further, any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

<sup>&</sup>lt;sup>72</sup> Tax is deferred until sale of the shares and the gain is taxed as capital gain provided that (i) the shares are acquired under an equity incentive plan, (ii) the equity incentive plan has been adopted pursuant to a resolution of the shareholders of your employer or the parent company of your employer (i.e., the Company), (iii) the equity incentive plan provides for the issuance of shares of a company, having its seat in a EU/EEA state or a state with which Poland has concluded a double tax treaty (which would include the United States), and (iv) you are hired as an employee or as a dependent contractor under a civil law contract. As such requirements have been met, the tax deferral is available.

	SALE OF SHARES	
Taxation in Your Country	When you sell shares acquired under the Plan, you may be subject to capital gains tax at a flat rate of 19% to the extent that the sale proceeds exceed your cost basis in the shares (generally, the price you paid to acquire your shares). You should consult with your personal tax advisor to determine the tax treatment in your particular circumstance as taxation of capital gains is complex.	
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.	

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	
Is Tax Withheld?	No.
Reporting	
Does the Taxable Amount Need to be Reported?	No. Your employer will not be subject to any reporting obligations in connection with your participation in the Plan.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	Not applicable.
Dividends	You are required to report any dividends. <sup>73</sup> you receive in a tax return submitted by the end of April of the following year (on the forms PIT-36 or PIT-38 or PIT-39).
Sale of Shares	You are required to report any capital gains. <sup>74</sup> from the sale of your shares in a tax return (PIT-38) submitted by the end of April of the following year and pay any applicable tax due.

<sup>&</sup>lt;sup>73</sup> The solidarity surcharge described in the next footnote does not apply to dividends.

<sup>&</sup>lt;sup>74</sup> Capital gains from the sale of the shares must be included when calculating your tax base for the purpose of determining whether you are subject to a solidarity surcharge, which applies if your tax base exceeds PLN 1,000,000. If the solidarity surcharge is triggered, you are personally responsible for paying such surcharge by the end of April of the applicable year as part of your tax return. You should consult with your personal tax advisor to determine if you are subject to the solidarity surcharge.

OTHER INFORMATION	
Foreign Asset/Account Reporting	None.
Exchange Control	If you hold shares acquired under the Plan and/or maintain a bank account abroad and the aggregate value of shares and cash held in such foreign accounts exceeds PLN 7 million, you must file reports on the transactions and balances of the accounts on a quarterly basis to the National Bank of Poland.
	If you transfer funds exceeding EUR 15,000 in a single transaction, you are required to do so through a bank account in Poland. You are required to retain all documents connected with foreign exchange transactions for a period of five (5) years, calculated from the end of the year when the foreign exchange transactions were made. You should consult with your personal legal advisor to determine your remittance responsibilities.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



### **PORTUGAL**

### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>75</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

The tax consequences described in this supplement are based, in part, on the existence of an arrangement for the Company to charge the costs of the awards to your employing entity (referred to as a "recharge arrangement") or for the employing entity to expense the cost of awards on its local books (referred to as the "local award accounting treatment"). In the event of any change to the recharge arrangement or the local award accounting treatment, the taxation and related requirements of awards granted to you may be different than those described in this supplement. The Company expressly reserves the right to implement, modify or terminate a recharge arrangement with your employing entity or modify the local award accounting treatment at any time.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>75</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.	
Taxable Amount	The fair market value of the shares on the date of vesting.	
Nature of Taxable Amount	Employment income.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	Yes.	
Are Other Taxes Payable?	Solidarity Surcharge. A solidarity surcharge will be due on annual income, including the taxable amount, in excess of the applicable annual threshold.	

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	
Is Income Tax Withheld?	No.
Are Employee Social Insurance Contributions Withheld?	Yes.
Are Other Taxes Withheld?	No.
Reporting	
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the taxable amount as income to you to the tax authorities on the applicable form(s).

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will report the payment as taxable income to the tax authorities. It also will be your responsibility to report the payment and remit any additional taxes due.

	DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.	
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.	

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you may be subject to additional taxation on any gain you realize.
	The taxable gain will equal the difference between the sale proceeds and your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition). Capital gains tax is payable on gains from all sources in excess of the personal annual exemption in any tax year at a flat rate. You also may be able to exclude a percentage of the gain equal to 10%, 20%, or 30% from taxation if you hold the shares for a period exceeding two, five, or eight years, respectively.
	If you sell Company shares acquired under the Plan at a price that is less than your cost basis in the shares, you will realize a capital loss. You should consult with your personal tax advisor to determine whether you can obtain a credit for any losses you realize in connection with the sale of shares.
	The calculation of capital gains (losses) at the time of sale is complex and you should consult with your personal tax advisor.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR T	AX REPORTING AND PAYMENT OBLIGATIONS
Vesting	You personally are responsible for reporting the taxable amount (as employment income in Annex A) in your Annual Tax Return Form ( <i>Modelo 3 do IRS</i> ) by June 30 of the year following the year of the taxable event.
	The Annual Tax Return Form is filed electronically through your personal page on the Portuguese Tax Authorities Website (www.portaldasfinancas.gov.pt/at/html/index.html).
Dividends	You personally are responsible for reporting any dividends (in Annex E) in your Annual Tax Return Form ( <i>Modelo 3 do IRS</i> ) by June 30 of the year following the year in which the income was received.
	The Annual Tax Return Form is filed electronically through your personal page on the Portuguese Tax Authorities Website (www.portaldasfinancas.gov.pt/at/html/index.html).
Sale of Shares	You personally are responsible for reporting any gain from the sale of your shares (in Annex F) in your Annual Tax Return Form ( <i>Modelo 3 do IRS</i> ) by June 30 of the year following the year in which the income was received.
	The Annual Tax Return Form is filed electronically through your personal page on the Portuguese Tax Authorities Website (www.portaldasfinancas.gov.pt/at/html/index.html).

	OTHER INFORMATION	
Foreign Asset/Account Reporting	None.	
Exchange Control	None.	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.	



### **PUERTO RICO**

### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>76</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are a U.S. citizen and a bonafide resident of Puerto Rico and that you have completed a Form W-9 to certify your status as a U.S. person.

<sup>&</sup>lt;sup>76</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.
Taxable Amount	The fair market value of the shares on the date of vesting.
Nature of Taxable Amount	Employment compensation.
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	Yes.
Are Other Taxes Payable?	Additional Medicare Tax. The taxable amount may be subject to additional Medicare Tax if your income exceeds a certain threshold.

COMPANY	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	Withholding	
Is Income Tax Withheld?	Yes.	
Are Employee Social Insurance Contributions Withheld?	Yes.	
Are Other Taxes Withheld?	Yes.	
Reporting		
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the taxable income to you, to Treasury and to the Social Security Administration on Form 499-R-2/W-2 PR, as part of your wages. Your employer also will electronically report all taxes withheld (including taxes on the taxable amount) on Employer's Quarterly Return (Form 499R-1B) to Treasury by the last day of the calendar month following the close of each calendar quarter (i.e., by April 30, July 31, October 31 and January 31 of the following quarter).	

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable income tax and social insurance contributions.

	DIVIDENDS	
Taxation in Your Country	If you acquire Company shares and a dividend is subsequently declared on the Company shares, any dividends paid with respect to the shares will be subject to tax in your country and must be reported in your Puerto Rico Individual Income Tax Return, as described below.	
	You are personally responsible for reporting the dividend amount and paying any local country tax due on the dividends paid on your shares, as described below. You should consult your tax advisor to determine whether you will have to pay estimated taxes as a consequence of realizing dividend income on the Company shares. 77	
Taxation in the U.S.	Generally, any dividends paid will not be subject to United States ("U.S.") federal tax withholding at source if you submit a Form W-9.	

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell your Company shares acquired under the Plan, any gain you realize will be subject to additional taxation. The taxable gain will equal the difference between the sale proceeds and your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition).
	If you hold the shares acquired under the Plan for more than one (1) year, you will be subject to long-term capital gains tax on the gain.
	If you hold the shares acquired under the Plan for one (1) year or less, you will be subject to ordinary income tax on the gain.
	If you sell Company shares acquired under the Plan at a price that is less than your cost basis in the shares, you will realize a loss. You should consult with your personal tax advisor to determine whether you can deduct any losses you realize in connection with the sale of shares.
	You personally will be responsible for reporting any capital gains (losses) you recognize from the sale of shares and paying any applicable taxes due on such gains, as described below. You should consult with your tax advisor

<sup>&</sup>lt;sup>77</sup> Estimated taxes are paid on four installments due on the 15<sup>th</sup> day of the fourth, sixth and ninth month of the taxable year in which the income is realized and on the 15<sup>th</sup> day of the first month of the next taxable year.

to determine whether you will have to pay estimated taxes as a
consequence of any capital gain realized on the sale of shares. 78

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You are required to report the taxable amount as compensation in your Puerto Rico Income Tax Return using Form 482.0, which should be filed electronically using SURI platform on or before April 15 of the year following the calendar year of the taxable event ("Due Date"). An automatic extension of six months from the original Due Date can be granted by the Puerto Rico Secretary of the Treasury to individuals that request such extension electronically before the original due date using Form SC 2644. This is an extension to file the return, not an extension to pay any income tax liability due.
	The total income tax liability must be paid by the Due Date. Unless you are required to make estimated income tax payments, you may elect to pay the unpaid amount of the tax in two (2) equal installments, in which case the first installment shall be paid by the Due Date, and the second installment shall be paid on the fifteenth (15th) day of the sixth (6th) month after such date.
	You may request an extension of the payment time to the Secretary of the Puerto Rico Treasury for a period not to exceed six (6) months from the date prescribed for the payment of the tax.
Dividends	You are required to report any dividend income in your Puerto Rico Income Tax Return (Form 482.0), as described above.
Sale of Shares	You are required to report any gain from the sale of your shares in your Puerto Rico Income Tax Return (Form 482.0), as described above.

<sup>&</sup>lt;sup>78</sup> You should consult your tax advisor to determine whether you will have to pay estimated taxes. Estimated taxes are paid on four installments due on the 15<sup>th</sup> day of the fourth, sixth and ninth month of the taxable year in which the income is realized and on the 15<sup>th</sup> day of the first month of the next taxable year.



### **ROMANIA**

(Vests 1 year or more from Date of Grant)

### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>79</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>79</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

Certain awards, including your RSUs, will be exempt from income tax and social insurance contributions, provided certain conditions are met, including that there is a minimum one (1) year acquisition period applicable to the award. The information below assumes this exemption will apply to your awards.

If a portion of your award vests and results in shares being issued to you prior to the first anniversary of the grant date, tax will be imposed at the time of share acquisition and tax withholding and reporting obligations apply; please see relevant supplement for additional detail.

You should consult with your personal advisor regarding the tax treatment of your award.

TAX	
Grant	No taxation.
Vesting	No taxation.  You will not be subject to taxation until you sell your Company shares acquired upon vesting. Please see the Sale of Shares section below for further details.

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to income tax and health contributions (if your annual income from certain sources, including dividends, exceeds 6 monthly minimum gross salaries) on the cash payment at vesting.
	Your employer will not report the payment as taxable income to the local tax authorities or withhold the income and health contributions. You will be personally responsible for reporting the dividend equivalent by submitting a standard form statement (i.e., sole statement on income tax and mandatory charges owed by individuals) with the competent tax authorities by March 15 of the year following the dividend payment and paying any applicable taxes.

DIVIDENDS	
Taxation in Your Country	If you acquire Company shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country. Note that health insurance contribution will not be due on your dividends provided that you do not realize an annual income from certain sources that exceeds 6 monthly minimum gross salaries.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S.

federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	When you sell shares acquired under the Plan, you will be taxed on any gain realized. The gain will equal the sale proceeds less your cost basis in the shares (generally, the price you paid to acquire your shares, if any, plus any applicable fees and/or commissions levied in connection with the sale).
	Note that health contributions will not be due on any capital gains provided that you do not realize an annual income from certain sources (including from the sale of shares) that exceeds 6 monthly minimum gross salaries. Otherwise, health contributions also will be due on the capital gain.
	If you sell Company shares acquired under the Plan at a price which is less than your cost basis in the shares, you will realize a capital loss. If the capital loss is recorded in years prior to 2024 that remain uncompensated as of December 31, 2023, you may offset the capital loss against any gains you have realized from similar transactions (e.g., the sale of shares of publicly-listed companies) from the same state and in the same year in the following seven (7) years subject to a limit of 70% of the gain. If you incur a capital loss on or after January 1, 2024, you may offset the capital loss against any gains you have realized from similar transactions (e.g., the sale of shares of publicly-listed companies) from the same state and in the same year in the following five (5) years subject to a limit of 70% of the gain.
	The calculation of capital gains (losses) at the time of sale is complex and you should consult with your personal tax advisor.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	
Is Tax Withheld?	No.

Reporting	
Does Your Participation in the Plan Need to be Reported?	Yes. Your employer will report the value of the exempt benefits to the local authorities on Form 112 in the month following the month in which the shares were acquired.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	Not applicable.
Dividends	You are personally responsible for reporting the dividend payment by submitting the tax statement <i>Sole statement on income tax and mandatory charges owed by individuals</i> to the competent tax authorities by May 25 of the year following the dividend payment and paying any applicable taxes due. This tax statement is a self-assessment return and can be submitted either online on the tax authority's website ( <a href="www.anaf.ro">www.anaf.ro</a> ) or in hard copy at the tax authority's registry office or via the post office. The tax statement can be downloaded from the tax authority's website. In addition, if health contributions are due on the dividend payment, they also must be paid by May 25 of the year following the dividend payment.
Sale of Shares	You are personally responsible for reporting any capital gains (losses) realized from the sale of shares by submitting the tax statement named <i>Sole statement on income tax and mandatory charges owed by individuals</i> to the competent tax authorities by May 25 of the year following the year of sale and paying any applicable taxes due. This tax statement is a self-assessment return and can be submitted either online on the tax authority's website ( <a href="www.anaf.ro">www.anaf.ro</a> ) or in hard copy at the tax authority's registry office or via the post office. The tax statement can be downloaded from the tax authority's website.

OTHER INFORMATION	
Foreign Asset/Account Reporting	None.
Exchange Control	You generally are not required to seek authorization from the National Bank of Romania to participate in the Plan or to open and operate a foreign bank account to receive any proceeds under the Plan. However, if you acquire 10% or more of the registered capital of a non-resident company, you must file a report with the National Bank of Romania (NBR) within 30 days from the date such ownership threshold is reached. This is a statutory requirement, but it does not trigger the payment of fees to NBR.
	You may be required to provide the Romanian bank to which you transfer any proceeds under the Plan with appropriate documentation regarding the source of the income.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S.

estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



### **ROMANIA**

(Vests prior to the 1 year anniversary of the Date of Grant)

### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").80 by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>80</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

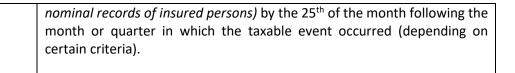
Certain awards may be exempt from income tax and social insurance contributions, provided certain conditions are met, including a minimum one (1) year acquisition period applicable to the award. The information below assumes this exemption will <u>not</u> apply to your awards.

If a portion of your award results in shares being acquired on or after the first anniversary of the grant date, tax will be imposed at the time of sale.

You should consult with your personal advisor regarding the tax treatment of your award.

TAX	
Grant	No taxation.
Vesting	For the portion of your RSUs that vests before the first (1st) anniversary of the grant date, you will be subject to taxation when the RSUs vest and shares are issued to you. See details below.
Taxable Amount	The fair market value of the shares on the date of vesting.
Nature of Taxable Amount	Employment income.
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	Yes.
Are Other Taxes Payable?	No.

COMPANY	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	Yes.	
Are Employee Social Insurance Contributions Withheld?	Yes.	
Are Other Taxes Withheld?	Not applicable.	
Reporting	Reporting	
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the taxable amount as taxable income to you to the local tax authorities on tax form 112 ( <i>Tax Statement on the payment obligations of social security contributions, income tax and</i>	



# Tax Treatment (Paid in Cash via Broker) If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to income tax and health contributions (if your annual income from certain sources, including dividends, exceeds 6 monthly minimum gross salaries) on the cash payment at vesting. Your employer will not report the payment as taxable income to the local tax authorities or withhold the income and health contributions. You will be personally responsible for reporting the dividend equivalent by submitting a standard form statement (i.e., sole statement on income tax and mandatory charges owed by individuals) with the competent tax authorities by May 25 of the year following the dividend payment and paying any applicable taxes.

DIVIDENDS	
Taxation in Your Country	If you acquire Company shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country. Note that health insurance contribution will not be due on your dividends provided that you do not realize an annual income from certain sources that exceeds 6 monthly minimum gross salaries.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	When you sell shares acquired under the Plan, you will be taxed on any gain realized. The gain will equal the sale proceeds less your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition plus any applicable fees and/or commissions levied in connection with the sale).

	Note that health contributions will not be due on any capital gains provided that you do not realize an annual income from certain sources (including from the sale of shares) that exceeds 6 monthly minimum gross salaries. Otherwise, health contributions also will be due on the capital gain.
	If you sell Company shares acquired under the Plan at a price which is less than your cost basis in the shares, you will realize a capital loss. If the capital loss is recorded in years prior to 2024 that remain uncompensated as of December 31, 2023, you may offset the capital loss against any gains you have realized from similar transactions (e.g., the sale of shares of publicly-listed companies) from the same state and in the same year in the following seven (7) years subject to a limit of 70% of the gain. If you incur a capital loss on or after January 1, 2024, you may offset the capital loss against any gains you have realized from similar transactions (e.g., the sale of shares of publicly-listed companies) from the same state and in the same year in the following five (5) years subject to a limit of 70% of the gain.
	The calculation of capital gains (losses) at the time of sale is complex and you should consult with your personal tax advisor.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding at a rate of 24%.

YOUR	YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	None.	
Dividends	You are personally responsible for reporting the dividend payment by submitting the tax statement <i>Sole statement on income tax and mandatory charges owed by individuals</i> to the competent tax authorities by May 25 of the year following the dividend payment. This tax statement is a self-assessment return and can be submitted either online on the tax authority's website ( <a href="www.anaf.ro">www.anaf.ro</a> ) or in hard copy at the tax authority's registry office or via the post office. The tax statement can be downloaded from the tax authority's website.	
Sale of Shares	You are personally responsible for reporting any capital gains realized from the sale of shares by submitting the tax statement named <i>Sole statement on income tax and mandatory charges owed by individuals</i> to the competent tax authorities by May 25 of the year following the year of sale. This tax statement is a self-assessment return and can be submitted either online on the tax authority's website ( <a href="www.anaf.ro">www.anaf.ro</a> ) or in hard copy at the tax authority's registry office or via the post office. The tax statement can be downloaded from the tax authority's website.	

OTHER INFORMATION	
Foreign Asset/Account Reporting	None.
Exchange Control	You generally are not required to seek authorization from the National Bank of Romania to participate in the Plan or to open and operate a foreign bank account to receive any proceeds under the Plan. However, if you acquire 10% or more of the registered capital of a non-resident company, you must file a report with the National Bank of Romania (NBR) within 30 days from the date such ownership threshold is reached. This is a statutory requirement, but it does not trigger the payment of fees to NBR.
	You may be required to provide the Romanian bank to which you transfer any proceeds under the Plan with appropriate documentation regarding the source of the income.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>81</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

The tax consequences described in this supplement are based, in part, on the absence of an arrangement for the Company to charge the costs of the awards to your employing entity (referred to as a "recharge arrangement"). In the event of any change to the recharge arrangement with your employer, the taxation and related requirements of awards granted to you may be different than those described in this supplement. The Company expressly reserves the right to implement, modify or terminate a recharge arrangement with your employing entity at any time.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>81</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	No taxation.	
Sale / Termination of Employment	If (1) you sell your shares within the first two (2) anniversaries of the vesting date, or (2) your employment relationship is terminated. <sup>82</sup> within the first two (2) anniversaries of the vesting date, you will be subject to taxation at such time.	
Taxable Amount	The fair market value of the shares at the time of the taxable event.	
Nature of Taxable Amount	Salary income.	
Is Income Tax Payable?	Yes, if a taxable event as described above is triggered, salary tax should be paid.	
Are Social Contributions Payable?	Yes, if a taxable event as described above is triggered, social insurance contributions are payable, consisting of: (i) health insurance contribution, (ii) pension and disability insurance contribution, and (iii) unemployment insurance contribution.	
Are Other Taxes Payable?	Annual income tax — if a taxable event occurs as described above, the taxable amount also forms a part of the tax basis for the annual income tax, which is payable if your income exceeds three times the average annual salary in Serbia in the year for which the tax is being determined.	

COMPANY/	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	Withholding	
Is Income Tax Withheld?	No. You personally will be responsible for paying income taxes due directly to the tax authorities.	
Are Employee Social Insurance Contributions Withheld?	No. You personally will be responsible for paying income taxes due directly to the tax authorities.	
Are Other Taxes Withheld?	No. You personally will be responsible for paying income taxes due directly to the tax authorities.	
Reporting		
Does the Taxable Amount Need to be Reported?	Your employer will not report the taxable amount at the time of RSU vesting to the Serbian Tax Authority. You personally will be responsible for reporting the taxable amount on form PP OPO and paying any applicable income taxes directly to the Serbian Tax Authority within 30 days after the taxable event.	

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<sup>&</sup>lt;sup>82</sup> Income will not be subject to taxation if, among other considerations, your employment is terminated due to disability, retirement, or transfer of employment to an affiliate of your current employer.

DIVIDEND EQUIVALENT	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting. Your employer will not report or withhold any dividend equivalents to the local tax authorities. Instead, you personally are responsible for reporting the payment as taxable income and paying any local country tax due directly to the tax authorities.

DIVIDEND	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country. You personally are responsible for reporting the dividend amount and paying any local country tax due on the dividends paid on your shares.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell shares acquired under the Plan, you will be subject to tax to the extent that the sale proceeds exceed your cost basis in the shares. You personally will be responsible for reporting any income you realize from the sale of shares acquired under the Plan and paying any applicable taxes due on such income.  You should consult with your personal tax advisor prior to acquiring or selling Company shares.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will need to perform U.S. back-up withholding on the gain and withhold tax at a rate of 24%.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You personally will be responsible for paying any income tax and social insurance contributions due directly to the local tax authorities if there is a taxable event, as explained above. An income tax return is due within 30 days as of occurrence of a taxable event.
Dividends	You personally will be responsible for reporting the dividend amount and paying any local country tax due on the dividends paid on your shares.
Sale of Shares	You personally will be responsible for reporting any capital gains you recognize from the sale of shares and paying any applicable taxes due on such gains.

	OTHER INFORMATION	
Foreign Asset/Account Reporting	Residents of Serbia may hold foreign accounts to receive proceeds, including dividends, only upon obtaining prior permission of the National Bank of Serbia ("NBS"). Further, Serbian residents are obligated to provide the foreign account number to the NBS within 30 days of opening such account. Serbian residents must also file an update to the NBS on Form RN on a quarterly basis. Serbian residents are also obligated to transfer any funds received to their Serbian bank account within 30 days of payment.	
Exchange Control	None.	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds US\$60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should seek the advice of a personal tax or financial advisor.	



### **SINGAPORE**

### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). 83 by Thermo Fisher Scientific Inc. (the "Company") under the Thermo Fisher Scientific Inc. Amended and Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>83</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

This supplement assumes that the equity awards granted under the Plan have not been deferred under the Qualified Employee Equity-Based Remuneration Scheme.

In addition, the Plan, your equity award agreement and other related documentation (the "Plan Documentation") have not been lodged or registered as a prospectus with the Monetary Authority of Singapore. Accordingly, the Plan Documentation may not be circulated or distributed, and the equity award may not be offered or sold, or be made the subject of an invitation for purchase, whether directly or indirectly, to persons in Singapore other than (i) to a qualifying person under Section 273(1)(f) of the Securities and Futures Act, Chapter 289 of Singapore (the "Act") or (ii) otherwise pursuant to, and in accordance with the conditions of, any other applicable provision of the Act.

	TAX	
Grant	No taxation.	
Vesting	You will be subject to tax when the RSUs vest and shares are issued to you. <sup>84</sup> .	
Taxable Amount	The fair market value.85 of the shares issued to you at vesting.	
Nature of Taxable Amount	Employment income.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	No.	
Are Other Taxes Payable?	No.	

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	
Is Income Tax Withheld?	No, unless a "tax clearance event" (as discussed below) is triggered. Otherwise, you personally will be responsible for paying any tax due directly to the local tax authorities.
	Tax Clearance Event
	If you are a foreign employee (i.e., not a Singapore citizen or Singapore permanent resident), or a Singapore permanent resident employee

<sup>&</sup>lt;sup>84</sup> This assumes that the shares are not subject to any sales restrictions or moratorium.

<sup>85</sup> Under Singapore tax law, the value of the shares is determined by the "open market price", which is the price of the shares in the open market at the relevant time. As this is equivalent to the "fair market value", we have used the term "fair market value" instead of "open market price" in this supplement. Where the "open market price" is not available, the Comptroller of Income Tax may use the net asset value of the shares.

	who (i) is posted overseas, (ii) intends to leave Singapore for more than three (3) months, or (iii) cease employment ("tax clearance event"), your employer is required to seek tax clearance from the IRAS at least one (1) month before the tax clearance event, and withhold any monies due to you until (i) tax clearance is given or (ii) 30 days after IRAS receives the Form IR21, whichever is earlier.
	Typically, any unvested awards or any underlying shares of vested awards which have not yet been acquired that will not be forfeited or cancelled upon termination of the Singapore employment will be deemed to have been vested one (1) month before the tax clearance event occurs or on the date the awards were granted (whichever is later) and the taxable amount will be computed based on the fair market value at that time ("deemed vesting rule").
	If you are a Singapore Permanent Resident who is not leaving Singapore permanently, your employer may not be required to seek tax clearance or withhold monies due to you, although it may request an undertaking by you to confirm that you are not leaving Singapore permanently. You should consult with your personal tax advisor for additional information about the deemed vesting rule and the tax clearance procedures in Singapore.
Are Employee Social Insurance Contributions Withheld?	Not applicable.
Are Other Taxes Withheld?	Not applicable.
Reporting	
Does the Taxable Amount Need to be Reported?	Your employer will prepare a Return of Employee's Remuneration (i.e., Form IR8A and its Appendices) reporting the taxable amount as taxable income and will give you this return before March 1 of the year following the year of the taxable event for the preparation of your tax return to the IRAS.
	Where your employer is under the Auto-Inclusion Scheme for Employment Income, such information will be submitted by your employer directly to the IRAS electronically and you will only need to complete and submit your annual tax return to the IRAS.
	In the event tax clearance is triggered, your employer will prepare the Form IR21 and submit this to IRAS (as discussed above).

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.

Your employer will report the payment as taxable income to the local tax
authorities and withhold social insurance contributions (to the extent the
applicable contribution ceiling has not been reached). Your employer will
not withhold the applicable income tax due on the payment. You personally
will be responsible for paying any applicable income tax directly to the local
tax authorities.

DIVIDENDS	
Taxation in Your Country	You will not be subject to taxation on any dividends you receive on the Company shares you acquire under the Plan, if either (i) the Company is tax resident in Singapore or (ii) the dividend income is considered foreign-sourced. <sup>86</sup> . You should consult with your personal tax advisor regarding the tax treatment of any dividends received.
Taxation in the U.S.	However, any dividends paid will be subject to United States ("U.S.") federal tax withholding at source.

SALE OF SHARES	
Taxation in Your Country	There is no capital gains tax regime in Singapore. When you subsequently sell your Company shares, you generally will not be subject to taxation on the gain if the gains are considered capital in nature (assuming you are not in the business of buying and selling shares). Whether the gain is capital or income in nature is a question of fact.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	If your income for a year of assessment is more than SGD 20,000, you generally will be required to file your income tax returns by way of electronic filing by April 18, or by way of paper filing (Form B / B1 / M) by April 15, unless otherwise notified by the Comptroller of Income Tax. If your employer is not under the Auto-Inclusion Scheme for Employment Income, you may be required to send a copy of the Form IR8A and its Appendices (as discussed above) to IRAS.

<sup>&</sup>lt;sup>86</sup> If the issuer is not tax resident in Singapore (i.e., the control and management of its business is exercised outside Singapore), and the dividends are declared during a board meeting that is held outside Singapore, the dividend income should not be Singapore-sourced and should be considered foreign-sourced for Singapore tax purposes.

	If you need additional time to file your tax return, you can submit a request to IRAS, subject to IRAS' approval.
	Once your tax return has been filed, IRAS will review the return and issue a notice of assessment to you. You will generally have one month from the date of the notice of assessment to pay your taxes. You can also apply to pay your taxes via General Interbank Recurring Order (GIRO), which allows you to enjoy up to 12 interest-free monthly installments or a one-time yearly deduction.
	You should consult with your personal tax advisor for additional information on whether you are required to file a tax return.
Dividends	Not applicable, unless the dividend income is taxable in Singapore. In such case, you are required to report the taxable dividend income in your income tax return.  Please see above for the relevant details.
	ricase see above for the relevant details.
Sale of Shares	Not applicable where any gain from the sale of shares is not subject to tax in Singapore (as discussed above). Otherwise, you are required to report the taxable gain in your income tax return.
	Please see above for the relevant details.

OTHER INFORMATION	
Other Reporting	If you hold the position of "director". 87 of the local affiliate in Singapore, you must give written notice to the affiliate whenever you receive and/or dispose of an interest (e.g., an equity award grant, acquire Company shares, etc.) in the affiliate or a related corporation, such as the Company, regardless of whether you are resident or employed in Singapore. Written notice must be given within 2 business days either after the director becomes aware of the change in respect of the particulars of any of the aforesaid, the date on which the director becomes such a director or the date on which the director becomes a holder of, or acquires an interest in, the shares, debentures, rights, options, contracts, participatory interests, other securities or securities-based derivatives contracts, whichever last occurs. There is no prescribed form for such disclosure, although in practice, the company secretary normally would prepare a formatted disclosure form that requests the following information: equity award granted, number of shares acquired, description of consideration, if applicable, and the date of the transaction.
	A director shall be deemed to have an interest in securities or securities-based derivatives contracts referred to above if a family member of the director (not being himself a director), holds or has an interest in those securities or securities-based derivatives contracts; and any contract entered into by, any assignment or right of subscription made or exercised by, or any grant made to, a family member of a director of a corporation (not being himself a director) shall be deemed to have been entered into by, made or exercised by or made to the director. A "family member"

<sup>87</sup> "Director" includes any person, by whatever name described, who occupies the position of director of a Singapore corporation and includes a shadow director on whose instructions the directors of the corporation are accustomed to act.

	means a spouse, or a son, adopted son, step-son, daughter, adopted daughter or step-daughter below the age of 21 years.
Exchange Control	None.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



# **SLOVAK REPUBLIC**

## **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>88</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>88</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.	
Taxable Amount	The fair market value of the shares on the date of vesting.	
Nature of Taxable Amount	Income in-kind from dependent personal activity.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	Yes, social insurance contributions (to the extent the applicable contribution ceiling has not been exceeded) and health insurance contributions are payable.	
Are Other Taxes Payable?	No.	

COMPANY/	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING		
Withholding	Withholding		
Is Income Tax Withheld?	Yes.		
Are Employee Social Insurance Contributions Withheld?	Yes, social insurance contributions (to the extent the applicable contribution ceiling has not been exceeded) and health insurance contributions are withheld.		
Are Other Taxes Withheld?	Not applicable.		
Reporting	Reporting		
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the taxable amount as taxable income to the Slovakian Tax Office on the "Survey of Withheld and Paid Prepayments for Income Tax from Dependent Activities, of Employee Allowance and Tax Bonus," which is filed monthly, and on the "Notification on Tax Reconciliation and on Sum of Income from Dependent Activities, on Withheld Tax Prepayments, Employee Allowance and Tax Bonus," which is filed annually.		

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.

Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable income tax and social insurance contributions (to the extent the applicable contribution ceiling has not been exceeded) and health insurance contributions .

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares from profits generated in tax periods starting on or after January 1, 2017 will be subject to tax in your country. However, you will not be subject to social or health insurance contributions on the dividend income.
	You are personally responsible for reporting the dividend amount on your annual income tax return and paying any local country tax due on the dividends paid on your shares. For more information regarding filing tax returns, please refer to the section "YOUR TAX REPORTING AND PAYMENT OBLIGATIONS" below.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you may be subject to additional taxation on any gain you realize.
	If you hold the shares acquired under the Plan for more than one (1) year and the period between their admission to a securities exchange and their sale exceeds one (1) year, the gain should be exempt from tax.
	If the above exemption does not apply to you, you will be subject to income tax and health insurance contributions (but not social insurance contributions) on the difference between the sale proceeds and your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition). However, under certain circumstances, the first EUR 500 of the gain per year may be exempt from income tax.
	If you sell Company shares acquired under the Plan at a price which is less than your cost basis in the shares, you will realize a loss. You should consult with your personal tax advisor to determine whether you can obtain a credit for any losses you realize in connection with the sale of shares.

# Taxation in the U.S.

Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	In the event you do not ask your employer to prepare your annual payroll tax reconciliation or you are required to file your annual income tax return for different reasons stipulated in the applicable Slovak laws, you must report the taxable income on your annual income tax return.
	If in the tax year for which you are filing a tax return you have employment-related income only, you should use "Tax return type A". If you also have other types of income (e.g., income from entrepreneurial activities, rental income, dividend income, income from the sale of shares, etc.), you should use "Tax return type B".
	The standard deadline for filing a tax return (and payment of the corresponding tax) for a particular tax year is March 31 of the following year. The deadline may be extended at your request to June 30 (under certain circumstances to September 30) by filing a notification on a prescribed form (Notification of the taxpayer about the extension of the deadline for filing a tax return) with the applicable Slovakian Tax Office. You must file the notification by March 31.
Dividends	You are personally responsible for reporting the dividend amount on your annual income tax return and paying any local country tax due on the dividends paid on your shares on "Tax return type B".
	The standard deadline for filing a tax return (and payment of the corresponding tax) for a particular tax year is March 31 of the following year. The deadline may be extended at your request to June 30 (under certain circumstances to September 30) by filing a notification on a prescribed form (Notification of the taxpayer about the extension of the deadline for filing a tax return) with the applicable Slovakian Tax Office. You must file the notification by March 31.
Sale of Shares	You will be responsible for reporting any capital gains (losses) you recognize from the sale of shares (except for any gains exempt from tax) on your annual income tax return and paying any applicable taxes due on such gains on "Tax return type B". You also will be responsible for payment of health insurance contributions due on such gains.
	The standard deadline for filing a tax return (and payment of the corresponding tax) for a particular tax year is March 31 of the following year. The deadline may be extended at your request to June 30 (under certain circumstances to September 30) by filing a notification on a prescribed form (Notification of the taxpayer about the extension of the deadline for filing a tax return) with the applicable Slovakian Tax Office. You must file the notification by March 31.

	OTHER INFORMATION	
Foreign Asset/Account Reporting	None.	
Exchange Control	None.	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.	



# **SOUTH AFRICA**

## **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>89</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>89</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.	
Taxable Amount	The fair market value of the shares on the date of vesting.	
Nature of Taxable Amount	Employment compensation.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	Yes (to the extent the applicable contribution ceiling has not been exceeded).	
Are Other Taxes Payable?	No.	

COMPANY	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	Yes.	
Are Employee Social Insurance Contributions Withheld?	Yes (to the extent the applicable contribution ceiling has not been exceeded).	
Are Other Taxes Withheld?	Not applicable.	
Reporting	Reporting	
Does the Taxable Amount Need to be Reported?	Yes. Your employer will, at the time of the taxable event, report the tax event and ascertain the taxable amount from the tax authorities.	

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will, at the time of vesting, report the payment as taxable income to the local tax authorities and withhold the applicable income tax and social insurance contributions (to the extent the applicable contribution ceiling has not been exceeded).

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares may be subject to income tax in your country.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

	SALE OF SHARES	
Taxation in Your Country	If you sell shares acquired under the Plan, you will be subject to tax to the extent that the sale proceeds exceed your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition). Provided you hold the shares as capital assets (rather than as part of a profit-making scheme) the amount of the tax on the gain which you are required to include as part of your taxable income in the year of the sale will depend on the income bracket under which you fall. The current maximum effective rate of capital gains tax is 18%. You are also able to exclude capital gains up to a certain annual threshold (currently, ZAR 40,000 as a standard case and ZAR 300,000 should the amount be taxable in the year of your death).	
	You should note that certain share identification rules may apply if you have acquired the shares that you sell at different times or for different values.	
	If your sale proceeds are lower than your cost basis in the shares sold, you will realize a capital loss. Capital losses may be used to offset capital gains in the year of sale and possibly in subsequent years, subject to certain loss limitation rules.	
	You should consult with your personal tax advisor prior to selling your shares to determine your tax liability.	
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.	

YOUR T	YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You are required to immediately notify your employer of the taxable amount at the time of the taxable event.	
	You must also report the taxable amount in your annual income tax return (ITR2) in the year following the taxable event and pay any difference between your actual tax liability and the tax withheld by your employer. If all income tax related to the exercise has been collected via PAYE, there is no need to separately report this and the information will automatically be populated in your income tax return.	
	If you need to submit an income tax return, you can complete and submit it to South African Revenue Service (SARS) via the following channels:	
	<ul> <li>eFiling on your computer – simply register for eFiling at www.sarsefiling.co.za</li> <li>Filing electronically at a SARS branch where an agent will assist you – please remember to bring along all your supporting documentation</li> <li>Requesting a return to be posted to you and completing your return manually and submitting it at a SARS branch.</li> </ul>	
	Filing deadlines:	
	<ul> <li>July 1 to October 24 - taxpayers who file online</li> </ul>	
	<ul> <li>July 1 to October 24 - taxpayers who cannot file online can do so at a SARS branch by appointment</li> </ul>	
	<ul> <li>July 1 to January 24 - provisional taxpayers who file online</li> </ul>	
	If you are a provisional taxpayer that does not file online, your filing deadlines will be different to those noted above.	
	You should consult with your personal tax advisor in respect of your filing obligation.	
Dividends	You are personally responsible for reporting the dividend amount in your ITR12 in the year following the dividend payment and paying any local country tax due on the dividends paid on your shares.	
	Please see above for details on filing your tax return.	
Sale of Shares	You will be responsible for reporting any capital gains (losses) you recognize from the sale of shares in your ITR12 in the year following the sale of shares and paying any applicable taxes due on any gains.	
	Please see above for details on filing your tax return.	

OTHER INFORMATION	
Foreign Asset/Account Reporting	None.
Exchange Control	You should not be subject to any foreign exchange requirements in connection with your acquisition of Company shares under the Plan, as your participation in the Plan does not entail any export of capital.

	However, because the exchange control regulations change frequently and without notice, you should consult your personal legal advisor prior to the acquisition or sale of Company shares to ensure compliance with current regulations. It is your responsibility to comply with South African exchange control laws and neither the Company nor your employer will be liable for any fines or penalties arising from your failure to comply with applicable laws.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



# **SOUTH KOREA**

## **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). 90 by Thermo Fisher Scientific Inc. (the "Company") under the Thermo Fisher Scientific Inc. Amended and Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

The tax consequences described in this supplement are based, in part, on the existence of an arrangement for the Company to charge the costs of the awards to your employing entity (referred to as a "recharge arrangement") or for the employing entity to expense the cost of awards on its local books (referred to as the "local award accounting treatment"). In the event of any change to the recharge arrangement or the local award accounting treatment, the taxation and related requirements of awards granted to you may be different than those described in this supplement. The Company expressly reserves the right to implement, modify or terminate a recharge arrangement with your employing entity or modify the local award accounting treatment at any time.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>90</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.	
Taxable Amount	The fair market value of the shares on the date of vesting.	
Nature of Taxable Amount	Employment compensation.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	Yes.	
Are Other Taxes Payable?	No.	

COMPANY	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	Yes.	
Are Employee Social Insurance Contributions Withheld?	Yes.	
Are Other Taxes Withheld?	Not applicable.	
Reporting		
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the taxes withheld on the taxable amount and certain other related documents with the Korean tax authorities by the 10th of the month following the month in which the taxable event occurs.	
	Effective as of January 1, 2024, your employer will be subject to additional reporting obligations in connection with your participation in the Plan and also will need to report the taxable amount in addition to certain other information (e.g., grant date, date of acquisition, acquisition price (if any), stock price on the date of acquisition, etc.) under the Plan by March 10 of the year following the taxable period in which the taxable event occurs.	

	DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.	
	Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable income tax and social insurance contributions.	

	DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.	
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.	

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you may be subject to additional taxation on any gain you recognize to the extent the gain exceeds your annual exemption amount of KRW2,500,000 for the tax year.
	The taxable gain will equal the difference between the sale proceeds and your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition, if such amount has been properly reported to the tax office and the relevant taxes have been paid). Capital gains tax is payable at a flat rate of 22% (including local income tax) on gains from all sources in excess of the personal annual exemption of KRW2,500,000.
	If you sell Company shares acquired under the Plan at a price that is less than your cost basis in the shares, you will realize a capital loss. Capital losses may be offset from any capital gain realized from the transfer of

	shares that are not publicly listed in Korea (e.g., shares in a foreign company) in the same tax year and subject to the same tax rate.
	Please note that share identification rules may affect the cost basis (and, therefore, any taxable capital gain or allowable loss) for the purposes of calculating your capital gains tax liability.
	The calculation of capital gains (losses) at the time of sale is complex and you should consult with your personal tax advisor on this issue.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	None.
Dividends	You are personally responsible for reporting the amount in the tax form called "a final report of comprehensive income tax base and tax computation" and paying any local country tax due on the dividends paid on your shares by May 31 of the year following the calendar year when the dividends are paid.  In most cases, a tax filing extension is not permitted.
Sale of Shares	You are personally responsible for reporting any capital gains (losses) from the sale of shares in the tax form called "report of capital gains amount and tax computation" and paying any applicable taxes due by May 31 of the year following the calendar year when the shares are sold.  In most cases, a tax filing extension is not permitted.

OTHER INFORMATION	
Foreign Asset/Account Reporting	You must declare all foreign financial accounts (e.g., non-Korean bank accounts, brokerage accounts) to the Korean tax authority and file a report with respect to such accounts in June of the following year if the monthly balance of such accounts exceeds KRW 500 million (or an equivalent amount in foreign currency) on any month-end date during a calendar year. You should consult with your personal tax advisor to determine your personal reporting obligations.
Exchange Control	If you sell shares acquired under the Plan and/or receive cash dividends on the shares, you may have to file a report with a Korean foreign exchange bank, provided the proceeds are in excess of USD 5,000 (per transaction)

	and deposited into a non-Korean bank account. A report may not be required if proceeds are deposited into a non-Korean brokerage account.  You should consult with a legal advisor prior to depositing sales proceeds in a foreign brokerage or other account to ensure compliance with any regulations applicable to any aspect of your participation in the Plan.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



# **SPAIN**

## **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>91</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>91</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

## **IMPORTANT INFORMATION**

<u>Securities Notification</u>. The Plan, your equity award agreement and this supplement have not been registered with or approved by the Spanish National Securities Market Commission (*Comisión Nacional del Mercado de Valores*) and no public offer of securities has taken place or is going to take place in Spain under the Plan.

	TAX	
Grant	No taxation.	
Vesting	You will be subject to tax when the RSUs vest and shares are issued to you.	
Taxable Amount	The fair market value of the shares issued to you at vesting. <sup>92</sup>	
Nature of Taxable Amount	Employment compensation.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	Yes (to the extent the applicable contribution ceiling has not been exceeded).	
Are Other Taxes Payable?	Wealth Tax / Solidarity Tax on Large Fortunes (STLF). All assets (including shares acquired under the Plan) held at the end of each taxable year are considered for purposes of calculating whether wealth tax / STLF is due. However, there are general exempt amounts and thresholds for filing a wealth tax / STLF return which may apply, depending on the net value of your assets and rights. You should consult with your personal tax advisor for further information regarding the applicability of the wealth tax or STLF to you.	
	Solidarity Contribution. Effective as of January 1, 2025, the social security contribution base will be uncapped progressively until 2045 under a new solidarity mechanism. Amounts exceeding 100% of the maximum contribution base will be subject to an additional contribution (which varies depending on the amount by which your income exceeds the maximum contribution base). The additional contribution is payable partly by employers and partly by employees.	

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<sup>&</sup>lt;sup>92</sup> You may be able to exempt 30% of up to EUR 300,000 of the taxable amount at vesting. The application of such 30% exemption requires: (i) more than two (2) years between RSU grant and vesting and (ii) you have not applied the 30% exemption in the previous five (5) years. You should consult with your personal tax advisor to determine whether this exemption is available to you.

COMPANY	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding		
Is Income Tax Withheld?	Yes. <sup>93</sup>	
Are Employee Social Insurance Contributions Withheld?	Yes (to the extent the applicable contribution ceiling has not been exceeded).	
Are Other Taxes Withheld?	Your employer is not responsible for withholding the STLF, but will withhold your portion of the solidarity contribution, if applicable.	
Reporting		
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the taxable amount as income and taxes withheld at the time of the taxable event to the tax authorities. Your employer also will submit an "annual summary" (Form 190 for ordinary tax residents and Form 296 for residents under Beckham Law) that includes the taxable amount and taxes withheld by January 31 of the year following the year in which the taxable event occurs.	

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable income tax and social insurance contributions (to the extent the applicable contribution ceiling has not been exceeded).

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be characterized as "savings income" and subject to savings income flat tax rates in your country, depending on the amount of savings income realized during the relevant tax year. Note that "savings income" includes any income derived not only from dividends but also from interest and capital gains (from the sale of shares or any other assets). The current maximum flat tax rate for savings income is 28% for yearly savings income exceeding EUR 300,000. <sup>94</sup>

<sup>&</sup>lt;sup>93</sup> Your employer will charge the payment on account to you and will withhold this amount from you. You will be entitled to deduct the payment on account and obtain a tax credit against your income tax obligation.

<sup>&</sup>lt;sup>94</sup> This rate is expected to increase to 30% for yearly savings income exceeding EUR 300,000 during 2025.

## Taxation in the U.S.

Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

# **SALE OF SHARES** When you subsequently sell shares acquired under the Plan, you will be **Taxation in Your Country** subject to tax to the extent that the sale proceeds exceed your cost basis in the shares (i.e., the fair market value of the shares on the date of acquisition). The flat tax rate applicable to the gain at sale will depend upon the amount of savings income you realized during the tax year, regardless of how long you hold the shares. Note that "savings income" includes any income derived not only from capital gains but also from dividends, interest and capital gains from the sale of other shares or any other assets. The current maximum flat tax rate for savings income is 28% for yearly savings income exceeding EUR 300,000. If the sale proceeds are lower than your cost basis in the shares sold, you will realize a capital loss. Capital losses may be used to offset any capital gains within the same category that you have realized in the same tax year, within certain limits with other savings income realized in the same tax year, and the excess may be carried forward in the subsequent four (4) years. The calculation of capital gains (losses) at the time of sale is complex and you should consult with your personal tax advisor. Taxation in the U.S. Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You must declare any taxable compensation income realized from your RSUs by including the content of the annual withholding certificate provided by your employer (which reflects your yearly compensation in cash and in kind and any withholdings made) in your Personal Income Tax return (Form D-100 for ordinary tax residents and Form 151 for residents under Beckham Law).

	You generally must file your Personal Income Tax return by June 30 of the year following the year of the taxable event. If you file your tax return late and before a tax audit is opened, surcharges for late payment will apply. If you file Form D-100, you can opt to pay 60% of your tax due generally by June 30 and the remaining 40% by November 5 by means of a charge in your bank account. If you file Form 151, the entire tax due should be paid by June 30.  In addition, please see the additional reporting requirements that may apply under "Foreign Asset/Account Reporting" below.
Dividends	You are solely responsible for reporting the dividend amount received and pay any local country tax due on the dividends in your Personal Income Tax return filing for the year following the year in which the dividend was paid (Form D-100 for ordinary tax residents and Form 151 for residents under Beckham Law). You generally must file your Personal Income Tax return by June 30 of the year following the year in which the dividends are paid. If you file your tax return late and before a tax audit is opened, surcharges for late payment will apply. If you file Form D-100, you can opt to pay 60% of your tax due generally by June 30 and the remaining 40% by November 5 by means of a charge in your bank account. If you file Form 151, the entire tax due should be paid by June 30.
Sale of Shares	You are solely responsible for declaring any capital gains (losses) you realize upon the sale of shares and paying applicable taxes due on such gains when filing your Personal Income Tax return for the year following the year of sale (Form D-100 for ordinary tax residents and Form 151 for residents under Beckham Law). You generally must file your Personal Income Tax return by June 30 of the year following the year of sale. If you file your tax return late and before a tax audit is opened, surcharges for late payment will apply. If you file Form D-100, you can opt to pay 60% of your tax due generally by June 30 and the remaining 40% by November 5 by means of a charge in your bank account. If you file Form 151, the entire tax due should be paid by June 30.

# Foreign Asset/Account Reporting To the extent you hold shares or have bank accounts outside of Spain with a value in excess of EUR 50,000 (for each type of asset category) as of December 31, you will be required to report information on such assets on your tax return Form 720 for such year with penalties in the event of noncompliance. After such shares or accounts are initially reported, the reporting obligation will apply for subsequent years only if the value of any previously reported shares or accounts increases by more than EUR 20,000 (for each type of asset category) as of each subsequent December 31, or if you sell shares or cancel bank accounts that were previously reported. You should consult with your personal tax advisor for further information regarding your foreign asset reporting obligations.

# **Exchange Control**

You are required to electronically declare to the Bank of Spain any security accounts (including brokerage accounts held abroad), as well as the securities (including shares acquired under the Plan) held in such accounts if the value of the transactions for all such accounts during the prior year or the balances of such accounts as of December 31 of the prior year exceeds EUR 1 million.

Different thresholds and deadlines to file this declaration apply. However, if neither such transactions during the immediately preceding year nor the balances / positions as of December 31 exceed EUR 1 million, no such declaration must be filed unless expressly required by the Bank of Spain. If any of such thresholds were exceeded during the current year, you may be required to file the relevant declaration corresponding to the prior year, however, a summarized form of declaration may be available. You should consult your personal tax or legal advisor for further information regarding your exchange control reporting obligations.

Additionally, if you hold 10% or more of the share capital of the Company or such other amount that would entitle you to join the Board, the acquisition of shares under Plan must be declared for statistical purposes to the Dirección General de Comercio e Inversiones (the "DGCI"), the Bureau for Commerce and Investments, which is a department of the Ministry of Industry, Trade and Tourism. Generally, the declaration must be filed within one month of the acquisition.

#### U.S. Estate Tax

You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



# **SWEDEN**

## **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>95</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>95</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	You will be subject to tax when the RSUs vest and shares are issued to you.	
Taxable Amount	The fair market value of the shares issued to you at vesting.	
Nature of Taxable Amount	Ordinary salary income.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	Yes. Employee social insurance contributions in the form of general pension contributions will be collected from you through income tax withholding, to the extent the applicable contribution ceiling has not been exceeded.	
Are Other Taxes Payable?	No.	

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING		
Withholding		
Is Income Tax Withheld?	Yes up to the amount of gross salary. If the full amount of tax owed is not withheld, You are personally responsible for paying any tax owed directly to the tax authorities.	
Are Employee Social Insurance Contributions Withheld?	Not applicable.	
Are Other Taxes Withheld?	Not applicable.	
Reporting	Reporting	
Does the Taxable Amount Need to be Reported?	Your employer will report the taxable amount as taxable income to the Swedish Tax Agency ("Skatteverket") through monthly individual PAYE returns and the taxable income will be pre-printed on your annual income tax return.	

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.

Your employer will report the payment as taxable income to the local tax
authorities and withhold income tax and social insurance contributions (to
the extent the applicable contribution ceiling has not been exceeded).

	DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.	
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.	

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell your Company shares, you will be subject to tax at a flat rate on any gain you may realize. The taxable amount will equal the difference between the sale proceeds and your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition). Alternatively, because the Company shares are traded on an exchange, you may elect to be taxed on 80% of the sale proceeds.
	Please note that the cost basis is computed as the average cost basis for all shares of the same type held at the time of sale.
	If your sale proceeds are lower than your cost basis in the shares sold, you will realize a capital loss. In general, capital losses on shares are deductible against capital gain on shares and up to 70% against certain other types of capital gains realized during the same tax year only and may not be carried forward to future tax years. A tax reduction may be allowed to the extent that the capital loss cannot be offset against capital gains in the same year.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker perform U.S. back-up withholding on the gain at a rate of 24%.

# YOUR TAX REPORTING AND PAYMENT OBLIGATIONS

Vesting	The taxable amount should be preprinted on your income tax return, but it is important to verify the preprinted information and make any corrections, if necessary.
	The deadline for filing your personal income tax return is May 2 of the year following the tax year in which the taxable event occurred. If you have a Swedish personal number and are civilly registered in Sweden, you can e-file your income tax return by using a Swedish electronic identification from a Swedish ID provider (e.g., a Swedish bank).
	You may apply for a tax filing extension by making a formal request to the Swedish Tax Agency.
Dividends	You are required to report any dividend income in your income tax return.
	Please see above for details on filing your income tax return.
Sale of Shares	You are required to report any gain/loss from the sale of shares in your income tax return. If the taxable amount is not prefilled on your income tax return, you should use appendices K4, K10 or K12 to the income tax return to calculate the capital gains (or losses) and includes such amounts in your income tax return.
	Please see above for details on filing your income tax return.

	OTHER INFORMATION	
Foreign Asset/Account Reporting	None.	
Exchange Control	None.	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.	



# **SWITZERLAND**

## **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). 96 by Thermo Fisher Scientific Inc. (the "Company") under the Thermo Fisher Scientific Inc. Amended and Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>96</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

## **IMPORTANT INFORMATION**

The information in this supplement assumes that you are: (1) subject to <u>ordinary tax assessment</u> in Switzerland (e.g., you are a tax resident of Switzerland with Swiss citizenship or holding a "C" residence permit) or (2) subject to <u>income taxation at source</u> (e.g., you are a foreign employee holding a "B" permit and, in particular that you are subject to retroactive ordinary tax assessment). Furthermore, it assumes that you are subject to the Swiss social insurance system. Finally, it does not address particular cantonal tax reporting obligations that may apply to you as a result of your participation in the Plan.

If you are required to file a tax return in Switzerland, you also will be required to report the grant of the awards as well as the income recognized upon vesting on such return. Additionally, you generally will be required to report the awards in the wealth tax section of your personal tax return.

Please note that the information in this supplement may not apply to you, if you are subject to income taxation at source due to your status as a cross-border employee since the tax consequences may differ depending both on your country of residence and the Swiss canton of employment.

TAX	
Grant	No taxation.
Vesting	You will be subject to tax when the RSUs vest and shares are issued to you.
Taxable Amount	The fair market value of the shares on the date of vesting.
Nature of Taxable Amount	Employment compensation.
Is Income Tax Payable?	Yes (including federal, cantonal and municipal tax as well as church tax, if applicable).
Are Employee Social Insurance Contributions Payable?	Yes.
Are Other Taxes Payable?	Wealth Tax. Awards granted to you under the Plan should not be subject to the net wealth tax but must be reflected "pro memoria" in the statement on bank accounts and securities (Wertschriftenverzeichnis) that you are required to file with your tax return. If you receive shares, the fair market value of such shares at the end of a respective tax period generally will be subject to the net wealth tax at the cantonal and municipal levels. Wealth tax also applies to any proceeds from the sale of shares acquired under the Plan (e.g. cash) you hold at the end of the respective tax period. You should consult with your personal tax advisor regarding any applicable wealth taxes.

COMPANY	EMPLOYER TAX WITHHOLDING AND REPORTING
Withholding	
Is Income Tax Withheld?	Employees Subject to Ordinary Tax Assessment: No.
	Employees Subject to Income Taxation at Source: Yes, irrespective of whether you are subject to retroactive ordinary tax assessment.
Are Employee Social Insurance Contributions Withheld?	Yes.
Are Other Taxes Withheld?	No.
Reporting	
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the grant of the awards in the year-er certificate of salary and in an annex to your year-end certificate of sala (both of which may have to be forwarded by the employer directly to the local tax and social insurance authorities in some cantons) for the year which the awards were granted to you.
	In addition, your employer will report the taxable amount on your year-er certificate of salary and in an annex to your year-end certificate of sala (both of which may have to be forwarded by the employer directly to the local tax and social insurance authorities in some cantons) for the year which the taxable event occurred.
	If you are subject to income taxation at source, your employ automatically reports the taxable event as a part of its regular income t withholding payments to the tax authorities.

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to income tax and social insurance contributions on the cash payment at vesting.
	Your employer will report the payment as taxable income on your year-end certificate of salary and in an annex to your year-end certificate of salary (both of which may have to be forwarded by the employer directly to the local tax and social insurance authorities in some cantons) and withhold the applicable social insurance contributions.
	If you are subject to ordinary tax assessment, your employer will not withhold the applicable income tax due on the payment. You personally will be responsible for paying any applicable income tax directly to the local tax authorities.
	If you are subject to income taxation at source, your employer will also withhold the applicable income tax and automatically

report the taxable event as a part of its regular income tax withholding
payments to the tax authorities.

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country. 97	When you subsequently sell the shares acquired under the Plan, you will not be subject to capital gains tax, provided you are not considered a professional securities dealer and the shares are held as private assets.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	Generally, You are personally responsible for reporting the taxable amount as part of your employment income. It should already be included in the net salary amount in section 11 of the certificate of salary that you may generally copy over to the employment income section of your tax return forms. You also should attach the certificate of salary, including the respective annex, to your annual income and wealth tax return. Generally, you are required to make provisional tax payments for Federal taxes in March for the previous calendar year. The deadline for payment of provisional cantonal taxes depends on your canton of residence.

<sup>&</sup>lt;sup>97</sup> The summary in the Sale of Shares section and in the example below assumes that the shares are listed shares. In the case of non-listed shares, tax may be due upon sale.

	You also must declare the shares / proceeds acquired under the Plan (like any other movable asset) that you hold at the end of each tax period in the statement on bank accounts and securities ( <i>Wertschriftenverzeichnis</i> ) that you are required to file with your income and wealth tax return.  The deadline for filing your annual tax return depends on your canton of
	residence, and most cantons allow for an extension of the filing deadline.  For detailed information on how to fill in the tax return forms and respective deadlines, you should check the resources available from your tax administration or consult with your personal tax adviser.
	If you are subject to income taxation at source, your employer will deduct the income tax owed directly from your salary and deliver the tax to the cantonal tax authorities of your canton of residence. If your gross annual income amounts to at least CHF 120,000 or you have other income that is not subject to income tax withholding, you are subject to retroactive ordinary tax assessment and required to file a tax return by law. You should consult with your personal tax advisor to determine whether you are subject to retroactive ordinary tax assessment by law or whether you may apply for retroactive tax assessment on a voluntary basis. If you want to apply for retroactive tax assessment on a voluntary basis, you must submit the application for the retroactive ordinary tax assessment by March 31 of the following year at the latest.
Dividends	You are personally responsible for reporting any dividends in your annual tax return. Typically, this is done by including the dividend amount in the respective income section of your statement on bank accounts and securities ( <i>Wertschriftenverzeichnis</i> ) that you are required to file with your income and wealth tax return.
	If you are subject to income taxation at source, such dividend income would qualify as other income not subject to income taxation at source and, consequently, you will be subject to retroactive ordinary tax assessment.  Please see above for additional information.
Sale of Shares	Generally, none, provided that you are not considered a professional securities dealer and the shares are held as private assets.
	However, most cantonal tax forms ask that you include acquisition and/or sale date of the shares in your statement on bank accounts and securities (Wertschriftenverzeichnis) for respective tax year.
	Please see above for additional information.

OTHER INFORMATION	
Foreign Asset/Account Reporting	You are required to declare all of your foreign bank and brokerage accounts in which you hold cash or securities, including the accounts that were opened and/or closed during the tax year, as well as any other assets, on an annual basis on in your tax return. This includes awards granted to you under the Plan which should not be subject to the net wealth tax, but must be reflected "pro memoria" in the statement on bank accounts and

	securities (Wertschriftenverzeichnis) that you are required to file with your tax return.
Exchange Control	None.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



# **TAIWAN**

## **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). 98 by Thermo Fisher Scientific Inc. (the "Company") under the Thermo Fisher Scientific Inc. Amended and Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you-or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>98</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.
Taxable Amount	The fair market value of the shares on the date of vesting.
Nature of Taxable Amount	Employment compensation.
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	No.
Are Other Taxes Payable?	No.

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	
Is Income Tax Withheld?	Your employer may withhold income tax on the taxable amount at vesting, depending on the facts and circumstances and your employer's determination of applicable requirements. If your employer does not withhold income tax at vesting, it will be your responsibility to calculate and pay the applicable income tax directly to the tax authorities. Please refer to Reporting below for further details.
Are Employee Social Insurance Contributions Withheld?	Not applicable.
Are Other Taxes Withheld?	Not applicable.
Reporting	
Does the Taxable Amount Need to be Reported?	Yes. Your employer will report the taxable income to the tax authority by January 31 of the year following the year in which the taxable event occurs.
	If your employer withholds income tax, your employer will issue a withholding statement reporting the tax withheld as well as the taxable amount as taxable income to you by February 10 of the year following the year in which the taxable event occurs.

If your employer does not withhold income tax, your employer will issue a non-withholding statement reporting the taxable amount as taxable income to you by February 10 of the year following the year in which the taxable event occurs.

In addition, you are required to include the RSU income in your individual annual income tax return and file it with the tax authority between May 1 and May 31.

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will neither report the payment to the local tax authorities nor withhold tax from the payment. It will be your responsibility to report the payment and remit the taxes due.

DIVIDENDS	
Taxation in Your Country	You may be subject to taxation on the dividends you receive on the Company shares you acquire under the Plan, if you fall within the "AMT" regime. Under the AMT regime's worldwide income provision, any dividends on Company shares may be subject to AMT at a flat rate.
	You are required to include any dividend income in your annual individual income tax return.
	Because the application of AMT will depend upon your personal circumstances, you should consult with your personal tax advisor to determine whether you will be subject to AMT.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be entitled to a credit against your country's taxes due on the dividends for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	When you sell shares acquired under the Plan, you will not be subject to capital gains tax on any gain you realize. However, any gain you realize may be included in your basic income for purposes of calculating your Alternative Minimum Tax ("AMT"). Under the AMT regime's worldwide income provision, capital gains may be subject to AMT at a flat rate (currently 20%).
	You are required to include any capital gain in your annual individual income tax return.

	Because the application of AMT will depend upon your personal circumstances, you should consult with your personal tax advisor to determine whether you will be subject to AMT.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You are required to report the income (recorded in either the withholding statement or the non-withholding tax statement, as applicable) in your individual annual income tax return and file it with the tax authority between May 1 and May 31.  Personal income tax filing extensions generally are not permitted.
Dividends	Same as above.
Sale of Shares	Same as above.

OTHER INFORMATION	
Foreign Asset/Account Reporting	None.
Exchange Control	You may remit foreign currency in relation to Company shares into Taiwan through an authorized foreign exchange bank in an amount of up to USD 10 million per year.  However, if the transaction amount is TWD 500,000 or more in a single transaction, you must submit a Foreign Exchange Transaction Form, and other supporting documentation (such as the award agreement, approval letter, etc.) to the satisfaction of the remitting bank.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



## **THAILAND**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs").<sup>99</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

The tax consequences described in this supplement are based, in part, on the absence of an arrangement for the Company to charge the costs of the awards to your employing entity (referred to as a "recharge arrangement") or for the employing entity to expense the cost of awards on its local books (referred to as the "local award accounting treatment"). In the event of any change to the recharge arrangement or the local award accounting treatment, the taxation and related requirements of awards granted to you may be different than those described in this supplement. The Company expressly reserves the right to implement, modify or terminate a recharge arrangement with your employing entity or modify the local award accounting treatment at any time.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>99</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.
Taxable Amount	The fair market value of the shares on the date of vesting.
Nature of Taxable Amount	Taxable fringe benefit.
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	No.
Are Other Taxes Payable?	No.

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	
Is Income Tax Withheld?	No. You personally will be responsible for paying any tax due directly to the local tax authorities.
Are Employee Social Insurance Contributions Withheld?	Not applicable.
Are Other Taxes Withheld?	Not applicable.
Reporting	
Does the Taxable Amount Need to be Reported?	No. Your employer will not be subject to any reporting obligations in connection with your participation in the Plan.

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	Your employer will neither report the payment to the local tax authorities nor withhold tax from the payment. It will be your responsibility to report

the payment in your annual personal income tax return (Form Phor. Ngor. Dor. 90) and remit the taxes by the end of March of the following year.

	DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country (unless the dividends are not brought into Thailand in the same calendar year they are received for dividends received prior to January 1, 2024). For dividends received on or after January 1, 2024, you will be subject to tax in your country on any dividends received if the dividends are brought into Thailand (regardless of whether the dividends are brought into Thailand in the same calendar year of receipt or in subsequent years).	
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.	

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell Company shares acquired under the Plan, you will be subject to additional taxation on any gain you receive, at personal income tax rates, only if you repatriate such gains to Thailand during the calendar year in which you receive the gains (for gains derived before January 1, 2024). For gains received on or after January 1, 2024, you will be subject to additional taxation on any gain you receive, at personal income tax rates, only if you repatriate such gain to Thailand (regardless of whether the gains are brought into Thailand in the same calendar year of receipt or in subsequent years).
	If applicable, the taxable gain will equal the difference between the sale proceeds and your cost basis in the shares (generally, the fair market value on the date of acquisition, as defined for Thai tax purposes).
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR 1	AX REPORTING AND PAYMENT OBLIGATIONS
Vesting	You are personally responsible for reporting the taxable amount in your annual personal income tax return (Form Phor. Ngor. Dor. 90) to the Thai Revenue Department and paying any personal income tax due by the end of March of the following year. The filing deadline is extended for another eight (8) days if the filing is made electronically through the Thai Revenue Department's website ( <a href="www.rd.go.th">www.rd.go.th</a> ). The extension is applicable to the tax filings that are due from February 1, 2021 to January 31, 2027.
Dividends	If you repatriate your dividends to Thailand in the year of receipt for dividends received prior to January 1, 2024 or at any time for dividends received on or after January 1, 2024, You are personally responsible for reporting the dividend amount in your annual personal income tax return (Form Phor. Ngor. Dor. 90) to the Thai Revenue Department and paying any personal income tax due on the dividends paid on your shares by the end of March of the following year. The filing deadline is extended for another eight (8) days if the filing is made electronically through the Thai Revenue Department's website ( <a href="www.rd.go.th">www.rd.go.th</a> ). The extension is applicable to the tax filings that are due from February 1, 2021 to January 31, 2027.
Sale of Shares	If you repatriate gains from the sale of your shares to Thailand in the year of receipt received for gains received prior to January 1, 2024 or at any time for gains received on or after January 1, 2024, You are personally responsible for reporting any gain you recognize from the sale of shares in your annual personal income tax return (Form Phor. Ngor. Dor. 90) to the Thai Revenue Department and paying any personal income tax due on such gain by the end of March of the following year. The filing deadline is extended for another eight (8) days if the filing is made electronically through the Thai Revenue Department's website ( <a href="www.rd.go.th">www.rd.go.th</a> ). The extension is applicable to the tax filings that are due from February 1, 2021 to January 31, 2027.

	OTHER INFORMATION	
Foreign Asset/Account Reporting	None.	
Exchange Control	If you receive funds in connection with the Plan (e.g., dividends or sale proceeds) with a value equal to or greater than USD 1,000,000 per transaction, you are required to immediately repatriate such funds to Thailand, unless you can rely on any applicable exemptions (e.g., where the funds will be used offshore for any permissible purposes under exchange control regulations and the relevant form and supporting documents have been submitted to a commercial bank in Thailand). Any foreign currency repatriated to Thailand must be converted to Thai Baht or deposited into a foreign currency deposit account opened with any commercial bank in Thailand acting as the authorized agent within 360 days from the date the funds are repatriated to Thailand. You are also required to inform the authorized agent of the details of the foreign currency transaction,	

	including your identification information and the purpose of the transaction.  If you do not comply with the above obligations, you may be subject to penalties assessed by the Bank of Thailand. Because exchange control regulations change frequently and without notice, you should consult your legal advisor before selling any shares (or receiving any other funds in connection with the Plan) to ensure compliance with current regulations. It is your responsibility to comply with exchange control laws in Thailand, and neither the Company nor your employer will be liable for any fines or penalties resulting from failure to comply with applicable laws.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



## **TÜRKIYE**

### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). 100 by Thermo Fisher Scientific Inc. (the "Company") under the Thermo Fisher Scientific Inc. Amended and Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

The tax consequences described in this supplement are based, in part, on the absence of an arrangement for the Company to charge the costs of the awards to your employing entity (referred to as a "recharge arrangement") or for the employing entity to expense the cost of awards on its local books (referred to as the "local award accounting treatment"). In the event of any change to the recharge arrangement or the local award accounting treatment, the taxation and related requirements of awards granted to you may be different than those described in this supplement. The Company expressly reserves the right to implement, modify or terminate a recharge arrangement with your employing entity or modify the local award accounting treatment at any time.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>100</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

	TAX	
Grant	No taxation.	
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation. 101	
Taxable Amount	The fair market value of the shares on the date of vesting.	
Nature of Taxable Amount	Quasi-salary.	
Is Income Tax Payable?	Yes.	
Are Employee Social Insurance Contributions Payable?	Yes (to the extent the applicable contribution ceiling has not been exceeded).	
Are Other Taxes Payable?	Yes, stamp duty on the fair market value of the shares at vesting.	

COMPANY	COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	Withholding	
Is Income Tax Withheld?	No.	
Are Employee Social Insurance Contributions Withheld?	Not applicable.	
Are Other Taxes Withheld?	Not applicable.	
Reporting	Reporting	
Does the Taxable Amount Need to be Reported?	No. Your employer will not report any income to the Turkish Revenue Authority in connection with your participation in the Plan.	

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<sup>&</sup>lt;sup>101</sup> Under the current tax legislation there is no specific equity award regulation; however, there is a draft Income Tax Law which includes legislation governing the tax treatment of foreign stock awards in Turkey. Although the tax legislation is in draft form and there has been no move to adopt it since it was introduced several years ago, this supplement reflects the tax authority's position and should be taken into account when determining equity award tax implications. You should monitor this legislation and discuss it with your personal tax advisor to determine the appropriate treatment of your award.

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.
	As long as there is a recharge to your employer of the cost of RSUs paid as dividend equivalent, your employer will report the payment as taxable income to the local tax authorities and withhold the applicable income tax (including stamp duty tax) and social insurance contributions (to the extent the applicable contribution ceiling has not been exceeded).

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	When you sell shares acquired under the Plan, you will be subject to capital gains tax to the extent that the sale proceeds exceed your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition).
	If the sale proceeds are lower than your cost basis in the shares sold, you will realize a capital loss.
	As the calculation of capital gains (losses) may be complex, you should consult with your personal tax advisor to determine the tax treatment of any capital gains (losses) you realize at the time of sale.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR TA	X REPORTING AND PAYMENT OBLIGATIONS
Vesting	You are personally responsible for reporting any income realized under the Plan and for paying any applicable taxes (including stamp duty) due to the tax authorities through the annual tax return filing. The annual tax return must be filed during March of the following year.
	No income tax filing extensions are available. Income tax accrued must be paid in two equal installments in March and July in the year the filing is made. The returns can be filed online through the system accessible from Revenue Administration website ( <a href="https://dijital.gib.gov.tr/">https://dijital.gib.gov.tr/</a> ) or in paper format to the relevant tax office.
Dividends	You are personally responsible for reporting the dividend amount and paying any local country tax due on the dividends paid on your shares through the annual tax return filing. The annual tax return must be filed during March of the following year.
	No income tax filing extensions are available. Income tax accrued must be paid in two equal installments in March and July in the year the filing is made. The returns can be filed online through the system accessible from Revenue Administration website ( <a href="https://dijital.gib.gov.tr/">https://dijital.gib.gov.tr/</a> ) or in paper format to the relevant tax office.
Sale of Shares	You are personally responsible for reporting any capital gains (losses) you realize upon the sale of shares and for paying any applicable taxes due on such gains through the annual tax return filing. The annual tax return must be filed during March of the following year.
	No income tax filing extensions are available. Income tax accrued must be paid in two equal installments in March and July in the year the filing is made. The returns can be filed online through the system accessible from Revenue Administration website ( <a href="https://dijital.gib.gov.tr/">https://dijital.gib.gov.tr/</a> ) or in paper format to the relevant tax office.

OTHER INFORMATION	
Foreign Asset/Account Reporting	None.
Exchange Control	None.
Other	In certain circumstances, you are permitted to acquire and sell securities on a non-Turkish stock exchange only through a financial intermediary licensed in Turkey. Therefore, you may be required to appoint a Turkish broker to assist with the sale of the Company shares acquired under the Plan. You should consult your personal legal advisor before selling any Company shares acquired under the Plan to confirm the applicability of this requirement.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside

outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



## **UKRAINE**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>102</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

The tax consequences described in this supplement are based, in part, on the absence of an arrangement for the Company to charge the costs of the awards to your employing entity (referred to as a "recharge arrangement") or for the employing entity to expense the cost of awards on its local books (referred to as the "local award accounting treatment"). In the event of any change to the recharge arrangement or the local award accounting treatment, the taxation and related requirements of awards granted to you may be different than those described in this supplement. The Company expressly reserves the right to implement, modify or terminate a recharge arrangement with your employing entity or modify the local award accounting treatment at any time.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>102</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.
Taxable Amount	The fair market value of the shares on the date of vesting.
Nature of Taxable Amount	Foreign-source income.
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	No.
Are Other Taxes Payable?	Military Tax. The taxable amount will be subject to Military Tax at a flat rate.

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING		
Withholding		
Is Income Tax Withheld?	No.	
Are Employee Social Insurance Contributions Withheld?	Not applicable.	
Are Other Taxes Withheld?	No.	
Reporting		
Does the Taxable Amount Need to be Reported?	No. Your employer will not be subject to any reporting obligations in connection with your participation in the Plan.	

DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.

Your employer will neither report the payment to the local tax authorities
nor withhold tax from the payment. It will be your responsibility to report
the payment and remit the taxes due.

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in your country for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	If you subsequently sell or otherwise dispose of Company shares acquired under the Plan, you are subject to taxation, but Ukrainian tax legislation does not provide clear guidance regarding the calculation taxable amount. Thus, there is a risk that you may be subject to tax on the entire sale proceeds, rather than the sale proceeds less your cost basis in the shares. In light of this uncertainty, you may wish to seek a tax ruling to confirm the taxable amount upon sale of the shares. You may apply for a tax ruling, in your own name, and the tax office must reply within 25 calendar days of receipt of the application for a tax ruling.
	Given the complexities associated with the sale of your shares you should consult with your personal tax advisor to determine the tax treatment at sale of your shares and the availability to pursue a local tax ruling. It is important to note that neither the Company nor your employer may be held responsible for any costs associated with your personal tax advisor and/or tax ruling; further neither the Company nor your employer will be responsible for the outcome of the tax ruling and any taxes due. All costs and taxes due are your responsibility.
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

YOUR T	YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	You are personally responsible for reporting the taxable amount in your annual income tax return to the local tax authorities by May 1 of the year following the year of the taxable event and paying the applicable taxes directly to the tax authorities by August 1.	
	A filing extension may be requested in limited cases if you are claiming a tax credit in Ukraine with respect to foreign-source income and may be granted only until December 31 of the year following the reporting year. In order to qualify for an extension, you must file an application to the local tax authorities.	
Dividends	You are personally responsible for reporting the dividend amount in your annual income tax return to the local tax authorities by May 1 of the year following the year of the taxable event and paying the applicable taxes directly to the tax authorities by August 1.	
	A filing extension may be requested in limited cases if you are claiming a tax credit in Ukraine with respect to foreign-source income and may be granted only until December 31 of the year following the reporting year. In order to qualify for an extension, you must file an application to the local tax authorities.	
Sale of Shares	Upon the sale of shares, you are personally responsible for reporting the taxable amount in your annual income tax return to the local tax authorities by May 1 of the year following the year of the taxable event and paying the applicable taxes directly to the tax authorities by August 1.	
	A filing extension may be requested in limited cases if you are claiming a tax credit in Ukraine with respect to foreign-source income and may be granted only until December 31 of the year following the reporting year. In order to qualify for an extension, you must file an application to the local tax authorities.	

OTHER INFORMATION	
Exchange Control	None. Ukrainian resident individuals may hold shares of a foreign issuer with a foreign broker without a Ukrainian license.
Foreign Asset/Account Reporting	None.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity

of these laws, your heirs should consult with a personal tax or finan	cial
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### UNITED ARAB EMIRATES

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>103</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>103</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

TAX	
Grant	No taxation.
Vesting	No taxation.
Taxable Amount	Not applicable.
Nature of Taxable Amount	Not applicable.
Is Income Tax Payable?	Not applicable.
Are Employee Social Insurance Contributions Payable?	Not applicable.
Are Other Taxes Payable?	Not applicable.

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	
Is Income Tax Withheld?	Not applicable.
Are Employee Social Insurance Contributions Withheld?	Not applicable.
Are Other Taxes Withheld?	Not applicable.
Reporting	
Does the Taxable Amount Need to be Reported?	Your employer will not be subject to any reporting obligations in connection with your participation in the Plan.

	DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will not be subject to tax on the cash payment at vesting and your employer will not report the payment to the local tax authorities.	

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, you will not be subject to tax in your country on any dividends paid with respect to the shares.
Taxation in the U.S.	However, any dividends paid will be subject to United States ("U.S.") federal tax withholding at source.

	SALE OF SHARES	
Taxation in Your Country	If you acquire Company shares and you subsequently sell your Company shares, you will not be subject to taxation on any gain you realize.	
Taxation in the U.S.	Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.	

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	Not applicable.
Dividends	Not applicable.
Sale of Shares	Not applicable.

	OTHER INFORMATION	
Foreign Asset/Account Reporting	None.	
Exchange Control	None.	
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.	



## UNITED KINGDOM

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs"). <sup>104</sup> by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting. If any dividends are paid on shares, it is assumed that the dividends will be paid into an offshore brokerage account (*i.e.*, they will not be paid by a bank in your country or into an account in your country). You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are not a U.S. tax resident and that you have completed a Form W-8BEN to certify your status as a non-U.S. person.

<sup>&</sup>lt;sup>104</sup> RSUs are an unfunded, unsecured promise to issue Company shares at no cost to you at a later time. Any references in this document to RSUs also are meant to cover performance-vested restricted stock units ("PSUs"), unless otherwise noted.

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.
Taxable Amount	The market value of the shares on the date of vesting.
Nature of Taxable Amount	Employment income.
Is Income Tax Payable?	Yes, at your marginal income tax rate.
Are Employee Social Insurance Contributions Payable?	Yes, employee National Insurance contributions ("NICs") will be due on the taxable amount.
Are Other Taxes Payable?	No.

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	
Is Income Tax Withheld?	Yes, your employer will calculate the income tax due and account for this amount to HM Revenue & Customs ("HMRC"). This amount will be withheld from you through the Pay As You Earn ("PAYE") system or by any other method referred to in the applicable award agreement.
	However, if your employer is unable to recover the income tax due from you at the taxable event, you are required to pay the income tax due within 90 days of the end of the U.K. tax year (April 5) during which the taxable event occurred. As provided in your applicable award agreement, you agree to indemnify your employer for any income tax due in relation to the taxable amount.
	Notwithstanding the foregoing, in the event that you are a director or an executive officer of the Company (within the meaning of such terms for purposes of Section 13(k) of the U.S. Securities Exchange Act of 1934, as amended), the amount of any uncollected income tax may constitute a benefit to you on which additional income tax and NICs may be payable. You will be responsible for reporting and paying any income tax due on this additional benefit directly to HMRC under the self-assessment regime and for paying the Company or your employer (as appropriate) for the value of any employee NICs due on this additional benefit, which may be collected by the Company or your employer by any method referred to in the applicable award agreement.
	If applicable, your employer will also deduct student loan repayments and account for such amounts to HMRC.

Are Employee Social Insurance Contributions Withheld?	Yes.		
Are Other Taxes Withheld?	Not applicable.		
Reporting	Reporting		
Does the Taxable Amount Need to be Reported?	Your employer will report information related to your participation in the Plan, including the grant and the taxable event to HMRC.		

	DIVIDEND EQUIVALENTS	
Tax Treatment (Paid in Cash via Broker)	If a dividend is declared prior to vesting and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to income tax and NICs on the cash payment at vesting.	
	Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable income tax and NIC.	

DIVIDENDS	
Taxation in Your Country	If you acquire shares and a dividend is subsequently declared on the Company's shares, any dividends paid with respect to the shares will be subject to tax in your country to the extent that they exceed the annual dividend allowance when combined with all other dividends for that tax year in which the dividend is declared.
Taxation in the U.S.	Any dividends paid will be subject to United States ("U.S.") federal tax withholding at source. You may be able to claim a reduced rate of U.S. federal tax withholding on such dividends as a resident of a country with which the U.S. has an income tax treaty. You must have a properly completed U.S. Internal Revenue Service Form W-8BEN on file with the broker with which your Company shares are deposited in order to claim the treaty benefit. You also may be entitled to a tax credit in the U.K. for the U.S. federal tax withheld at source. You should consult with your personal tax advisor regarding the availability of such a credit.

SALE OF SHARES	
Taxation in Your Country	When you subsequently sell your Company shares, you will be subject to capital gains tax on any gain you realize in relation to the shares, provided that your total capital gain for the U.K. tax year (April 6 to April 5) exceeds your annual exempt amount for the tax year in which the sale occurred.

The taxable gain will equal the amount by which the sale proceeds exceed your cost basis in the shares (generally, the market value of the shares on the date of acquisition).

Please note that share identification rules may affect your cost basis for the purposes of calculating your capital gains tax liability if you have acquired other shares in the Company (whether under the Plan or outside of it). You should consult your personal tax advisor to determine how the share identification rules apply in your particular situation.

Capital gains tax is payable on gains from all sources in excess of the personal annual exempt amount in any tax year and the rate(s) at which capital gains tax is paid will depend upon the amount of your combined taxable income and chargeable gains for the tax year. Capital gains are taxed at a rate of 24% where total taxable gains and income in any tax year are more than the income tax basic rate band. A tax rate of 18% will apply to any gains below this threshold.

If your sale proceeds are lower than your cost basis in the shares sold, you will realize a capital loss. Capital losses may be used to offset chargeable capital gains (i.e., capital gains in excess of your annual personal exemption amount) realized in the current U.K. tax year or in any subsequent U.K. tax year.

The calculation of capital gains (losses) at the time of sale is complex and you should consult with your personal tax advisor.

#### Taxation in the U.S.

Assuming you are not a U.S. tax resident and have provided the Company and/or the broker with a Form W-8BEN to certify your status as a non-U.S. person, you will not be subject to tax in the U.S. on any gain you realize when shares acquired under the Plan are sold. If you have not provided a Form W-8BEN, the broker will perform U.S. back-up withholding on the gain at a rate of 24%.

#### YOUR TAX REPORTING AND PAYMENT OBLIGATIONS

### Vesting

If you are required to complete a self-assessment return, you will be responsible for including any income resulting from the vesting of the RSUs on such return by October 31 (for paper returns) or January 31 following the end of the U.K. tax year (April 6 to April 5). Income will be reported through payroll, but to the extent that your employer has not deducted the tax (or not enough tax) you will need to complete the "Share schemes" box. You do not need to complete this box for taxable amounts that your employer has fully taxed. Normally these amounts are already included in your P60 (or, where you've left employment, your P45).

You must pay any tax you owe by January 31 following the end of the relevant U.K. tax year.

If you fail to submit your filing and pay the tax due by the above date, you may be required to pay a penalty. You may be able to appeal against the penalty if you have a reasonable excuse.

	HMRC has published helpful guides for people completing their self-assessment return. Please refer to the following links for more information:  • www.gov.uk/self-assessment-forms-and-helpsheets  • www.gov.uk/government/publications/employee-shares-and-securities-further-guidance-hs305-self-assessment-helpsheet
Dividends	You are personally responsible for reporting the dividend amount and paying any U.K. tax due on the dividends to HMRC in your self-assessment return. Where your total dividends for the year (including any that you receive in relation to shares acquired under the Plan) are less than the tax free dividend allowance, you are able to report any non-UK dividends in boxes 6 & 7 on page TR3 in the 'Dividends and interest from UK banks and building societies' section. If, however, your dividends exceed the tax free dividend allowance, they will need to be declared on the foreign pages of your self-assessment return.  Please see above for information regarding deadlines, forms and penalties.
Sale of Shares	You personally will be responsible for reporting any chargeable gains (or losses) from the sale of the Company shares and for paying any applicable capital gains tax directly to HMRC. Capital gains tax can either be paid to HMRC under the self-assessment return or by using the 'real time' Capital Gains Tax service. Where you complete a self-assessment return, you should fill out the "capital gains summary" pages of the self-assessment form. You also may have an obligation to report your non-chargeable capital gains to HMRC.  Please see above for information regarding deadlines, forms and penalties.

OTHER INFORMATION	
Foreign Asset/Account Reporting	None.
Exchange Control	None.
U.S. Estate Tax	You should be aware that U.S. estate tax may be assessed at the time of death if you hold Company shares (and certain awards) at this time. U.S. estate tax law requires that, for the estates of non-U.S. citizens who reside outside the U.S. ("non-resident aliens"), an estate tax return must be filed if the gross estate exceeds USD 60,000, though if an estate tax treaty applies, the consequences will differ. The gross estate of a non-resident alien consists only of assets located in the U.S., which will include your Company shares (and certain awards granted under the Plan). Due to the complexity of these laws, your heirs should consult with a personal tax or financial advisor.



### **UNITED STATES OF AMERICA**

#### **OVERVIEW**

This supplement has been prepared to provide you with a summary of the tax consequences and certain other issues associated with the grant of restricted stock units ("RSUs") by **Thermo Fisher Scientific Inc.** (the "Company") under the **Thermo Fisher Scientific Inc.** Amended and **Restated 2013 Stock Incentive Plan or any predecessor equity compensation plan** (individually referred to herein as the "Plan").

This supplement is based on the tax laws in effect in your country as of April 2025.

Tax laws often are complex and can change frequently. As a result, you should consult with your personal tax advisor for current information and further guidance regarding your personal tax liabilities and responsibilities associated with the grant of your RSUs, the vesting of your RSUs and issuance of Company shares, the payment of any dividends on such shares, and the sale of Company shares acquired under the Plan.

Please note that this supplement is general in nature and does not discuss all of the various laws, rules and regulations that may apply. It may not apply to your particular tax or financial situation, and the Company is not in a position to assure you of any particular tax result. The information in this supplement assumes that the RSUs will be settled in shares and that the shares will be issued as soon as administratively practicable following the date of vesting/non-forfeitability. This supplement is limited to U.S. federal tax consequences. State and local taxes may also apply. You should consult with an appropriate professional advisor as to how the tax or other laws in your country apply to your specific situation.

If you are a citizen or resident of another country or transfer employment and/or residency after RSUs are granted to you or if you are no longer actively employed at the time of the taxable event, the information contained in this supplement may not be applicable to you.

Finally, the information in this supplement assumes that you are a U.S. tax resident and that you have completed a Form W-9 to certify your status as a U.S. person.

TAX	
Grant	No taxation.
Vesting	On the date(s) the RSUs vest and you acquire shares, you will be subject to taxation.
Taxable Amount	The fair market value of the shares at vesting.
Nature of Taxable Amount	Employment income.
Is Income Tax Payable?	Yes.
Are Employee Social Insurance Contributions Payable?	Yes. Social insurance contributions, including Old-Age, Survivors and Disability Insurance component of FICA taxes (to the extent the applicable contribution ceiling has not been exceeded).  Further, Medicare tax will be due on the taxable amount.
Are Other Taxes Payable?	No.

COMPANY/EMPLOYER TAX WITHHOLDING AND REPORTING	
Withholding	
Is Income Tax Withheld?	Yes. For federal income tax withholding purposes, your employer may treat the taxable amount as supplemental wages and withhold federal income tax at a flat statutory rate to the extent the taxable amount, wher combined with prior supplemental wage payments made to you in the same tax year, does not exceed the threshold amount. Any excess over this supplemental wage threshold will be subject to federal income tax withholding at the highest marginal income tax rate in effect.
	State and/or local income tax also may be withheld based upon where you work and/or reside.
	You are personally responsible for paying any difference between you actual tax liability and the amount withheld from the taxable amount. Note that you also may be required to make quarterly estimated payments. You should consult with your personal tax advisor for further details regarding any additional income tax due and the applicable payment date.
Are Employee Social Insurance Contributions Withheld?	Yes.
Reporting	1

Does the Taxable Amount Need to be Reported?

Yes. Your employer will report the taxable amount as income to the Internal Revenue Service on your year-end Form W-2 (Box 1).

### **DIVIDEND EQUIVALENTS**

## Tax Treatment (Paid in Cash via Broker)

If a dividend is declared prior to vesting of the RSUs and a dividend equivalent accrues and is paid to you in cash through the broker when the corresponding RSUs vest, you will be subject to tax on the cash payment at vesting.

Your employer will report the payment as taxable income to the local tax authorities and withhold the applicable income tax and social insurance contributions.

#### **DIVIDENDS**

#### Taxation in the U.S.

Any dividends paid on shares acquired under the Plan will be subject to federal income tax. In addition, dividends may be subject to an unearned income Medicare contributions tax on the lesser of (i) your net investment income, and (ii) the excess of your modified adjusted gross income over an annual threshold amount that is determined based on your filing status. You will be responsible for reporting and paying any tax resulting from the receipt of any dividends. You should consult with your personal tax advisor regarding your tax liability.

#### **SALE OF SHARES**

#### Taxation in the U.S.

You will be subject to capital gains tax when you sell shares acquired to the extent that the sale proceeds exceed your cost basis in the shares (generally, the fair market value of the shares on the date of acquisition).

If you hold the shares for more than one (1) year, you will be taxed at the more favorable long-term capital gains tax rate (0, 15, or 20 percent for calendar year 2025, depending upon the amount of your taxable income). If you hold the shares for one (1) year or less, any gain you realize will be taxed as short-term capital gain at your marginal income tax rate.

In addition, regardless of how long you hold the shares prior to sale, any capital gain you realize upon the sale of the shares may be subject to an unearned income Medicare contributions tax on the lesser of (i) your net investment income, and (ii) the excess of your modified adjusted gross income over an annual threshold amount that is determined based on your filing status.

If the sale proceeds are lower than your cost basis in the shares sold, you will realize a capital loss. Capital losses may be used to offset, up to the applicable annual limit, against any capital gains you realize in the same

year. Any capital losses in excess of the applicable annual limit may be carried forward to future tax years.

You will be responsible for reporting any capital gains (or losses) resulting from the sale of shares and for paying any applicable taxes due on such gains.

The calculation of capital gains (losses) at the time of sale is complex and you should consult your personal tax advisor.

YOUR TAX REPORTING AND PAYMENT OBLIGATIONS	
Vesting	When you receive the Form W-2 from your employer, you should report the ordinary income reported in connection with the RSUs (and other wages, salaries and tips) in the appropriate line of your annual income tax return (Form 1040).
	The filing deadline for your personal income tax return is April 15th of the year following the taxable year. However, you may request an extension, including via the filing of a Form 4868 by the original deadline (April 15th) in order to apply for an automatic six-month extension of time. Although you may seek an extension of time to file your tax return, this does not extend the due date for any taxes you may owe, so you should ensure that you pay sufficient taxes on a timely basis to avoid interest and/or late payment penalties.
Dividends	When you receive the Form 1099-DIV from your employer, or if applicable, your broker, you should report the amounts listed on such form in the applicable boxes of your annual income tax return (Form 1040), or if applicable, on Schedule D of your Form 1040.
	The filing deadline for your personal income tax return is April 15th of the year following the taxable year. However, you may request an extension, including via the filing of a Form 4868 by the original deadline (April 15th) in order to apply for an automatic six-month extension of time. Although you may seek an extension of time to file your tax return, this does not extend the due date for any taxes you may owe, so you should ensure that you pay sufficient taxes on a timely basis to avoid interest and/or late payment penalties.
Sale of Shares	To report your stock sales:
	<ul> <li>List the details of each of your stock sales for the calendar year on IRS Form 8949.</li> <li>Report the column totals from Form 8949 in Schedule D to calculate your overall short-term and long-term capital gains and losses for the year.</li> <li>Report your capital gains or losses in your Form 1040 tax return.</li> <li>In completing Form 8949, you may need to adjust the cost basis reported on any Form 1099-B you received from a broker involved in the sale of your shares to include the compensation on which you paid tax upon vesting of your RSUs.</li> </ul>

The filing deadline for your personal income tax return is April 15th of the year following the taxable year. However, you may request an extension, including via the filing of a Form 4868 by the original deadline (April 15th) in order to apply for an automatic six-month extension of time. Although you may seek an extension of time to file your tax return, this does not extend the due date for any taxes you may owe, so you should ensure that you pay sufficient taxes on a timely basis to avoid interest and/or late payment penalties.