

Joint Election under s431 ITEPA 2003 for full or partial disapplication of Chapter 2 Income Tax (Earnings and Pensions) Act 2003

Two Part Election (For this joint election to be valid both Parts A and B must be signed and dated)

Part A - To be completed by the Employee

1. Between

the Employee	<i>Catherine Rostron</i>
whose National Insurance Number is	<i>JJ979601B</i>
and	
the Company (who is the Employee's employer)	<i>The Office of Boris Johnson Limited</i>
of Company Registration Number	<i>14409444</i>

2. Purpose of Election

This joint election is made pursuant to section 431(1) or 431(2) Income Tax (Earnings and Pensions) Act 2003 (ITEPA) and applies where employment-related securities, which are restricted securities by reason of section 423 ITEPA, are acquired.

The effect of an election under section 431(1) is that, for the relevant Income Tax and NIC purposes, the employment-related securities and their market value will be treated as if they were not restricted securities and that sections 425 to 430 ITEPA do not apply. An election under section 431(2) will ignore one or more of the restrictions in computing the charge on acquisition. Additional Income Tax will be payable (with PAYE and NIC where the securities are Readily Convertible Assets).

Should the value of the securities fall following the acquisition, it is possible that Income Tax/NIC that would have arisen because of any future chargeable event (in the absence of an election) would have been less than the Income Tax/NIC due by reason of this election. Should this be the case, there is no Income Tax/NIC relief available under Part 7 of ITEPA 2003; nor is it available if the securities acquired are subsequently transferred, forfeited or revert to the original owner.

3. Application

This joint election is made not later than 14 days after the date of acquisition of the securities by the employee and applies to:

Number of securities	<i>50,000</i>
Description of securities	<i>Ordinary shares of £0.01 each</i>
Name of issuer of securities	<i>Better Earth Limited</i>
* acquired by the Employee on	<i>28 May 2024</i>

4. Extent of Application

This election disapplies:

- * S.431(1) ITEPA: All restrictions attaching to the securities

5. Declaration

This election will become irrevocable upon the later of its signing or the acquisition of employment-related securities to which this election applies.

In signing this joint election, I agree to be bound by its terms as stated above.

Catherine Rostron.....

10 June 2024

Signature of employee

Joint Election under s431 ITEPA 2003 for full or partial disapplication of Chapter 2 Income Tax (Earnings and Pensions) Act 2003

Two Part Election (For this joint election to be valid both Parts A and B must be signed and dated)

Part A - To be completed by the Employee

1. Between

the Employee	<i>Ann Sindall</i>
whose National Insurance Number is	<i>WL456082B</i>
and	
the Company (who is the Employee's employer)	<i>The Office of Boris Johnson Limited</i>
of Company Registration Number	<i>14409444</i>

2. Purpose of Election

This joint election is made pursuant to section 431(1) or 431(2) Income Tax (Earnings and Pensions) Act 2003 (ITEPA) and applies where employment-related securities, which are restricted securities by reason of section 423 ITEPA, are acquired.

The effect of an election under section 431(1) is that, for the relevant Income Tax and NIC purposes, the employment-related securities and their market value will be treated as if they were not restricted securities and that sections 425 to 430 ITEPA do not apply. An election under section 431(2) will ignore one or more of the restrictions in computing the charge on acquisition. Additional Income Tax will be payable (with PAYE and NIC where the securities are Readily Convertible Assets).

Should the value of the securities fall following the acquisition, it is possible that Income Tax/NIC that would have arisen because of any future chargeable event (in the absence of an election) would have been less than the Income Tax/NIC due by reason of this election. Should this be the case, there is no Income Tax/NIC relief available under Part 7 of ITEPA 2003; nor is it available if the securities acquired are subsequently transferred, forfeited or revert to the original owner.

3. Application

This joint election is made not later than 14 days after the date of acquisition of the securities by the employee and applies to:

Number of securities	<i>50,000</i>
Description of securities	<i>Ordinary shares of £0.01 each</i>
Name of issuer of securities	<i>Better Earth Limited</i>
* acquired by the Employee on	<i>28 May 2024</i>

4. Extent of Application

This election disapplies:

- * S.431(1) ITEPA: All restrictions attaching to the securities

5. Declaration

This election will become irrevocable upon the later of its signing or the acquisition of employment-related securities to which this election applies.

In signing this joint election, I agree to be bound by its terms as stated above.

Ann Sindall.....

10 June 2024

Signature of employee

Joint Election under s431 ITEPA 2003 for full or partial disapplication of Chapter 2 Income Tax (Earnings and Pensions) Act 2003

Two Part Election (For this joint election to be valid both Parts A and B must be signed and dated)

Part A - To be completed by the Employee

1. Between

the Employee	<i>Michelle Williams-Walker</i>
whose National Insurance Number is	<i>JN635807D</i>
and	
the Company (who is the Employee's employer)	<i>The Office of Boris Johnson Limited</i>
of Company Registration Number	<i>14409444</i>

2. Purpose of Election

This joint election is made pursuant to section 431(1) or 431(2) Income Tax (Earnings and Pensions) Act 2003 (ITEPA) and applies where employment-related securities, which are restricted securities by reason of section 423 ITEPA, are acquired.

The effect of an election under section 431(1) is that, for the relevant Income Tax and NIC purposes, the employment-related securities and their market value will be treated as if they were not restricted securities and that sections 425 to 430 ITEPA do not apply. An election under section 431(2) will ignore one or more of the restrictions in computing the charge on acquisition. Additional Income Tax will be payable (with PAYE and NIC where the securities are Readily Convertible Assets).

Should the value of the securities fall following the acquisition, it is possible that Income Tax/NIC that would have arisen because of any future chargeable event (in the absence of an election) would have been less than the Income Tax/NIC due by reason of this election. Should this be the case, there is no Income Tax/NIC relief available under Part 7 of ITEPA 2003; nor is it available if the securities acquired are subsequently transferred, forfeited or revert to the original owner.

3. Application

This joint election is made not later than 14 days after the date of acquisition of the securities by the employee and applies to:

Number of securities	<i>50,000</i>
Description of securities	<i>Ordinary shares of £0.01 each</i>
Name of issuer of securities	<i>Better Earth Limited</i>
* acquired by the Employee on	<i>28 May 2024</i>

4. Extent of Application

This election disapplies:

- * S.431(1) ITEPA: All restrictions attaching to the securities

5. Declaration

This election will become irrevocable upon the later of its signing or the acquisition of employment-related securities to which this election applies.

In signing this joint election, I agree to be bound by its terms as stated above.

Michelle Williams-Walker.....

10 June 2024

Signature of employee

Joint Election under s431 for full or partial disapplication of Chapter 2 Income Tax (Earnings and Pensions) Act 2003.

Two Part Election (For this joint election to be valid both Parts A and B must be signed and dated)

Part B - To be completed by the Employer

1. Between

the Employees, listed on the attached schedule, who have completed **Part A** to this joint election.

and

the Company (who is the Employees' employer)	<i>The Office of Boris Johnson Limited</i>
of Company Registration Number	<i>14409444</i>

2. Purpose of Election

This joint election is made pursuant to section 431(1) or 431(2) Income Tax (Earnings and Pensions) Act 2003 (ITEPA) and applies where employment-related securities, which are restricted securities by reason of section 423 ITEPA, are acquired.

The effect of an election under section 431(1) is that, for the relevant Income Tax and NIC purposes, the employment-related securities and their market value will be treated as if they were not restricted securities and that sections 425 to 430 ITEPA do not apply. An election under section 431(2) will ignore one or more of the restrictions in computing the charge on acquisition. Additional Income Tax will be payable (with PAYE and NIC where the securities are Readily Convertible Assets).

Should the value of the securities fall following the acquisition, it is possible that Income Tax/NIC that would have arisen because of any future chargeable event (in the absence of an election) would have been less than the Income Tax/NIC due by reason of this election. Should this be the case, there is no Income Tax/NIC relief available under Part 7 of ITEPA 2003; nor is it available if the securities acquired are subsequently transferred, forfeited or revert to the original owner.

3. Application

This joint election is made not later than 14 days after the date of acquisition of the securities by the employee and applies to:

Number of securities	150,000
Description of securities	Ordinary shares of £0.01 each
Name of issuer of securities	Better Earth Limited
* acquired by the Employees on	28 May 2024

4. Extent of Application

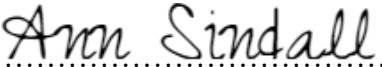
This election disappplies:

* S.431(1) ITEPA: All restrictions attaching to the securities

5. Declaration

This election will become irrevocable upon the later of its signing or the acquisition of employment-related securities to which this election applies.

In signing this joint election, we agree to be bound by its terms as stated above.


.....
Signed for and on behalf of the company

10 June 2024

Director

Position in company

Note: Where the election is in respect of multiple acquisitions, prior to the date of any subsequent acquisition of a security it may be revoked by agreement between the employee and employer in respect of that and any later acquisition.

Joint Election under s431 for full or partial disapplication of Chapter 2 Income Tax (Earnings and Pensions) Act 2003.

Description of securities

Ordinary shares of £0.01 each

Name of issuer of securities

Better Earth Limited

* acquired by the Employees on

28 May 2024

[illegible]