

## **Demerger of Ice Cream business to form The Magnum Ice Cream Company Group**

### **Tax base cost allocation – Information for UK shareholders**

*This information is intended to help certain UK tax resident holders of Unilever plc (“Unilever”) shares or ADSs apportion their base cost between their Unilever shares and The Magnum Ice Cream Company N.V. (“TMICC”) shares for UK capital gains tax purposes following the demerger of Unilever’s Ice Cream business to TMICC.*

*This information is provided as indicative and general guidance only and applies only to such holders (i) resident for tax purposes in the United Kingdom (and, in the case of individuals, only to those holders who are not eligible for and claiming relief from the United Kingdom taxation of foreign income and gains under the rules in Chapter 1, Part 2 of the Finance Act 2025 and to whom “split year” treatment does not apply), (ii) who hold their Unilever Shares or ADSs and TMICC shares as an investment (other than in an individual savings account or pension arrangement) and (iii) who are, or are treated as, the absolute beneficial owners of both their Unilever shares or ADSs and their TMICC shares and any dividends paid on them (“UK Shareholders”). It further assumes that a Unilever ADS holder is the absolute beneficial owner of the underlying Unilever shares and of the TMICC shares. It assumes that a UK Shareholder is entitled to receive a whole number of TMICC shares and does not take into account the impact of any fractional entitlements. UK Shareholders are directed to Part IX (Taxation) of the TMICC prospectus dated 3 December 2025, under United Kingdom Taxation – Demerger Dividend – Chargeable Gains for further information, including on the capital gains tax treatment of fractional entitlements.*

*This information does not constitute tax or financial advice and must not be relied upon as such. Shareholders should determine their own tax position taking into account their own particular circumstances. If you are in any doubt as to your tax position, you should consult an appropriate professional adviser. Unilever accepts no responsibility for the use that may be made of this information.*

The aggregate tax base cost of a UK Shareholder's Unilever shares and TMICC shares immediately after the demerger should be the same as the tax base cost of their Unilever shares immediately before the demerger. Such tax base cost should be apportioned between that UK Shareholder's Unilever shares and TMICC shares in accordance with sections 130 and 272 of the Taxation of Chargeable Gains Act 1992 and the Market Value of Shares, Securities and Strips Regulations 2015 (SI 2015/616). These rules require that the apportionment be made by reference to the market value of the Unilever shares and the TMICC shares on the first day of dealing in TMICC shares on the London Stock Exchange (the “LSE”) (being 8 December 2025). Market value, in this context, is the midpoint between the two closing prices quoted for each company's shares in the LSE's daily Official List. That indicates the following market value for UK tax purposes:

	<b>Market Value</b> (Shown in pence)
Unilever	4159.50
TMICC	1123.70

Where a UK Shareholder received one TMICC share for every five Unilever shares held, this means that approximately 94.87% of base cost should be apportioned to the Unilever shares and approximately 5.13% should be apportioned to the TMICC shares.

As an example, if a UK Shareholder had acquired 1,000 Unilever shares prior to the demerger at a cost of £10 per share, their UK chargeable gains base cost in those Unilever shares should have been £10,000. This should then be apportioned as follows, on the basis of the UK Shareholder receiving 200 TMICC shares on the demerger:

**Unilever shares:**

$$\left( \frac{1,000 \times 4159.50}{(1,000 \times 4159.50) + (200 \times 1123.70)} \right) \times £10,000 = £9,487.39$$

**TMICC shares:**

$$\left( \frac{200 \times 1123.70}{(1,000 \times 4159.50) + (200 \times 1123.70)} \right) \times £10,000 = £512.61$$

The tax base cost apportioned to the Unilever shares as outlined above should not be affected by the consolidation of Unilever shares which became effective on 9 December 2025.