Bank of Ireland Group PLC (the “Company”)

Odd-lot Offer, September 2026

General Description of the Irish & UK tax treatment of participating in an Odd-lot Offer

This summary is provided for general information purposes only and does not constitute, and should not be construed as, tax, legal or financial advice. It is based on current applicable taxation laws and published practice in Ireland of the Revenue Commissioners and in the United Kingdom of H.M. Revenue & Customs (“HMRC”) as at the date hereof (both of which are subject to change, possibly with retrospective effect). It does not purport to be, and is not, a complete description of the tax considerations that may be relevant to a decision by the Eligible Odd-lot Holders to dispose of Ordinary Shares under the Odd-lot Offer.

It summarises certain Irish and UK taxation consequences which would arise on a disposal of Ordinary Shares under the Odd-lot Offer by Eligible Odd-lot Holders who are resident, ordinarily resident and domiciled in Ireland or the UK for tax purposes and who beneficially own their Ordinary Shares as an investment and not for trading purposes. The summary may not apply to certain Odd-lot Holders, such as dealers in securities, insurance companies and collective investment schemes, Odd-lot Holders who are exempt from taxation or benefit from certain reliefs or exemptions, and, save as set out below, Odd-lot Holders who have (or are deemed to have) acquired their Ordinary Shares by virtue of an office or employment. Such persons may be subject to special rules.

All Eligible Odd-lot Holders irrespective of their residence or domicile, who are considering participating in the Odd-lot Offer are recommended to seek advice from their own professional advisers regarding the tax consequences applicable to their particular circumstances before taking any action in relation to the Odd-lot Offer.

1. ODD-LOT HOLDERS RESIDENT IN IRELAND

Individual Eligible Odd-lot Holders

Individual Eligible Odd-lot Holders who are tax resident and ordinarily resident in Ireland and elect to participate in the Odd-lot Offer may be liable to Irish capital gains tax (“CGT”) on capital gains arising on the disposal of their Ordinary Shares. Irish CGT applies to the extent that any gain (taking into account any other taxable gains realised in that tax year) exceeds the annual exempt amount (currently €1,270), and after taking account of any capital losses, exemptions or reliefs available to the individual. The rate of Irish CGT is currently 33%. All individual Eligible Odd-lot Holders who are tax resident and ordinarily resident in Ireland are under a statutory obligation to account for Irish tax on a self-assessment basis and there is no requirement for the Revenue Commissioners to issue or raise an assessment.

Generally, the capital gain is calculated by reference to the amount received less the base cost of the Ordinary Shares for CGT purposes.

If the amount received by the individual Eligible Odd-lot Holder is less than the base cost of the Ordinary Shares for CGT purposes, the difference may give rise to a capital loss for Irish tax purposes.

Typically, the base cost is the amount paid by the individual Eligible Odd-lot Holder to acquire the Ordinary Shares. Where the individual Eligible Odd-lot Holder has, in the past, made a negligible value claim with respect to the Ordinary Shares, the base cost will have been exhausted and will not be available in computing any gain or loss arising on the disposal of the Ordinary Shares. However, any capital loss carried forward, if applicable, may offset any capital gain arising on the disposal of the Ordinary Shares, if applicable.

There will be no withholding tax applied to the cash payment made by the Company to the individual Eligible Odd-lot Holders.

Corporate Eligible Odd-lot Holders

Corporate Eligible Odd-lot Holders who are tax resident in Ireland and elect to participate in the Odd-lot Offer may be liable to Irish corporation tax on chargeable gains arising on the disposal of their Ordinary Shares. Generally, the chargeable gain is calculated by reference to the amount received less the base cost of the Ordinary Shares for CGT purposes. The effective rate of Irish corporation tax on chargeable gains is currently 33%.

If the amount received by the corporate Eligible Odd-lot Holder is less than the base cost of the Ordinary Shares for CGT purposes, the difference may give rise to a capital loss for Irish tax purposes.

Typically, the base cost is the amount paid by the corporate Eligible Odd-lot Holder to acquire the Ordinary Shares. Where the corporate Eligible Odd-lot Holder has in the past made a negligible value claim with respect to the Ordinary Shares, the base cost will have been exhausted and will not be available in computing any gain or loss arising on the disposal of their Ordinary Shares. However, any allowable loss carried forward, if applicable, may offset any chargeable gain arising on the disposal of the Ordinary Shares, if applicable.

There will be no withholding tax applied to the cash payment made by the Company to corporate Eligible Odd-lot Holders.

Pension Funds and Approved Charities

Eligible Odd-lot Holders participating in the Odd-lot Offer who are Irish approved pension funds or Irish approved charities should be exempt from tax in Ireland on the disposal of Ordinary Shares under the Odd-lot Offer.

Stamp duty

The sale of Ordinary Shares pursuant to the Odd-lot Offer should not give rise to any liability to Irish stamp duty for the selling Eligible Odd-lot Holder.

2. ODD-LOT HOLDERS RESIDENT IN THE UNITED KINGDOM

Individual Eligible Odd-lot Holders

The sale of Ordinary Shares by a UK Individual Eligible Odd-lot Holder to the Company pursuant to the Odd-lot Offer should be treated as a disposal of those shares for United Kingdom tax purposes. Such disposal may, depending on the circumstances of the relevant UK Individual Eligible Odd-lot Holder and subject to any available exemption or relief, give rise to a chargeable gain or allowable loss for the purposes of the UK taxation of capital gains. Broadly, the gain or loss will be calculated by reference to the amount received (in sterling) less the UK Individual Eligible Odd-lot Holder's base cost in the Ordinary Shares (which will generally be the amount paid by the individual Eligible Odd lot Holder to acquire the Ordinary Shares).

UK CGT should be levied to the extent that any gain (taking into account any other taxable gains realised in that tax year) exceeds the annual exempt amount (£3,000 for 2026/2027), and after taking account of any capital losses, exemptions or reliefs available to the individual. The current rate of UK CGT is either 18 per cent (to the extent the gains fall within the basic rate band) or 24 per cent (to the extent the gain falls within the higher or additional rate band). UK Individual Eligible Odd-lot Holders are under a statutory obligation to file details of and (where applicable) account to HMRC for UK CGT either on a self-assessment basis or pursuant to a notice issued by HMRC, as applicable.

If the amount received by the UK Individual Eligible Odd-lot Holder is less than the base cost of the Ordinary Shares for UK CGT purposes, the difference may give rise to a capital loss for UK tax purposes.

Where the UK Individual Eligible Odd-lot Holder has, in the past, made a negligible value claim with respect to the Ordinary Shares, the base cost for the purposes of computing any UK gain or loss arising on any later disposal of the Ordinary Shares will be the amount specified in such negligible value claim. However, any UK capital loss carried forward, if applicable, may offset any UK capital gain arising to the UK Individual Eligible Odd-lot Holder on the disposal of the Ordinary Shares, if applicable.

There will be no UK withholding tax applied to the cash payment made by the Company to the UK Individual Eligible Odd-lot Holders under the Odd-lot Offer.

Corporate Eligible Odd-lot Holders

The sale of Ordinary Shares by a UK Corporate Eligible Odd-lot Holders Eligible Shareholder to the Company pursuant to the Odd-lot Offer should be treated as a disposal of those shares for United Kingdom tax purposes. Such disposal may, depending on the circumstances of the relevant UK Corporate Eligible Odd-lot Holder and subject to any available exemption or relief, give rise to a chargeable gain or allowable loss for the purposes of UK taxation of chargeable gains. Broadly, the gain or loss will be calculated by reference to the amount received less the UK Corporate Eligible Odd-lot Holder's base cost in the Ordinary Shares (which will generally be the amount paid by the corporate Eligible Odd-lot Holder to acquire the Ordinary Shares). UK Corporate Eligible Odd-lot Holders should also consider the implications of any foreign exchange movements which will depend on their individual circumstances.

The main corporation tax rate on chargeable gains is currently 25%.

If the amount received by the UK Corporate Eligible Odd-lot Holder is less than the base cost of the Ordinary Shares for UK CGT purposes, the difference may give rise to a capital loss for UK tax purposes.

Where the UK Corporate Eligible Odd-lot Holder has, in the past, made a negligible value claim with respect to the Ordinary Shares, the base cost for the purposes of computing any UK gain or loss arising on the disposal of the Ordinary Shares will be the amount specified in such negligible value claim. However, any UK capital loss carried forward, if applicable, may offset any UK capital gain arising to the UK Corporate Eligible Odd-lot Holder on the disposal of the Ordinary Shares, if applicable.

There will be no UK withholding tax applied to the cash payment made by the Company to UK Corporate Eligible Odd-lot Holders under the Odd-lot Offer.

Pension Funds and Approved Charities

Eligible Odd-lot Holders participating in the Odd-lot Offer who are UK registered pension schemes or UK approved charities may be exempt from tax in the UK on the disposal of Ordinary Shares under the Odd-lot Offer. An Eligible Odd-lot Holder that is unclear as to whether any of these exemptions apply should seek their own tax advice as to whether these exemptions would apply in their specific circumstances.

Stamp duty and stamp duty reserve tax ("SDRT")

The sale of Ordinary Shares pursuant to the Odd-lot Offer should not give rise to any liability to UK stamp duty or UK SDRT for the selling Eligible Odd-lot Holder.

11 September 2026