

FRENCH INHERITANCE TAX (*DROITS DE SUCCESSION*)

AS FROM 21 August 2007 (Euros).

This schedule applies to the net amount received by each beneficiary to which must be added all previous gifts received from the deceased during the last 6 years.

1. Relationship: children and parents

Each child/parent has a 150,000 Euros nil rate band from each child/parent, then:

Estate	%	Euros
Not exceeding 7,600	5	380
Between 7,600 and 11,400	10	380
Between 11,400 and 15,000	15	540
Between 15,000 and 520,000	20	101,000
Between 520,000 and 850,000	30	99,000
Between 850,000 and 1,700,000	35	297,500
Above 1,700,000	40	

2. Relationship: spouses / partners with a French "PACS"

The surviving spouse / partner with a French *pacte civile de solidarité* (PaCS) benefits from a total exemption.

3. Relationship: siblings

Each beneficiary has a nil rate band of 15,000 Euro, then:

Estate	%	Euros
Not exceeding 23,000	35	8,050
Above 23,000	45	

Note: cohabiting siblings may benefit from a total exemption under certain conditions.

4. Relationship: others

Each beneficiary has a nil rate band of 1,500 Euro, then:

Relatives to 4 th degree	35
Others	60

USUFRUIT

Age of the beneficiary	Value of the <i>Usufruit</i>	Value of the ownership
Until 20	90%	10%
From 21 to 30	80%	20%
From 31 to 40	70%	30%
From 41 to 50	60%	40%
From 51 to 60	50%	50%
From 61 to 70	40%	60%
From 71 to 80	30%	70%
From 81 to 90	20%	80%
Over 91	10%	90%