

# KEY FIGURES 2025

## PERSONNAL & ESTATE TAXATION

### 1 | GIFT & INHERITANCE

#### ALLOWANCE ON GIFTS AND INHERITANCES

Beneficiary	Gift	Inheritance
Spouse or civil partner	€80,724	Exemption
Living or represented child	€100,000	€100,000
Grandchild	€31,865	€1,594
Great-grandchild	€5,310	€1,594
Direct ascendant	€100,000	€100,000
Siblings not subject to conditions	€15,932	€15,932
Siblings subject to conditions (CGI 796-0 ter)	€15,932	Exemption
Nephew and niece	€7,967	€7,967
Disabled heir (additional allowance)	€159,325	€159,325
In the absence of any other allowance	None	€1,594

The residual allowance available at the time of the transfer depends on the registered gifts made in the preceding 15 years.

#### ALLOWANCE OF €31,865 ON GIFTS OF SUMS OF MONEY CGI ART. 790 G

- For gifts of sums of money in full ownership
- To children, grandchildren and great-grandchildren or, in the absence of direct descendants, to nephews and nieces, or to great-nephews and great-nieces by representation
- By a donator under 80 years of age to a recipient over 18 years of age
- Renewable every 15 years
- Cumulative with the allowances listed on the left

#### EXEMPTION FOR FAMILY GIFTS OF SUMS OF MONEY CGI ART. 790 A bis

- For gifts of sums of money in full ownership
- Made between 02/15/2025 and 12/31/2026
- To a descendant or, in the absence of descendant, to a nephew
- Up to the double limit of €100,000 per the same donator to the same recipient, and of €300,000 per recipient
- Provided that the sums are used within 6 months to buy a new real estate asset used as a principal residence for 5 years or to finance energy renovation work in the recipient's principal residence, which he or she owns and occupies personally

#### TAXATION OF DIRECT LINE GIFTS AND INHERITANCES CGI ART. 777

Net taxable fraction	Rate	Calculation formula <sup>(1)</sup>
< €8,072	5%	$P \times 0.05$
Between €8,072 and €12,109	10%	$(P \times 0.10) - €404$
Between €12,109 and €15,932	15%	$(P \times 0.15) - €1,009$
Between €15,932 and €552,324	20%	$(P \times 0.20) - €1,806$
Between €552,324 and €902,838	30%	$(P \times 0.30) - €57,038$
Between €902,838 and €1,805,677	40%	$(P \times 0.40) - €147,322$
> €1,805,677	45%	$(P \times 0.45) - €237,606$

<sup>(1)</sup>P = Net taxable fraction

#### TAXATION OF INTER VIVOS GIFTS BETWEEN SPOUSES AND CIVIL PARTNERS | CGI ART. 777 |

Net taxable fraction	Rate	Calculation formula <sup>(1)</sup>
Transfers by death are exempt		
< €8,072	5%	$P \times 0.05$
Between €8,072 and €15,932	10%	$(P \times 0.10) - €404$
Between €15,932 and €31,865	15%	$(P \times 0.15) - €1,200$
Between €31,865 and €552,324	20%	$(P \times 0.20) - €2,793$
Between €552,324 and €902,838	30%	$(P \times 0.30) - €58,026$
Between €902,838 et €1,805,677	40%	$(P \times 0.40) - €148,310$
> €1,805,677	45%	$(P \times 0.45) - €238,594$

<sup>(1)</sup>P = Net taxable fraction

#### TAXATION OF GIFTS AND INHERITANCES BETWEEN SIBLINGS CGI ART. 777

Net taxable fraction	Rate	Calculation formula <sup>(1)</sup>
Between 0 and €24,430	35%	$P \times 0.35$
> €24,430	45%	$(P \times 0.45) - €2,443$

<sup>(1)</sup>P = Net taxable fraction

#### TAXATION OF GIFTS AND INHERITANCES CGI ART. 777

Degree of kinship	Rate
Between relatives up to and including the 4th degree of kinship	55%
Between relatives beyond the 4th degree of kinship	60%
Between non-relatives	60%

## 2 | INCOME TAX

2025 INCOME TAX CGI ART. 197	
Taxable fraction	Rate
From 0 to €11,497	0%
From €11,497 to €29,315	11%
From €29,315 to €83,823	30%
From €83,823 to €180,294	41%
> €180,294	45%

+ CEHR and CDHR where applicable

DIVIDENDS CGI ART. 117 QUATER AND 158 3.2*
<ul style="list-style-type: none"> <li>→ Flat-rate non-final withholding tax (PFNL) of 12.8% becoming final (except if option for the progressive income tax (IT) scale for all income subject to flat-rate taxation) + social security contributions (SSC) of 17.2%</li> <li>→ If IT option: after 40% allowance, progressive IT scale + SSC of 17.2% on 100% of the dividend (and charging of PFNL with refund in the case of a surplus)</li> <li>→ + CEHR where applicable, up to 4% (see CEHR box)</li> </ul>

### TAXATION OF CAPITAL REDUCTIONS IN COMPANIES SUBJECT TO CORPORATION TAX | CGI ART. 112 |

PRINCIPLE	
Capital reduction by repurchase, by the company, of securities forming part of the private estate of the individual shareholder. No French sharing tax	Taxation according to the regime of capital gains on disposal securities
EXCEPTION	
If the capital reduction does not involve any allocation to shareholder, since it results from losses	No taxation
NOTA	
In the event of company dissolution	The liquidation bonus is taxed at French sharing tax and comes under the investment income tax regime (flat-rate tax). According to case law, French sharing tax is not due on the repayment of capital (not included in the «BOFIP»).

### EXCEPTIONAL CONTRIBUTION ON HIGH INCOMES CEHR CGI ART. 223 SEXIES

For taxpayers domiciled for tax purposes in France or abroad, who are liable to French income tax		
Single person: fraction of the STI <sup>(1)</sup>	Couple: fraction of the RFR <sup>(1)</sup>	Rate
From 0 to €250,000	From 0 to €500,000	0%
From €250,001 to €500,000	From €500,001 to €1,000,000€	3%
> €500,000	> €1,000,000	4%

<sup>(1)</sup> Standard Taxable Income (Revenu Fiscal de Référence) of CGI art. 1417 IV, calculated by the tax authorities on the basis of net taxable income, with the addition of certain income or allowances

### DIFFERENTIAL CONTRIBUTION ON HIGH INCOMES CDHR CGI ART. 224

<ul style="list-style-type: none"> <li>→ Payable on the 2025 income by taxpayers who receive a recalculated STI &gt; €250,000 for a single person or €500,000 for a couple. The recalculated STI may be lower than the STI.</li> <li>→ It supplements income tax to reach an average tax rate of 20%, including CEHR but excluding social security contributions.</li> <li>→ A down payment of 95% is due between 12/01/2025 and 12/15/2025.</li> </ul>
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### TAXATION OF CAPITAL GAINS ON DISPOSALS OF MOVABLE PROPERTIES | CGI ART. 150 UA AND 150-0 A |

Sold assets	Taxation
Securities and corporate titles	<ul style="list-style-type: none"> <li>→ Flat-rate tax of 12.8% + social security contributions (SCC) of 17.2%</li> <li>→ Or on global option for all income, taxation of the capital gain (CG) at the IT scale (after allowance where applicable, see box) + SSC of 17.2% on the CG before allowance</li> <li>→ + CEHR where applicable, on the CG before allowance</li> </ul>
Precious metals	<ul style="list-style-type: none"> <li>→ 11% of the sale price + social debt repayment contribution (CRDS) of 0.5%</li> <li>→ Or option for the regime of capital gains on movable properties</li> </ul>
Jewellery, works of art, collectibles or antiques	<ul style="list-style-type: none"> <li>→ 6% of the sale price + CRDS 0.5%</li> <li>→ Or option for the regime of capital gains on movable properties</li> </ul>
Other movables	Taxation of CG at 19% after a yearly 5% allowance starting on the 3rd year of holding + SCC of 17.2%

### ALLOWANCES ON CAPITAL GAINS FROM DISPOSAL OF SECURITIES

Fixed allowance €500,000 CGI ART. 150-0 D TER	Holding period allowances CGI ART. 150-0 D			
<b>SCOPE OF APPLICATION</b> <ul style="list-style-type: none"> <li>→ In the event of flat-rate taxation or at the progressive IT scale</li> <li>→ No accumulation with the holding period allowance as per art. 150-0 D of the French CGI</li> </ul>	<ul style="list-style-type: none"> <li>→ Securities acquired or subscribed before 01/01/2018</li> <li>→ Only in the event of a global option for taxation at the progressive income tax scale for all income and capital gains on movable properties</li> <li>→ Ordinary law allowance or allowance for SME of less than 10 years</li> </ul>			
	<b>CONDITIONS</b> <ul style="list-style-type: none"> <li>→ Transfer due to the retirement of an executive</li> <li>→ Securities held for at least 1 year</li> <li>→ Transfer between 01/01/2018 and 31/12/2024</li> </ul>	Ordinary law allowance		Allowance for SME of less than 10 years
Holding period		Amount of the allowance	Holding period	Amount of the allowance
From 0 to 2 years		0%	Less than 1 year	0%
From 2 to 7 years		50%	From 1 to 3 years	50%
8 years and over	65%	From 4 to 7 years	65%	
		8 years and over	85%	

### 3 | LIFE INSURANCE

TAXATION OF LIFE INSURANCE POLICIES UPON THE DEATH OF THE POLICYHOLDER <sup>(1)</sup>				LIFE INSURANCE   CGI ART. 990 I <sup>(1)</sup>	
		Premiums paid		Taxation of each separate beneficiary of the same insured person, regardless of the degree of kinship	
		Before 13/10/1998 ↓	Since 13/10/1998 ↓		
Policy taken out before 20/11/1991, including for payments after 70 years of age		Exemption	CGI art. 990 I	Allowance «contrat vie génération» subject to conditions	20%
Policy taken out since 20/11/1991	Premiums paid before 70 years of age	Exemption	CGI art. 990 I	Allowance per beneficiary <sup>(2)</sup>	€152,500
	Premiums paid after 70 years of age	CGI art. 757 B: inheritance tax according to the degree of kinship between insured and beneficiary, after an overall allowance of €30,500 <sup>(2)</sup>		Tax rate → From 0 to €700,000 → Over €700,000	→ 20% → 31.25%
<sup>(1)</sup> Except for the sums paid to a spouse or civil partner, or siblings subject to conditions, tax-exempt <sup>(2)</sup> Death benefit and any allowances distributed between usufructuary and bare owner in accordance with art. 669 of the French CGI				<sup>(1)</sup> Except for the sums paid to a spouse or civil partner, or siblings subject to conditions, tax-exempt <sup>(2)</sup> Death benefit and any allowances distributed between usufructuary and bare owner in accordance with art. 669 of the French CGI	

TAXATION OF LIFE INSURANCE POLICY REDEMPTIONS EXCLUDING SOCIAL SECURITY CONTRIBUTIONS CGI ART. 125-0 A AND 200 A			
Length of time since the policy was taken out	Income related to premiums paid before 27/09/2017	Income related to policies taken out since 27/09/2017 or to premiums paid since 27/09/2017 on policies taken out previously	
		Premiums < €150,000 <sup>(1)</sup>	Premiums > €150,000 <sup>(1)</sup>
< 4 years	35%	12.8%	12.8%
Between 4 and 8 years	15%	12.8%	12.8%
8 years and over <sup>(2)</sup>	7.5%	7.5%	7.5% then 12.8% depending on the pro rata of art. 200 A of the French CGI
+ social security contributions (SSC) at the time the income is perceived on the policy or upon redemption + CEHR where applicable (see CEHR box) <sup>(1)</sup> Premiums paid by the insured on all policies still open <sup>(2)</sup> After annual allowance of €4,600 for a single person and €9,200 for a couple, in accordance with specific imputation methods			

NON-SETTLED POLICY PART OF COMMUNITY PROPERTY CIOT MINISTERIAL REPLY OF 23/02/2016	
If the policy was taken out with the spouses' funds which are part of community property and is not settled by death → In civil terms: it is a joint asset, half of which is dependent on the estate → In tax terms: the surrender value of the policy is not part of the assets of the estate for the calculation of the inheritance tax due by the heirs of the predeceased spouse	

## 4 | PROPERTY DIVISION

Determination of the value of the bare ownership and the usufruct for the registration fees (*droits d'enregistrement*) and the land registration tax (*taxe de publicité foncière*)

LIFETIME USUFRUCT CGI ART. 669 I			TEMPORARY USUFRUCT   CGI ART. 669 II
Age of the usufructuary	Usufruct	Bare ownership	The usufruct constituted for a fixed term is estimated 23% of the value of the full ownership for each 10-year period of the usufruct term, without fraction and without taking into account the age of the usufructuary. The value so determined cannot exceed the value of the lifetime usufruct (see opposite), which is a maximum valuation.
Under 21 years of age	90%	10%	
Under 31 years of age	80%	20%	
Under 41 years of age	70%	30%	
Under 51 years of age	60%	40%	
Under 61 years of age	50%	50%	
Under 71 years of age	40%	60%	
Under 81 years of age	30%	70%	
Under 91 years of age	20%	80%	
Over 91 years of age	10%	90%	
			RIGHT OF OCCUPANCY AND USE
			The value of the right of occupancy and use = 60% of the value of the lifetime usufruct determined by article 669 I of the French CGI (see opposite).

## 5 | WEALTH TAX ON REAL ESTATE (IFI)

TAX SCALE   CGI ART. 977			TRIGGERING THRESHOLD   CGI ART. 964
Taxable fraction	Rate	Calculation formula <sup>(1)</sup>	<ul style="list-style-type: none"> <li>→ Net taxable real estate assets as at 1 January &gt; €1,300,000</li> <li>→ Assets held directly or indirectly, including life insurance policies, real estate investment companies (SCPI), private real estate companies (SCI), etc</li> </ul>
From 0 to €800,000	0%		<b>DECLARATORY OBLIGATIONS   CGI ART. 982  </b>  Taxpayers must: <ul style="list-style-type: none"> <li>→ State the amount of the gross value and the net taxable value of their assets on the 2042-IFI declaration</li> <li>→ Provide details on the composition and value of taxable assets in the annexes</li> </ul>
From €800,001 to €1,300,000	0.50%	$(P \times 0.005) - \text{€}4,000$	
From €1,300,001 to €2,570,000	0.70%	$(P \times 0.007) - \text{€}6,600$	
From €2,570,001 to €5,000,000	1%	$(P \times 0.01) - \text{€}14,310$	
From €5,000,001 to €10,000,000	1.25%	$(P \times 0.0125) - \text{€}26,810$	
> €10,000,000	1.50%	$(P \times 0.015) - \text{€}51,810$	
<sup>(1)</sup> P = net taxable assets If P is between €1,300,000 and €1,400,000: discount = €17,500 - 1.25% P			<b>REDUCTION FOR GIFTS   CGI ART. 978  </b>  The amount of the tax can be reduced by: <ul style="list-style-type: none"> <li>→ 75% of gifts made</li> <li>→ If the beneficiary is an organisation listed in art. 978 of the CGI</li> <li>→ Within the limit of €50,000 per year</li> </ul>
			<b>CAPPING MECHANISM   CGI ART. 979  </b>  <ul style="list-style-type: none"> <li>→ All the taxes paid by the taxpayer (IFI + IT + other income taxes + SSC) may not exceed 75% of the income received the previous year, including non-taxable capital gains (CG)</li> <li>→ Failing this, the excess is deducted from the IFI</li> </ul>
<b>PROPERTY DIVISION   CGI ART. 968  </b>  <ul style="list-style-type: none"> <li>→ In principle, when the ownership of a real estate asset is divided (in between usufruct and bare ownership), this asset is included in the usufructuary's estate at its full ownership value. No deduction is applicable for property division.</li> <li>→ As a corollary, the bare owner is not required to declare these assets for wealth tax.</li> </ul>			<b>MAIN RESIDENCE   CGI ART. 973 I  </b>  <ul style="list-style-type: none"> <li>→ A 30% allowance is applied to the value of the main residence of the taxpayer.</li> <li>→ This allowance does not apply in the case of indirect ownership through a French société civile.</li> </ul>


## 6 | TRANSFER FOR VALUABLE CONSIDERATION

REGISTRATION FEES DUE ON THE SALE OF BUILDINGS   CGI ART. 1594 D		REGISTRATION FEES DUE ON TRANSFERS OF SECURITIES CGI ART. 726	
	Rate	Sold assets	Rate
In principle	5.81%*	Stock in listed companies	→ The sale of which is recorded by deed 0.1%
Unless the property is located in the departments of Indre (36) or Mayotte (262)	5.09%*		→ The sale of which is not recorded by deed 0%
<p>*For sales completed between 04/01/2025 and 03/31/2028, except for first-time buyers, the departments may raise their registration fees. In the departments that vote in favour of this measure, the maximum rate for registration fees could be raised to 6.3185%. Consult applicable rates by department: <a href="https://www.impots.gouv.fr/droits-denregistrement">https:// www.impots.gouv.fr/droits-denregistrement</a></p>		Stock in unlisted companies	0.1%
		Company's shares	3% after an allowance, for each of the company's shares, equal to the ratio between €23,000 and the total number of shares
		Securities of companies that are mostly real estate	5% regardless of the type of company

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