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International Tax
France Highlights 2021

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Recent developments

For the latest tax developments relating to France, see Deloitte tax@hand.

Investment basics

Currency: Euro (EUR)

Foreign exchange control: There are no foreign exchange controls.

Accounting principles/financial statements: French GAAP. Financial statements must be filed annually.

Principal business entities: These are the joint stock company (SA/SAS), limited liability company (SARL), commercial partnership (SNC), and branch of a foreign company.

Corporate taxation

Rates	
Corporate income tax rate	26.5% if turnover is less than EUR 250 million; 27.5% if turnover is at least EUR 250 million
Branch tax rate	26.5%; 26.5% tax on after-tax income deemed distributed to foreign parent companies
Capital gains tax rate	26.5%

Residence: A company incorporated in France is deemed to be tax resident. A foreign company can be tax resident in France if it is managed and controlled in France.

Basis: France operates a territorial tax system. Residents and nonresidents are taxable in France on profits allocable to a French business and on French-source income. Foreign-source income of French tax residents generally is not subject to French tax (and foreign-source losses may not be deducted).

Taxable income: Taxable income is equal to book income, plus or minus certain tax adjustments.

Rate: The standard corporate income tax rate for 2021 is 27.5% for companies whose turnover is at least EUR 250 million (reduced from the standard 31% rate that applied for 2020) and 26.5% for companies whose turnover is less than EUR

250 million (a 28% standard rate applied for 2020). The rate should be reduced to 25% by 2022. Small or new businesses may benefit from lower rates.

Surtax: A 3.3% social surcharge applies to a standard corporate income tax liability exceeding EUR 763,000, bringing the marginal effective rate to 28.4% with a 27.5% standard rate (or 27.4% with a 26.5% standard rate). Small and medium-sized enterprises benefit from specific exemptions, provided certain conditions (e.g., turnover, capital) are satisfied.

Alternative minimum tax: There is no alternative minimum tax.

Taxation of dividends: Dividends generally are included in taxable income, although distributions from qualifying subsidiaries benefit from the participation exemption (see "Participation exemption," below).

Capital gains: Capital gains generally are subject to corporate tax at the standard rate, but capital gains derived from the sale of qualifying shareholdings can benefit from the participation exemption (see "Participation exemption," below).

Losses: Ordinary losses may be carried forward indefinitely but may be offset against taxable profit (excluding distributed income) of a given year only up to an amount equal to EUR 1 million, plus 50% of the taxable result in excess of this amount for the fiscal year. Losses may be carried back for one year in certain cases, up to EUR 1 million. This creates a receivable from the French tax authorities equal to the tax surplus previously remitted, which may be used to offset corporate income tax payable in the five following fiscal years. After the five-year period, the unutilized amount of the receivable is refunded to the taxpayer. Exceptionally in 2020, companies may apply for the immediate refund of their carryback receivable balance. The request must be made before the May 2021 tax return filing deadline for the fiscal year closing on 31 December 2020. For carryback receivables arising in 2020, the request may be made as from the day following the fiscal year closing date and before the final settlement of corporate income tax (with a 20% margin of error granted).

Additional limitations apply to the deduction of capital losses on the sale of shares between related parties.

Foreign tax relief: French domestic law generally does not provide for a credit for foreign taxes. Income subject to foreign tax that is not exempt from French tax under the territoriality principle is taxable net of foreign tax paid. However, most tax treaties provide for a tax credit mechanism, which generally corresponds to the withholding tax paid in the source country but is capped at the French tax actually due on the net income. The portion of the credit exceeding the cap is forfeited.

Participation exemption: A participation exemption on dividends applies where the recipient owns at least 5% of the shares of the distributing entity for at least 24 months. If the participation exemption applies, the dividends are 95% tax exempt, resulting in a maximum effective rate of 1.42% with a standard rate of 27.5% (5% x 28.4% (including social surcharge)) or 1.37% (5% x 27.4% (including surcharge)) with the standard rate of 26.5% that applies to companies whose turnover is lower than EUR 250 million. However, if an entity is merged shortly after making a distribution and the merger is within two years of its acquisition, the parent company must choose between having the distribution within the scope of the participation exemption and taking a deduction for the loss on the shares of the distributing entity. (See also "Other" under "Anti-avoidance rules," below).

A participation exemption also applies to capital gains arising on the sale of shares that form part of a substantial investment if the shares have been held for at least 24 months. The gain is 88% exempt, resulting in a maximum effective rate of 3.4% with a 27.5% standard rate (12% x 28.4% (including social surcharge)) or 3.29% (12% x 27.4% (including social surcharge)), with the standard rate of 26.5% that applies for companies whose turnover is lower than EUR 250 million.

Holding company regime: See "Participation exemption," above.

Incentives: France offers an R&D tax credit of 30% on qualifying research expenses up to EUR 100 million and 5% above this limit, provided certain criteria are met.

A patent box regime is available under which income and capital gains arising from certain patents are taxed at a reduced corporate tax rate of 10%.

Compliance for corporations

Tax year: The tax year generally is the calendar year, although a taxpayer may choose a different year-end date. The tax year is 12 months but can be shorter or longer in certain cases.

Consolidated returns: Under the fiscal integration regime, a group of companies may opt to consolidate profits and losses so that tax is assessed at the level of the parent company but is based on the group profit or loss. To qualify for consolidation, the parent must, inter alia, be subject to French tax and may not be 95% or more owned directly by French corporate taxpayers. Only subsidiaries that are at least 95% owned, directly or indirectly, by the parent may be included in the tax group (if subject to French corporate tax). Subsidiaries indirectly held through a chain of participations that include French companies not part of the tax group or non-EU resident companies may not be part of the group. However, groups may be consolidated vertically (the traditional interpretation) or horizontally (French sister companies with a common EU parent company may form a horizontally consolidated group).

Filing and payment: A self-assessment regime applies. Corporate tax returns normally are due by the second business day following 1 May of the year following the calendar year, or within three months of the year end for a non-calendar financial year.

Penalties: Late payments and late filing are subject to a 10% penalty. If additional tax is payable as a result of a reassessment of tax, interest is charged at 0.2% per month (2.4% per year). Special penalties can apply in the event of bad faith or abuse of law.

Rulings: Rulings are becoming a regular practice and are binding only on the tax authorities. No fee is payable. A special ruling procedure exists to confirm whether a foreign entity has a permanent establishment (PE) in France. Advance pricing agreements for transfer pricing purposes also are available.

Individual taxation

Rates		
Individual income tax rate	**Taxable income**	**Rate**
	Up to EUR 10,084	0%
	EUR 10,085–25,710	11%
	EUR 25,711–73,516	30%
	EUR 73,517–158,122	41%
	Over EUR 158,122	45%
Capital gains tax rate		30% (movable assets); 19% (immovable property)

Residence: Individuals domiciled in France are considered resident. Individuals normally are considered domiciled in France if their principal residence, main place of business or professional activity, or center of financial interests is located in France. Executives of large French corporations with an annual turnover exceeding EUR 250 million are deemed to perform their principal professional activities in France.

Basis: Residents are taxed on worldwide income; nonresidents are taxed only on French-source income.

Taxable income: Taxable income generally includes employment income, business income, real estate income, investment income, and capital gains.

Rates: Rates on ordinary income are progressive, ranging from 0% to 45%, plus special social security surcharges for French residents of a maximum of 17.2%.

An exceptional contribution applies on the portion of income that exceeds EUR 250,000 for single individuals and EUR 500,000 for married couples. The rate of the contribution is 3% on income between EUR 250,000 and EUR 500,000 for single individuals (EUR 500,000 and EUR 1 million for married couples) and 4% on the part of income exceeding EUR 500,000 for single individuals (EUR 1 million for married couples). The measure will remain in effect until the government achieves a zero deficit.

Capital gains: Capital gains from the disposal of movable assets (e.g., securities, bonds) are subject to a 30% tax rate (i.e., 12.8% income tax, plus a 17.2% social contribution). Capital gains from the disposal of immovable property are taxed at a special flat rate of 19%, plus special social security surcharges.

Deductions and allowances: Various deductions and allowances are available, based primarily on family circumstances and related to certain types of investment or expense incurred during the year.

Foreign tax relief: French domestic law generally does not provide for a credit for foreign taxes. Income subject to foreign tax that is not exempt from French tax under the territoriality principle is taxable net of foreign tax paid. However, most tax treaties provide for a tax credit mechanism, which generally corresponds to the withholding tax paid in the source country but is capped at the French tax actually due on the net income. The portion of the credit exceeding the cap is forfeited.

Compliance for individuals

Tax year: The tax year is the calendar year

Filing status: Married persons file a joint tax return, with no option to file separately after the year of marriage or before the year of divorce.

Filing and payment: A Pay As You Earn (PAYE) system applies, under which tax is withheld at source by employers from employees' remuneration, including pensions and "replacement income" (e.g., unemployment benefits, etc.). The tax due on self-employment and investment income is payable on a monthly basis (or a quarterly basis if the taxpayer so elects) and is debited by the tax authorities directly from the taxpayer's bank account. However, individuals still must file an income tax return, generally by 31 May after the end of the tax year.

Penalties: Late payments and late filing are subject to a 10% penalty. If additional tax is payable as a result of a reassessment of tax, interest is charged at 0.2% per month (2.4% per year). Special penalties can apply in the case of bad faith or abuse of law.

Rulings: Rulings are becoming a regular practice and are binding only on the tax authorities. No fee is payable.

Withholding tax

Rates				
Type of payment	**Residents**		**Nonresidents**	
	Company	**Individual**	**Company**	**Individual**
Dividends	0%	0%	26.5%	26.5%
Interest	0%	0%	0%	0%
Royalties	0%	0%	26.5%	26.5%
Fees for technical services	0%	0%	26.5%	26.5%

Dividends: Dividends paid by a French company to a nonresident shareholder are subject to a 26.5% withholding tax (reduced from 28% for 2020), unless a tax treaty provides for a lower rate or the EU parent-subsidiary directive applies. Under the directive, dividends paid by a French company to a qualifying EU parent company are exempt from withholding tax (see "Controlled foreign companies," below, for rules on noncooperative countries). The 26.5% domestic withholding tax rate should be reduced to 25% in 2022 in line with the reduction in the standard corporate tax rate. No withholding tax is imposed on dividends paid to residents.

Interest: Interest paid by a French company to a nonresident lender generally is not subject to withholding tax (see "Controlled foreign companies," below, for rules on noncooperative countries). No withholding tax is imposed on interest paid to residents.

Royalties: Royalties paid to a nonresident entity are subject to the 26.5% standard corporate income tax rate for 2021 (reduced from 28% for 2020), regardless of the entity's annual income (see under "Rate," above). The rate may be reduced or eliminated under a tax treaty, or where the royalties qualify for the benefit of the EU interest and royalties directive (see "Controlled foreign companies," below, for rules on noncooperative countries). The rate should be reduced to 25% in 2022 in line with the reduction in the standard corporate tax rate. No withholding tax is imposed on royalties paid to residents

Fees for technical services: Fees paid for commissions, consultancy, and services performed or used in France are subject to the 26.5% standard corporate income tax rate for 2021 (reduced from 28% for 2020), regardless of the entity's annual income (see under "Rate," above). The rate may be reduced or eliminated under a tax treaty (see "Controlled foreign companies," below, for rules on noncooperative countries). The rate should be reduced to 25% in 2022 in line with the reduction in the standard corporate tax rate. No withholding tax is imposed on such fees paid to residents.

Branch remittance tax: The after-tax income of a French branch of a foreign company is deemed to be distributed to nonresidents and is subject to a 26.5% branch tax for 2021. The rate should be reduced to 25% in 2022 in line with the reduction in the standard corporate income tax rate. The tax may be eliminated or reduced under a tax treaty and is not due if the foreign head office is located in the EU/European Economic Area (EEA) and is subject to income tax with no possibility of opting out or of being exempt, and the income is taxable in the foreign country.

Anti-avoidance rules

Transfer pricing: French entities controlled by entities established outside of France are taxable in France on profits transferred, directly or indirectly, to an entity located abroad through an increase or decrease in purchase or sales prices, or by any other means. Companies exceeding certain thresholds must maintain contemporaneous transfer pricing documentation.

Rates on interest paid by French corporate taxpayers to related parties are deemed to be at arm's length if they do not exceed an index corresponding to the average annual floating rate applied by banks to two-year loans granted to businesses. If the interest rate exceeds that index, the taxpayer will have to demonstrate that it would have paid a similar or higher rate to a bank in a comparable situation.

Interest deduction limitations: Interest expense deduction limitation rules apply in line with the EU Anti-Tax Avoidance Directive (ATAD 1). Net borrowing costs ("exceeding borrowing costs"), such as interest expense, guarantee costs, or foreign exchange losses on borrowings, are deductible only up to the greater of 30% of the tax EBITDA (i.e., earnings before interest, tax, depreciation, and amortization, restated with tax exempt income) or EUR 3 million.

Excess borrowing costs may be carried forward indefinitely, and unused interest deduction capacity in any given financial year may be carried forward for up to five years.

Companies that are members of a consolidated group for financial accounting purposes may benefit from a safeguard clause. According to this clause, if a company can demonstrate that its equity-over-assets ratio is at least equal to the ratio of the consolidated group, it may deduct 75% of the exceeding borrowing costs disallowed under the EBITDA test.

For tax consolidated groups, the EBITDA test and group safeguard provision are applied at the group level.

Companies that are not part of a consolidated group and that do not have a PE outside of France or an associated company (i.e., "autonomous" companies) may deduct 75% of the excess borrowing costs disallowed under the general limitation rule.

For companies that are considered to be thinly capitalized (i.e., where the related party debt-to-equity ratio exceeds 1:5), the portion of deductible financial expenses will be determined based on the application of two sets of rules:

- External debt: The standard 30% EBITDA test will apply to the portion of interest deemed to derive from external debt, calculated as the total interest multiplied by the amounts put at the disposal of the company by unrelated parties, increased by 1.5 x equity/total amounts put at the disposal of the company.
- Related party debt: Interest on related party debt will be subject to stricter rules, with a 10% of tax EBITDA limitation applying to interest expense deemed to derive from related party debt, calculated as the total interest multiplied by the amounts put at the disposal of the company by related parties/total amounts put at the disposal of the company.

Financial expenses that are deemed to be nondeductible based on the external debt rule may be carried forward indefinitely to be deducted in a subsequent financial year. However, only one-third of financial expenses that are deemed to be nondeductible based on the related party debt rule may be carried forward.

A specific safeguard clause is introduced for consolidated groups for financial accounting purposes, under which the reinforced mechanism provided for in the case of thin capitalization will not apply if the company can demonstrate that the debt ratio of the consolidated group to which it belongs is higher than or equal to its own debt ratio. In that case, the company will continue to benefit from the application of the standard thresholds (i.e., 30% of tax EBITDA or EUR 3 million), as well as from the general safeguard clause allowing an additional deduction (if certain conditions are fulfilled). For the application of the thin capitalization safeguard clause, the company's debt ratio would correspond to the ratio between the total amount of its debt and the amount of its equity. The debt ratio of the consolidated group would be determined by taking into account debt, except debt to companies that are part of the consolidated group. The company's debt ratio will be considered equal to the debt ratio of the consolidated group to which it belongs when the first ratio is higher than the second by a maximum of two percentage points.

The specific thin capitalization safeguard clause also applies to tax-consolidated groups.

Controlled foreign companies: The CFC rules apply to more-than-50%-owned or controlled foreign subsidiaries or PEs of a French company when the local taxation is less than 50% of the French rate (i.e., the actual tax paid compared to the French tax that would be due on the income calculated under French GAAP). In such a case, the French company is: (i) taxed on its pro rata share of the income deemed to be received from the CFC if the CFC is a PE or a branch; or (ii) deemed to have received distributed income from the CFC if the latter is a subsidiary. EU companies are outside the scope of the CFC rules, unless the structure was put in place to avoid tax.

Dividends, interest, royalties, and payments for services made to companies located in a noncooperative country may be subject to a 75% withholding tax. Further, dividends received from entities located in noncooperative countries cannot benefit from the participation exemption.

Hybrids: The ATAD 2 directive has been transposed into domestic law. The directive aims to prevent multinational companies from using "hybrid" arrangements to limit the taxation of their profits and also applies to hybrid mismatches with non-EU countries. The rules address the following types of arrangement:

- Situations that give rise to a deduction without inclusion of: (i) a payment under a financial instrument; (ii) a payment to/by a hybrid entity; (iii) a payment to an entity with one or more PEs; (iv) a payment to a PE; or (v) a deemed payment between a head office and a PE, or between two or more PEs;
- Situations that give rise to a double deduction; and
- Specific situations involving: (i) an imported hybrid; (ii) a payment to a PE that is disregarded in its jurisdiction; (iii) a hybrid transfer; (iv) a reverse hybrid; or (v) a double deduction by a payer that is a dual tax resident.

The ATAD 2 rules apply only to hybrid mismatches that arise between the taxpayer and its associated enterprises (i.e., generally, entities in which the taxpayer holds a 50% direct or indirect interest (or 25% interest in some cases)) or between associated enterprises. An exception applies to structured arrangements involving a taxpayer, in which case the presence of associated enterprises is not required.

Hybrid mismatches result from the difference in the treatment of financial instruments, entities, or payment attribution rules between two countries. Such differences may result in either a deduction in one country without corresponding taxation in the other, a deduction in both countries, or no taxation in either country. The new rules provide several ways to neutralize hybrid arrangements: either France can disallow the deduction of a payment that is not taxed or that is deducted in the other country, or France can tax income resulting from a payment that is deducted or not taxed in the other country. Another solution is for France to tax payments made by a French entity to a PE located in another country if the PE (and thus its income) is disregarded in that other country. The law provides exceptions to the anti-hybrid rules and notably in cases where: (i) the hybrid transfer is made by a professional financial trader; (ii) the double deduction affects a payment that also is subject to a double inclusion; or (iii) the imported hybrid is fully corrected by another country.

These measures apply as from 1 January 2020. The measures regarding reverse hybrids will be effective as from 1 January 2022.

Economic substance requirements: France does not have any specific economic substance rules, although a lack of economic substance may be challenged under case law or anti-abuse rules.

Disclosure requirements: Country-by-country reporting is required for certain companies with annual consolidated group revenue equal to or exceeding EUR 750 million.

New rules implement the EU DAC 6 directive into domestic law. DAC 6 is designed to enhance transparency to prevent aggressive cross-border tax planning, and to this end targets any "intermediary" who designs, markets, organizes, makes available for implementation, or manages the implementation of potentially aggressive tax-planning arrangements. It requires information reported on cross-border schemes to be automatically exchanged by the tax authorities of EU member states. DAC 6 also requires intermediaries to disclose certain information on "reportable cross-border arrangements" to the French tax authorities. A reportable cross-border arrangement is one that involves France and any other country (EU or non-EU) and meets one or more specified hallmarks (i.e., broad categories that set out certain characteristics identified as potentially indicative of aggressive tax planning).

The penalty for failure to comply with the DAC 6 reporting requirements is a maximum of EUR 10,000 per unreported or unnotified arrangement. The penalty is limited to EUR 5,000 for a first infringement for the relevant year and the three preceding years. The total amount of penalties that can be imposed on a single taxpayer or single intermediary may not exceed EUR 100,000 per year.

DAC 6 was expected to become effective as from 1 July 2020 (with a transition period for reportable arrangements where the first step of implementation took place between 25 June 2018 and 1 July 2020). However, France has decided to extend its reporting deadlines in line with the optional six-month delay agreed by the European Council in June 2020 as follows:

- The starting point of the 30-day deadline to report cross-border arrangements is postponed from 1 July 2020 to 1 January 2021 (i.e., the first reporting will take place on 30 January 2021);
- The deadline to report cross-border arrangements whose first stage was implemented between 25 June 2018 and 30 June 2020 (reportable stock) is postponed from 31 August 2020 to 28 February 2021; and
- The deadline for the first update of tradable arrangements is postponed until 30 April 2021.

Exit tax: Unrealized capital gains from the transfer of individual assets, a main office, or an establishment from France to an EU/EEA country that has concluded a mutual assistance agreement for the recovery of tax with France are spread over five years. Any tax due on the unrealized gains must be paid within two months following the transfer, either in full or in five equal annual installments.

General anti-avoidance rule: A general anti-abuse rule (GAAR) applies in line with ATAD 1. The GAAR provides that, with respect to corporate income tax, nongenuine arrangements put in place for the main purpose (or one of the main purposes) of obtaining a tax advantage that defeats the object or purpose of the applicable tax law should be ignored. An arrangement is defined as nongenuine to the extent it is not put in place for valid commercial reasons that reflect the underlying economic reality.

Other: In line with amendments to the EU parent-subsidiary directive, the French tax code excludes from the French participation exemption regime distributed profits that are deductible from the distributing subsidiary's taxable income.

Moreover, the French tax authorities have the general power to disregard or recharacterize all transactions, arrangements, or legal acts that are fictitious or have been executed or entered into for the sole purpose of avoiding French tax. In this case, an automatic penalty applies of 40% or 80% of the tax avoided.

Value added tax

Rates	
Standard rate	20%
Reduced rate	0%/2.1%/5.5%/10%

Taxable transactions: VAT is levied on the sale of goods and the provision of services, and on imports.

Rates: The standard VAT rate is 20%. Reduced rates of 5.5% or 10% apply to most food products for human consumption and certain other items, and a preferential rate of 2.1% is payable on some periodicals and medicines reimbursed by the social security system. Certain transactions are zero-rated or exempt. Exceptionally, as from 15 October 2020, the 0% VAT rate applies to COVID-19 vaccines and to in-vitro diagnostic medical devices. The measure will be repealed as from 1 January 2023.

Registration: Entities subject to VAT must register with the tax authorities.

Filing and payment: Filing can be monthly, quarterly, or annually, depending on the type of activities and other factors. Companies belonging to the same group may elect to consolidate payment of VAT (but not VAT returns) in certain cases, but VAT grouping is not possible.

Other taxes on corporations and individuals

Unless otherwise stated, the taxes in this section apply both to companies and individuals and are imposed at the national level.

Social security contributions: Social security contributions and surcharges are deducted at source from employees' salary payments, with contributions of approximately 20% for the employee.

Contributions payable by the employer vary depending on the size and type of business and the location. In certain cases, employer contributions can exceed 50% of gross pay.

Payroll tax: Payroll tax is levied on entities that collect revenue not subject to VAT (mostly banks and financial institutions).

Real property tax: Several real property taxes apply in France, including the "CET" (see "Other," below), the taxe foncière, and the "3% tax." (See also "Transfer tax," below.)

Both owners and occupants are liable for a dwelling tax based on the "rental value" of the property assessed by the tax authorities.

Transfer tax: The sale of real property is subject to a transfer tax at a maximum rate of 5.8%.

The sale of shares of an SARL or SNC is subject to a transfer tax equal to 3% of the sales price, minus a sum equal to the number of units sold x EUR 23,000/total number of the company units. A flat rate of 0.1% applies for the sale of shares of an SA, SAS, or SCA. The rate is increased to 5% if the company whose shares are transferred is a real estate company, i.e., if more than 50% of the fair market value of the company's assets correspond to French real property or real property rights.

The sale of a French going concern, a French customer list, or leasehold rights is subject to a 5% transfer tax. The same tax applies to the sale of intellectual property rights (other than patents) that are related to a French going concern and used in France.

Net wealth/worth tax: Households pay wealth tax (on real estate assets only) if the net worth of their real estate exceeds EUR 1.3 million (per household, rather than per individual). Nonresidents must pay tax on their property in France, unless they are exempt under a tax treaty. Individuals transferring their tax residence to France after having been tax resident in another country during the preceding five years must only pay tax on their property in France until 31 December of the fifth year following their becoming French residents. Rates are progressive, ranging from 0.5% to 1.5%.

Inheritance/estate tax: Transfers between close relatives are subject to tax at rates ranging from 5% to 45%, after a rebate (e.g., up to EUR 100,000 per child).

Other: A 3% digital services tax (DST) applies to revenue derived from the provision of online placement of advertising, sale of collected user data, and intermediation services to companies whose revenue from the relevant services during the calendar year exceeds EUR 750 million globally and EUR 25 million in France. For related companies, these thresholds are assessed at the group level.

Resident and nonresident companies operating a French business must pay the CET (contribution économique territoriale). The CET has two components: a real property tax and a tax calculated on adjusted gross receipts of the French business.

A number of minor taxes apply to corporations in France, to fund specific social initiatives.

A financial transaction tax of 0.3% applies to transactions involving shares of publicly traded companies established in France, the capital of which exceeds EUR 1 billion. The tax is calculated based on the value of the shares.

Tax treaties: The OECD multilateral instrument (MLI) entered into force for France on 1 January 2019. For information on France's tax treaty network, visit Deloitte International Tax Source.

Tax authorities: French Tax Administration

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