

# SALMON-LEGAGNEUR & ASSOCIÉS

AVOCATS À LA COUR

Marie Dessimond

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## Reminder

As from March 1<sup>st</sup>, 2010, interest paid to a non (French) tax resident are not subject to French WHT, except if they are paid in a "non-cooperative country/territory"<sup>1</sup>.

**The list of non-cooperative countries/territories is annually amended :**

| List amended on<br><b>January 1<sup>st</sup>, 2013</b><br>(French arrêté<br>du 21 août 2013,<br>JO 28 p. 14564) | List amended on<br><b>January 1<sup>st</sup>, 2012</b><br>(French arrêté<br>du 4 avril 2012,<br>JO 12 p. 6731) | List amended on<br><b>January 1<sup>st</sup>, 2011</b><br>(French arrêté<br>du 14 avril 2011,<br>JO 29 p. 7477) | List on<br><b>January 1<sup>st</sup>, 2010</b><br>(French arrêté<br>du 12 février 2010,<br>JO 17 p. 2923) |
|-----------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|
|                                                                                                                 | <b>Suppressed</b>                                                                                              | Anguilla                                                                                                        | Anguilla                                                                                                  |
|                                                                                                                 | <b>Suppressed</b>                                                                                              | Belize                                                                                                          | Belize                                                                                                    |
| <b>BERMUDA</b>                                                                                                  |                                                                                                                |                                                                                                                 |                                                                                                           |
| Botswana                                                                                                        | <b>Botswana</b>                                                                                                |                                                                                                                 |                                                                                                           |
| Brunei                                                                                                          | Brunei                                                                                                         | Brunei                                                                                                          | Brunei                                                                                                    |
|                                                                                                                 | <b>Suppressed</b>                                                                                              | Costa Rica                                                                                                      | Costa Rica                                                                                                |
|                                                                                                                 | <b>Suppressed</b>                                                                                              | Dominica                                                                                                        | Dominica                                                                                                  |
|                                                                                                                 | <b>Suppressed</b>                                                                                              | Grenada                                                                                                         | Grenada                                                                                                   |
| Guatemala                                                                                                       | Guatemala                                                                                                      | Guatemala                                                                                                       | Guatemala                                                                                                 |
|                                                                                                                 | <b>Suppressed</b>                                                                                              | Cook Islands                                                                                                    | Cook Islands                                                                                              |
| Marshall Islands                                                                                                | Marshall Islands                                                                                               | Marshall Islands                                                                                                | Marshall Islands                                                                                          |
|                                                                                                                 | <b>Suppressed</b>                                                                                              | <b>Turk and Caicos Islands</b>                                                                                  |                                                                                                           |
| <b>Virgin Islands (British)</b>                                                                                 |                                                                                                                |                                                                                                                 |                                                                                                           |
| <b>Jersey</b>                                                                                                   |                                                                                                                |                                                                                                                 |                                                                                                           |
|                                                                                                                 | <b>Suppressed</b>                                                                                              | Liberia                                                                                                         | Liberia                                                                                                   |
| Montserrat                                                                                                      | Montserrat                                                                                                     | Montserrat                                                                                                      | Montserrat                                                                                                |
| Nauru                                                                                                           | Nauru                                                                                                          | Nauru                                                                                                           | Nauru                                                                                                     |
| Niue                                                                                                            | Niue                                                                                                           | Niue                                                                                                            | Niue                                                                                                      |
|                                                                                                                 | <b>Suppressed</b>                                                                                              | <b>Oman</b>                                                                                                     |                                                                                                           |
|                                                                                                                 | <b>Suppressed</b>                                                                                              | Panama                                                                                                          | Panama                                                                                                    |
| <b>Suppressed</b>                                                                                               | Philippines                                                                                                    | Philippines                                                                                                     | Philippines                                                                                               |
|                                                                                                                 |                                                                                                                | <b>Suppressed</b>                                                                                               | Saint-Kitts-et-Nevis                                                                                      |
|                                                                                                                 |                                                                                                                | <b>Suppressed</b>                                                                                               | Sainte-Lucia                                                                                              |
|                                                                                                                 | <b>Suppressed</b>                                                                                              | Saint-Vincent and the<br>Grenadines                                                                             | Saint-Vincent and the<br>Grenadines                                                                       |

<sup>1</sup> Articles 125 A III & 238-O A French Tax Code