# Sword Group

## Tax withheld at source on dividends

**A natural person who is a shareholder and French resident for tax purposes**

- If the shares are not placed on a PEA:
  - The shareholder will benefit from a tax credit in France equal to the amount withheld at source => double taxation is avoided
  - The IFU will mention the amount of the dividend and the amount of the tax credit
- If the shares are placed on a PEA:
  - The tax credit cannot be refunded since the dividend is not taxed in France

**A shareholder that is a legal entity established in France (with a holding of less than 10% and an acquisition price of less than 1.2 million euros)**

- The shareholder will benefit from a tax credit in France equal to the amount withheld at source => double taxation is avoided

**A shareholder who is a natural person or a legal entity residing in a State other than France (with a holding of less than 10% and an acquisition price of less than 1.2 million euros)**

- If the double taxation tax treaty between Luxembourg and the State of residence provides for a lower rate of tax withheld at source, the shareholder can file a request for partial or total reimbursement with the Luxembourg tax authorities (form 901bis)
- Moreover, in accordance with the tax treaty, the shareholder will benefit in his country of residence from a tax credit that is equal to the amount withheld at source => double taxation is avoided

**A shareholder who is a legal entity able to benefit from the European Parent-Subsidiary Directive (+ EEE and Switzerland), that owns or promises to own on the date of the dividend distribution, for at least twelve months, a holding of at least 10% or an acquisition price of at least 1.2 million euros**

- exoneration from tax withheld at source in Luxembourg