PRACTICAL CROSS-BORDER PLANNING GUIDE • FRANCE & UK

Your Cross-Border Estate Planning Checklist

Aself-assessmentpreparationworksheetforBritishexpatslivinginFrancewithfamilyorassets in the UK.

How to use this checklist: Work through these four areas to organize your paperwork and prepare focused questions for your French *notaire*, UK solicitor, and cross-border financial adviser. Tick each item once reviewed and record the date.

1. Residency & Family Structure

DONE	REVIEW ITEM & CROSS-BORDER CONSIDERATION	DATE REVIEWED
☐	**Have you formally established the exact date you became French tax residents?** Determines when French worldwide succession and inheritance tax rules began applying to you.	____/____/20__
☐	**Are you married, in a civil partnership/PACS, or unmarried?** SpousesandPACSpartnersareexemptfromFrenchinheritancetax;unmarried partners face a 60% tax rate.	____/____/20__
☐	**If married, do you know which matrimonial property regime applies under French law?** UK marriages default to separation of assets in France unless a French marriage contract is in place.	____/____/20__
☐	**Do either of you have children from a previous relationship, and where do they live?** Step-childrenaretaxedat60%asastep-parent;EUresidencyornationalitycanalsotriggerforced-heirship compensation rights.	____/____/20__

2. Wills & Succession Law

DONE	REVIEW ITEM & CROSS-BORDER CONSIDERATION	DATE REVIEWED
☐	**Have your Wills been reviewed since they last reviewed?** RelocatingtoFrance,remarrying,oracquiringFrenchpropertyrequiresreviewing older UK Wills.	____/____/20__
☐	**Do your UK Wills contain trust provisions that could cause issues in France?** Discretionary or life interest trusts do not exist in French civil law and can create severe tax complications.	____/____/20__
☐	**Have you considered whether you need separate, coordinated Wills for France and the UK?** Coordinated Wills prevent accidental revocation and avoid simultaneous probate delays across both jurisdictions.	____/____/20__
☐	**Have you taken advice on a Brussels IV election for UK succession law?** AllowsyoutochooseUKlawforsuccessiondistribution,thoughFrenchinheritancetaxrules still apply.	____/____/20__

3. Worldwide Asset Audit & Ownership

DONE	REVIEW ITEM & CROSS-BORDER CONSIDERATION	DATE REVIEWED
☐	**Have you listed all worldwide assets and noted whether each is held solely or jointly?** Include French and UK property, bank accounts, pensions, investment portfolios, and life policies.	____/____/20__
☐	**Have you checked the title deed (*acte de propriété*) of your French home?** Ownershipclausessuchas*enindivision* or *en tontine* significantlyaffecthowpropertypasses on death.	____/____/20__
☐	**Are any UK investments (such as ISAs or offshore bonds) inefficient in France?** UKISAslosetheirtax-freestatusuponFrenchtaxresidency,impactingbothlifetimeincomeandestate planning.	____/____/20__

4. *Assurance Vie* & Beneficiary Clauses

DONE	REVIEW ITEM & CROSS-BORDER CONSIDERATION	DATE REVIEWED
☐	**For any existing *assurance vie* policies, were contributions made before or after age 70?** Premiumspaidbefore age 70 benefitfromhigherper-beneficiarytaxallowancesthancontributionsmadeafter 70.	____/____/20__
☐	**Have you reviewed the exact wording of all beneficiary clauses (*clauses bénéficiaires*)?** Ensuresfundspassdirectlytoyourintendedrecipientsoutsidestandardsuccession rather than fallinginto your estate.	____/____/20__

Need Clarity on Your Cross-Border Estate Plan?

AxisFinancialConsultantsworksalongside yourFrench*notaire*and UK legal advisers to structure tax-efficient investments and *assurance vie* policies tailored to expat families. Contact our team to arrange an initial cross-border planning review.

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