

<b>1. INTRODUCTION</b> .....	<b>1</b>
<b>2. AUSTRIA</b> .....	<b>3</b>
2.1. Civil Law Framework.....	3
2.2. Tax Treatment of Private Foundations.....	4
2.3. Conclusion .....	8
<b>3. BELGIUM</b> .....	<b>10</b>
3.1. Civil Law Framework.....	10
3.2. Tax Treatment of Foundations.....	13
3.3. International Context.....	17
3.4. Conclusion .....	17
<b>4. GERMANY</b> .....	<b>19</b>
4.1. Civil Law Framework.....	19
4.2. Tax Treatment.....	21
<b>5. FRANCE</b> .....	<b>24</b>
5.1. General .....	24
5.2. Establishment .....	24
5.3. Types of foundations.....	25
5.4. Dissolution .....	28
5.5. The International context .....	28
<b>6. LIECHTENSTEIN</b> .....	<b>29</b>
6.1. Introduction .....	29
6.2. Civil Law Framework.....	29
6.3. Tax Treatment of Foundations.....	31
6.4. Conclusion .....	33
<b>7. LUXEMBOURG</b> .....	<b>35</b>
7.1. General .....	35
7.2. Establishment .....	36
7.3. Existing foundation.....	36
7.4. Alternatives to the foundation .....	37
7.5. Dissolution .....	38
7.6. International context.....	38
<b>8. NETHERLANDS</b> .....	<b>39</b>
8.1. Civil Law Framework.....	39
8.2. Foundation Forms.....	40
8.3. Tax Treatment of Foundations.....	42
<b>9. SWITZERLAND</b> .....	<b>45</b>
9.1. Civil Law Framework.....	45
9.2. Tax Treatment.....	46
9.3. Conclusion .....	48
<b>10. UNITED KINGDOM</b> .....	<b>49</b>
10.1. General .....	49
10.2. Bare Trust .....	49
10.3. Interest in Possession Trust.....	50
10.4. Discretionary Trust.....	51
10.5. Accumulation and Maintenance Trust.....	51
10.6. Tax Pool.....	52
10.7. Mixed Trust .....	52
10.8. Trusts and Capital Gains .....	53
<b>11. SUMMARY AND CONCLUSIONS</b> .....	<b>54</b>
<b>12. LITERATURE</b> .....	<b>59</b>