

COUNTRY	SOUTH AFRICA (SA)	UNITED KINGDOM (UK)	UNITED STATES OF AMERICA (USA)
NAME	Estate duty (ED)	Inheritance tax (IHT)	Estate tax (ET)
RATE	20%	40%	40% (maximum)
THRESHOLD	R3,5 million	£325 000	US\$60 000
ROLLOVER RELIEF BETWEEN SPOUSES	Yes, therefore R7 million on the death of the surviving spouse.	Yes, therefore £650 000 on the death of the surviving spouse.	The surviving spouse may make use of a unified credit of up to \$13 000. Property passing to a qualified domestic trust is also excluded.
IMMOVABLE PROPERTY	Subject to ED in SA.	Subject to IHT in the UK.	Subject to ET in the USA.
EQUITIES	Subject to ED in SA if the company issuing the shares was incorporated in SA.	Subject to IHT in the UK if the company issuing the shares was incorporated in the UK.	Subject to ET in the USA if the company issuing the shares was incorporated in the USA.
UNIT TRUSTS	Subject to ED in SA if the register of unitholders is kept in SA.	Subject to IHT in the UK if the register of unitholders is kept in the UK.	Subject to ET in the USA if the register of the unitholders is kept in the USA.
FOREIGN COLLECTIVE INVESTMENT SCHEMES	N/A	Generally excluded from IHT in the UK.	Generally excluded from IHT in the USA.
ASSETS HELD BY A TRUST	<i>South African-registered trust.</i> The assets are generally excluded from the founder's estate. The value of assets settled on the trust by way of a loan account is generally pegged.	<i>Offshore-registered trust.</i> There is a 10-year charge on UK <i>situs</i> assets. This is usually overcome by incorporating an offshore company (the shares of which are owned by the offshore trust) to acquire the UK.	<i>Offshore-registered trust.</i> The assets are generally excluded from ET in the USA, provided there are no resident in the USA beneficiaries.
ASSETS HELD BY AN OFFSHORE COMPANY	N/A	Excluded from IHT in the UK.	Generally excluded from ET in the USA.
ASSETS HELD IN AN OFFSHORE LIFE POLICY (LIFE WRAPPER)	N/A	Excluded from IHT in the UK.	Excluded from IHT in the USA.