

| Feature                                                  | Canada                                                                                                                                                    | U.S.                                                                                                                                                                                                                                                                                                                                                                |
|----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Tax credit/deduction for estate/individual via bequest   | Estate & individual donation credits available; (e.g., estate may claim within 5 years) ( <a href="http://Canada.ca">Canada.ca</a> )                      | Deduction for estate under estate tax rules (if taxable)                                                                                                                                                                                                                                                                                                            |
| Applicability                                            | Every estate may benefit (since Canadian income tax and death-tax interplay)                                                                              | Only estates subject to (federal or state) estate tax get full benefit                                                                                                                                                                                                                                                                                              |
| Percentage limitation on donation deduction (via estate) | For individual death year donations up to 100% of net income in death year or preceding year in many cases ( <a href="http://taxtips.ca">taxtips.ca</a> ) | For bequests under estate tax rules: there is no percentage limitation analogous to lifetime gift deduction limits ( <a href="http://lasher.com">lasher.com</a> )                                                                                                                                                                                                   |
| Timing flexibility                                       | Estate donation credit can apply up to 5 years (or 10 for certain property) after donation. ( <a href="http://Canada.ca">Canada.ca</a> )                  | Estate administration and timing matter; but the window is essentially the estate's lifetime and distribution. More rigid in some contexts.                                                                                                                                                                                                                         |
| Complexity (tax/estate planning)                         | Relatively streamlined at the federal level, though provincial variation and executorship matters                                                         | More complex (federal + state layers; interplay of income tax, gift tax, estate tax; special rules)                                                                                                                                                                                                                                                                 |
| Incentive for legacy giving vs everyday philanthropy     | Strong incentives built into tax credit system for bequests as part of estate planning in Canada                                                          | Also strong for high-net-worth donors in U.S., but benefit is much more dependent on size of estate and whether estate tax applies                                                                                                                                                                                                                                  |
| Registered charity / qualified donee status              | Must be a registered charity / "qualified donee" in Canada. ( <a href="http://BDO Canada">BDO Canada</a> )                                                | Must be a "qualified organization" (typically a 501(c)(3) in U.S.) to receive tax-deductible charitable bequest.<br>( <a href="https://www.irs.gov/charities-non-profits/private-foundations/special-rules-for-certain-foundations-and-trusts">https://www.irs.gov/charities-non-profits/private-foundations/special-rules-for-certain-foundations-and-trusts</a> ) |