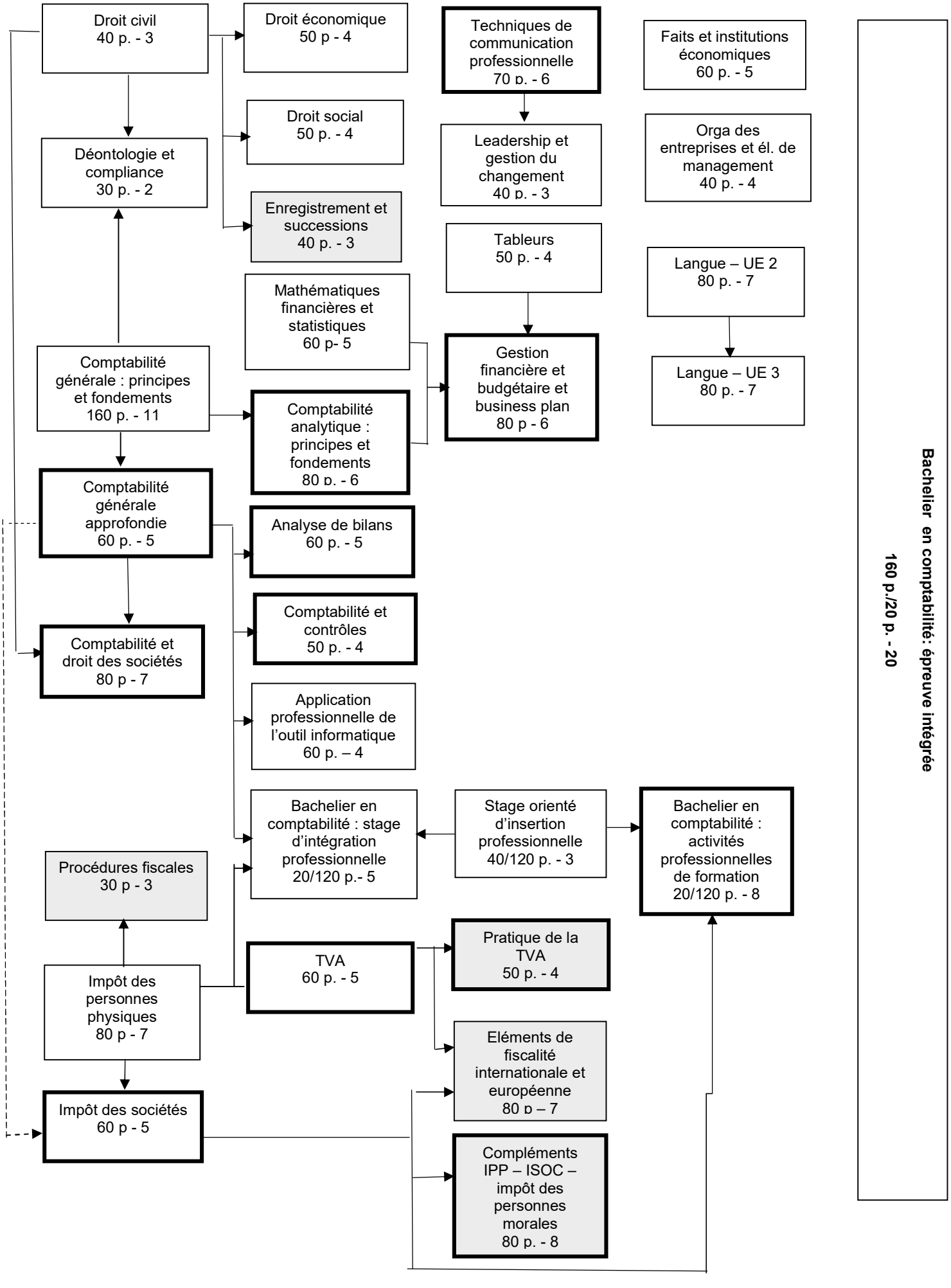3. MODALITES DE CAPITALISATION - OPTION FISCALITE