

« Y a-t-il une vie après l'arrêté Bonny »

Fribourg International, 19 juin 2008

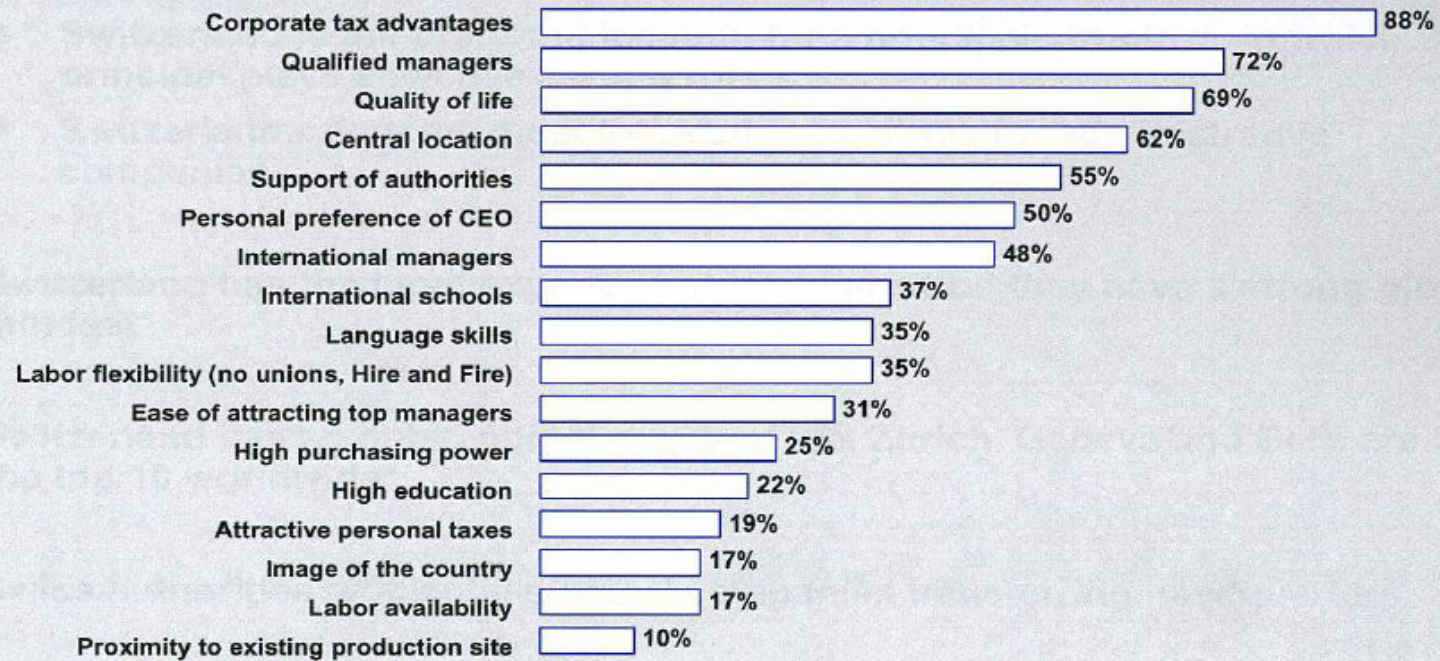




Preferred Headquarters Location

Companies use very specific criteria to determine the appropriate headquarters location

Most important criteria used by companies for the selection of headquarters location





Swiss Tax System

	<u>Gross</u>	<u>Net Effective</u>
• Federal	8.5%	7.83 %
• Cantonal	10 %	
• Municipal	8.5%	
	27 %	21.25 %

$$\text{Net Rate} = \frac{\text{GR}}{(100+\text{GR})/100}$$





Swiss Tax System

Two types of tax incentives

	<u>Standard Tax</u>	<u>Privileged Status Ruling</u>	<u>Tax Exemption</u>
• Federal	8.5%	Headquarters	International Activities plus Economic Substance and/or Value Adding Activities
• Cantonal } • Municipal }	18.0%	Coordination center Licensing company Trading company	
	27.0%	Royalty company Principal to commissionaire Finance company/branch	
Net Rate →	21.25%	Holding company Sales/Marketing Etc.	





Swiss Tax System

Before 01.01.2008

- Federal
- Cantonal
- Municipal

	Standard Tax	Privileged Status
	8.5%	8.5%
	18.5%	1.8%
	27 %	10.3 %
Net Rate	21.25%	1% - 9.3%
		<ul style="list-style-type: none"> • No substance • Perpetually renewable

Total Tax Exemption

(applies to all forms of income & capital)

~~8.5%~~ = 0.0%

~~18.0%~~ = 0.0%

Tax Rate = 0.0%





Swiss Tax System **From 01.01.08 to 31.12.10**

- Federal
- Cantonal
- Municipal

	Standard Tax	Privileged Status
	8.5%	8.5%
	18.5%	1.8%
	27 %	10.3 %
Net Rate	21.25%	1% - 9.3%

Total Tax Exemption

(applies to all forms of income & capital)

$$\frac{8.5\%}{2} = 4.25\%$$

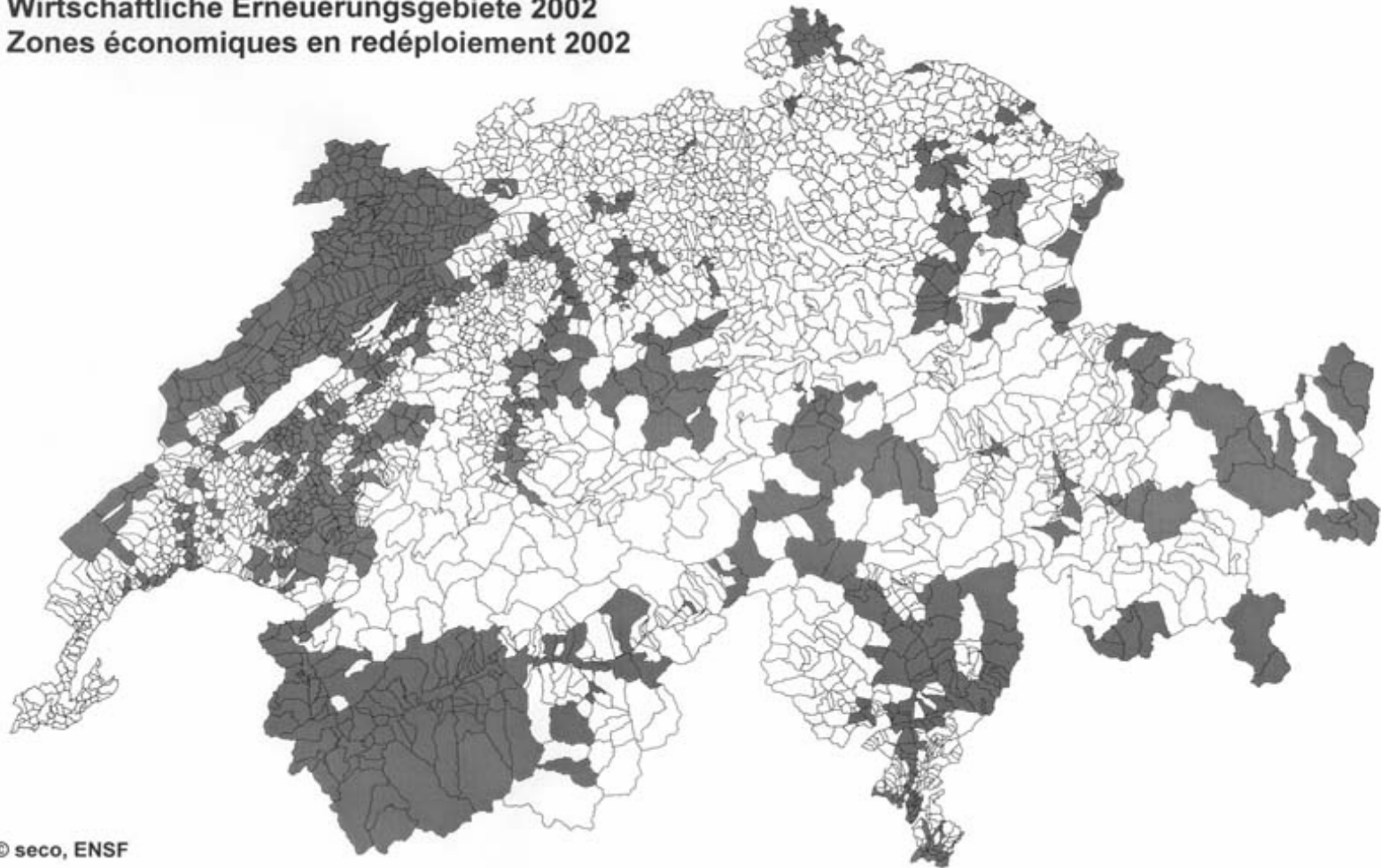
$$\frac{\cancel{18.0\%}}{2} = 0.0\%$$

$$\text{Tax Rate} = 4\%$$





Wirtschaftliche Erneuerungsgebiete 2002
Zones économiques en redéploiement 2002

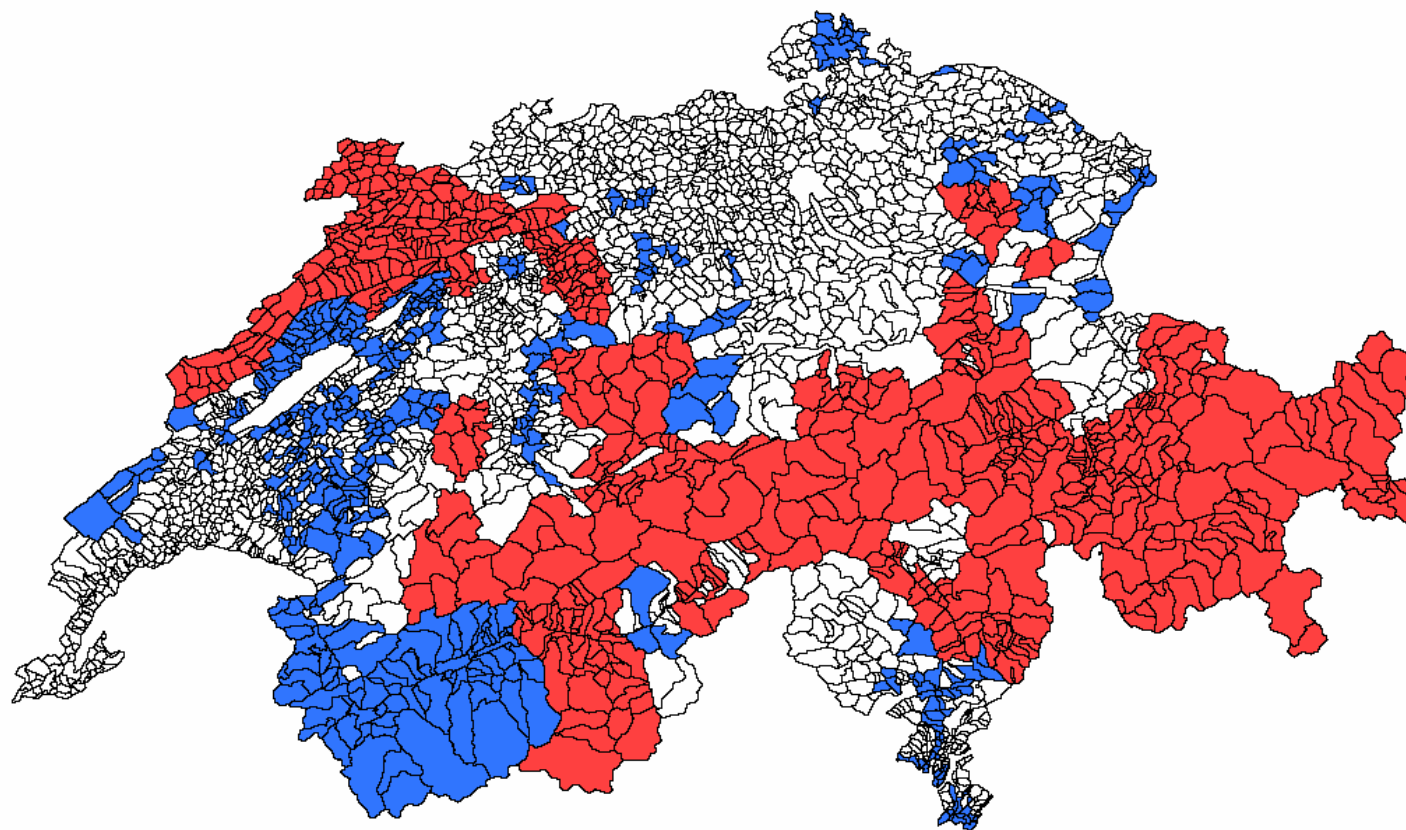


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Allégements fiscaux en application de la politique régionale
Steuererleichterungen im Rahmen der Regionalpolitik



- Zones bénéficiaires selon l'Ordonnance du DFE du 28 novembre 2007
Anwendungsgebiete gemäss EVD-Verordnung vom 28. November 2007
- Zones bénéficiaires d'un régime transitoire jusqu'à fin 2010 (allégements de max. 50 %)
Begünstigte Gebiete einer Überganslösung bis Ende 2010 (mit maximalen Steuererleichterungen im Umfang von 50 %)

