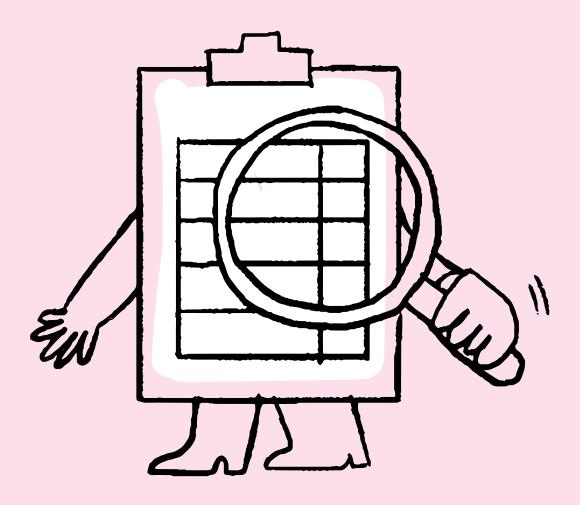
# Taxation

# How to estimate the tax burden of a business in the canton of Geneva

This chapter provides information on the taxes currently in effect and their rates, as well as possible reductions for new businesses.



# Contents

P.105	01.	Tax periods			
P.105	02.	Businesses			
		2.1	Main types of tax		
		2.1.1	ITax due when creating a company		
		2.1.2	Net income tax		
		2.1.3	Tax on capital and reserves		
		2.1.4	Special taxation on business property		
		2.1.5	Tax on profit distributions (withholding tax)		
		2.1.6	Stamp duty		
		2.1.7	Property registration fees		
		2.2	Tax rates		
		2.2.1	Minimum tax rates		
		2.3	Specific measures for economic promotion (tax reductions decided by the State Council)		
		2.3.1	New businesses		
		2.3.1.1	JEDI status		
		2.3.2	Company restructuring		
		2.3.3	Companies affected by the 15% minimum tax		
		2.4	Value added tax (VAT)		
		2.5	Acquisition tax		
P.116	03.	Natural persons			
		3.1	Income tax		
		3.1.1	Persons subject to income tax		
		3.1.2	Taxable income		
		3.1.3	Income from foreign sources		
		3.1.4	Deductions		
		3.1.5	Tax rates		
		3.2	Capital gains tax on property		
		2.2	Wealth tay		

# Useful addresses

P.120

# O1. Tax periods

There are three tax periods that are important to know:

- Calculation period: serving as the basis for determining the tax receivable.
- Fiscal period: period in which tax is due.
- Taxation period: period in which administrative operations take place to determine taxable income (profit/income) and wealth (capital/fortune).

For individuals, regarding cantonal and municipal tax as well as direct federal tax, the fiscal period is the same as the calculation period. As such, tax for the year 2018 (to be paid in instalments throughout the year 2018) would be calculated based on income earned in the 2018 calendar year.

For legal entities, the fiscal period is the same as the calculation period, which in turn corresponds to the company's financial year. Tax for 2018 (also to be paid during the year 2018) is therefore calculated based on the company's financial year ending in the year 2018 (even if this occurs before the calendar year ends).

# 02. Entreprises

# 2.1 Main types of tax

Where applicable, companies based in Geneva with an industrial, commercial, financial or service-based activity in the city must pay tax on:

Items subject to tax and types of tax	Authority
Setting up a business in the form of a company (SA or Sàrl): federal stamp duty	Confederation
Net profit: direct federal tax, cantonal and municipal taxes	Confederation/Canton
Capital and reserves (legal entities): cantonal and municipal taxes (the Confederation no longer collects tax on capital as of 1 January 1998)	Canton
Property: cantonal tax	Canton
Profit distribution: withholding tax (safeguard tax)	Confédération
Securities transactions: securities transfer tax	Canton

Delivery of goods and services: value added tax (VAT)	Confederation
Legal acts: registration fees	Canton

# 2.1.1 Tax due when creating a company

Capital contributions to a newly created company (public limited company, partnership limited by shares, limited liability company, cooperative) and subsequent increases in capital are subject to federal stamp duty at a rate of 1%.

It is calculated based on the amount received by the company in return for issuing participation rights, and at a minimum on the par value of new equity investment. Contributions in kind are assessed on the basis of their market value.

Shares issued during mergers or "concentrations" economically equivalent to a merger, conversions, or demergers are exempt from stamp duty. The same applies to foreign companies transferring their headquarters to Switzerland.

#### The following are not subject to federal stamp duty:

Participation rights issued upon a company's founding and in the occurrence of capital increase - applicable to public liability companies, partnerships limited by shares, and limited liability companies, up to the first 1,000,000 francs of capital.

### 2.1.2 Net income tax

#### **Businesses affected**

Legal entities recognised by private or public law are subject to net income tax, in particular:

- companies with share capital, such as public limited companies and limited liability companies, cooperatives, associations and foundations with headquarters in Geneva,
- foreign companies with an industrial, commercial, financial or service activity in Geneva (permanent establishments) or that own real estate in Geneva.

The first category is taxed on its entire net profit from all sources, including any capital gains (global profit), while the second category only owes tax on the net profit attributable to the permanent establishment or property in Geneva.

Please note that other businesses under Swiss law without a legal entity (e.g. limited partnerships or general partnerships) are not subject to tax; only the partners are liable for their share of income from these entities.

#### Net taxable income

Taxable income is determined based on financial statements prepared in line with commercial accounting principles. Moreover, tax returns are always accompanied by a copy of the financial statements (balance sheet, profit and loss account and notes) approved and signed by the company's competent bodies.

The accounting net profit is of course subject to a whole series of adjustments that take into account the limitations imposed on deductions by tax law. These limitations are:

- depreciation, deductible from taxable income if it complies with commercial usage and, where applicable, if it is in line with the rates prescribed by the administration,
- overheads, which are deductible from taxable income to the extent that they comply with commercial usage,
- interest, deductible from taxable income provided that the rates are reasonable, and the company is adequately capitalised.

#### Income from foreign sources for companies with their tax domicile in Switzerland

Income from foreign sources is part of taxable profit in Switzerland, unless a provision in domestic or contract law states otherwise.

Switzerland has just over one hundred treaties in place to avoid double taxation. These treaties directly concern the tax treatment of income from a foreign source.

They can be used by companies which are domiciled in Switzerland and are the beneficial owners of the income concerned.

Property income from foreign sources and net profit attributable to permanent establishments abroad (branches, long-term construction sites, etc.) are excluded from the Swiss tax base (and are therefore taxable abroad, if domestic laws provide for this).

However, income from movable capital from foreign sources (i.e. dividends and interest) is fully taxable in Switzerland. Tax on this income is often subject to withholding in the source country. One of the advantages of tax treaties consists precisely in reducing the foreign tax burden by offering substantial reductions in withholding taxes.

For dividends, withholding tax is generally reduced to 15%, 5% or even 0% on share dividends; similarly, that on interest and royalties is generally limited to 10%, 5% or even 0%.

If income from foreign sources is only partially deducted, the residual withholding can be offset against Swiss taxes on this income (flat rate allocation), albeit with certain restrictions.

# 2.1.3 Tax on capital and reserves

Cantons and municipalities collect tax annually on capital gains and reserves. The Confederation has waived this levy since 1 January 1998.

In Geneva, since the 2020 tax period, basic cantonal tax amounts to 1.8% (overall rate of 4.00% in the City of Geneva for combined cantonal and municipal tax).

The basic capital gains tax rate is reduced to 0.005‰ for the portion of equity relating to participation rights, patents and comparable rights, as well as loans granted to group companies (overall rate of 0.01‰ in the City of Geneva for combined cantonal and municipal tax).

In addition, the basic cantonal capital gains tax is reduced by the entire amount of the basic cantonal income tax from the 2024 tax period.

# 2.1.4 Special taxation on business property

Buildings in Geneva are subject to special taxation under the additional property tax (IIC). This tax is calculated on the tax value of the buildings on 31 December of the tax period, with debts non-deductible. For buildings belonging to legal entities, if the building is occupied, the IIC amounts to 1‰ of the tax value. For buildings that are rented out, the tax rate is 1.5‰ if the legal entity does not pursue a profit-making aim, or 2‰ if it pursues a profit-making aim or the income is from property exclusively². If the legal entity only uses part of the building for its operation (mixed-use property), a reduced tax rate of 1‰ is applied to a sum equal to its capitalisation at a fixed rate for each tax period by the State Council for premises used by the owner, which is assessed by comparing it to similar premises. The rate of 1.5‰ or 2‰ applies to the balance of the building value.

Some buildings coming under one of three types - HBM ("low-price residential buildings"), HLM ("low-rent residential buildings") or HM ("mixed residential buildings") - may be subject to exemptions for additional property tax. In addition, from 5 August 2010, buildings that meet a high or very high energy performance standard are exempt from additional property tax for a period of 20 years.

# 2.1.5 Tax on profit distributions (withholding tax)

From the 2009 tax period, the Federal Act on the Improvement of General Fiscal Conditions for Business Activities and Investments (Business Tax Reform Act II) introduced the mitigation of double taxation for holders of "qualifying" shareholdings, i.e. for persons whose participation rights are equivalent to at least 10% of the share capital belonging to a cooperative or company with share capital.

Dividends and profit shares from such participations belonging to private wealth are now taxed at a rate of 70%, both at the cantonal and federal level. If these participations belong to business assets, dividends and profit shares, as well as profits from the disposal of these participations, they are taxed at 70% at the federal level and 60% at the cantonal level.

Distributions made by Swiss companies to their shareholders are subject to 35% withholding tax. This tax is for dividends, as well as all monetary benefits assimilated to profit distributions. When Swiss residents declare their income correctly, they are entitled to a full reimbursement of withholding tax by deduction from cantonal and municipal taxes due.

For foreign residents, withholding tax is generally a non-deductible charge, unless they reside in a treaty country. In this case, partial or total relief can be requested on the basis of treaty provisions. Treaty relief is granted on request. With only a few exceptions, it is not deducted at source. In other words, the Swiss debtor company should deduct the entire withholding tax at the standard rate (35%), even if the foreign resident receives a subsequent reimbursement.

# 2.1.6 Stamp duty

Stamp duty is a federal tax which can affect some legal transactions, particularly the issue and trade of securities, i.e. capital formation and circulation, as well as insurance premium payments. Stamp duties are generally due within 30 days following the legal act giving rise to them.

There are three types of stamp duty:

- Issuance tax
- Securities transfer tax
- Insurance premium tax

#### Issuance tax

The purpose of issuance tax is the creation of participation rights and Swiss bonds (i.e. issued in Switzerland by Swiss companies), either for a fee or free of charge. It is therefore collected when participation rights are issued, and when their par value increases. This is for participation rights in the form of shares for public limited companies, limited liability companies, cooperatives, as well as dividend rights and participation certificates for Swiss companies or commercial enterprises with public law status.

The issuance tax on Swiss participation rights is 1.0%.

Currently, however, companies being created, as well as capital increase for public limited and limited liability companies using participation rights issued against payment, benefit from an exemption which has been increased to one million Swiss francs as of 1 January 2006.

For participation rights, tax liability lies with the company.

However, tax exemptions apply to equity securities created or increased through mergers, conversions or demergers of companies with share capital or cooperatives, as well as limited companies domiciled abroad transferring their headquarters to Switzerland.

#### Securities transfer tax

Securities transfer tax applies to the purchase and sale of Swiss and foreign securities by Swiss securities dealers (mainly banks or pension funds).

The tax rate is:

- 1.5% for securities issued by an entity domiciled in Switzerland,
- 3.0% for securities issued by an entity domiciled abroad.

This tax is calculated based on the security's exchange value, i.e. the price paid on its purchase or sale. The securities transfer tax may be passed on to end customers.

To keep the Swiss financial centre attractive despite the internationalisation of securities trading and growing competition from foreign stock exchanges, federal stamp duty has been subject to several revisions in recent years, with some exemptions made on securities transfer tax.

#### Insurance premium tax

Stamp duty on insurance premiums essentially applies to the payment of premiums onpublic liability insurance, fire insurance, CASCO insurance and home insurance.

The rate is calculated based on the amount of the insurance premium: in principle, it is 5%. Single premium life insurance policies subject to surrender are an exception, with a rate of 2.5%.

Personal insurance such as life insurance, for which premiums are paid periodically, health insurance, accident insurance, disability insurance and unemployment insurance are exempt.

# 2.1.7 Property registration fees

The main legal acts regarding property, particularly transactions, are subject to cantonal registration fees. For transfers of ownership (sale), the rate is 3%.

# 2.2 Tax rates

Since the 2024 tax period for companies with share capital and cooperatives, income tax is set at a fixed proportional rate for cantons, municipalities and the Confederation. The figures below are representative of a company with headquarters in the City of Geneva.

• Confederation (statutory rate): 8.50%

• Canton and municipality (statutory rate): 8.70%

• Total (statutory rate): 17.20%

The tax rate applies to remaining profit after cantonal, municipal and federal taxes have been deducted (excluding fines), which are considered as a deductible expense from the taxable income. This accounts for the notable difference between the statutory rate and effective tax rate, expressed as a % of profit before taxes. In the example above, the statutory rate is 17.20%, while the effective tax rate on profit before tax is 14.68%.

#### Example:

Profit before tax	100%
Direct federal tax (effective rate)	07,25%
Cantonal and municipal tax (effective rate)	07,43%
Total (effective rate	14,68%
Net profit after tax	85,32%

After compulsory allocation to legal reserves, net profit after tax may be distributed to shareholders; at this time, it will be subject to withholding tax.

#### **Features**

Patents and comparable rights: At the taxpayer's request and under certain conditions in the legal provisions, the net profit from patents and comparable rights may be taxed at a preferential rate.

Additional deduction for R&D expenses: On request, the Department of Finance will authorise the deduction of R&D expenses incurred in Switzerland by the taxpayer, whether directly or through third parties, at an amount exceeding by 50% the R&D expenses justified by commercial use. The details of the conditions for this measure are given in the relevant legal provisions.

### 2.2.1 Minimum tax rates

Since 1 January 2024, the minimum taxation set by the OECD and the G20 has come into force in Switzerland and the canton of Geneva.

In summary, companies based in Switzerland that are part of a multinational group with a turnover of more than 750 million euros will have to pay tax on profit at an effective rate of at least 15%.

For companies that fit this profile in the canton of Geneva, to the extent that the effective tax rate is normally less than 15%, an additional tax will apply to reach the minimum rate of 15% (Swiss additional tax).

The practical rules for implementing this reform are detailed in a Federal Ordinance (Ordinance on the Minimum Taxation of Large Business Groups/OIMin).

# 2.3 Specific measures for economic promotion (tax reductions decided by the State Council)

### 2.3.1 New businesses

Newly created companies can receive significant tax relief, facilitating their establishment and growth. These advantages depend on the planned activity's economic interest for the canton and municipality where the company is based, particularly its impact on employment and contribution in terms of new technologies. An activity that competes with one already present is a disqualifying factor for tax relief.

Here, tax relief means exemption from the cantonal tax burden. It can be requested for a period not exceeding 10 years, up to a maximum of 100%. For example, the exemption could be the maximum in the first year and then reduced by 10% each year, meaning that in the tenth year it would be 10%, and at the end of that period, the exemption would end.

# **2.3.1.1** JEDI status

Among the State Council's main objectives are promoting innovation and enabling new companies to grow. The law granting "JEDI" status to young companies that are developing innovations allows administrative procedures to be simplified on the one hand, and on the other encourages new companies to be created.

In this way, the law aims to simplify procedures for granting tax relief to young innovative companies. Such companies will no longer have to provide a complex file to submit a request for tax exemption. All they need to do is fill out a questionnaire highlighting what makes the company innovative.

This approach is reserved for young, innovative companies acting as legal entities that meet all of the following 6 criteria:

- Innovative projects that are being developed in the field of goods and services
- The headquarters or permanent premises are in the canton
- Most of their business activity takes place in the canton
- The company has not been created following a merger, demerger, conversion, transfer of assets, and is not a company with assets and liabilities or an extension of a pre-existing activity or a company taking over a pre-existing activity
- The company is not listed on the stock exchange, and its listing on specialised stock exchanges for small and medium-sized companies is reserved
- Every year since its formation, the company has spent at least 35% of expenses on research activities, and at least half of which on Swiss territory.

If the company meets the required conditions and obtains "JEDI" status, it can then send its file to the cantonal tax administration to process the exemption request. It should be noted that "JEDI" status does not include any training rights.

Additional information from the Cantonal Office for Economy and Innovation (OCEI): innovation.ge.ch

# 2.3.2 Company restructuring

Similar tax reliefs can be obtained if a company already established in Geneva changes the essential nature of its activity or abandons the production of certain goods to manufacture a new range of products involving significant investment or the use of different technical processes. However, simply reorganising activities or the natural development of business operations does not qualify for the tax relief. The decision falls under the authority of the State Council.

# 2.3.3 Companies affected by the 15% minimum tax

Given that the effective tax rate on profits in the canton of Geneva is around 14.7% (company with headquarters in the City of Geneva), tax relief can no longer be granted to companies affected by the minimum tax of 15% in the future (see point 2.2.1 above).

# 2.4 Value added tax (VAT)

Since 1 January 1995, Eurocompatible value added tax (VAT) has been integrated into the Swiss tax system. This tax makes it possible to comply with the principle of competitive neutrality. The new tax also eliminates the notion of a wholesaler.

#### Tax principles

VAT is a general tax on the consumption of goods and services.

#### Rate

VAT involves four rate categories:

1. Normal rate: 8.1%

2. Reduced rate: 2.6%

- 3. Special rate for accommodation services: 3.8%
- 4. Flat rates: applicable on request to companies with an annual turnover of less than CHF 5,024,000 (VAT included) whose tax contributions do not exceed CHF 108,000. Flat rates are branch-specific tax rates that considerably simplify the settlement with the Federal Tax Administration (FTA), since the input tax does not have to be determined. When applying one of these methods, the tax due is calculated by multiplying the gross turnover, i.e. turnover including VAT, by the net tax rate or flat rate granted by the FTA. However, in invoices sent to customers, the taxable entity must indicate the legal rate of tax.

#### Transactions subject to the reduced rate of 2.6% are:

- water supplied by pipes,
- solid and liquid foodstuffs, except alcoholic beverages and excluding catering services,
- livestock, poultry, fish,
- cereals,
- seeds, plants, cut flowers and others,
- medicines,
- newspapers, magazines, books, printed materials, except those used for advertising,
- radio/TV services, except those of a commercial nature,
- sport and cultural activities.

An exhaustive list of transactions outside the scope of this tax is given in the ordinance governing Article 21 VATA (health, social security, education, culture, insurance, money and capital markets, property sale and rent (except voluntary taxation), etc.).

Exempt transactions are exports of goods and certain services provided to recipients abroad.

These transactions are zero-rated, i.e. they always give right to recovery of input tax, unlike operations that are excluded.

Transactions subject to VAT are all those that are not exempt from paying the tax by law, such as:

• the delivery of goods: the transfer of the right to disposal (trade) and the delivery of items manufactured for third parties (production), including work carried out on items even without modification (verifying, adjusting, controls, etc.). Delivery does not necessarily mean a transfer of ownership; rent and leasing annuities also count as delivery. Energy is also part of deliverable goods (electricity, gas, heat, cold, pressure, vacuum, etc.);

- service provision: transfers of value or intangible rights (copyrights, trademarks, samples, models, patents, expertise, etc.) are also considered as a service provision. The same applies to waiving or tolerating an action or state (for example, acceptance or prohibition of competition in return for compensation).
- self-supply: acquiring goods from your own company or the construction/repair/conversion of buildings intended for sale or rent.
- imported goods, except for:
- goods in small quantities where the amount of tax does not exceed CHF 5 per customs clearance request;
  - goods admitted free of customs duties;
  - goods cleared with a transit bill for temporary import or export;
  - goods returned of Swiss origin.
- the provision of services from abroad for use in Switzerland if these services are taxable in Switzerland and if their cost exceeds CHF 10,000 per year (this CHF 10,000 is not exempt from tax).

#### Liability:

In principle, all companies are subject to VAT, regardless of their legal status. If, however, the turnover for services subject to VAT is less than CHF 100,000 per year (or CHF 250,000 for not-for-profit sport and cultural associations, as well as charitable bodies), the organisation is exempt from VAT. However, any organisations who do not pay VAT cannot claim input taxes.

The following categories do not pay value added tax:

- farmers, foresters and horticulturists on products from their own land;
- livestock dealers on turnover relating to the livestock trade;
- milk collection centres on turnover for milk sold to processing companies;
- non-profit sports companies and charitable bodies managed on a voluntary basis whose annual turnover does not exceed CHF 250,000.

It is nevertheless possible to voluntarily waive exemption from tax liability, provided that the company aims to generate income of a permanent nature (it must not be a hobby or passion). It is possible to become liable voluntarily for the start of each current tax period.

#### Registration procedure:

The annual turnover determining liability is calculated according to the considerations received (income) for deliveries or services that are subject to tax and carried out on Swiss territory, plus the value of deliveries to oneself. Exports of goods and services are also taken into consideration.

Compulsory tax liability begins at the end of the calendar year in which the turnover threshold is reached. Voluntary liability is not backdated.

Companies that find they meet the conditions for tax liability are required to register automatically.

#### 2.5 Acquisition tax

The Federal Act on Value Added Tax (VATA) also regulates acquisition tax which may be due on the acquisition of certain services provided by foreign companies. However, this only concerns service provision which is governed by the recipient's principle place of business.

#### Examples include:

- advertising service provision
- advisory services, wealth management, trustees, lawyers, etc.
- management services
- data processing services
- staffing agencies
- the transfer and granting of intangible rights

No acquisition tax is due if the services are exempt from paying VAT.

If the recipient is VAT registered, such acquisitions must be declared and taxed.

A recipient who is not VAT registered will be liable for tax in two situations. Firstly, if services are acquired by the recipient for more than CHF 10,000 per calendar year. Secondly, in the case of deliveries on Swiss territory, if the competent authorities have informed the recipient in writing of liability to acquisition tax.

The rates are identical to VAT rates.

# 03. Natural persons

### 3.1 Income tax

The Confederation, cantons and municipalities all collect personal income tax.

# 3.1.1 Persons subject to income tax

Those subject to the tax are:

- 1. people who are domiciled or staying in Switzerland, on their entire net income from all sources (global income),
- people who are neither domiciled nor staying in Switzerland, on income from Swiss sources, in particular labour income and income from movable capital (interest, dividends) from Swiss sources,

3. people who are neither domiciled nor staying in Switzerland, on property income from Swiss sources, and income linked to the operation of a business or permanent establishment in Switzerland.

The first and third categories must complete an annual tax return. Taxes due by the second category are generally deducted at source, known as withholding tax on earned income, and withholding tax for income from movable capital.

### 3.1.2 Taxable income

Taxable income includes all income from work and capital received during the calendar year. Labour income includes:

- with regard to employees, all cash benefits (basic salary, 13th-month salary, bonuses, gratuities, employee shares or options, etc.) and benefits in kind (for example, living accommodation or a company car),
- for self-employed people, the net profit from their industrial, commercial, financial or freelance activity, including capital gains made through their work.

#### Capital income includes:

- land revenue from Swiss sources including, where applicable, the rent value of buildings occupied by the owner,
- interest, dividends and royalties from Swiss and foreign sources.

# 3.1.3 Income from foreign sources for natural persons domiciled or staying in the canton

Income from foreign sources is part of taxable income in Switzerland, unless a provision in domestic or contract law states otherwise.

Switzerland has just over one hundred treaties in place to avoid double taxation. These treaties directly concern the tax treatment of income from a foreign source. They can be used by natural persons who are domiciled in Switzerland and are the beneficial owners of the income concerned.

In particular, if domestic law so provides, property income from foreign sources and income linked to the operation of a business or establishment are excluded from the Swiss tax base. This excluded income is, however, taken into consideration to determine the overall rate applicable to taxable income.

However, income from movable capital (i.e. dividends and interest) is fully taxable in Switzerland. Tax on this income is often subject to withholding in the source country. One of the advantages of tax treaties consists precisely in reducing the foreign tax burden by offering substantial reductions in withholding taxes.

For dividends, withholding tax is generally reduced to 15%, or even 10% or 5%, whereas that on interest and royalties is generally limited to 10% or even 0%.

If income from foreign sources is only partially deducted, the residual withholding can be offset against Swiss taxes on this income (flat rate allocation).

### 3.1.4 Deductions

The main deductions apply to:

- social security contributions, including contributions to a recognised occupational pension scheme,
- passive interest,
- professional insurance premiums (with upper limits for Federal Direct Tax),
- with regard to employees, fixed professional costs; and, under certain conditions, actual costs but to a limited extent,
- with regard to self-employed people, overheads for commercial usage (income acquisition costs).

If part of the overall income is exempt in Switzerland (for example, property income from foreign sources), deductions are distributed proportionally.

### 3.1.5 Tax rates

Income tax rates are progressive depending on the level of taxable income, i.e. the result of the sum of the taxpayer's income minus deductions provided for by law. Income splitting has been introduced into cantonal law, whereby two taxpayers are taxed on their collective income, at the rate of half the total income amount.

For example, a couple with a net taxable income of CHF 120,000 is taxed on CHF 120,000 at the rate applicable to half the amount, i.e. CHF 60,000.

#### Taxpayers who can benefit from income splitting:

- married people and registered partners living in the same household,
- single, widowed, divorced, legally separated or de facto taxpayers living in the same household with their minor or adult children, or a friend or relative with family responsibilities under the definition in Article 39, paragraph 2 LIPP who is essentially responsible for care duties.

From the 2024 tax period, parents living in two separate households, assuming equal responsibility for their children's care and expenses, will now be able to benefit from the same tax burden reduction in the form of partial income splitting (1/8 division).

# 3.2 Capital gains tax on property

Capital gains on property (i.e. the net profit from the disposition of buildings or shares of buildings in the canton) made by companies are part of their taxable profit and are subject to capital gains tax. Similarly, capital gains made by professionals on property are subject to normal taxation under personal income tax.

Capital gains made by individuals (non-professionals) on property are subject to a specific tax: the tax on property profits and gains. This is calculated on the difference between the property's disposition value and the acquisition value, with regressive rates depending on the duration of the property's ownership. Long-term capital gains (> 25 years) are not taxed, while short-term capital gains (< 2 years) are taxed at 50%.

### 3.3 Wealth tax

The canton and municipalities (not the Confederation) collect tax on individual wealth. Those subject to wealth tax each year are:

- people domiciled or staying in Switzerland for their overall net wealth (with the exception of property or commercial wealth located outside the canton, which is taken into account to determine the tax rate),
- people who are neither domiciled nor staying in Switzerland for property or commercial assets located in the canton, at the rate of the person's overall wealth.

As a rule, the object of this tax is the taxpayer's overall wealth. Part of taxable wealth includes all movable assets (e.g. securities and cash held in the bank) and property assets (e.g. buildings), life and annuity insurance subject to surrender, as well as wealth invested in commercial or agricultural operations. Household furniture and everyday personal items are exempt. The tax base for wealth is determined by the individual's net wealth. This means that all existing debts are deducted from the taxpayer's gross asset value. Wealth tax is collected at a progressive rate, ranging from 0% to around 1%.

# Useful addresses

# Département des finances, des ressources humaines et des affaires extérieures (DF)

(Department of Finance, Human Resources and External Affairs Hôtel des Finances, Cantonal Tax Administration)

Hôtel des finances, Administration fiscale cantonale Rue du Stand 26 | Case postale 3937 | 1211 Genève 3 Tél. 022 327 70 00 | ge.ch/contacter-afc

# Administration fédérale des contributions (AFC), Division principale de la taxe sur la valeur ajoutée, Service de l'assujettissement

(Federal Tax Administration (FTA), Main Value Added Tax Division, Taxation Department)

Schwarztorstrasse 50 | 3003 Berne Tél. 058 462 71 06 | estv.admin.ch

# Office cantonal de l'économie et de l'innovation (OCEI)

(Cantonal Office for Economy and Innovation (OCEI))

Rue de l'Hôtel-de-Ville 11 | Case postale | 1211 Genève 3 Tél. 022 388 34 34 | innovation.ge.ch