



Switzerland 瑞士

Attractive business location 商业胜地

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"EY Switzerland" refers to "Ernst & Young AG"

"安永瑞士"指代"Ernst & Young AG"

About Switzerland

关于瑞士

1.1 Switzerland has a lot to offer 瑞士的独特优势



>850 International companies />850家国际公司

have their Headquarters or other functions here

在此设立总部或其他职能部门



500 million / 5亿

consumers can be reached in one day

消费者近在咫尺



In 2 hours / 2小时内

all major European capitals can be reached

可达所有主要欧洲国家首都



Switzerland shares a border with 3 of the 4 largest European markets:

瑞士与欧洲四大市场中的三个接壤
(意大利、德国、法国)



1st / 第一

most open economies KOF Globalization Index
KOF全球化指数 - 最开放的经济体



1st / 第一

HSBC expat survey
汇丰外籍人士调查报告



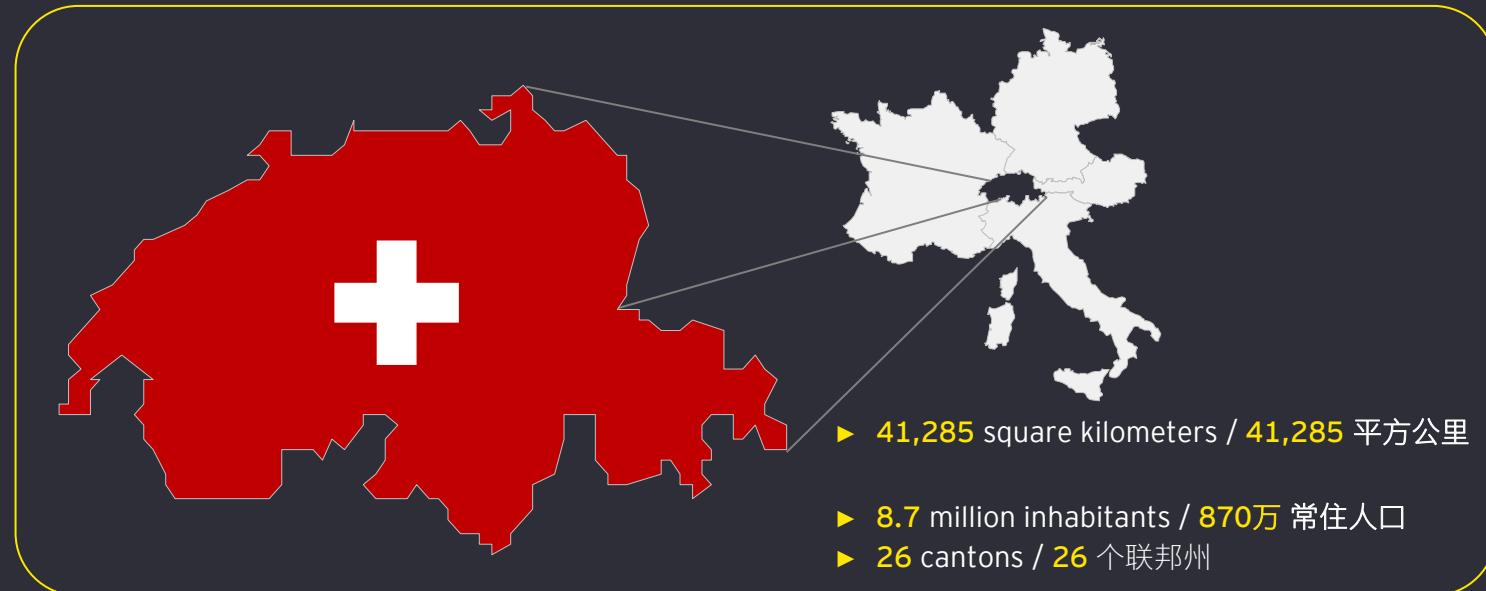
2nd / 第二

most resilient countries FM Global Resilience Index
全球经济韧性指数



3rd / 第三

IP protection in international comparison
知识产权保护 (国际排名)



1.2 Swiss Industries 瑞士行业

The financial sector 金融行业

Total value added by the financial sector (in CHF bn)
金融行业增加值总额 (单位: 十亿瑞士法郎)



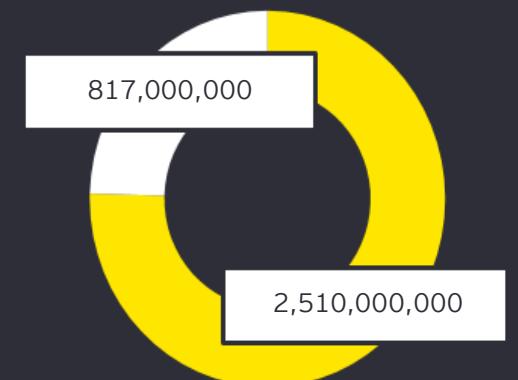
of Swiss GDP contributed by the Swiss financial sector that had a total value added of CHF 66.9 bn
瑞士金融业贡献的瑞士国内生产总值为669亿瑞士法郎

 211,605 employees, representing 5.2% of Swiss overall employment
金融业雇员占瑞士总就业人数的5.2%

 11.7% of public tax revenue stems from the financial sector
11.7%的公共税收来自金融业

Life sciences 生命科学 - Swiss Biotech 瑞士生物技术行业

Capital Investments in Swiss Biotech (in CHF)
瑞士生物技术公司的资本投资 (单位: 瑞士法郎)



Capital investments in Swiss biotech companies reached CHF 3.3 bn with 75% invested into public and 25% into private companies*
对瑞士生物技术公司的资本投资达到33亿瑞士法郎, 其中75%投资于上市公司, 25%投资于私营公司*

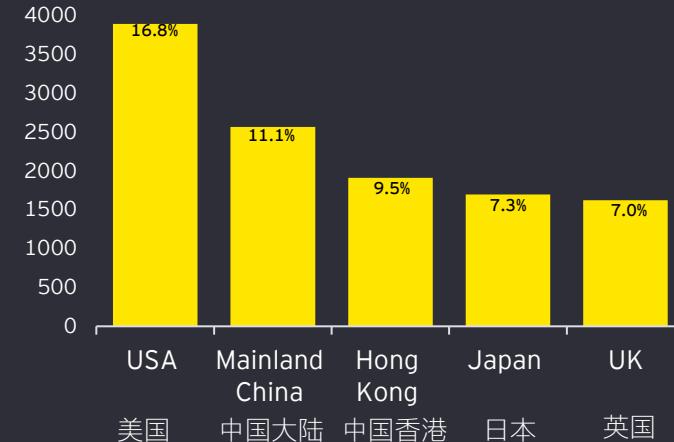
Luxury goods 奢侈品 - Swiss watch industry 瑞士钟表业

In general, China is Switzerland's top 5 trading partner
总的来说, 中国是瑞士的前五大贸易伙伴之一

 CHF 22.3 bn worth of Swiss watches exported, 2.7% increase to 2020
2023年瑞士钟表出口额为223亿瑞士法郎, 较2020年增长2.7%

 95% of Swiss watches produced were exported
95%的瑞士钟表均用于出口

Swiss watch exports per market in 2023 (Mil of CHF)
2023年瑞士钟表向各市场出口量 (百万瑞士法郎)



Sources: Swiss.financialcentre.admin.ch

Sources: SwissBiotechReport2022 shows sector again performs exceptionally at all levels | EY - Switzerland; SwissBiotechReport2022_FINAL

Sources: SwissWatchExports2023 (fbs.swiss); AnnualReport2021 (fbs.swiss)

General Benefits

总体优势

2.1 General benefits

- ▶ Located in the heart of Europe
- ▶ Most innovative country for 10 years in a row - according to UN Global Innovation Index
- ▶ Switzerland is the 3rd most competitive economy in the world (2020) - according to IMB World Competitiveness Rankings
- ▶ Business friendly government and administration
- ▶ Stable political, financial and legal framework
- ▶ More than 30 Free Trade Agreements with 43 Partners (incl. EU, China, Hong Kong) covering 77 countries
- ▶ Highly qualified workforce, liberal labor law
 - ▶ Access to whole EU skill pool through bilateral agreements
 - ▶ Possible to get Expatriate tax packages
- ▶ First class education system, international schools
- ▶ Top universities
 - ▶ ETH Zurich, EPFL Lausanne and several other Swiss universities among the top 100 universities worldwide
- ▶ Outstanding infrastructure
- ▶ Quick access to international airports
 - ▶ In whatever business location you are in Switzerland, drive to international airport is always below 2 hours
- ▶ Small country with short distances
 - ▶ Drive time from Geneva (southwest) to St. Gallen (northeast) Approx. 3.5 hours
 - ▶ Drive time from Basel (north) to Lugano (south) Approx. 3 hours
- ▶ Very high standard of living
 - ▶ Zurich (2nd), Geneva (9th), Basel (10th) and Bern (14th) in the top 15 of the worlds most livable cities (2019)
 - ▶ According to Mercer Quality of Living City Rankings



2.1 总体优势

- ▶ 位于欧洲中心
- ▶ 连续十年被评为最具创新力的国家（联合国全球创新指数）
- ▶ 瑞士是全球第三竞争力的经济体（2020）（IMB世界竞争力排名）
- ▶ 对企业友好的政府和行政管理
- ▶ 政治、金融和法律框架稳定
- ▶ 与 43 个合作伙伴（包括欧盟、中国大陆及中国香港）签署了 30 余项自由贸易协定
- ▶ 高素质的人才、宽松的劳动法
 - ▶ 通过双边协议可全面获取欧盟的人才库
 - ▶ 可享受外籍人士税收优惠政策
- ▶ 顶尖的教育体系和一流的国际院校
 - ▶ 苏黎世联邦理工学院（ETH Zurich）、洛桑联邦理工学院（EPFL Lausanne）和其他几所瑞士大学跻身全球百强大学行列
- ▶ 卓越的基础设施
- ▶ 快速抵达国际机场：无论您在瑞士的哪个商务地点，驱车前往国际机场的时间始终不超过 2 小时
- ▶ 国家小，城市之间距离短
 - ▶ 从日内瓦到圣加仑的车程约3.5小时
 - ▶ 从巴塞尔到卢加诺的车程约3小时
- ▶ 极高的生活水平
 - ▶ 四大城市位列全球最宜居城市前 15 名（2019美世全球生活质量调查）：苏黎世（第 2 位）、日内瓦（第 9 位）、巴塞尔（第 10 位）和伯尔尼（第 14 位）

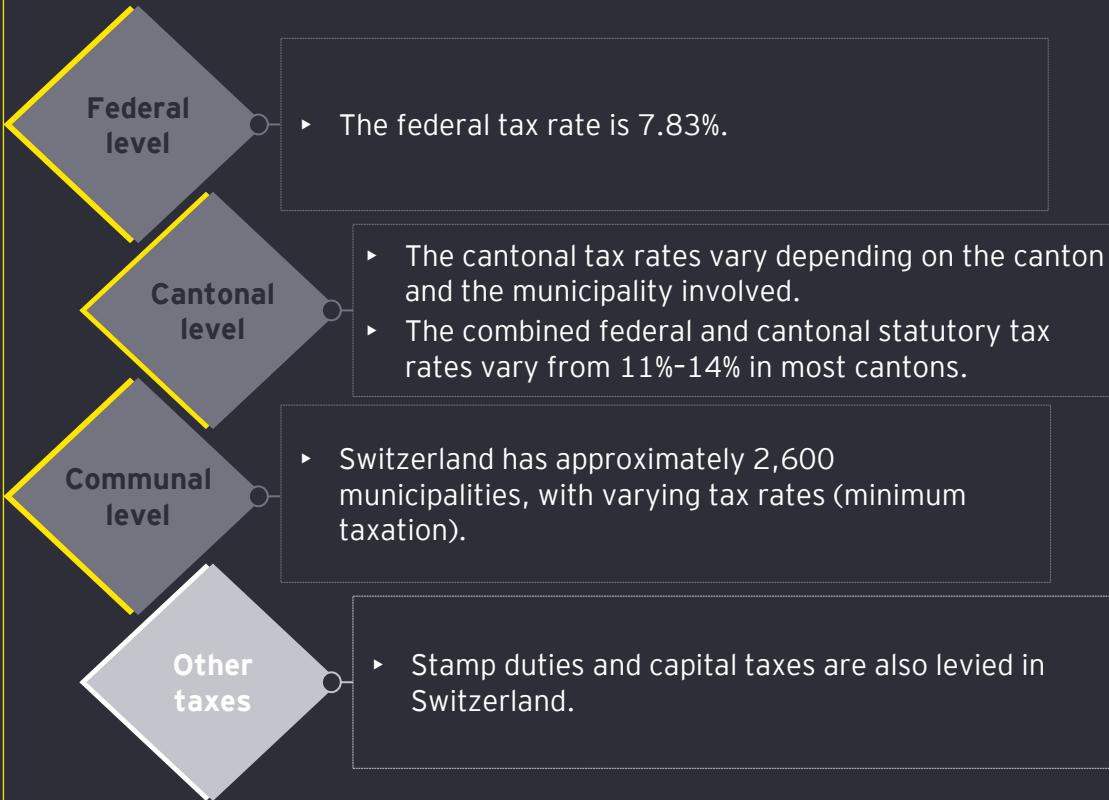


Insights into Switzerland's Tax System

深入了解瑞士的税收制度

3.1 Insights into Switzerland's Tax System

Corporate income tax (CIT) are levied at three levels



Federal and cantonal tax holidays continued (typically not in the bigger cities)

At a federal level

In addition to the Federal corporate tax rate of 7.83%, there are also withholding taxes and the value added tax that are levied at a federal level.

Withholding tax rates

- ▶ 0% if the counterparty is the government, a political subdivision, the Chinese Central Bank or an institution or fund fully owned by the government
- ▶ 5% if the counterparty owns at least 25% of the company paying the dividends
- ▶ 10% in all other cases

Value Added tax rate

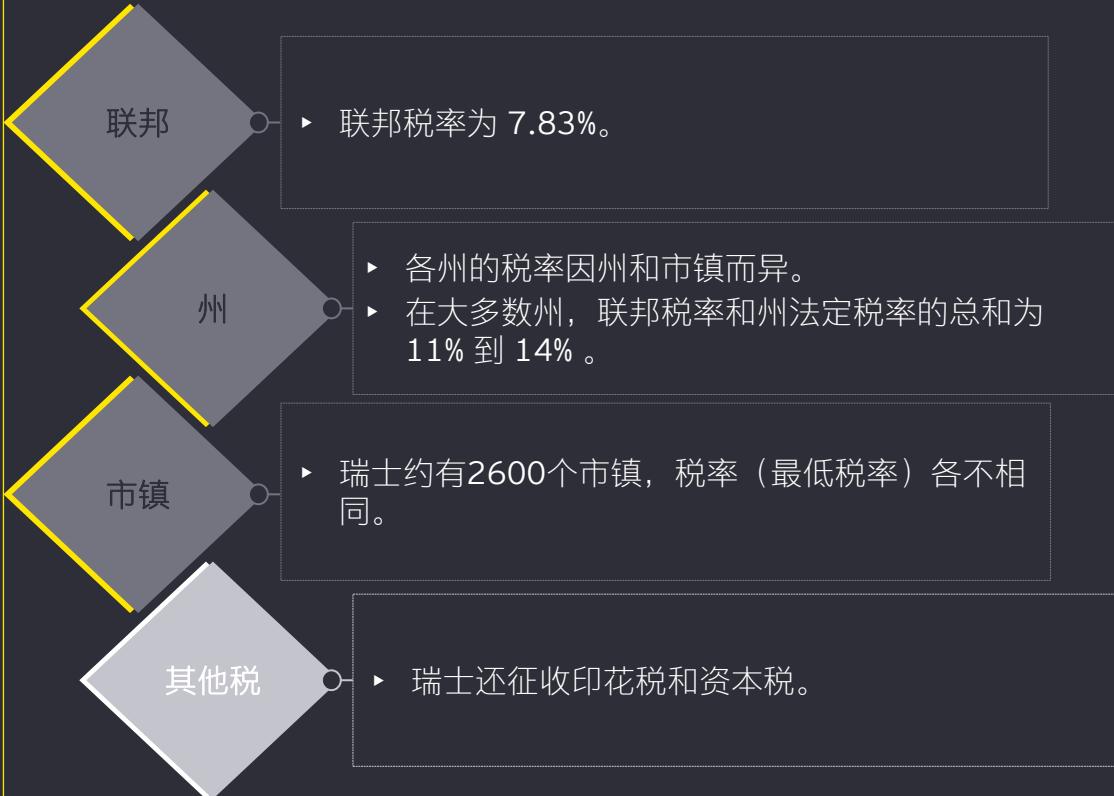
- ▶ Switzerland has the lowest added value tax rate in Europe with a rate of only 8.1% (compared to a minimum of 16% for all European Union countries).

Customs duties

- ▶ Industrial tariffs have been abolished. Customs duties only apply on agricultural products of HS chapter 1 - 24, 35 and 38.

3.1 深入了解瑞士的税收制度

企业所得税 (CIT) 分三个等级征收:



联邦和州继续实行针对在瑞士成立的新企业的免税期（大城市一般不实行免税期）

在联邦层面:

除了7.83%的联邦公司税率外, 还有预扣税和增值税, 均在联邦一级征收。

预扣税税率

- ▶ 如果交易方是政府、政治分支机构、中国中央银行或政府全资拥有的机构或基金, 则预提税率为0%
- ▶ 如果交易对手拥有支付股利公司至少25%的股权, 税率则为5%
- ▶ 其他情况下, 税率为10%

增值税税率

- ▶ 瑞士是欧洲增值税率最低的国家, 仅为8.1% (欧盟国家的最低税率为16%)

关税

- ▶ 工业关税已被取消。关税仅适用于HS第1章 - 24、35和38章的农产品

3.2

Share-issuance tax / capital contribution tax

- ▶ Switzerland levies a 1% duty on share-capital increases incl. contributions to the share premium account that are made by direct shareholders.
- ▶ There are various accepted planning options to avoid the 1%, like contributions from a grand-parent company.
- ▶ Additionally, the contribution of significant shareholdings to a Swiss company is exempt from the 1%.

股份发行税/资本出资税

- ▶ 瑞士对直接股东增加的股本（包括向股本溢价账户的出资）征收1%的税。
- ▶ 有多种公认的规划方案可以规避1%的税率，比如来自控股公司的出资。
- ▶ 此外，将重要股权出资给瑞士公司也免征1%税。

3.3

Securities transfer tax

- ▶ Companies with investments in shares, bonds or investment funds that exceed a total statutory book value of CHF 10m qualify as a securities dealer for Swiss stamp tax purposes
- ▶ They need to declare and pay securities transfer tax on the acquisition and disposal of such investments.
- ▶ The rates are 0.3% for foreign investments and 0.15% for domestic investments.
- ▶ There are various exemptions, as for intra-group transfers, share-buy backs, reorganizations, etc.

证券转让税

- ▶ 对股票、债券或投资基金进行投资，且法定账面总价值超过1000万瑞士法郎的公司作为证券交易商负有缴纳瑞士印花税的义务。
- ▶ 相关证券交易商需要申报并缴纳购买和处置此类投资的证券转让税。
- ▶ 海外投资的税率为0.3%，国内投资的税率为0.15%。
- ▶ 免税情形包括集团内部转让、股份回购、重组等。

3.4

Switzerland and the OECD Pillar 2 minimum taxes

- ▶ Switzerland is committed to introduce the OECD Pillar 2 minimum taxes.
- ▶ Switzerland will likely introduce the Income Inclusion Rule (IIR) and a Qualified Domestic Minimum Top-up Tax (QDMTT) as of 1 January 2024.
- ▶ It is currently open whether Switzerland will also introduce an Undertaxed Payment Rule (UTPR). In any case, this will not happen before 2025.
- ▶ The Swiss authorities are currently working on the details of the Pillar 2 minimum taxes. The objective is to be OECD-compliant but also to reduce the administrative burden for the companies as far as possible and to minimize adverse tax implications by using as many elections as possible.
- ▶ Several cantons are also working on new solutions to maintain and further improve the attractiveness of Switzerland as a business location (e.g. financial support for R&D activities, non-fiscal incentives, etc.).
- ▶ Swiss tax authorities are generally open to discuss OECD-compliant planning options to mitigate the impact of the Pillar 2 regulations.

瑞士和经合组织支柱二最低税率

- ▶ 瑞士致力于引入经合组织支柱二最低税。
- ▶ 瑞士可能会从2024年1月1日起引入收入包含规则（IIR）和国内最低补足税（QDMTT）。
- ▶ 2025年之后，瑞士是否还会引入低税率支付规则（UTPR），目前尚无定论。
- ▶ 瑞士当局目前正在制定支柱二最低税率的细节。其目标是与经合组织保持一致，同时尽可能减轻公司的行政负担，并通过尽可能多的选择将不利的税务影响降至最低。
- ▶ 一些州还在研究新的解决方案，以保持并进一步提高瑞士作为商业地点的吸引力（例如对研发活动的财政支持、非财政激励措施等）。
- ▶ 瑞士税务机关通常愿意讨论符合经合组织要求的规划方案，以减轻支柱二法规的影响。

Tax Benefits

税收优惠

4.1

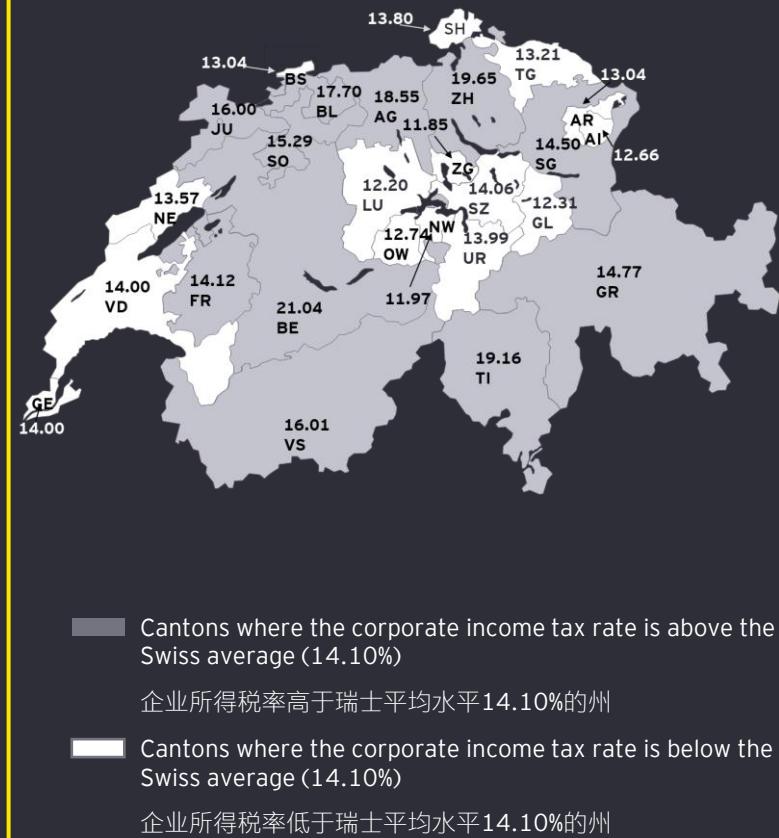
Headline CIT rates between 11%-14% in most cantons

- ▶ In addition to low headline tax rates, Switzerland also provides for:
 - ▶ Full participation relief (no subject to tax rules)
 - ▶ Unrestricted loss carry forward (unlimited in case of a financial restructurings, for 7 years otherwise)
 - ▶ Unilateral exemption of foreign branch profits, but losses of foreign branches can be offset in Switzerland
 - ▶ No interest barrier rules
 - ▶ Tax expenses are tax deductible
 - ▶ Generous thin cap rules / safe harbour interest rules
 - ▶ Full amortization of assets (including acquired goodwill)
 - ▶ Tax holiday for up to 10 years
 - ▶ Fully amortisable tax step-up of hidden reserves (FMV less BV) on business incl. goodwill upon migration ("entry step-up")
 - ▶ Additional tax relief of up to 70% at cantonal level leading to CIT rates as low as 9% through:
 - ▶ Patent box
 - ▶ R&D super deduction (up to 150%)
 - ▶ Notional interest deduction on equity

大多数州的企业所得税在11%-14%之间

除了低税率外，瑞士还提供以下税收优惠：

- ▶ 全额参与减免（不受税收规则限制）
- ▶ 不受限制的亏损结转（在财务重组的情况下无限制，否则为7年）
- ▶ 单方面豁免外国分支机构的利润，但外国分支机构的亏损可在瑞士抵消
- ▶ 无利息障碍规则
- ▶ 税务支出可减税
- ▶ 宽松的资本弱化/安全港利息规则
- ▶ 资产（包括收购的商誉）全额摊销
- ▶ 长达10年的免税期
- ▶ 企业迁移时，包括商誉在内的隐性储备金（市值减去账面价值）可全额摊销递增税率（“进入递增税率”）
- ▶ 州一级的额外税收减免高达70%，从而使企业所得税税率可通过以下方式降至9%：
 - ▶ 专利盒
 - ▶ 研发费用加计扣除（最高150%）
 - ▶ 股权名义利息扣除



4.2

Relationship with tax authorities

- ▶ Cooperative and responsive relationship with tax authorities
- ▶ Advance tax rulings available on short notice and free of charge
- ▶ Easy access to APA / MAP
- ▶ Switzerland is fully committed to an internationally accepted, sustainable and competitive tax system (incl. compliant Pillar 2 implementation)

与税务机关的关系

- ▶ 与税务机关保持合作和响应迅速的关系
- ▶ 提供及时且免费的预先税务裁定
- ▶ 轻松访问APA（预先定价协议）/ MAP（争端解决机制）
- ▶ 瑞士全面致力于建立一个国际认可、可持续和具有竞争力的税收体系（包括合规的支柱二实施）

4.3

Reorganizations

- ▶ Tax neutral reorganization schemes available (merger, demerger, book value transfers, etc.)
- ▶ No non-resident capital gains tax
 - ▶ Except for real estate companies and dormant companies
- ▶ No change of ownership rules
- ▶ Migration to Switzerland possible with legal continuity
- ▶ Tax neutral disclosure of hidden reserves incl. goodwill (step-up) upon migration and subsequent amortization over up to 10 years

重组

- ▶ 提供税收中立的重组计划（合并、分立、账面价值转让等）
- ▶ 无非居民资本利得税（房地产公司和休眠公司除外）
- ▶ 无所有权变更规定
- ▶ 可迁移至瑞士并保持法律连续性
- ▶ 在迁移时以税收中立的方式披露隐藏储备金，包括商誉（升值）以及随后长达10年的摊销期

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Our Service Offerings

How do we aid Chinese companies in their endeavors in Switzerland?

Leveraging EY competencies in all service lines of:



AUDIT & ASSURANCE

- ▶ Insight into the Swiss financial reporting and accounting standards
- ▶ Provide high-quality audits to promote transparency and trust
- ▶ To assist in acquiring funding from local stakeholders via the optimization of internal systems.



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STRATEGY & TRANSACTION (SAT)

- ▶ We assist clients in M&A transactions, that includes funding strategies, expanding and divesting in businesses in Switzerland



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TAX & LEGAL

- ▶ Support to navigate the local tax systems, data laws, and legal requirements
- ▶ These legal requirements include incorporation services, support in corporate law, labor and employment law



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CONSULTING

- ▶ To aid in cross border transaction, to create and implement business strategies (i.e. establish local partnerships, and supply chain diversification and management)



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PEOPLE ADVISORY SERVICES (PAS)

- ▶ Tailored solutions for culture adaptation, talent support, social costs, or work authorization for your business entity in Switzerland



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我们的业务范围

我们如何帮助中国企业在瑞士开展业务？

我们的业务范围覆盖了安永的全部业务线：



审计和鉴证

- ▶ 深入了解瑞士财务报告和会计准则
- ▶ 提供高质量的审计，提高透明度和信任度
- ▶ 通过优化内部系统，协助从当地利益相关方获得资金



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战略与交易

- ▶ 我们协助客户在瑞士进行并购交易，包括融资战略、企业扩张和撤资业务。



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税务和法务

- ▶ 提供当地税务系统、数据法律和法律要求方面的支持
- ▶ 这些法律要求包括公司注册服务、公司法支持、劳动和就业法



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商业咨询

- ▶ 协助跨境交易，制定和实施业务战略（即建立当地合作伙伴关系，以及供应链多元化和管理）



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人力资本咨询

- ▶ 为您在瑞士的商业实体量身定制本土化策略、人才支持、企业社会责任或工作许可解决方案



Jan Wong
总监
税收、人力资本咨询、人员海外派遣
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Thank you
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