

Topic Sheets are available in English. Whenever available, references to further information are also given in French, German and Italian.

Domestic

Double Taxation

FEDERAL DEPARTMENT OF FINANCE: [French](#); [German](#)

SWISS FEDERAL TAX ADMINISTRATION:

- International Fiscal Law and Double Taxation: [English](#); [French](#); [German](#) and latest up-dates: [French](#); [German](#)
- Tax Amnesty: [French](#); [German](#)
- Glossary for information on any other related topic: [English](#); [French](#); [German](#); [Italian](#)

The SWISS-AMERICAN CHAMBER OF COMMERCE on the Swiss tax system: [info](#)

USA-SWITZERLAND: Memorandum of Understanding defining the term "tax fraud and the like":
[English](#) (published by the US Treasury); [French](#); [German](#) (published by the Swiss Federal Tax Administration)

The SWISS-AMERICAN CHAMBER OF COMMERCE on tax treaties met between USA and Switzerland: [taxation](#)

International

Singapore

An overview of the Singapore Tax System: www.iras.gov.sg

United States of America

The SWISS-AMERICAN CHAMBER OF COMMERCE on the US tax system: [website](#)

International tax harmonisation

The OECD on tax questions: www.oecd.org \ By Topic \ Taxation (then chose in the left bar)

- Exchange of Information in Tax Matters
- Tax Policy and Administration
- Harmful Tax Practices
- SWISS FEDERAL TAX ADMINISTRATION: [French](#); [German](#) (p.12.)
- WTO: [website](#)

EU Taxation of Savings

Proposal of an agreement between Switzerland and the EU on taxation of savings: [English](#); [French](#); [German](#); [Italian](#)

EU Council Directive on taxation of savings income: [English](#); [French](#); [German](#); [Italian](#) (as of 2003)

Proposal of an EU Council Directive to ensure effective taxation of savings income by means of exchange of information: [English](#); [French](#); [German](#); [Italian](#) (as of 2001)

EU Council Directive on taxation of interest and royalty payments: [English](#); [French](#); [German](#); [Italian](#)

ECOFIN on the EU Tax Package: taxation of savings, business taxation, interest/royalties: [English](#); [French](#); [German](#); [Italian](#) (21.1.2003)

The FEDERAL DEPARTMENT OF FINANCE: on the bilateral II negotiations: [English](#); [French](#); [German](#); [Italian](#); taxation of savings: [English](#); [French](#); [German](#)

The Swiss administration's INTEGRATION OFFICE publishes the bilateral II agreements and explanatory notes: [English](#); [French](#); [German](#); [Italian](#)

The SWISS BANKERS' ASSOCIATION

- www.sba.ch/zast-home.htm (French, German; password protected)
- Circulars: www.sba.ch (French, German; password protected)
- 7236, 5.2.2003: negotiations between Switzerland and the EU
- 7344, 9.7.2004: Tax withholding in interest payments
- 7352, 26.8.2004: Tax withholding on interest payments: exchange of information

The UK INLAND REVENUE makes available various information on the topic: www.inlandrevenue.gov.uk/esd

- Regulatory Impact Assessment: [text](#)
- Glossary: [website](#)
- Consultation on Key Principles of Implementation: [text](#)

Information from private sources:

The SWISS-AMERICAN CHAMBER OF COMMERCE on the agreement: [info](#)

Publications on tax matters, also EU taxation of savings: [TAXeNEWS](#) (PWC)

EU Savings Directive: [website](#) (Ernst&Young Luxembourg)

Qualified Intermediary Agreement

The SWISS BANKERS' ASSOCIATION'S Circulars: www.sba.ch (French, German; password protected)

- 7323, 6.4.2004: US Withholding tax / Qualified Intermediary
- 7308, 23.12.2003: Modified rulings regarding Partnerships and Trusts
- 7223, 19.12.2002: Pension funds
- 7216, 29.11.2002: US Withholding tax / Qualified Intermediary
- 7132, 19.12. 2001: QI-procedure
- 7062, 26.4.2001: Customer identification requirements ("Qualified Intermediary" and CDB 98)
- 7027, 15.12.2000: IRS Notice 2001-4
- 7014, 26.10.2000: Round-table among banks and auditors of 2.10.2000
- 7001, 28.8.2000: Additional US Withholding tax
- 6995, 25.7.2000: US Withholding tax

The SWISS BANKERS' ASSOCIATION on Tax Treaties the USA have met with third countries: [Treaty Section](#)

The US INTERNAL REVENUE SERVICE informs on the Qualified Intermediary Procedures:

- <http://www.irs.gov/businesses/corporations/article/0,,id=96865,00.html>
- <http://www.irs.gov/businesses/small/international/article/0,,id=102314,00.html>

Tax Amnesties

General Information on Tax Amnesties provided by the World Bank: [website](#)

Belgium: Déclaration Libératoire Unique-DLU runs from 1 January until 31 December 2004. It allows declaration of repatriation of all assets held illegally abroad prior to 1 June 2003; rates of 6 and 9% will apply; no penal prosecutions can be started upon the declarations made:

- [Parliament](#); [Text and Comments](#); [Q&A](#); [PWC](#)
- The Luxembourg Bankers' Association filed a complaint with the EU Commission: [website](#) \ Documents \ Publications \ Plainte de l'ABBL
- Swiss Bankers' Association: Circulars 7317, 12.2.2004: www.sba.ch (French and German, password protected)

Germany: Strafbefreiungserklärungsgesetz-StraBEG runs from 1 January 2004 until 31 March 2005. It requires declaration of all revenues illegally earned abroad between 1993 and 2002 and revelation of the taxpayer's identity. Revenues of the amounts declared are taxed at 25% until 31 December and 35% beyond:

- Bundesministerium der Finanzen: text of law and info [website](#); [Press release](#)
- Summary published by KPMG Switzerland: [text](#)
- Swiss Bankers' Association: Circulars 7318, 13.2.2004, 7348, 22.7.2004: www.sba.ch (French and German, password protected)

Italy: Scudi fiscali foresaw regularisation (declaration of assets held abroad) and repatriation. Declarations were made by an intermediary thus preserving the tax payer's identity; in case of repatriation, the conto segreto also prevents customer data being transferred to authorities. Taxation of returns on investments are fixed at 12.5%, inheritance tax was abolished.

- first round: deadlines ran until 28. February 2002 and were prolonged until 15.5.2002 for regularisation and 30.6.2002 for repatriation of assets. A fee of 2.5% of assets declared was due. Information: [website](#); extension: [website](#); [website](#)
- second round: tax amnesty for the period of 1 January until 30 September 2003; a fee of 2.5 - 4.0% was due. Information: [website](#) (Ministero dell'Economia e delle Finanze); www.lexitalia.it/leggi/1_2004-47.htm
- Swiss Bankers' Association: Circulars 7113, 7119, 7135: www.sba.ch (French and German, password protected)

According to estimates, the first round brought a total of EUR 54.6 Mia (31.1 Mia from Switzerland) and the second round EUR 18.4 Mia (appr. 9 Mia from Switzerland).

Switzerland: the Parliament discusses the possibility of a tax amnesty:

- Information by the FEDERAL DEPARTMENT OF FINANCE: [French](#); [German](#)