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Schweiz, ein Steuerparadies?

Attraktivität der Schweiz als Steuerstandort

TAX

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Jörg Walker / Pierre-Olivier Gehriger
Zürich, 1. November 2006

Methodik der Umfrage

- **Teil 1: Corporate Income Tax Rate Survey 2006: Untersuchung der Unternehmenssteuersätze von insgesamt 86 Ländern weltweit im Zeitraum von 1993 bis 2006 durch KPMG (S. 3 bis 12)**
- **Teil 2: Zusätzliche Befragung von international tätigen Wirtschafts-institutionen in der Schweiz durch telefonische Interviews der Führungskräfte im Oktober 2006 durch KPMG (S. 13 bis 22).**
  - Gefragt wurde nach Entscheidungskriterien bei der Auswahl des Steuerstandortes innerhalb der Schweiz.
  - Mit Fokus auf die Attraktivität des Steuerstandortes Schweiz wurden 26 Institutionen im Bereich Wirtschaftsförderung befragt.

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Teil 1: Corporate Income Tax Rate Survey 2006

Untersuchung der Unternehmenssteuersätze von insgesamt 86 Ländern weltweit im Zeitraum von 1993 bis 2006

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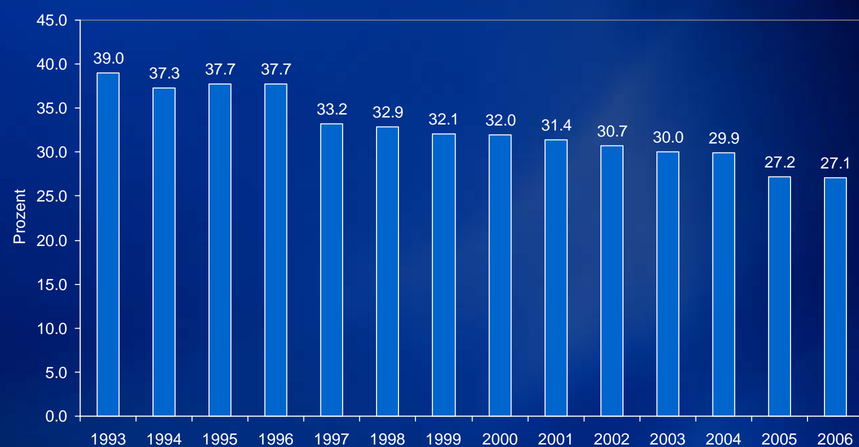
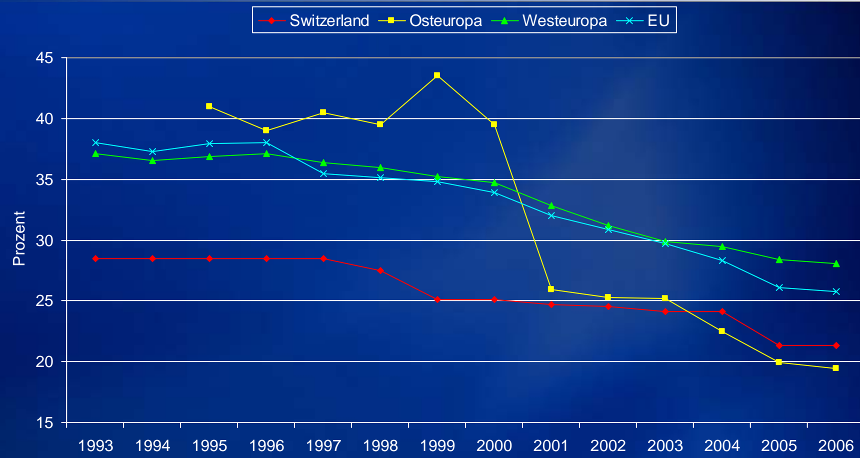
Entwicklung der Unternehmenssteuersätze aller in der Studie berücksichtigten Länder weltweit im Zeitraum 1993 bis 2006



Die Unternehmenssteuersätze weltweit sind in 14 Jahren um nahezu 12 Prozentpunkte gesunken.

In allen Grafiken in dieser Studie wurden die jeweils höchsten Steuersätze berücksichtigt; Quelle: KPMG International, 2006

Entwicklung der Unternehmenssteuersätze in der EU, West- und Osteuropa im Vergleich zur Schweiz im Zeitraum 1993 bis 2006



Aggressive Steuerpolitik: Innerhalb von 7 Jahren haben die osteuropäischen Länder ihre Unternehmenssteuersätze im Durchschnitt um 24 Prozentpunkte gesenkt.

Angaben in Prozent, Quelle: KPMG International, 2006

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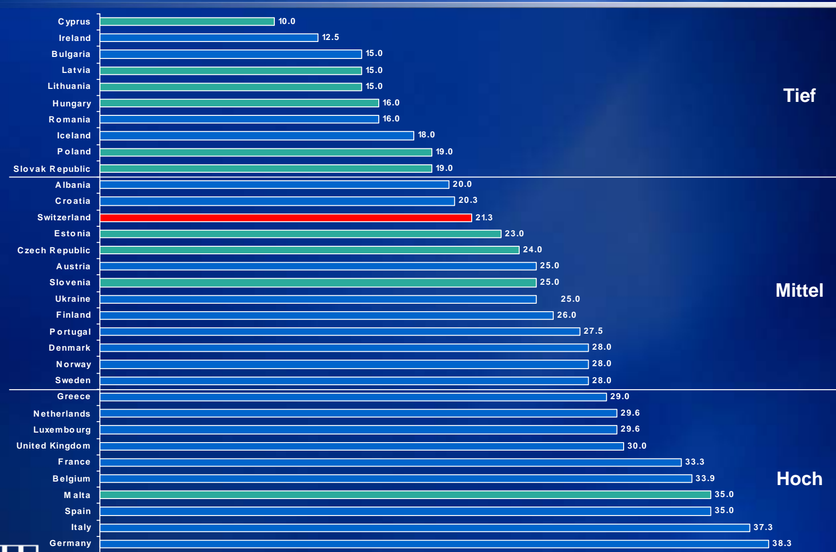
Die attraktivsten Steuer-Standorte für Unternehmen in Europa 2006 – Zypern und Irland vorne, Schweiz nur im Mittelfeld?

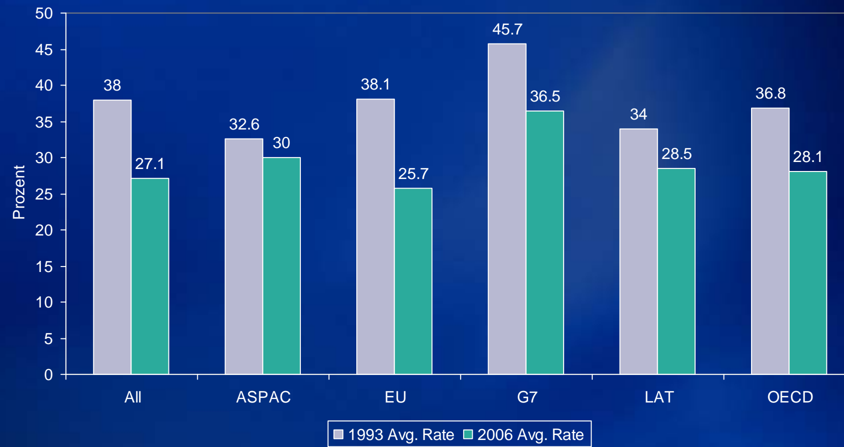


Angaben in Prozent, Quelle: KPMG International, 2006

Neue EU-Mitgliedsländer seit 1. Mai 2004

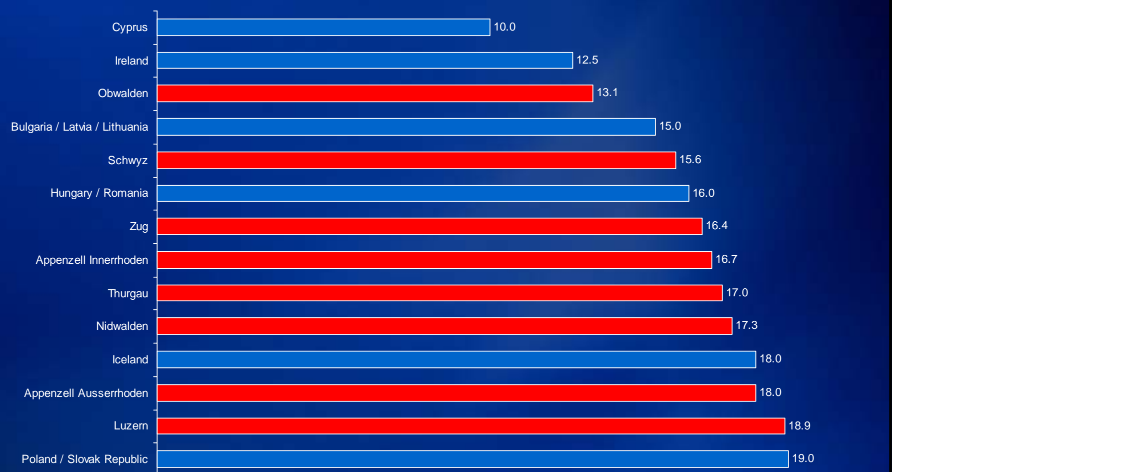
6

Entwicklung der Unternehmenssteuern – Globale Wirtschaftsräume im Vergleich



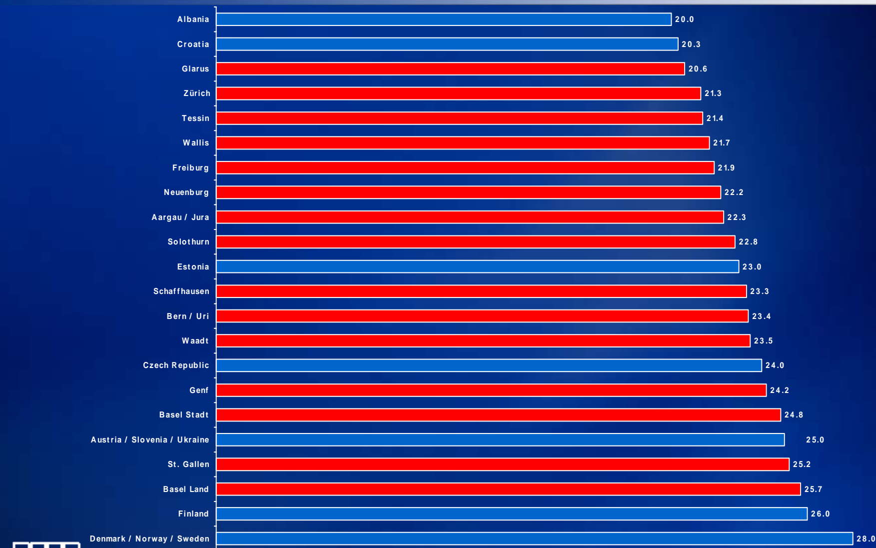
Quelle: KPMG International, 2006

Insgesamt 8 Kantone innerhalb der Spitzengruppe – Obwalden und Schwyz unter den Top 5 in Europa



Angaben in Prozent, Quelle: KPMG International, 2006

… 17 Kantone im Mittelfeld …



Angaben in Prozent, Quelle: KPMG International, 2006

… und 1 Kanton in der „schwächsten“ Gruppe: Schlusslicht Graubünden

Angaben in Prozent, Quelle: KPMG International, 2006

Unter bestimmten Voraussetzungen können in der Schweiz tiefere Steuersätze erzielt werden

- **Besteuerung als Verwaltungsgesellschaft**
  Gemischte Gesellschaft oder Domizilgesellschaft mit vorwiegend Ausland/Ausland-Geschäften werden auf Ebene Staats- und Gemeindesteuern reduziert besteuert
- **Besteuerung als Principalgesellschaft**
  Zentralisierung von Funktionen und Risiken in der Schweiz; Vertrieb im Ausland erfolgt grundsätzlich über Kommissionärsstrukturen
- **Besteuerung als Finance Branch in der Schweiz**
  Ausländische Gesellschaft übt Finanzierungsaktivitäten über eine Betriebstätte in der Schweiz aus
- **CH-Gesellschaft mit Betriebstätte im Ausland**
  Gewisse Geschäftsaktivitäten werden mittels eigenem Personal und eigener Infrastruktur offshore erbracht
- **Eidgenössische Wirtschaftsförderung, Lex Bonny**
  Befristete Steuererleichterungen in bestimmten Regionen für direkte Bundessteuer
- **Kantonale Wirtschaftsförderung**
  Befristete Steuererleichterungen für Staats- und Gemeindesteuern

Die Schweiz steht im Bereich Steuerprivilegien in einem harten Wettbewerb

- **Reduzierung der Steuerbemessungsgrundlage führt nicht nur in der Schweiz in bestimmten Fällen zu einer wesentlich tieferen Gesamtsteuerbelastung (z.B. 1% - 8%), aber auch in**
  - Luxemburg
  - Niederlanden
  - Belgien
  - Ungarn
  - Etc..

➔ **Neben den Steuersätzen ist folglich auch die Bemessungs-grundlage für die Höhe der Steuerbelastung entscheidend**

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Teil 2: Attraktivität des Steuerstandortes Schweiz

Zusätzliche Befragung von insgesamt 26 Wirtschaftsförderungs-stellen in der Schweiz

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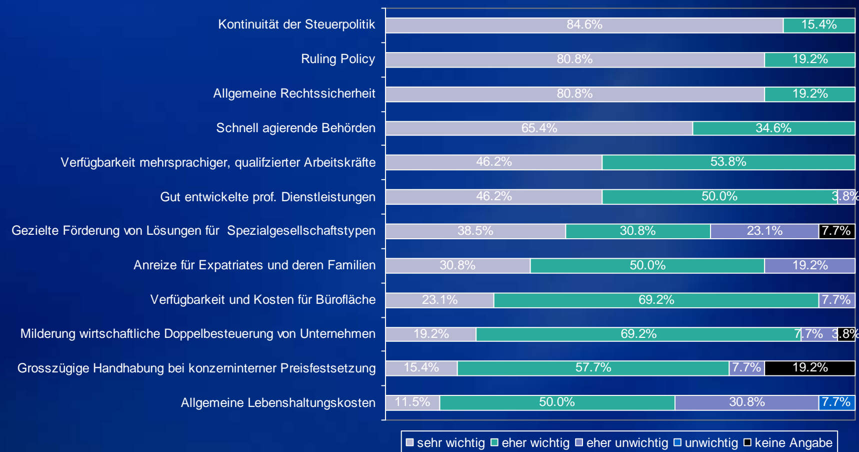
Die wichtigsten Kriterien bei der Wahl des Steuer-Standortes: Kontinuität der Steuerpolitik, Ruling Policy u. Rechtssicherheit



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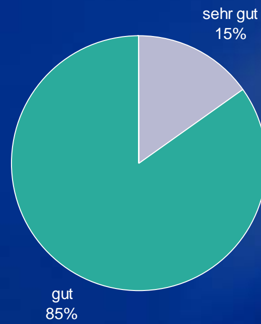
Die schweizerische Steuerpolitik aus Investorensicht – Nahezu jeder 7. erteilt der Schweiz ein „sehr gut“

sehr gut | gut | weiß nicht | eher schlecht | schlecht



Frage: „Wie bewerten Sie die aktuelle Schweizerische Steuerpolitik aus Investorensicht? Als …“

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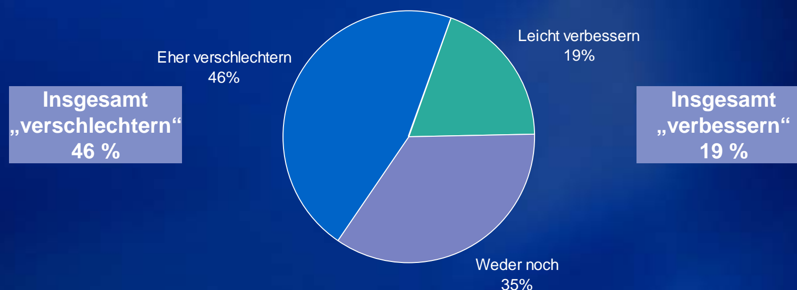
Die Attraktivität der Schweiz als Steuerstandort - Trübe Aussichten? Fast jeder 2. glaubt an schlechtere Aussichten.

Deutlich verbessern | Leicht verbessern | Weder noch | Eher verschlechtern | Starker Rückgang



Frage: „Die Attraktivität der Schweiz als Steuerstandort wird sich in den nächsten 3 Jahren …?

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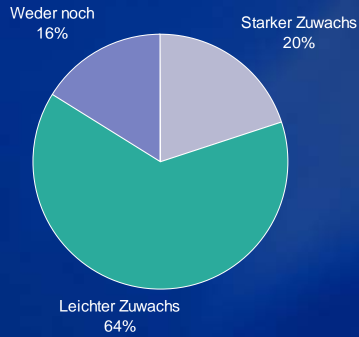
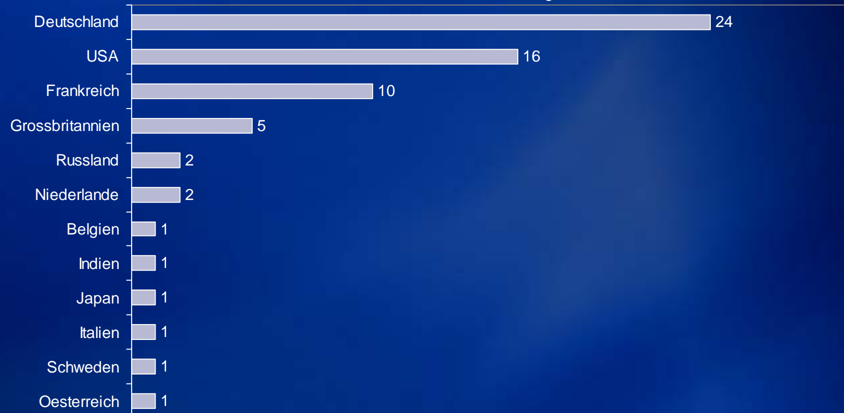
84 Prozent der Befragten registrieren einen leichten bis starken Zuwachs an Unternehmensansiedlungen



Frage: „Konnten Sie während der vergangenen zwei Jahre tendenziell einen Zuwachs / Rückgang an Unternehmensansiedlungen verzeichnen?“

Aus welchen Ländern die meisten Unternehmen in die Schweiz kommen: Deutschland und USA

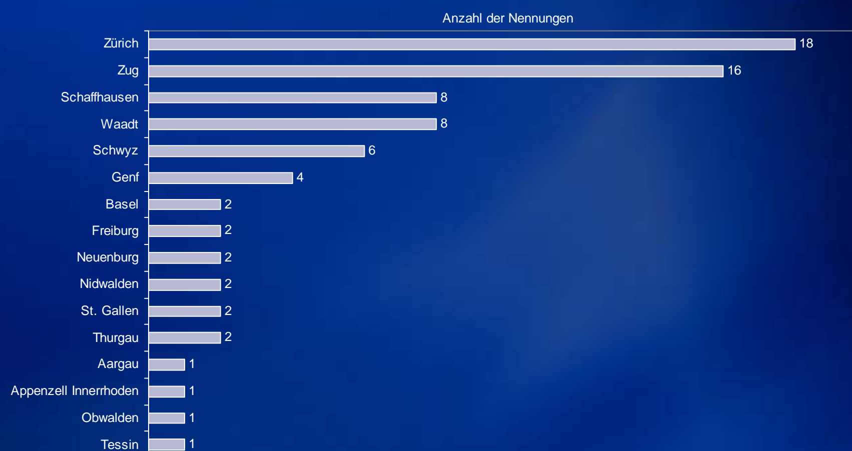


Frage: „Aus welchen Ländern kamen die Unternehmen überwiegend (Sitz der Top-Holdinggesellschaft)?“ (Mehrfachnennungen möglich)

Die derzeit stärksten Wettbewerber der Schweiz aus Steuersicht: Irland und Länder Osteuropas

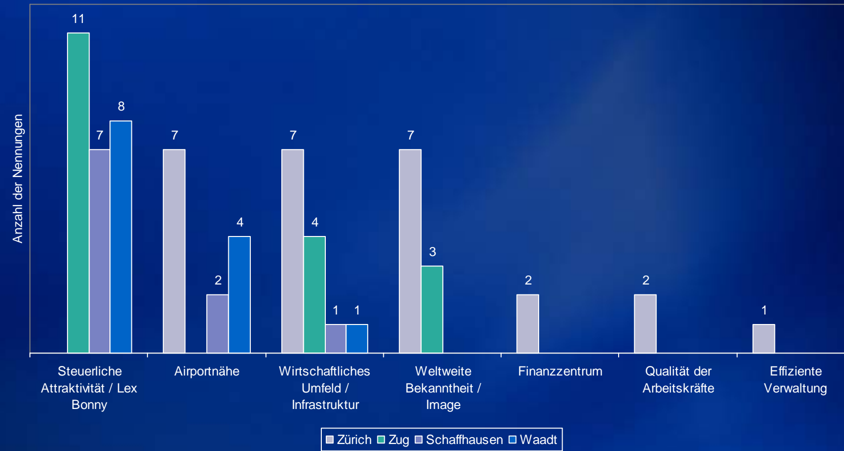
Frage: „Welche Länder sind für Sie derzeit die stärksten Wettbewerber?"
(Mehrfachnennungen möglich)

Die attraktivsten Standorte innerhalb der Schweiz aus Sicht der kantonalen Wirtschaftsförderungsstellen



Frage: „Welche drei Kantone sind für Sie aktuell die stärksten Wettbewerber?"

… und was die „besten 4“ so erfolgreich macht:



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Handlungsempfehlungen an die Politik

Frage: „Welche Neuerungen und Modifikationen wünschen Sie sich von der Politik zur Belebung des Steuerstandortes Schweiz?“ (Mehrfachnennungen möglich)

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Corporate Income Tax Rate

A Trend Analysis

TAX

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Summary and Comment

Since 1993, KPMG has published an annual analysis of corporate tax rates around the world. In our initial survey, the rates from 23 countries were examined. Now, in 2006, the list stands at 86 countries.

The survey has recorded a consistent and dramatic reduction in corporate tax rates over that 14-year period. This reduction began in the mid-1980s in the United Kingdom when the government of Margaret Thatcher lowered the corporate tax rate from 52 percent to 35 percent between 1982 and 1986, forcing other countries to follow suit.

Once one major industrialized economy cuts its rates, others seem compelled to do the same, in a process of international tax competition that continues and intensifies over time. In the past 14 years, the average corporate tax rate of countries surveyed by KPMG declined nearly 29 percent (28.7), dropping from an average of 38 percent to 27.1 percent.

This same process seems to apply across entire regions and economic alliances, as shown by the clear impact on European Union (EU) tax rates of the 10 new states that joined the community in 2004, and indeed by the evident worldwide competition between the trading blocs such as the Asia Pacific (ASPAC) nations, Group of 7 (G7), Organisation for Economic Co-operation and Development (OECD) and the EU.

This competition suggests that there must be some benefit in having low corporate taxes, and indeed it appears that countries that adopt comparatively low tax rates tend to do better in terms of growth and inward investment than those that do not.

But does this mean that countries are locked into a "race to the bottom" in tax rates? Policymakers, faced with the need to fund social programs, may fear revenue shortfalls if they simply reduce corporate income tax rates, even though there is a tendency among high tax rate countries not to rely substantially on revenue from this source.

In the long term, low tax rates should attract more inward investment, which should expand the economy and thereby provide a greater tax base. But in the short to medium term there is often a need for measures to offset the impact of low tax rates, such as improving spending efficiency or relying more on other sources of revenues, such as indirect taxes.

The practical answer favored by some governments seems to be to combine favorable tax rates with a broadening of the tax collection system by reducing tax breaks and loopholes. This strategy was used with conspicuous success by tax reformers in the Scandinavian countries as well as in Ireland, and is finding its way into Eastern Europe. The new German government has proposed a package of tax reforms that broadly follows this model.

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But given the intense global competition for tax revenue it may make sense for governments to follow the example of the commercial sector and consider strategies other than simple price cuts to attract and retain discerning customers.

This recognizes a subtle but important shift in the relationship between large multinational corporate taxpayers and national governments. As transport, communication, and trading links improve across the world, corporations are finding it progressively easier to site their operations wherever they can find the best combination of resources, skills, finance, security, and the effective rule of law.

Tax, under these circumstances, becomes effectively a price that multinationals have to pay to make use of the goods and services that a country can provide. Like any astute consumer faced with this kind of choice, corporations are shopping around globally for the best combination of price and value.

What this means for governments is that they have an opportunity to attract inward investment not just through low taxation, but through astute global marketing of the benefits of siting operations in their countries. Corporations value policies that give them control and certainty, so shifts toward long-term, business-friendly tax administration systems are likely to attract their attention. Also, sensibly, countries may consider the best balance of income sources—between direct and indirect taxes to provide a diversity of income and collection and compliance efficiency.

Corporations value policies that give them control and certainty, so shifts toward long-term, business-friendly tax administration systems are likely to attract their attention.

The next step for governments could be to recognize the reputational impact of tax policy on corporate behavior. Paying customers sometimes have to justify to others why they made a particular decision to buy. Through better communication of their strategic policy for collecting taxes and strategic plans for spending the money, i.e., actively explaining to investors the benefits arising from their social policies, governments can make it significantly easier for corporations to persuade shareholders and others that a particular siting decision was both financially sensible and socially responsible. In a fiercely competitive and judgmental global environment, information like this can make a real difference.

In summary, from our past 14 years' tracking experience it appears to be economically and socially desirable for countries to strive for lower corporate income taxes. Corporations are sensitive to income tax rates, and the enhanced mobility of capital and labor all over the world increases their ability to transfer functions from a high-tax regime to a low-tax country. But, if countries want to offset the risks of relying on lower rates alone, just as corporates in global competition strive constantly for new ways of differentiating products and services and increasing customer loyalty, so, in the face of globalization, governments may be well advised to find new ways to make sure their countries attract and collect a sustainable share of global tax revenue to fund long-term programs.

Loughlin Hickey
Global Managing Partner, Tax
KPMG in the United Kingdom

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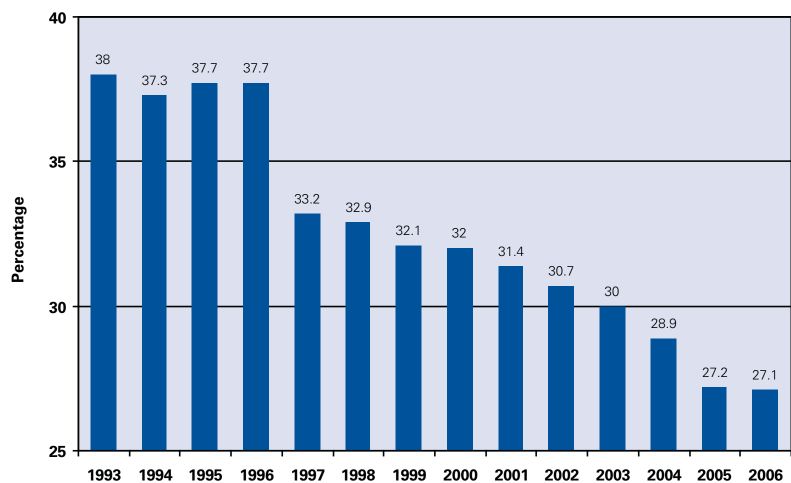
Analysis

Corporate tax rates around the world continue to decline, driven primarily by competition among nations for business, tax receipts, and jobs. In the 14-year period beginning in 1993, the average corporate tax rate of countries surveyed by KPMG declined nearly 29 percent (28.7), dropping from an average of 38 percent to 27.1 percent.

Corporate Tax Rates All Countries 1993 – 2006

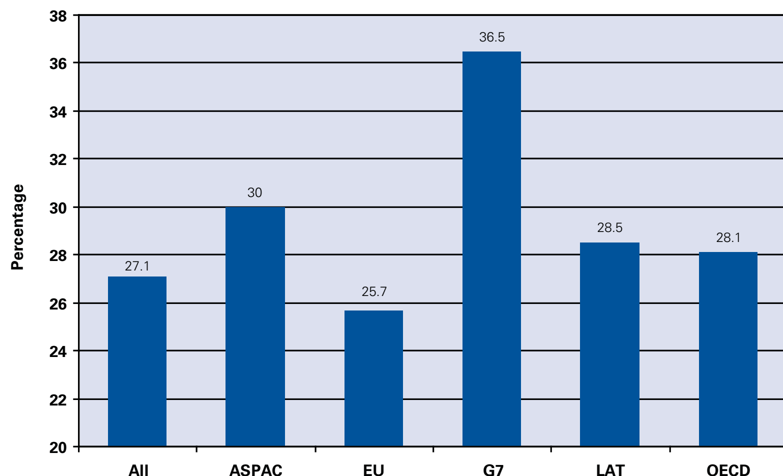


(In all charts in this document, highest rates reported were used for calculations.)

Source: KPMG International, 2006

As part of its survey, KPMG also examined corporate tax rates for a number of regions around the world, including the OECD, the G7, the EU, 19 countries in the ASPAC region, and 19 countries in the Latin American/Caribbean (LAT) region. Among those regions, the G7 has the highest average rate in 2006, with 36.5 percent. The lowest, with 25.7 percent, is the EU.

Corporate Tax Rates 2006 by Global Region



Source: KPMG International, 2006

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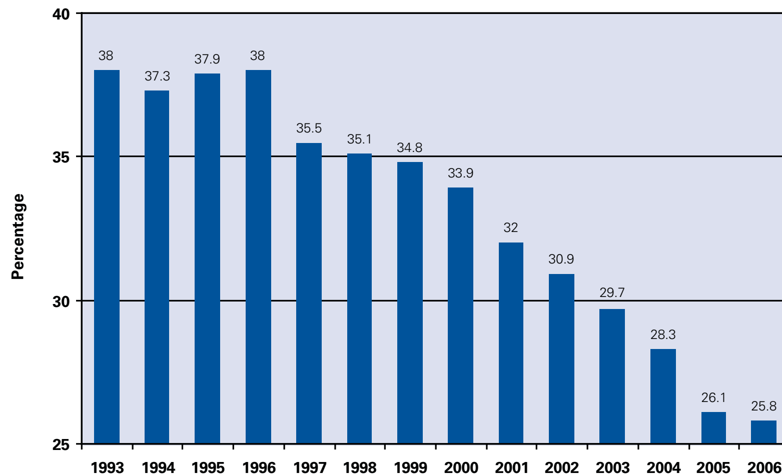
In 1993, when the EU comprised 15 nations, the rate was 38 percent. By 2006, when there were 25 members, rates had dropped 12.2 percentage points to 25.8 percent, representing a decline of 32 percent.

With an average corporate income tax rate of 18.9 percent the Eastern European states that joined the EU in 2004 have tax rates among the lowest in Europe. Their accession to the EU also increased their attractiveness for foreign investors. Furthermore, due to the increased freedom of movement of capital and labor in the EU, these countries now directly compete with western European nations for investment and labor.[1]



Source: KPMG International, 2006

Among the major nations in the EU, Germany slashed its federal tax rate from 59.7 percent in 1993 to 38.4 percent this year, representing a decline of nearly 36 percent in the 14-year period. This decline may be attributable to increasing competition, especially with the accession of the new EU Member States in 2004. Despite that hefty decrease, Germany still has the highest corporate income tax rate among EU countries (although there are moves to cut the German rate still further and widen the tax base), followed by Italy, with 37.3 percent. Malta and Spain each have a corporate tax rate of 35 percent.

The largest decline among EU countries in the 14-year period was Ireland, which cut its rate from 40 percent in 1993 down to 12.5 percent in 2006, a 68.8 percent reduction. The second-largest declines were Austria and Germany, each cutting their rates by 39 percent. Portugal and Italy reduced rates 31 percent and 29 percent, respectively. Portugal's rate is 27.5 percent and Italy's is 37.3 percent.

[1] Jens Tartler, "Neue EU-Staaten zwingen das alte Europa zu Steuersenkungen," *Financial Times Deutschland*, April 29, 2005, p. 14; available at http://www.cesifo.de/portal/page?_pageid=36,2381006&_dad=portal&_schema=PORTAL&item_link=echo-FTD-29-04-05.htm

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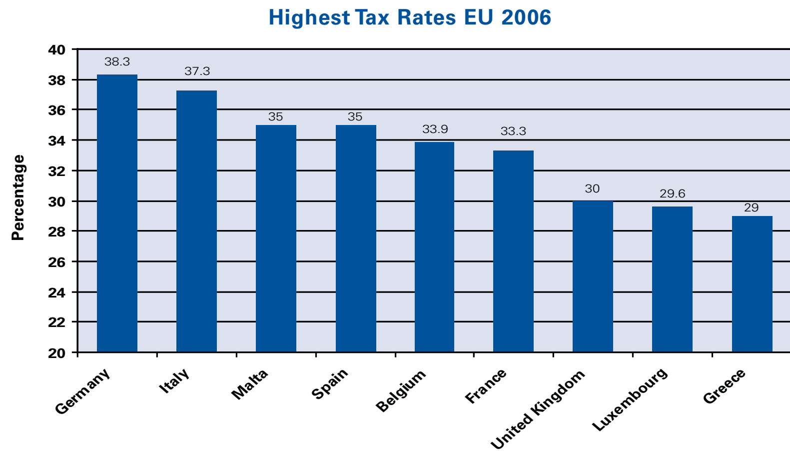
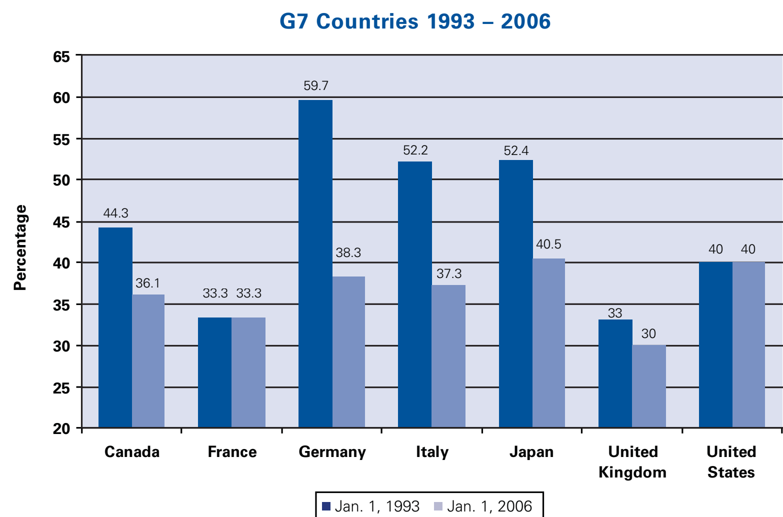


Source: KPMG International, 2006

The average corporate tax rate for countries in the OECD in 2006 is 28.1 percent, which is 8.7 percentage points less than the 1993 average rate. By contrast, nations in the G7 have an average corporate tax rate in 2006 of 36.5 percent, which stands in significant contrast to those nations in the OECD.

Reviewing the development of the countries among the G7[2] with the exception of the United States and France, all have reduced their corporate income tax rates during the 14-year period[3].



Source: KPMG International, 2006

[2] Countries of the Group of Seven are Canada, France, Germany, Italy, Japan, the United Kingdom, and the United States

[3] *KPMG Corporate Tax Rate Survey 2006*, available at http://www.kpmg.co.nz/download/102964/110012/KPMG's%20Corporate%20Tax%20Rate%20Survey%202006.pdf

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Among the countries that have reduced their rates:

- Germany's rate dropped 21.3 points, or 36 percent in the period
- Italy's 14.9 percent decline represents a decrease of 28.6 percent
- Japan's rate declined 11.9 points, or 22.7 percent
- Canada's rate dropped 8.2 percentage points, or 18.5 percent
- The United Kingdom's rate slipped 3 points in the period, down 9.1 percent

High-Tax Regimes

An examination of the tax data over this period indicates that despite cuts in corporate income tax rates, there is a tendency for high-tax regimes to remain so, as indicated in the comparison of regions around the world. At top there are the G7 countries whose corporate income tax rates, with the exception of the United Kingdom and France, are all within a range of 4 percentage points. The G7 average rate is 36.5 percent, which is about 8 percentage points more than the OECD average and 11 percentage points higher than the average rate of the EU countries.

Today the highest corporate income tax rate within the OECD is in Japan, with a rate of 40.7 percent. As is the case with Germany and most countries in the OECD, Japan substantially reduced its tax rate during the 14-year period. Japan's 1997 rate stood at 51.6 percent, which had been unchanged since 1994. But in 1999, Japan reduced the rate to 48 percent, and the following year the rate was cut again, to 42 percent. Today's rate of 40.7 percent represents a drop of slightly more than 22 percent since 1993.

Second-ranked in terms of the highest corporate income tax rate today is the United States with a combined rate of 40 percent. The United States was among the first countries to react to the large tax reduction in the United Kingdom, reducing its corporate income tax rate in 1986 from 50 to 39 percent. Before the reduction, the United States had the second-highest corporate income tax rate within the G7. Only Germany imposed a higher tax burden with 56 percent at that time. Since then the corporate income tax rate in the United States has changed only once when policymakers increased the rate by 1 percentage point in 1993. Since nearly all other countries reduced their taxes during the past decade, the United States now faces increased economic competition, especially since improved transport and communication links mean that corporations now have a greater choice than ever before of where to site their operations.

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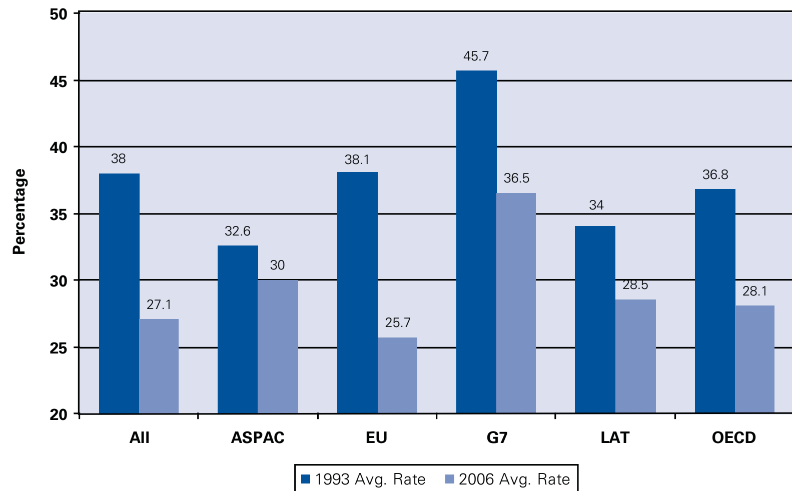

Source: KPMG International, 2006

Notes for chart

- ASPAC: 2 countries in 1993; 19 in 2006
- EU: 15 countries in 1993; 25 in 2006
- LAT: First year was 1995, with 1 country; 19 in 2006
- OECD: 24 countries in 1993; 30 countries in 2006

Budgetary Aspects

Despite its consistently high rates, U.S. corporate income tax has proved to be a relatively inefficient budgetary instrument. Corporate income tax revenue in the United States only amounts to 2 percent of GDP (making it 26th by this measure in the OECD) and accounts for only 8.1 percent of all collected taxes (ranked 15th) in the United States in 2003.

The countries that rely most on corporate income taxes are Luxembourg, Norway, and Australia; however, all of them have below-average corporate income tax rates.[4]

In Germany, corporate tax receipts account for 3.5 percent of all tax revenues and only 1.3 percent in relation to the GDP. In fact countries with higher tax rates, such as the United States, Germany, and Japan, tend to have lower corporate tax collections as a percentage of GDP than the OECD average of 3.4 percent.[5]

[4] Chris Atkins and Scott A. Hodge, "The U.S. Corporate Income Tax System: Once a World Leader, Now a Millstone Around the Neck of American Business," The Tax Foundation, November 2005 No. 136, available at http://www.taxfoundation.org/news/show/1175.html

[5] Chris Atkins and Scott A. Hodge, loc cit, p.4

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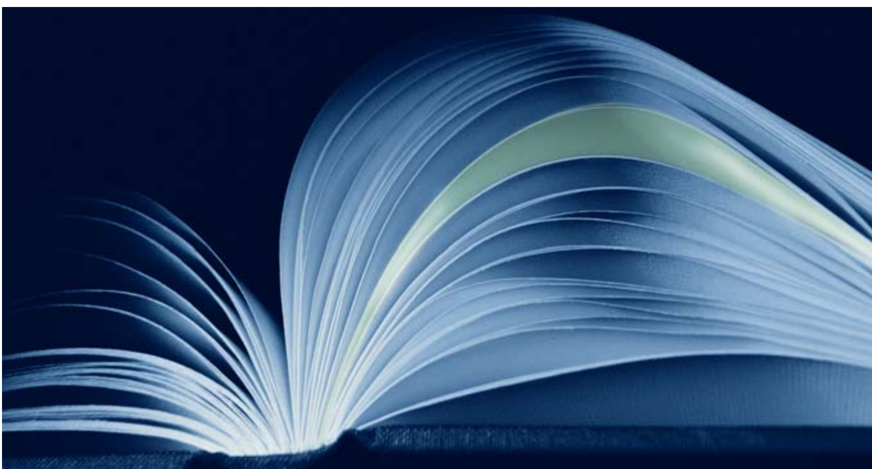
Thus, a reduction in corporate income taxes might be a tax cut that more often than not will pay for itself. A lower tax rate might initially reduce a corporation's motivation to transfer taxable profits to low-tax regimes.[6] For example, the enactment of the American Jobs Creation Act of 2004, which lowered repatriation taxes from 35 percent to 5.3 percent for one year, showed that companies can be very sensitive to such tax offers. During 2005, U.S. companies, according to a J. P. Morgan Chase evaluation, repatriated approximately $300 billion, which was far more than expected.[7]

Low-Tax Regimes

Aside from countries such as the Cayman Islands and Bermuda, which do not impose any corporate taxes on businesses, several countries have adopted a low-tax policy over the period and have shown themselves to be attractive for foreign investments. Poland reduced its tax rate from 38 percent in 1997 to 19 percent, Cyprus has cut its rate from 28 percent to 10 percent, and Hungary's rate stands at 16 percent.

Perhaps the most remarkable example of a successful rate reduction is Ireland, which slashed its rate from 40 percent in 1993 to 12.5 percent today. This tax cut had a very positive effect on the Irish economy. When Ireland joined the EU in 1973 its GDP was 60 percent of the average European GDP. This year (2006) its GDP stands at 110 percent. Additionally, Ireland will this year become net contributor to the EU, meaning that the country will pay more to the EU than it receives in grants and aid. During the 1990s the Irish economy enjoyed growth rates of up to 12 percent and became a magnet for foreign capital and immigrants. The growth of the Irish economy, however, has slowed to a more moderate 2.5 percent in recent years due to strong competition from Eastern Europe. Nevertheless, in 2003, Ireland still attracted foreign investments of $34.3 billion, compared with $36.1 billion in Germany.[8]



[6] Martin A. Sullivan, "A New Era in Corporate Taxation," *Tax Notes*, January 30, 2006, p.440-442, available at http://taxprof.typepad.com/taxprof_blog/files/2006-1557-1.pdf

[7] Chris Atkins and Scott A. Hodge, loc cit

[8] "EU Newcomers Anger France, Germany With Tax Cuts," Bloomberg.com, June 1, 2004, available at http://www.bloomberg.com/apps/news?pid=10000085&sid=aHHCzI1gwQkg&refer=europe

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Similarly, countries in Scandinavia have realized significant economic growth, in part due to tax reductions. As a group, these northern European countries have an average tax rate of 25.6 percent, which is only slightly higher than the European average. However, the Scandinavians have been quietly reducing their corporate income tax rates. Denmark reduced its statutory tax rate from 50 percent to 30 percent in 1987, with an actual rate of 28 percent. Sweden followed in 1992 when it reduced the tax rate from 51 percent to 25 percent, with a slight rise to 26 percent today. Norway heavily reformed its tax system in 1992, implemented a flat tax system, and lowered the corporate tax rate from 52 to 28 percent, which is still the actual rate.[9] In 1993, Finland also slashed its corporate tax rate, from 43 percent to 25 percent, with a rate currently at 26 percent. Iceland reduced its corporate tax rate in 2002 by 12 percentage points to 18 percent, which is by far the lowest in Scandinavia and the third-lowest among the OECD countries.[10] Today there are five Scandinavian countries among the top 10 when measured by economic growth. Finland is also leading the United States, Denmark, and Sweden in economic competitiveness.[11]

Many factors influence economic growth, and tax rate reductions may very well be one of those factors.[12] To quote Stefan Bach of the German Institute of Economic Development, "Even if a nexus between tax cuts and economic growth is not clear in theory and difficult to prove empirically, the international experience shows: countries that have lowered their corporate income tax had a positive economic development."[13]

[9] *Recent Developments in the Norwegian Tax System*, Ministry of Finance, Norway, available at http://odin.dep.no/fin /english/topics/p4500279/006041-990650/dok-bn.html

[10] Martin A. Sullivan, loc cit

[11] "USA im Schatten Finnlands," *Sueddeutsche Zeitung*, October 30, 2003, available at http://www.sueddeutsche.de /wirtschaft/artikel/604/20584/

[12] Peter Birch Sorensen, "Neutral Taxation of Shareholder Income: A Norwegian Tax Reform Proposal," p. 5

[13] Stefan Bach, German Institute of Economic Development (DIW), "Ruettgers erzuernt Union und FDP," Handelsblatt 8. August 2006, S. 3

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