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Switzerland's 15% top-up tax in 2026: first returns, safe harbours and who gets the money

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The Swiss top-up tax has applied since 2024 and the international one since 2025. In April 2026 the Federal Tax Administration confirmed how the new OECD safe harbours apply.

Country reference

- Country: Switzerland (Wave 1 expansion country)
- Authorities: Federal Tax Administration (FTA); Federal Department of Finance (FDF); cantonal tax administrations
- Topic: Top-up tax for large multinational groups under the OECD/G20 minimum tax
- Key date: FTA communications of 7 April 2026; first Swiss top-up tax returns due 30 June 2026
- Law: Federal Constitution (vote of 18 June 2023); Minimum Taxation Ordinance

The rules in brief

- Groups with consolidated annual turnover of at least EUR 750 million are in scope.
- Where the effective tax rate is below 15%, Switzerland charges the difference as a top-up tax.
- Swiss top-up tax (a qualified domestic minimum top-up tax) has applied since 1 January 2024.
- International top-up tax (the income inclusion rule) has applied since 1 January 2025, after the Federal Council's decision of 4 September 2024.
- Switzerland has not introduced the undertaxed profits rule.

What happened in 2026

- 5 January: the OECD Inclusive Framework agreed the Side-by-Side Package of new safe harbours.
- 7 April: the FTA published two communications. One covers the temporal application of the Side-by-Side Package and how elections are exercised. The other covers the guidance on Article 9.1 of the model rules, which limits the use of certain deferred tax assets.
- 30 June: first Swiss top-up tax returns were due, according to adviser commentary.
- Returns and registration go through the federal ePortal.

Where the money goes

- 75% of top-up tax receipts go to the cantons and 25% to the Confederation.
- The first receipts arrive in 2026. The federal financial plan assumes CHF 400 million a year for the Confederation and CHF 1.2 billion for the cantons.

- In its 2027 budget release the Federal Council called these estimates very uncertain.

Legal footing

Voters approved the constitutional basis on 18 June 2023 with 78.5% in favour. The tax runs on an ordinance for now. The Federal Council must send Parliament a federal act within six years of the ordinance taking effect.

What to do now

- Check which safe harbours the group can elect for financial years starting in 2026, and document the election.
- Review deferred tax assets against the Article 9.1 guidance before finalising returns.
- Confirm ePortal access and who files for each Swiss entity.

Our take

Several cantons have set up or announced location support funded from their share, so the top-up tax is changing the Swiss offer, not ending it. Groups with a Swiss principal company should model the safe harbours before assuming a top-up payment, and should ask their canton what support is available.

Sources

- Federal Tax Administration: Top-up tax
- Federal Tax Administration: Official statements on the top-up tax
- Federal Council news: Top-up tax and the Side-by-Side Package (7 April 2026)
- Federal Department of Finance: Implementation of the OECD minimum tax rate in Switzerland
- Deloitte: Switzerland provides guidance on the integrity rule and the Side-by-Side Package

Important. This summary is for general information and is not tax, legal or financial advice. It is based on public Federal Tax Administration and Swiss federal government publications, together with adviser commentary, and may be incomplete or out of date. The official legislation and guidance prevail; check the official text before acting.

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