

## Overview of Tax Changes in 2026 and Outlook on Key Legislative Projects

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As of 1 January 2026, various tax-relevant legislative and regulatory changes came into effect in Switzerland. Additional provisions will follow over the course of the year. The reforms largely reflect a trend towards increased transparency and the expansion of international tax information exchange. The most important changes are summarized below.

### **AUTOMATIC EXCHANGE OF INFORMATION ON CRYPTO ASSETS (CARF) AND ADJUSTMENTS TO THE COMMON REPORTING STANDARDS (CRS)**

As of 1 January 2026, Switzerland has established the domestic legal framework for the implementation of the automatic exchange of information on crypto assets. To this end, the Federal Act and Ordinance on the International Automatic Exchange of Information in Tax Matters (**AEOIA / AEOI Ordinance**) were amended. The new reporting framework is based on the OECD's **Crypto-Asset Reporting Framework (CARF)**.

The international treaty basis<sup>1</sup> has not yet been ratified. The National Council's Economic Affairs Committee (WAK-N) suspended discussions in November 2025, mainly due to delayed implementation in key markets and unresolved interpretive issues at the OECD level. Parliamentary consideration is expected to resume in 2026. If approved, information exchange could begin on **1 January 2027**, with the first data exchange likely occurring in **2028**.

In parallel, adjustments to the OECD **Common Reporting Standard (CRS)** have been decided, particularly concerning:

- inclusion of digital payment instruments,
- expansion of reportable assets to include hybrid and tokenized instruments,
- clarifications on due diligence obligations and technical harmonisation.

The Swiss Federal Council has decided that the CRS amendments relating to crypto assets will also apply only from 2027.

Further information can be found at this [LINK](#).

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<sup>1</sup> Addendum to the Multilateral Competent Authority Agreement on the Automatic Exchange of Information on Financial Accounts and to the Multilateral Competent Authority Agreement on the Automatic Exchange of Information under the Crypto-Asset Reporting Framework.

## **INTERNATIONAL AUTOMATIC EXCHANGE OF SALARY DATA**

Double taxation agreements (**DTAs**) or related supplementary agreements with Italy and France contain special rules on taxation of cross-border workers and teleworking. These rules are complemented by an automatic exchange of salary data.

Implementing the automatic exchange of information requires new legal provisions under Swiss law. The Federal Act on the International Automatic Exchange of Information on Salary Data (**AIALG**) provides the necessary domestic legal basis. The Act specifically regulates:

- employer reporting obligations,
- responsibilities of Cantonal Tax Authorities and the Swiss Federal Tax Administration (**SFTA**),
- data protection and procedural matters.

The referendum period for the AIALG expired unused on 15 January 2026. The Act is expected to come into force no earlier than 1 May 2026.

Under this [LINK](#) you will find further information on this topic.

## **TRANSPARENCY REGISTER AND AMENDMENTS TO THE ANTI-MONEY LAUNDERING ACT**

The new Federal Act on the Transparency of Legal Entities and the Identification of Beneficial Owners (**LETA**) aims to increase transparency of corporate structures in Switzerland and to more effectively combat the misuse of legal entities. In the future, legal entities must not only identify their beneficial owners but also report them to a federal transparency register. The transparency register is, in principle, not publicly accessible.

A beneficial owner is a natural person who directly or indirectly, alone or with others, controls a company. Control through ownership exists, in particular, when a person holds at least 25% of the capital or voting rights. Control by other means exists when a person can exert a significant legal or factual influence over the company. Reporting obligations also apply to certain foreign companies with a connection to Switzerland.

The purpose of the transparency register is to provide law enforcement and administrative authorities with targeted access to reliable information, to more effectively combat money laundering, asset concealment, corruption, tax fraud, and tax evasion. Notably, the SFTA and cantonal tax authorities will also have access to the register. In particular, in residence and tax domicile procedures, the new transparency is expected to reduce the information asymmetry between taxpayers and tax authorities.

In parallel, the scope of the Anti-Money Laundering Act (**AMLA**) is being expanded. In the future, certain advisers – in addition to financial intermediaries – will also be subject to AMLA's due diligence and reporting obligations. This includes, in particular, individuals professionally involved in real estate transactions or in the structuring of non-operational legal entities.

The referendum period for the LETA and the AMLA amendments expired unused on 15 January 2026. The corresponding legislative and regulatory provisions are expected to come into force in the second half of the year 2026.

Under this [LINK](#) you will find more information.

## **GLOBE INFORMATION RETURN (GIR) AND INTERNATIONAL INFORMATION EXCHANGE**

In the context of the OECD minimum taxation rules (Pillar 2), the GloBE Information Return (**GIR**) has been introduced in Switzerland. To avoid multiple filings, an international agreement allows the automatic exchange of this information between countries.

As of 1 January 2026, corresponding ordinance amendments came into effect. They specifically regulate:

- submission procedures with the SFTA,
- international exchange of information,
- the use of data by cantonal authorities.

Additionally, on 16 December 2025 the Council of States approved the multilateral agreement on the exchange of GloBE information. Entry into force is expected no earlier than 1 July 2026.

Further information can be found at this [LINK](#).

## **EXTENSION OF THE LOSS CARRYFORWARD PERIOD FROM 7 TO 10 YEARS, EXPECTED FROM 2028**

On 19 December 2025, Parliament passed the Federal Act on the Extension of the Loss Carryforward Period. This legislative amendment extends the previous loss carryforward period for self-employed individuals and legal entities from 7 to 10 years. The new rules apply to federal direct tax as well as cantonal and municipal taxes.

The extended carryforward period applies to tax losses arising from the 2020 tax period onwards. Losses from earlier periods remain subject to the previous 7-year carryforward period.

Since losses are generally verified at the time of their utilisation, it is advisable to retain relevant business documents and accounting records until the assessment of the tax period in which the loss is applied becomes final. Due to the newly provided 10-year carryforward period, it may occur that, at the time of offsetting, the statutory minimum retention period for accounting records has already expired. Voluntary extended retention is therefore recommended.

The referendum period lasts until 17 April 2026. Entry into force is expected on 1 January 2028, provided no referendum is called.

## **CONCLUSION**

The tax changes in 2026 represent another step towards greater transparency and international coordination. Companies, financial intermediaries, and advisers face expanded reporting, due diligence, and compliance obligations. Early engagement with the new rules is crucial to limit legal risks and administrative burdens.