



Key recommendations of the steering body on the substantive TP17 parameters

Date: 1 June 2017

- **Abolition of the arrangements for cantonal status companies**
- **Recommendations as a whole package of balanced tax policy, fiscal policy and social policy measures**
- **Introduction of a mandatory *patent box* in accordance with the OECD standard at cantonal level**
- **Introduction of additional *research and development deductions* that are optional at cantonal level, up to a maximum of 50%**
- **Introduction of a mandatory *relief restriction* of 70% at cantonal level**
- **Increase in *dividend taxation***
 - **Direct federal tax: 70%**
 - **Cantonal level: minimum 70%**
- ***Increase in the cantons' share* of direct federal tax from 17% to 21.2%**
- **Clause to *take the cities and communes into account* in connection with the increase in the cantons' share of direct federal tax**
- **Increase of CHF 30 in the Confederation's minimum guidelines for *child and education allowances***

Comparison of the CTR III with the steering body's TP17 recommendations

CTR III	TP17 (steering body's recommendations)
Abolition of the arrangements for status companies, with a transitional arrangement	Abolition of the arrangements for status companies, with a transitional arrangement
Increase in the cantons' share of direct federal tax from 17% to 21.2%	Increase in the cantons' share of direct federal tax from 17% to 21.2%
Patent box	Patent box
Additional R&D deductions (max. 50%)	Additional R&D deductions (max. 50%) - Restricted to personnel expenses with supplement
Relief restriction 80%	Relief restriction 70%
	Increase in dividend taxation - Confederation: 70% - Cantons: min. 70%
	Consideration of the cities and communes
	Increase of CHF 30 in family allowances
Interest-adjusted profit tax on above-average levels of equity capital	