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Implementation of Tax Reform and AHV Financing in the canton of Obwalden

The Swiss corporate tax reform ensures that the Swiss corporate tax system enjoys international acceptance and maintains Switzerland's attractiveness as a business location. The changes affect, in particular, the Swiss Federal Act on Direct Federal Tax (DBG), as well as the Tax Harmonisation Act (StHG) and its implementation into cantonal tax law. They include the abolition of the cantonal tax status (privileged taxation of holding companies, mixed companies and domiciliary companies) and the introduction of internationally recognised substitute measures.

In the referendum of 19 May 2019, the Swiss electorate passed the tax package with a 66.4 % majority of the votes. On 22 September 2019, the Obwalden cantonal electorate also approved the 2020 finance bill with a 55.7 % majority of the votes. The legislative amendments came into force on 1 January 2020.

To maintain the canton's attractiveness and avoid possible migration to cantons and/or countries with lower taxation, the canton of Obwalden fully implemented the internationally recognised substitute measures provided for in the StHG.

To promote innovation, the canton of Obwalden has introduced, for example, the maximum additional deduction for R&D expenses of 50 % and the maximum relief of 90 % for the patent box. The income tax rate remains unchanged at 12.74 %.

The following page provides an overview of the most important changes to the law with an impact on corporate taxation in the canton of Obwalden.

If you have any questions, your usual contacts at PwC or one of the following STAF experts at PwC Lucerne will be happy to help you.

Overview of the most important planned legislative changes with their effects on corporate taxation in Obwalden

