

Corporate Environment

- 6.1 Corporate taxes
- 6.2 VAT and cost of capital
- 6.3 Commercial real estate

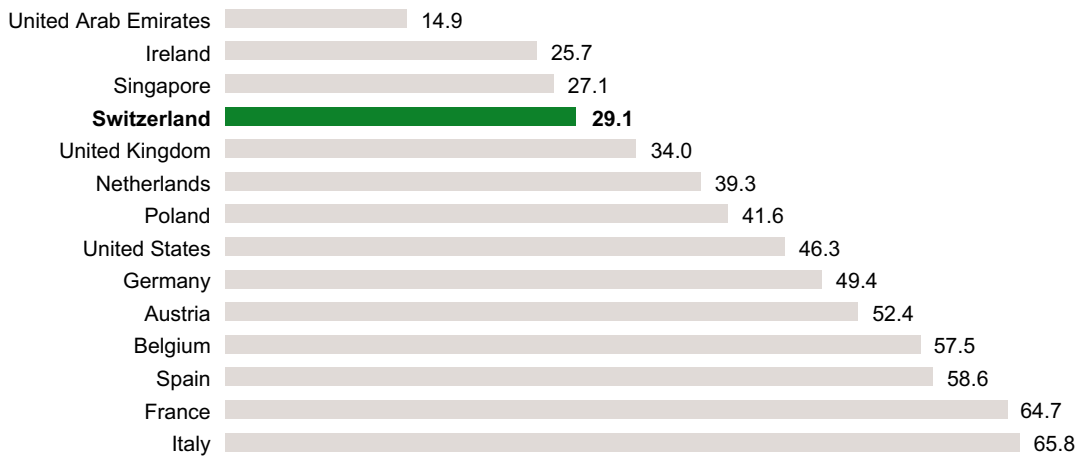


A truly business friendly environment

- A fiscal environment conducive to business
- Cheap capital readily available
- Commercial premises available at competitive prices

6.1.1 Total corporate tax rates (in % of profits)

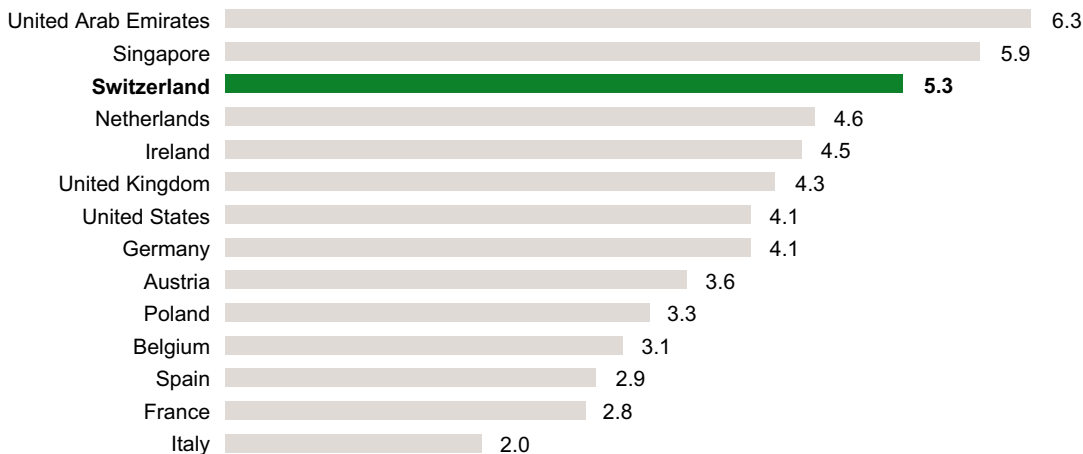
Combination of profit tax, labor tax and contributions and other taxes



Source: World Economic Forum • The Global Competitiveness Report • 2014-2015

6.1.2 Tax impact on investment

Extent to which taxes reduce the incentive to invest
(on a scale from 1 to 7, the higher the better)



Source: World Economic Forum • The Global Competitiveness Report • 2014-2015

A fiscal environment conducive to business

Swiss corporate taxes are widely recognized to be moderate by international standards and to not discourage investments and business development. Moreover, Switzerland has, by far, Europe's lowest VAT.

6.1.3 Average tax rates applied to corporate income

	Tax rate
Switzerland	12.0 to 24.0
Ireland	12.5
Germany	15.8
Singapore	17.0
Poland	19.0
United Kingdom	23.0
Austria	25.0
Netherlands	25.0
Italy	27.5
Spain	30.0
Belgium	33.0
France	33.3
United States	35.0

Note: *Switzerland:* The maximum effective corporate tax rate ranges from 12.00 percent to 24.00 percent depending on the canton and the commune. The rate comprises federal, cantonal and communal taxes. All 26 cantons apply different tax rates.

United Arab Emirates: No corporate income tax.

Source: EY • Worldwide Corporate Tax Guide • 2014

6.1.4 Treaty withholding rates (in %)

Payments from a Swiss company to	Minimum rate on dividend ordinary rule ¹	Minimum rate on dividend subsidiary	Royalties on licences ²
Austria	0 to 15	0	0
Belgium	10 to 15	0 to 10	0
Brazil (no treaty)	35	35	0
China	5 to 10	0 to 10	0
France	0 to 15	0	0
Germany	0 to 30	0.0	0
India	10	0 to 10	0
Ireland	0 to 15	0	0
Italy	15	12.5	0
Netherlands	0 to 15	0	0
Poland	0 to 15	0 to 5	0
Russia	0 to 15	0	0
Singapore	0 to 15	0 to 5	0
Spain	0 to 15	0	0
United Arab Emirates	5 to 15	0	0
United Kingdom	0 to 15	0	0
United States	0 to 15	0	0

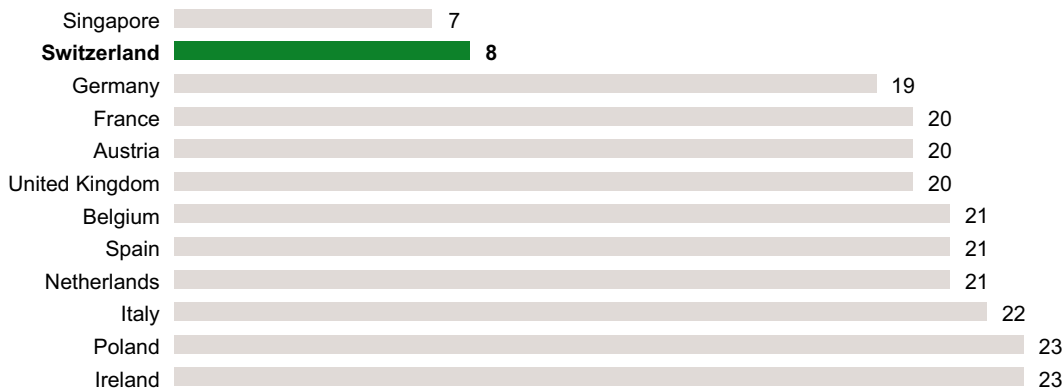
Note: 1. Dividend paid by a Swiss company is subject to a 35% Swiss withholding tax and can be reduced according to the above-mentioned tax treaty rates.

2. There is no Swiss withholding tax on payment of royalties.

Source: TreatyPro.com • 2014

6.2.1 Value added tax (in %)

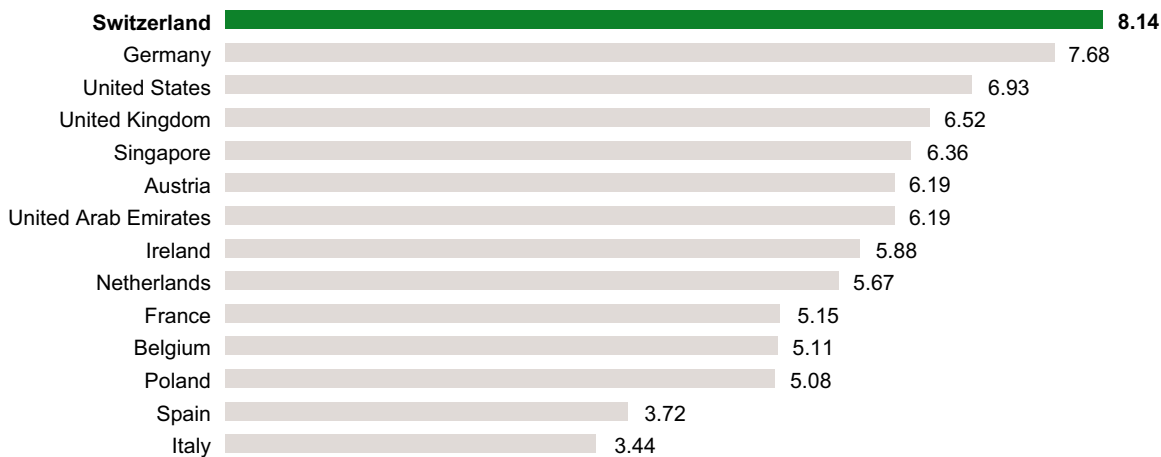
VAT standard rates (reduced or special rates may exist)



Note: Data for the United States are not homogeneous: the tax rate (state or local) may range from 2.9% to 7.5%. No value added tax in the United Arab Emirates.
Source: EY • Worldwide VAT, GST and Sales Tax Guide • 2014

6.2.2 Cost of capital

Cost of capital encourages business development
 (on a scale from 0 to 10, the higher the better)



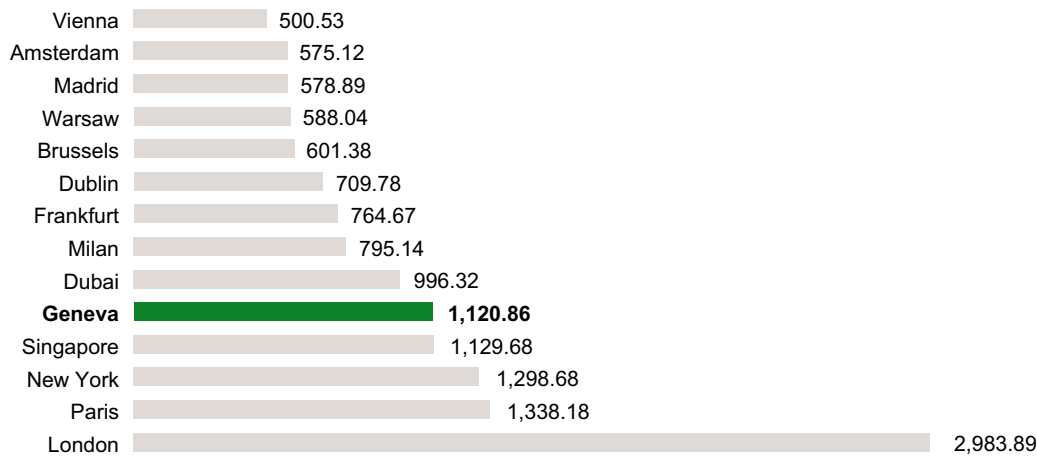
Source: IMD • World Competitiveness Yearbook Online • 2014

Cheap capital readily available

Thanks to low interest rates, the cost of capital in Switzerland is considered to be low and encourages business development.

6.3.1 Prime office occupancy costs

Prime office total occupancy costs (include service charges and taxes)
In US\$, by square meter / annum



Source: CBRE • Global Prime Office Occupancy Costs • June 2014

6.3.2 Annual office costs in Geneva (US\$/m²)

Area	Standard		Prime	
	Minimum	Maximum	Minimum	Maximum
Central business district	480	620	650	910
Center, left bank	360	470	445	625
Center, right bank	325	445	460	615
Airport, International organizations	300	385	460	545
Meyrin, Vernier	195	265	270	360
Praille, Accacias, Vernets	270	335	355	435
Lancy, Carouge	265	340	375	470
Chêne, Thônex	225	280	290	380

Source: Colliers • Office Costs Indicator • N. 18 Summer 2014

Commercial premises available at competitive prices

Office space is readily available in Geneva and at competitive prices by international standards.

