

From the taxation of savings to automatic exchange

*Dr Alexander Ressos, TEP
Attorney-at-Law (Switzerland), Solicitor (Hong Kong),
Solicitor (England & Wales)*

The tax relationship between the Geneva financial centre and the Union has followed a path of its own. The savings taxation agreement, concluded within the framework of the Bilateral Agreements II and applied from 2005, required Swiss paying agents to levy a withholding tax on interest paid to residents of the Union, the proceeds of which were passed on to the States concerned, in exchange for the preservation of banking secrecy. This agreement was the compromise the financial centre had secured in order to protect its model.¹ The end of banking secrecy, traced in Part E, rendered that compromise obsolete. The agreement on the automatic exchange of information, signed in 2015, replaced the withholding tax with the transmission of account data from 2017 onwards.²

This development had a paradoxical consequence for the financial centre. By accepting tax transparency, Switzerland removed the Union's principal grievance against it, without obtaining in return the market access it had hoped for. The Union treated transparency as a self-evident obligation rather than as a concession calling for a counterpart. The extension to crypto-assets and digital assets, with 74 partner States including all the Member States, and the Union's parallel introduction of its own directive on the reporting of crypto-assets confirm that tax convergence is now an established fact and no longer serves as a bargaining chip.³ For the financial centre's European clientele, the consequence is clear: they are served in Geneva in conditions of complete transparency. The centre's argument now rests on expertise, stability and diversification, as Part E has shown.

1 Notes

1. Agreement of 26 October 2004 between Switzerland and the European Community on the taxation of savings (Bilateral Agreements II), in force on 1 July 2005; Federal Department of Foreign Affairs, "Échange automatique de renseignements en matière fiscale (ancien

From the taxation of savings to automatic exchange

accord sur la fiscalité de l'épargne)" [Automatic exchange of information in tax matters (former savings taxation agreement)], europa.eda.admin.ch (accessed September 2026). ↩

2. Agreement of 27 May 2015, in force on 1 January 2017, first exchange in 2018; Federal Department of Foreign Affairs, europa.eda.admin.ch, cited above. ↩
3. "La Suisse échangera des informations sur les cryptoactifs avec 74 États" [Switzerland to exchange information on crypto-assets with 74 States], Allnews, 6 June 2025. ↩

For general information only. This article does not constitute legal or tax advice, does not replace advice on an individual case and creates no lawyer-client relationship. It reflects the legal position as of September 2026.

Online version: helveticaregister.com/geneva-from-the-taxation-of-savings-to-automatic-exchange