

Neighbouring France: cross-border workers, taxation and market

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

Within the Union, France occupies a place apart for Geneva, which Part J described from the angle of language. The 107,200 cross-border workers recorded in Geneva at the beginning of 2026 are, in their overwhelming majority, French residents. Their status is governed by the agreement on the free movement of persons, by a bilateral tax treaty and by an agreement of 1973 on financial compensation. Under that agreement, Geneva returns to the neighbouring French départements a share of the tax withheld at source.¹² Cross-border teleworking, which became widespread during the pandemic, has been the subject of specific agreements on social security and taxation, and their stability shapes the organisation of work within Geneva institutions.³

France is also a market and a regulator. French clients, a historic clientele for the financial centre, are served from Geneva within strict limits or through French subsidiaries. French taxation, with its real-estate wealth tax, its succession rules and its treaty with Switzerland, shapes the estate planning of French clients. Tax and judicial cooperation between the two countries, long marked by conflict, has normalised since the end of banking secrecy. Greater Geneva, a cross-border conurbation of more than a million inhabitants, 58 per cent of whom live in Switzerland, is the catchment area in which the financial centre's people live. Questions of housing, transport and taxation are dealt with there together with French authorities whom the Geneva institutions have learned to know.⁴

Worked example. A Geneva wealth manager employs 60 staff, 25 of whom are cross-border workers resident in France. The teleworking of these cross-border workers, limited to two days a week in order to remain within the framework of the tax and social security agreements, requires individual tracking of days of attendance. Documenting that tracking costs about CHF 40,000 a year in administrative time. Exceeding

the thresholds would expose the employer to the affiliation of these employees to the French social security system and to double taxation, at a potential cost of several hundred thousand francs. The manager invests in a tracking tool and trains its managers in the applicable rules.

1 Notes

1. “Statistiques frontaliers 2026”, lesfrontaliers.ch, 27 April 2026: 107,200 cross-border workers in Geneva, citing OCSTAT. ↩
2. Franco-Swiss agreement of 29 January 1973 on financial compensation relating to cross-border workers employed in Geneva: 3.5% of the gross payroll of cross-border workers from the Ain and Haute-Savoie; Comité régional franco-genevois, “La compensation financière genevoise” (The Geneva financial compensation), crfginfo.org (accessed September 2026). ↩
3. Franco-Swiss transitional agreement of 22 December 2022 and amending protocol to the tax treaty signed on 27 June 2023, allowing up to 40% of annual working time to be spent teleworking without a change in taxation, applied since 1 January 2023; Ministry of the Economy (France), “La Suisse et la France signent un avenant à leur convention fiscale bilatérale” (Switzerland and France sign an amending protocol to their bilateral tax treaty), economie.gouv.fr (accessed September 2026). ↩
4. Greater Geneva: 1,046,168 inhabitants in January 2021, of whom 58.3% in Switzerland (canton of Geneva and district of Nyon) and 41.7% in France, over 1,996 km²; some 550,000 jobs; “Grand Genève”, en.wikipedia.org and grand-geneve.org, “Habitants et emplois” (accessed September 2026). ↩

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-neighbouring-france-cross-border-workers-taxation-and-market