

Pillar Two and the GloBE Information Return

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The global minimum tax under Pillar Two of the OECD/G20 Inclusive Framework added a further exchange. Switzerland introduced a qualified domestic minimum topup tax from 2024 and the income inclusion rule from 2025, as Chapter F.II explains.¹ Groups in scope must file a GloBE Information Return (GIR), which contains detailed data on the effective tax rate in each jurisdiction. The OECD developed a multilateral competent authority agreement under which the GIR filed in one state is shared with the other states in which the group operates.

Switzerland signed the multilateral agreement on the exchange of GIR information in the summer of 2025. The Council of States approved it in the winter session of 2025, and the National Council in the spring session that ended on 20 March 2026. Amendments to the Minimum Taxation Ordinance took effect on 1 January 2026. Swissheadquartered groups must file the GIR for the fiscal year 2024 by 30 June 2026 through the Federal Tax Administration's portal, and Switzerland can exchange and receive GIR data for 2024 from the autumn of 2026.² The exchange gives the Italian tax administration a complete picture of the effective taxation of Swiss entities belonging to groups that also operate in Italy.

1 What corporate transparency means for Italian groups in Ticino

The cumulative effect is that a Ticino company within an international group is now visible to the Italian authorities through several independent channels: rulings, CbCR, GIR and, where the group's financial assets are held in Switzerland, the CRS. Italian anti-avoidance rules on controlled foreign companies (Art. 167 TUIR) and on the deemed Italian residence of foreign companies (*esterovestizione*, Art. 73 para. 5-bis TUIR), which Chapter H.II examines, are applied with the help of these data. A Ticino company whose substance is thin, whose effective tax rate is low and whose

management sits in Milan will be identified without the Italian authorities having to suspect it in advance. Transparency at the corporate level thus shifts the risk of Italian groups in Ticino from detection to qualification: the facts are known, and the dispute concerns their legal assessment.

Essentials. Since 2018 Switzerland spontaneously exchanges tax rulings issued since 2010 under Art. 22a ff. TAAA and Art. 5 ff. of the Tax Administrative Assistance Ordinance. Country-by-country reports of groups with revenue of at least EUR 750 million are exchanged automatically for fiscal years from 2018. The GloBE Information Return under Pillar Two will be exchanged from the autumn of 2026 for the fiscal year 2024. For Italian groups with Ticino subsidiaries, the Italian tax administration has access to these data without any request.

2 Notes

1. Ordinance on the Minimum Taxation of Large Corporate Groups of 22 December 2023 (Minimum Taxation Ordinance), SR 642.161, in force on 1 January 2024 for the QDMTT; income inclusion rule from 1 January 2025 by decision of the Federal Council of 4 September 2024. ↩
2. Deloitte Switzerland, "Switzerland ratifies multilateral agreement on GIR exchange", 2026, <https://www.deloitte.com/ch/en/services/tax/blogs/switzerland-ratifies-multinational-agreement-on-gir-exchange.html>. ↩

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