

Tax transparency and the CARF

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Switzerland has decided to implement the OECD Crypto-Asset Reporting Framework together with amendments to the Common Reporting Standard. The amended Common Reporting Standard has applied since 1 January 2026. In November 2025, however, the Federal Council decided that the crypto-asset provisions would not apply in 2026, because a parliamentary committee had suspended its deliberations on the partner states. The crypto-asset rules will therefore apply from 2027 at the earliest.¹ Crypto service providers resident in Switzerland will have to collect information on their clients' tax residence and report their transactions to the Federal Tax Administration, which will exchange the data with the tax authorities of the partner states.

The framework ends the anonymity that holders of crypto-assets could enjoy in relation to their own tax authorities when they used a Swiss provider. It completes the automatic exchange of information that transformed Swiss private banking after 2017, as Part F described. For Zug, the reform affects both the service providers, which must build reporting systems, and the wealthy residents and foreign clients who hold crypto-assets. The canton's attraction for holders of crypto-assets will rest on its tax rates, its legal certainty and its services. It will no longer rest on any form of discretion.

1 Notes

1. Federal Council, press release "Federal Council approves amendment to the automatic exchange of information in tax matters", 26 November 2025, [news.admin.ch](https://www.admin.ch/news.admin.ch): amended CRS in force on 1 January 2026; the provisions on crypto-assets in the AEOIA and the AEOI Ordinance shall not apply in 2026 after the National Council's Economic Affairs and Taxation Committee suspended its deliberations on the CARF partner states on 3 November 2025; Alpadis, "Switzerland delays exchange of crypto-asset information to 2027", 2 January 2026, alpadis.com. ↩

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