

The Zurich Commercial Court and international dispute resolution — overview and summary

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A financial centre is judged by the quality of the institutions that decide its disputes as much as by the size of its banks. Investors, lenders and trading houses place money where they expect a contract to be read as it was written, where an interim order can be obtained within days and where a judgment or award will be enforced against assets that sit in a local account. Zurich has offered these conditions for a long time. Its specialised commercial court, created in the 1860s, was the first institution of its kind in Switzerland. The city is also among the most frequently chosen seats of international arbitration in the world, while the Swiss law of debt enforcement gives creditors a set of tools for reaching assets that few other legal systems combine in a single statute.

This chapter opens Part I of the book, which presents the law, the courts, the enforcement machinery and the compliance framework of the Zurich financial centre as they stand in September 2026. It concentrates on civil and commercial dispute resolution. The prosecution of economic crime, anti-money-laundering compliance, sanctions and export control, and mutual legal assistance with asset recovery and tax information exchange each receive a chapter of their own and are mentioned here only where the lines cross. Readers who know the Geneva volume will find a different institutional landscape: Geneva has no commercial court in the sense of the federal Civil Procedure Code, whereas Zurich has built its reputation for commercial justice around one.

The chapter proceeds from the court to the wider system. It begins with the history, composition and jurisdiction of the Zurich Commercial Court, the *Handelsgericht*, and then turns to the Swiss Civil Procedure Code of 2011 and its revision in force since 1 January 2025, including the project of a Zurich International Commercial Court conducting proceedings in English. After a short description of the other Zurich courts, the chapter

examines international arbitration with its seat in Zurich, the role of mediation and ombudsman schemes, the recognition and enforcement of foreign judgments and awards, and the Swiss law of debt enforcement and attachment as an instrument of recovery. A comparison with London, Singapore, the new German commercial courts and Geneva precedes a closing assessment of what Zurich's tradition of commercial adjudication means for the financial centre today.

1 Conclusion

The Zurich Commercial Court is the institution that best embodies the relationship between law and commerce in the financial centre. Founded in 1866 as the first court of its kind in Switzerland, it brought together professional judges and businesspeople in a mixed bench that has survived every reform since. Its jurisdiction under Article 6 CPC and sections 44 and 45 of the Zurich GOG covers the core of the financial centre's disputes, from shareholder litigation and director liability to banking, insurance and fund disputes. Its judgments can be challenged only before the Federal Supreme Court, which gives parties a two-instance procedure of rare efficiency. The revision of the CPC in force since 1 January 2025 has made the court more accessible through lower cost advances, the refund of advances to successful parties, electronic hearings and a limited in-house counsel privilege. It has also opened the way for an international chamber conducting proceedings in English, a project that Zurich has pursued since 2018 and that was before the cantonal parliament in 2026.

Alongside the state courts stands an arbitration practice of international rank. Chapter 12 PILA, revised with effect from 2021, offers a liberal framework, a narrow review by the Federal Supreme Court and the possibility of filing challenges in English. Zurich is the leading seat for institutional arbitration under the Swiss Rules, and Switzerland as a whole ranks among the three leading countries of seat in the ICC statistics. Mediation and the ombudsman system under the Financial Services Act complete the offer for smaller disputes and for private clients. The Lugano and New York Conventions, together with the general rules of the PILA, ensure that foreign judgments and awards can be enforced against Zurich assets, while the Swiss attachment gives creditors a fast and inexpensive freezing tool. The comparison with London, Singapore, the German commercial courts and Geneva shows that Zurich is not alone in seeking international commercial disputes. Its distinctive contribution is the combination of an expert commercial bench, a settlement culture, a strong arbitration community and an enforcement system that reaches the assets that the financial centre holds.

2 In five sentences

1. The Zurich Commercial Court, founded in 1866 and attached to the Obergericht, decides commercial disputes as the single cantonal instance with a mixed bench of professional judges and commercial judges drawn from business.
2. The revised Civil Procedure Code, in force since 1 January 2025, reduced cost advances, introduced electronic hearings and an in-house counsel privilege, and allowed cantons to create international commercial courts conducting proceedings in English.
3. Zurich's project for a Zurich International Commercial Court, submitted to the cantonal parliament in July 2025, would open the existing Commercial Court to international disputes of at least CHF 100,000 in English on the agreement of all parties.
4. Under Chapter 12 PILA as revised in 2021, Zurich is the leading seat for arbitrations under the Swiss Rules, and challenges to awards go directly to the Federal Supreme Court, which sets aside only a small fraction of them and accepts submissions in English.
5. The Lugano and New York Conventions, the recognition rules of the PILA and the Swiss attachment under the SchKG allow creditors to enforce judgments and awards against assets held in Zurich, which makes the city a central place of enforcement as well as of adjudication.

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