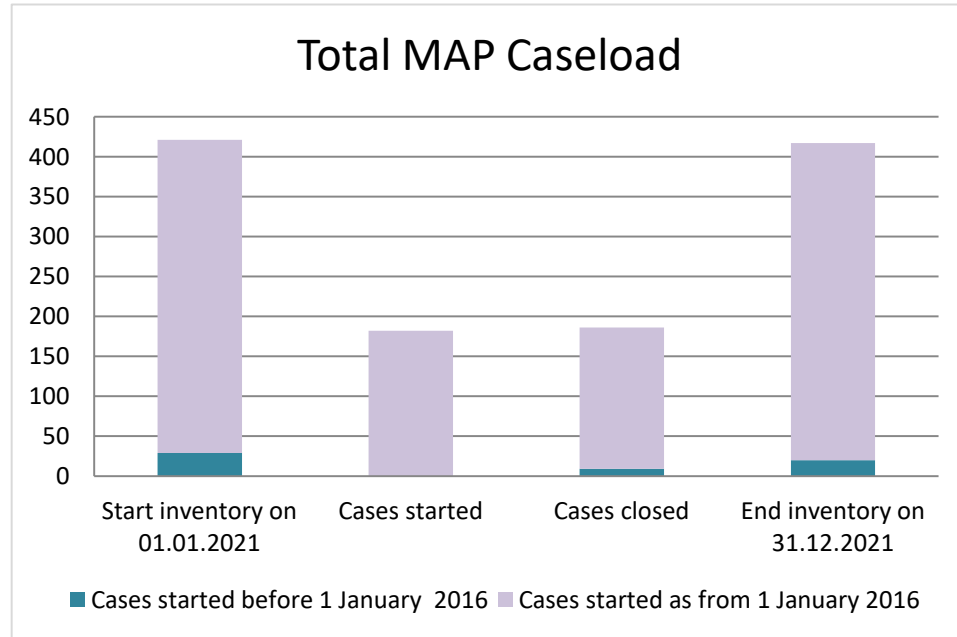


Switzerland



Cases started before 1 January 2016	2021 Start inventory	Cases started	Cases closed	2021 End inventory
Transfer pricing cases	15	0	4	11
Other cases	14	0	5	9

Cases started as from 1 January 2016	2021 Start inventory	Cases started	Cases closed	2021 End inventory
Transfer pricing cases	175	72	62	185
Other cases	217	110	115	212

Average time needed to close MAP cases

Cases started before 1 January 2016	Average time
Transfer pricing cases	67.13
Other cases	66.70

Note: the average time taken to close MAP cases that started before 1 January 2016 was computed by applying the following rules:

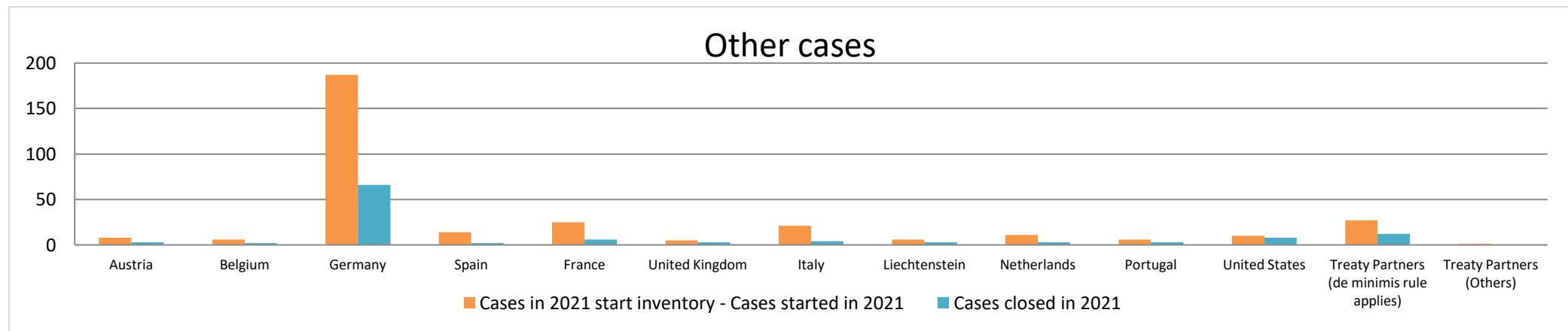
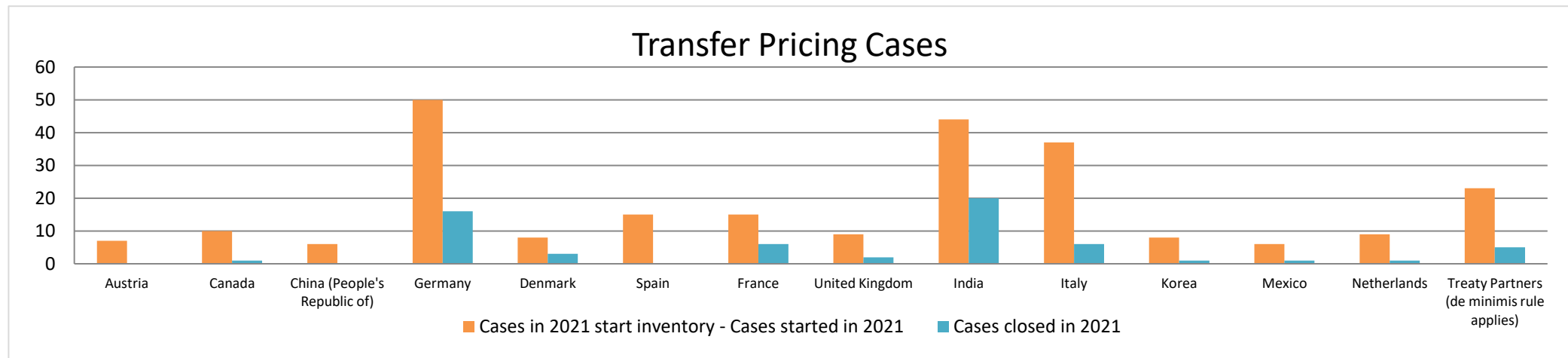
- (i) start date: the date when the MAP request was received; and
- (ii) end date: either the date of the closing letter sent to the taxpayer or the date of final closure of the case if no agreement was reached.

Cases started as from 1 January 2016	Start to End	Receipt to Start	Start to Milestone 1	Milestone 1 to End
Transfer pricing cases	25.56	1.14	10.53	8.56
Other cases	19.56	2.18	10.31	12.43

Note: the average times to close MAP cases that started as from 1 January 2016 were computed according to the MAP statistics reporting framework available at <http://www.oecd.org/tax/dispute/mutual-agreement-procedure-statistics-reporting-framework.pdf>

Overview of MAP partners (only for cases started as from 1 January 2016)

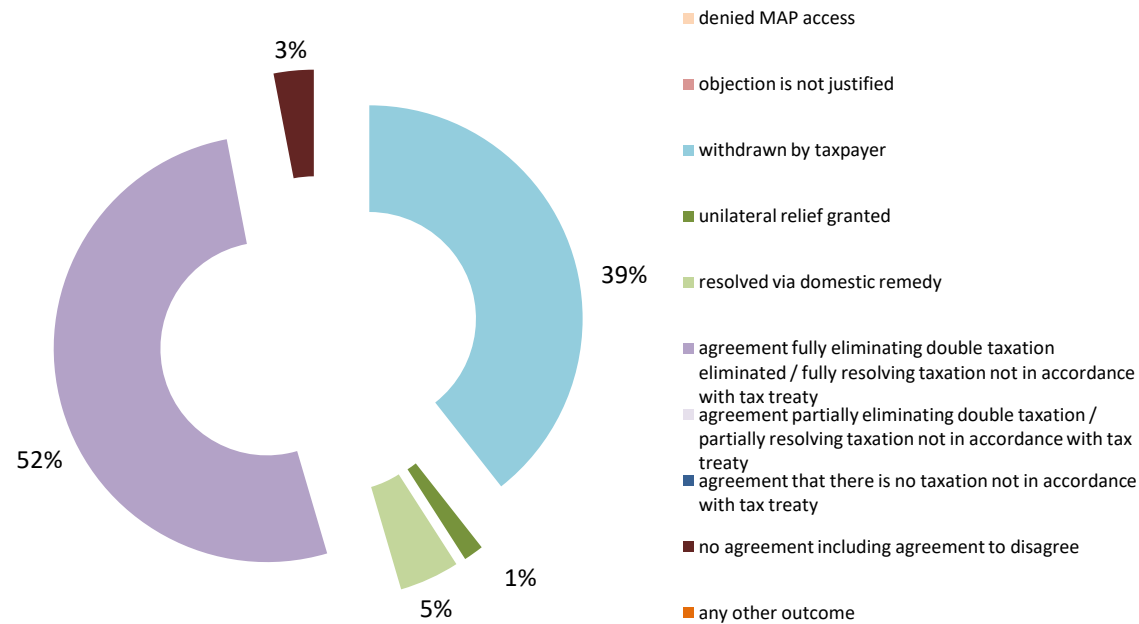
Note: the MAP cases started before 1 January 2016 and closed in 2021 are not shown in these graphs



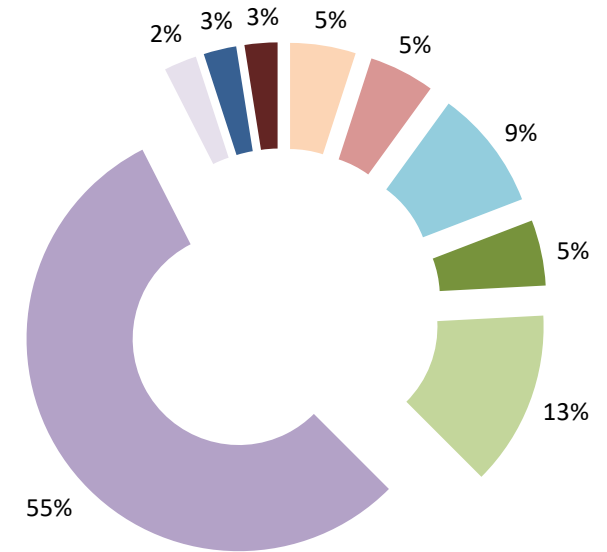
The label "Treaty Partners (de minimis rule applies)" applies to treaty partners with which the number of cases in start inventory plus the number of cases started is less than 5. The relevant MAP statistics are aggregated under this category.

The label "Treaty Partners (Others)" applies to treaty partners that are not reporting MAP statistics for the reporting period. The relevant MAP statistics are aggregated under this category.

MAP Outcomes - TP cases



MAP Outcomes - other cases



Cases closed by outcome	denied MAP access	objection is not justified	withdrawn by taxpayer	unilateral relief granted	resolved via domestic remedy	agreement fully eliminating double taxation eliminated / fully resolving taxation not in accordance with tax treaty	agreement partially eliminating double taxation / partially resolving taxation not in accordance with tax treaty	agreement that there is no taxation not in accordance with tax treaty	no agreement including agreement to disagree	any other outcome	Total
Transfer pricing cases (all)	0	0	26	1	3	34	0	0	2	0	66
Cases started before 1 January 2016	0	0	0	0	0	2	0	0	2	0	4
Cases started as from 1 January 2016	0	0	26	1	3	32	0	0	0	0	62
Other cases (all)	6	6	11	6	16	66	3	3	3	0	120
Cases started before 1 January 2016	0	0	2	0	0	0	2	0	1	0	5
Cases started as from 1 January 2016	6	6	9	6	16	66	1	3	2	0	115
All cases	6	6	37	7	19	100	3	3	5	0	186

category of cases	no. of pre-2016 cases in MAP inventory on 1 January 2021	number of pre-2016 cases closed during the reporting period by outcome:										no. of pre-2016 cases remaining in on MAP inventory on 31 December 2021	average time taken (in months) for closing pre-2016 cases during the reporting period
		denied MAP access	objection is not justified	withdrawn by taxpayer	unilateral relief granted	resolved via domestic remedy	agreement fully eliminating double taxation / fully resolving taxation not in accordance with tax treaty	agreement partially eliminating double taxation / partially resolving taxation not in accordance with tax treaty	agreement that there is no taxation not in accordance with tax treaty	no agreement including agreement to disagree	any other outcome		
Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11	Column 12	Column 13	Column 14
Row 1 Attribution/ Allocation	15	0	0	0	0	0	2	0	0	2	0	11	67.13
Row 2 Others	14	0	0	2	0	0	0	2	0	1	0	9	66.70
Row 3 Total	29	0	0	2	0	0	2	2	0	3	0	20	66.89

Notes:

Definition of a MAP case and counting of MAP cases In general, Switzerland uses the same methods to (i) classify the MAP "pre- 2016"-cases and (ii) to count these "pre- 2016"-cases as for the "post-2015"-cases (according to MAP Statistics Reporting Framework.)

Category of cases Switzerland uses the definitions set under the MAP Statistics Reporting Framework.

Potential mismatches between 2021 start inventory and 2020 end inventory Mistake in the start inventory 2020.

Notes on the computation of average time In general, Switzerland uses the same definitions of the (i) start date, (ii) end date and (iii) average times as for the "post-2015"-cases (according to MAP Statistics Reporting Framework.)

Table 1: Attribution / Allocation MAP Cases													
Treaty Partner	no. of post-2015 cases in MAP inventory on 1 January 2021	no. of post-2015 cases started during the reporting period	number of post-2015 cases closed during the reporting period by outcome:										no. of post-2015 cases remaining in MAP inventory on 31 December 2021
			denied MAP access	objection is not justified	withdrawn by taxpayer	unilateral relief granted	resolved via domestic remedy	agreement fully eliminating double taxation / fully resolving taxation not in accordance with tax treaty	agreement partially eliminating double taxation / partially resolving taxation not in accordance with tax treaty	agreement that there is no taxation not in accordance with tax treaty	no agreement including agreement to disagree	any other outcome	
Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11	Column 12	Column 13	Column 14
Row 1	Austria	3	4	0	0	0	0	0	0	0	0	0	7
	Canada	8	2	0	0	0	0	1	0	0	0	0	9
	China (People's Republic of)	2	4	0	0	0	0	0	0	0	0	0	6
	Germany	30	20	0	0	0	0	3	13	0	0	0	34
	Denmark	4	4	0	0	0	0	0	3	0	0	0	5
	Spain	6	9	0	0	0	0	0	0	0	0	0	15
	France	11	4	0	0	0	0	0	6	0	0	0	9
	United Kingdom	4	5	0	0	0	0	0	2	0	0	0	7
	India	43	1	0	0	20	0	0	0	0	0	0	24
	Italy	32	5	0	0	2	0	0	4	0	0	0	31
	Korea	5	3	0	0	0	0	0	1	0	0	0	7
	Mexico	6	0	0	0	0	0	0	1	0	0	0	5
	Netherlands	6	3	0	0	0	0	0	1	0	0	0	8
Row 2	Treaty Partners (de minimis rule applies)	15	8	0	0	4	1	0	0	0	0	0	18
	Total	175	72	0	0	26	1	3	32	0	0	0	185
Notes:													

Table 2: Other MAP Cases														
Treaty Partner	no. of post-2015 cases in MAP inventory on 1 January 2021	no. of post-2015 cases started during the reporting period	number of post-2015 cases closed during the reporting period by outcome										no. of post-2015 cases remaining in MAP inventory on 31 December 2021	
			denied MAP access	objection is not justified	withdrawn by taxpayer	unilateral relief granted	resolved via domestic remedy	agreement fully eliminating double taxation / fully resolving taxation not in accordance with tax treaty	agreement partially eliminating double taxation / partially resolving taxation not in accordance with tax treaty	agreement that there is no taxation not in accordance with tax treaty	no agreement including agreement to disagree	any other outcome		
Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10	Column 11	Column 12	Column 13	Column 14	
Row 1	Austria	7	1	0	0	0	0	0	2	0	1	0	0	5
	Belgium	4	2	0	0	0	1	1	0	0	0	0	0	4
	Germany	131	56	1	2	6	1	11	42	0	1	2	0	121
	Spain	11	3	0	1	0	0	0	0	0	1	0	0	12
	France	15	10	1	0	0	0	4	1	0	0	0	0	19
	United Kingdom	3	2	1	0	0	0	0	2	0	0	0	0	2
	Italy	12	9	0	2	0	0	0	2	0	0	0	0	17
	Liechtenstein	2	4	0	0	0	3	0	0	0	0	0	0	3
	Netherlands	10	1	1	0	1	0	0	1	0	0	0	0	8
	Portugal	1	5	2	0	0	0	0	1	0	0	0	0	3
	United States	7	3	0	0	0	0	0	8	0	0	0	0	2
Row 2	Treaty Partners (de minimis rule applies)	14	13	0	1	2	1	0	7	1	0	0	0	15
Row 3	Treaty Partners (Others)	0	1	0	0	0	0	0	0	0	0	0	0	1
	Total	217	110	6	6	9	6	16	66	1	3	2	0	212
Notes:														

Table 1: Attribution / Allocation MAP Cases					
Treaty Partner	average time taken (in months) for post-2015 cases from:				
	"Start" to "End"	Receipt of taxpayer's MAP request to "Start"	"Start" to Milestone 1	Milestone 1 to "End"	
Column 1	Column 2	Column 3	Column 4	Column 5	
Row 1	Canada	5.33	1.15	n.a.	n.a.
	Germany	22.58	1.64	14.48	9.74
	Denmark	15.29	0.93	6.10	9.18
	France	12.74	0.76	11.02	4.92
	United Kingdom	1.02	0.00	n.a.	n.a.
	India	40.21	1.15	n.a.	n.a.
	Italy	25.55	1.02	2.07	2.79
	Korea	24.33	1.15	10.78	13.55
	Mexico	16.27	1.12	0.03	16.24
	Netherlands	36.33	1.15	n.a.	n.a.
Row 2	Treaty Partners (de minimis rule applies)	11.85	0.70	1.12	2.60
	Total	25.56	1.14	10.53	8.56
Notes:					

Table 2: Other MAP Cases					
Treaty Partner	average time taken (in months) for post-2015 cases from:				
	"Start" to "End"	Receipt of taxpayer's MAP request to "Start"	"Start" to Milestone 1	Milestone 1 to "End"	
Column 1	Column 2	Column 3	Column 4	Column 5	
Row 1	Austria	28.00	1.00	2.33	26.33
	Belgium	10.14	0.25	1.61	18.44
	Germany	21.87	2.69	10.82	13.68
	Spain	7.69	1.04	n.a.	n.a.
	France	20.81	1.30	14.27	10.64
	United Kingdom	13.84	2.82	2.89	10.95
	Italy	15.74	1.14	36.82	11.77
	Liechtenstein	3.90	6.70	2.35	1.45
	Netherlands	26.24	1.88	28.57	24.10
	Portugal	12.79	1.10	9.14	21.86
	United States	14.99	0.95	8.42	7.65
Row 2	Treaty Partners (de minimis rule applies)	17.39	0.85	10.70	6.24
	Total	19.56	2.18	10.31	12.43
Notes:					

Table 3: All MAP Cases					
average time taken (in months) for post-2015 cases from:					
	"Start" to "End"	Receipt of taxpayer's MAP request to "Start"	"Start" to Milestone 1	Milestone 1 to "End"	
	Column 1	Column 2	Column 3	Column 4	
Row 1	Total Average Time	21.66	1.82	10.35	11.68
Notes:					