



Tax Policy

Agreement on OECD minimum tax: USA withdraws

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At a glance

- The G7 countries have agreed in principle to exempt the USA from the OECD minimum tax.
- In return, the USA will waive the planned "Section 899" penalty article, which would have affected EU states in particular.
- The specific implementation of the agreement will still have to be discussed within the OECD.

The USA and the other G7 countries have agreed that the USA will be exempt from the OECD minimum taxation. The agreement was reached behind closed doors on June 26, 2025. Other countries outside the G7 were not involved in the talks, including Switzerland. The agreement reached is of a fundamental nature and is to be fleshed out in the coming weeks and months within the G20 and the OECD. Final implementation will require an adjustment to the OECD rules on the global minimum tax.

When President Donald Trump took office, the USA declared that it would not accept the OECD minimum tax because it considers the US tax system to be equivalent. Where US taxes are applied, from the US perspective, these and no other taxes apply. In order to emphasize the demand for "coexistence", an article has been included in the currently planned legislation ("One Big Beautiful Bill Act") that punishes states that apply taxes that are harmful from the US perspective; these harmful taxes also include the OECD minimum tax in some cases.

The USA has now declared that it will waive this "Section 899" penalty article in return for the aforementioned agreement. EU states and companies from these states with investments in the USA would have been particularly affected by the penalty article. The agreement therefore comes as a relief there. Switzerland was not the focus of "Section 899".

What this development means for Switzerland remains to be seen. The final solution in the OECD is decisive. Depending on the regulation, changes will have to be made. As Switzerland is only implementing the minimum tax on the basis of an ordinance for the time being, the necessary adjustments could be made relatively quickly. It is clear at the moment that the two OECD taxes UTPR and IIR do not apply to US companies. This is confirmed by the official G7 statement of June 28 ([G7 statement on global minimum taxes - Canada.ca](#)). Switzerland does not apply the UTPR, but does apply the IIR (Income Inclusion Rule). The IIR also applies to US companies in Switzerland. The application of this tax will probably have to be reviewed in light of the new agreement.

economiesuisse is following developments closely and is committed to finding optimal solutions in the interests of Swiss companies and Switzerland as a business location.



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