

# Corporate Tax

## Work anywhere, together

As employees are looking at ways to “work anywhere,” companies must manage the complexities of a remote and mobile workforce. This new virtual environment amplifies existing corporate tax challenges and creates new issues as employees work outside their normal tax jurisdictions on a longer-term basis.



Regardless of the extent a company allows remote work, organizations are going to face significant risk as it relates to tax compliance. Having employees who work in a remote jurisdiction – either in another canton or country – for an extended amount of time runs the risk of establishing a

taxable permanent establishment in that location. It’s important to identify and manage the corporate and individual tax risks linked to working remotely and mitigate compliance issues before the tax authorities apply existing laws more strictly.



## Your challenges

When employees are working remotely, either in home office or from another location other than their designated workplace at the company’s domicile or at an already existing permanent establishment, the company may face the following exposures:

- Establishment of a taxable presence of the company at the home office location (permanent establishment or even place of effective management)
- Additional tax burdens
- Compliance obligations
- Issues with and/or administrative work around claiming relief from double taxation – depending on whether the home office location is in another jurisdiction (canton or country).



# How KPMG can help you

Organizations will have to confront tax challenges to stay compliant in a work anywhere world. We can help you:

- Identify whether a tax risk is expected due to specific home office arrangements (risk assessment regarding creation of a permanent establishment).
- Mitigate any potential permanent establishment risk by identifying and establishing safeguards including structural and contractual measures.
- Clarify uncertainties with tax authorities (tax rulings).
- Deal with compliance obligations (tax return preparation including allocations and claiming relief from double taxation).
- Adjust tax provision calculations.

## Your benefits

- **Understanding** your company's tax risk exposure as a result of the rapid shift to remote working in a different location
- **Reduction** of potential tax risks
- **Certainty** regarding the expected tax burden for consideration when preparing financial statements
- **Compliance** with Swiss cantonal and foreign tax laws



---

### Contact

#### KPMG AG

Räffelstrasse 28  
PO Box  
8036 Zurich

[kpmg.ch](http://kpmg.ch)

#### Vincent Thalmann

Partner,  
Head of Corporate Tax  
Western Switzerland  
+41 58 249 64 18  
[vthalmann@kpmg.com](mailto:vthalmann@kpmg.com)

#### Olivier Eichenberger

Director  
Corporate Tax  
Switzerland  
+41 58 249 41 67  
[oeichenberger@kpmg.com](mailto:oeichenberger@kpmg.com)

#### Roberta Venturi Lechartier

Director  
International Corporate Tax  
Switzerland  
+41 58 249 52 98  
[rventuri@kpmg.com](mailto:rventuri@kpmg.com)

---

The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavor to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received, or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation. The scope of any potential collaboration with audit clients is defined by regulatory requirements governing auditor independence. If you would like to know more about how KPMG AG processes personal data, please read our Privacy Policy, which you can find on our homepage at [www.kpmg.ch](http://www.kpmg.ch).

© 2021 KPMG AG, a Swiss corporation, is a subsidiary of KPMG Holding AG, which is a member firm of the KPMG global organization of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.