

# Overview of cantonal inheritance and gift taxes

Status as of January 1, 2019

Canton		Gift tax							Inheritance tax						
		Spouses and reg. partners <sup>21</sup>	Descendants (children, grandchildren)	Parents	Siblings	Partners <sup>22</sup> (see reverse)	Other persons (see on the right)	Repeat gifts * subject to tax progression **entitlement to tax-free allowance (free limit)	Spouses and reg. partners <sup>21</sup>	Descendants (children, grandchildren)	Parents	Siblings	Partners <sup>22</sup> (see reverse)	Other persons (see on the right)	
<b>Aargau</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	6–23% 0 (2,000)	4–9% 0 (2,000)	12–32% <sup>1</sup> 0 (2,000)	yes, within 5 years –	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	6–23% 0 (0)	4–9% 0 (0)	12–32% <sup>1</sup> 0 (0)	
<b>Appenzell A. Rh.</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	22% 5,000 (2,000)	12% 10,000 (2,000)	max. 32% <sup>2</sup> 5,000 (2,000)	– (linear tariff) once only	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	22% 5,000 (2,000)	12% 10,000 (2,000)	max. 32% <sup>2</sup> 5,000 (2,000)	
<b>Appenzell I. Rh.</b>	Tax allowance (free limit)	tax-exempt – (–)	1% <sup>3</sup> 300,000 (5,000)	4% 20,000 (5,000)	6% 5,000 (5,000)	20% 5,000 (5,000)	max. 20% <sup>3</sup> 5,000 (5,000)	– (linear tariff) once only	tax-exempt – (–)	1% 300,000 (5,000)	4% 20,000 (5,000)	6% 5,000 (5,000)	20% 5,000 (5,000)	max. 20% 5,000 (5,000)	
<b>Basel-Land</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	15% 30,000 (0)	15% 30,000 (0)	30% 10,000 (0)	– (linear tariff) once only	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	15% 30,000 (0)	15% 30,000 (0)	30% 10,000 (0)	
<b>Basel-Stadt</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt – (–)	5–11% 0 (10,000)	7.5–16.5% 0 (10,000)	7.5–16.5% 0 (10,000)	22.5–49.5% <sup>4</sup> 0 (10,000)	yes – (once only)	tax-exempt – (–)	tax-exempt – (–)	5–11% 2,000 (0)	7.5–16.5% 2,000 (0)	7.5–16.5% 2,000 (0)	22.5–49.5% <sup>4</sup> 2,000 (0)	
<b>Bern</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt – (–)	6–15% 12,000 (0)	6–15% 12,000 (0)	6–15% 12,000 (0)	max. 40% <sup>5</sup> 12,000 (0)	yes, within 5 years every 5 years	tax-exempt – (–)	tax-exempt – (–)	6–15% 12,000 (0)	6–15% 12,000 (0)	6–15% 12,000 (0)	max. 40% <sup>5</sup> 12,000 (0)	
<b>Fribourg</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	5.25% <sup>6</sup> 5,000 (0)	8.25% <sup>6</sup> 5,000 (0)	max. 22% <sup>6</sup> 5,000 (0)	– (linear tariff) every 5 years	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	5.25% <sup>6</sup> 5,000 (0)	8.25% <sup>6</sup> 5,000 (0)	max. 22% <sup>6</sup> 5,000 (0)	
<b>Geneva</b>	Tax allowance (free limit)	tax-exempt <sup>7</sup> – (–)	tax-exempt <sup>7</sup> – (–)	tax-exempt <sup>7</sup> – (–)	9–12% <sup>7a</sup> 0 (5,000)	24–26% <sup>7a</sup> 0 (5,000)	max. 26% <sup>7a</sup> 0 (5,000)	yes, within 10 years every 10 years	tax-exempt <sup>7</sup> – (–)	tax-exempt <sup>7</sup> – (–)	tax-exempt <sup>7</sup> – (–)	6–11% <sup>7a</sup> 0 (500)	20–26% <sup>7a</sup> 0 (500)	max. 26% <sup>7a</sup> 0 (500)	
<b>Glarus</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt – (–)	2.88–7.19% <sup>8</sup> 50,000 (5,000)	4.6–11.5% <sup>8</sup> 10,000 (5,000)	4.6–11.5% <sup>8</sup> 10,000 (5,000)	max. 28.75% <sup>8</sup> 10,000 (5,000)	yes once only	tax-exempt – (–)	tax-exempt – (–)	2.88–7.19% <sup>8</sup> 50,000 (5,000)	4.6–11.5% <sup>8</sup> 10,000 (5,000)	4.6–11.5% <sup>8</sup> 10,000 (5,000)	max. 28.75% <sup>8</sup> 10,000 (5,000)	
<b>Graubünden</b>	Tax <sup>9</sup> allowance (free limit)	tax-exempt – (–)	tax-exempt – (–)	10% <sup>9</sup> 100,000 (0)	10% <sup>9</sup> 7,000 (0)	tax-exempt <sup>9</sup> – (0)	10% <sup>9</sup> 7,000 (0)	– (linear tariff) every 5 years	tax-exempt – (–)	tax-exempt – (–)	10% <sup>9</sup> 100,000 (0)	10% <sup>9</sup> 7,000 (0)	tax-exempt <sup>9</sup> – (–)	10% <sup>9</sup> 7,000 (0)	
<b>Jura</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt <sup>10</sup> – (–)	7% – (10,000)	14% – (10,000)	14% – (10,000)	max. 35% – (10,000)	– (linear tariff) – (every 5 years)	tax-exempt – (–)	tax-exempt <sup>10</sup> – (–)	7% 0 (10,000)	14% 0 (10,000)	14% 0 (10,000)	max. 35% 0 (10,000)	
<b>Lucerne</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt <sup>11a</sup> – (–)	tax-exempt <sup>11a</sup> – (–)	tax-exempt <sup>11a</sup> – (–)	tax-exempt <sup>11a</sup> – (–)	tax-exempt <sup>11a</sup> – (–)	yes –	tax-exempt – (–)	0–2% <sup>11</sup> 0 (100,000)	6–12% 0 (0)	6–12% 0 (0)	tax-exempt – (–)	max. 40% 0 (0)	
<b>Neuchâtel</b>	Tax allowance (free limit)	tax-exempt <sup>12</sup> – (–)	3% 0 (10,000)	3% 0 (10,000)	15% 0 (10,000)	20% 0 (10,000)	max. 45% 0 (10,000)	– (linear tariff) – (yearly)	tax-exempt <sup>12</sup> – (–)	3% <sup>12a</sup> 50,000 (0)	3% <sup>12a</sup> 50,000 (0)	15% <sup>12a</sup> 0 (10,000)	20% <sup>12a</sup> 0 (10,000)	max. 45% <sup>12a</sup> 0 (10,000)	
<b>Nidwalden</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	5% 20,000 (0)	tax-exempt – (–)	max. 15% <sup>13</sup> 20,000 (0)	– (linear tariff) yearly	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	5% 20,000 (0)	tax-exempt – (–)	max. 15% <sup>13</sup> 20,000 (0)	
<b>Obwalden</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	–	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	
<b>St. Gallen</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt – (–)	10% 25,000 (5,000)	20% 10,000 (5,000)	30% 10,000 (5,000)	max. 30% <sup>14</sup> 10,000 (5,000)	– (linear tariff) once only	tax-exempt – (–)	tax-exempt – (–)	10% 25,000 (5,000)	20% 10,000 (5,000)	30% 10,000 (5,000)	max. 30% <sup>14</sup> 10,000 (5,000)	
<b>Schaffhausen</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt – (–)	2–8% 30,000	4–16% 10,000	10–40% 10,000	max. 40% <sup>15</sup> 10,000	yes once only	tax-exempt – (–)	tax-exempt – (–)	2–8% 30,000 (0)	4–16% 10,000 (0)	10–40% 10,000 (0)	max. 40% <sup>15</sup> 10,000 (0)	
<b>Solothurn</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	4–10% 14,100 (0)	12–30% 14,100 (0)	12–30% 14,100 (0)	no yearly	tax-exempt <sup>16</sup> – (–)	tax-exempt <sup>16</sup> – (–)	tax-exempt <sup>16</sup> – (–)	4–10% <sup>16</sup> 0 (0)	12–30% <sup>16</sup> 0 (0)	12–30% <sup>16</sup> 0 (0)	
<b>Schwyz</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	–	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	
<b>Thurgau</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt <sup>17</sup> – (–)	2–7% 20,000 (5,000)	4.1–14% 0 (5,000)	8.2–28% 0 (5,000)	max. 28% 0 (5,000)	yes once only	tax-exempt – (–)	tax-exempt <sup>17</sup> – (–)	2–7% 20,000 (0)	4.1–14% 0 (5,000)	8.2–28% 0 (5,000)	max. 28% 0 (5,000)	
<b>Ticino</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	5.95–15.5% 0 (0)	17.85–41% 0 (0)	max. 41% 0 (0)	yes –	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	5.95–15.5% <sup>18</sup> 0 (0)	17.85–41% <sup>18</sup> 0 (0)	max. 41% <sup>18</sup> 0 (0)	
<b>Uri</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	8% 15,000 (0)	tax-exempt – (–)	max. 24% 15,000 (0)	– (linear tariff) yearly	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	8% 15,000 (0)	tax-exempt – (–)	max. 24% 15,000 (0)	
<b>Vaud</b>	Tax allowance (free limit)	tax-exempt – (–)	1.2–3.5% <sup>19</sup> 0 (50,000) <sup>19a</sup>	2.64–7.5% <sup>19</sup> 0 (10,000)	5.28–12.5% <sup>19</sup> 0 (10,000)	15.84–25% <sup>19</sup> 0 (10,000)	max. 25% <sup>19</sup> 0 (10,000)	yes – (yearly)	tax-exempt – (–)	0.01–3.5% <sup>19</sup> 0 (250,000)	2.64–7.5% <sup>19</sup> 0 (10,000)	5.28–12.5% <sup>19</sup> 0 (10,000)	15.84–25% <sup>19</sup> 0 (10,000)	max. 25% <sup>19</sup> 0 (10,000)	
<b>Valais</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	10% 0 (2,000)	25% 0 (2,000)	max. 25% 0 (2,000)	yes, within calendar year –	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	10% 0 (10,000)	25% 0 (10,000)	max. 25% 0 (10,000)	
<b>Zug</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	4–8% 0 (5,000)	tax-exempt – (–)	max. 20% <sup>20</sup> 0 (5,000)	yes –	tax-exempt – (–)	tax-exempt – (–)	tax-exempt – (–)	4–8% 0 (5,000)	tax-exempt – (–)	max. 20% <sup>20</sup> 0 (5,000)	
<b>Zurich</b>	Tax allowance (free limit)	tax-exempt – (–)	tax-exempt – (–)	2–6% 200,000 (0)	6–18% 15,000 (0)	12–36% 50,000 (0)	max. 36% 0 (5,000)	yes once only	tax-exempt – (–)	tax-exempt – (–)	2–6% 200,000 (0)	6–18% 15,000 (0)	12–36% 50,000 (0)	max. 36% 0 (5,000)	

## Tax

Amount of tax in percent of the value (reduced by the tax-free allowance) of a lifetime gift (gift/advancement) or of the inheritance. Where progressive rates apply, the minimum and the maximum are indicated. In some cantons, an estate tax or a municipal tax also applies (see footnotes).

### Tax-free allowance and free limits

Tax-free allowance means that only the portion of the donation or inheritance exceeding this amount is taxable. This is not the same as "free limits," which are not taxed in some cantons under certain conditions or up to specific maximum amounts (amounts in brackets).

### Repeat gifts

Cantonal laws on inheritance taxes and gift taxes contain provisions for the event that a beneficiary receives repeat gifts from the same donor. This also applies if a donee subsequently inherits from the donor.

\* Subject to tax progression: The tax rate applies to the total of all gifts to date. As tariffs are on a sliding scale, a higher tax rate will thus usually apply. Of no significance in cantons with linear tariffs.

\*\* Entitlement to the tax-free allowance: As a rule, the recipient can only claim the tax-free allowance for the first gift. In some cantons, however, the tax-free allowance can be claimed again after a certain period of time has elapsed.

### Other persons

This refers to third parties and to family members not listed in the table, such as uncles, aunts, nephews, and nieces. The tax-free allowance stated refers to third parties. Tax-free allowances and tariffs for family members may deviate from this.

### General notes

- In Switzerland, the cantons are entitled to levy inheritance taxes and gift taxes. The federal government does not levy any inheritance taxes or gift taxes.
- Tax liability rests with the donee or legatee, and with each heir for his/her share of the inheritance. Please note that the donor and all heirs are jointly and severally liable for the tax. The inheritance tax is generally billed to the heirs' representative as a single amount.
- When assessing liability for inheritance tax, the last domicile of the testator generally applies. In the case of gifts and advancements, the domicile of the donor applies (except in the event of land ownership).
- If land is owned, the canton in which the property is located is entitled to levy tax on it. Where more than one canton is involved, to avoid double taxation, the total tax amount is split between the entitled cantons in proportion to the location of the aggregate assets in the estate.
- Where more than one country is involved, tax sovereignty with regard to land rests in principle with the country in which the estate is located. For more precise information, the laws of the country concerned and (if applicable) the related double taxation agreement must be consulted.
- As a rule, gifts are subject to the same taxation principles as inheritance. In the event of subsequent inheritance from the donor, lifetime gifts will usually be taken into account in calculating the tax rate and the tax-free allowance.
- For going concerns, some cantons (e.g. AR, BE, BL, FR, GL, GR, NW, SG, TG, VD, ZH) grant tax relief.
- Some cantons grant special allowances to godchildren, engaged couples, domestic staff, dependent persons, etc. These are not shown in the table.

## Special notes/details

- <sup>1</sup> **AG** Stepchildren are zero-rated, as are foster children (subject to certain conditions).
- <sup>2</sup> **AR** Stepchildren and foster children are zero-rated.
- <sup>3</sup> **AI** Stepchildren are treated the same as descendants. Foster children after two years in foster care.
- <sup>4</sup> **BS** Foster children are zero-rated.
- <sup>5</sup> **BE** Stepchildren are zero-rated, as are foster children (subject to certain conditions).
- <sup>6</sup> **FR** The listed tax rates relate solely to cantonal tax. Some municipalities additionally levy a municipal tax. This equals up to 70% of the cantonal tax.
- <sup>7</sup> **GE** Not applicable if testator or donor is subject to expenditure-based tax. In such cases, the tax rate is between 2% and 12%.
- <sup>7a</sup> **GE** In addition, "centimes additionnels" are levied. 2017: 110% of the rate indicated.
- <sup>8</sup> **GL** Including construction tax which currently amounts to 15%. Adopted children are tax-free.
- <sup>9</sup> **GR** The tax rates listed relate solely to the cantonal gift tax and to the cantonal estate duty. Some municipalities additionally levy a municipal gift tax/inheritance tax. Municipal tax may be payable at a rate of up to 5% for persons receiving money from their partner or down the parental line, or of up to 25% for other beneficiaries. Stepchildren and foster children are zero-rated.
- <sup>10</sup> **JU** Not applicable if testator or donor is subject to expenditure-based tax. In this case, the tax rate is 3.5%.
- <sup>11</sup> **LU** No tax at cantonal level. However, every municipality can levy a descendants' inheritance tax which amounts to a maximum of 2%. Stepchildren and foster children are treated as descendants.
- <sup>11a</sup> **LU** Gifts made fewer than five years prior to death are subject to inheritance tax.
- <sup>12</sup> **NE** Also applies to partners that have been registered under cantonal law for at least two years.
- <sup>12a</sup> **NE** Gifts made fewer than five years prior to death are subject to inheritance tax.
- <sup>13</sup> **NW** Stepchildren, foster children, children-in-law, stepparents, foster parents, and parents-in-law are zero-rated.
- <sup>14</sup> **SG** Stepchildren and foster children are zero-rated.
- <sup>15</sup> **SH** Stepchildren are zero-rated, as are foster children (subject to certain conditions).
- <sup>16</sup> **SO** Per estate, an (additional) 8–12% estate tax is payable.
- <sup>17</sup> **TG** Stepchildren and foster children are treated the same as descendants after seven years in the family's care.
- <sup>18</sup> **TI** Per estate, bank/savings balances up to CHF 50,000 are tax-exempt.
- <sup>19</sup> **VD** The listed tax rates relate solely to cantonal tax. Many municipalities levy a municipal tax in addition. This amounts to 100% of the cantonal tax.
- <sup>19a</sup> **VD** The free-limit amount for grandchildren is only CHF 10,000.
- <sup>20</sup> **ZG** Stepchildren and step-parents are zero-rated.
- <sup>21</sup> **Federal Act on the Registration of Partnerships for Same-Sex Couples:** In all cantons, registered partners are equated with spouses and are thus tax-exempt.  
**Note:** In many cantons, a special tax schedule applies to cohabiting mixed-sex couples. See the definition on the right.

## Note regarding income and wealth tax

January 1, 2010 saw the entry into force of the federal act on the simplification of payment of tax in arrears in instances of inheritance. If a testator had evaded taxes, his or her heirs now benefit from a less rigorous regime with regard to paying tax in arrears. This arrears tax is now due for up to three preceding tax periods rather than ten.

## The Federal Popular Initiative on Inheritance Tax Reform

The initiative launched in 2011 for a national inheritance tax was rejected by the electorate and the cantons on June 14, 2015. The cantons (and in some cantons, the municipalities) reserve the right to levy inheritance and gift taxes.

## **Definition of partner<sup>22</sup> pursuant to the laws on inheritance taxes and gift taxes**

- AG** Persons who have shared a home with the donor (same domicile) for at least five years.
- AR** An unmarried person who has shared a home for an uninterrupted period of at least five years with his or her partner, provided the deceased person made a considerable contribution to his or her living costs or the partners pooled their resources.
- AI/GE/SG/SH/SO/TG/TI/UR/VD/VS** Partners are not mentioned and thus come under the heading of "other persons."
- BL** Persons who have shared a home with the donor for an uninterrupted period of at least five years and have the same domicile.
- BS** Persons who have shared a home with the donor for an uninterrupted period of at least five years and have the same tax domicile.
- BE** Persons who have shared a home with the donor (same tax domicile) for at least ten years.
- FR** Persons who have shared a home with the donor (same tax domicile) for at least ten years.
- GL** Partners living together as a married couple who have shared a home for at least five years.
- GR** No legal definition of partner at the cantonal level. Subject to differences from one municipality to another.
- JU** Partners who have shared a home for at least ten years.
- LU** Comprehensive domestic partnership, whether mixed-sex or same-sex, that continued without interruption for at least two years prior to death.
- NE** Partners who have shared a home for at least five years. See also footnote 12.
- NW** Persons who have had a permanent shared home at the same place of residence for at least five years.
- UR** Persons who, at the time of the gift or on the day of decease, were living together with their joint children (minors) or who had shared a home with the testator or donor for at least five years.
- ZG** No legal definition. The Tax Administration requires a de facto domestic partnership of at least five years and further prerequisites.
- ZH** Partners who have shared a home for at least five years.



### **CREDIT SUISSE (Switzerland) Ltd.**

P.O. Box 100  
CH-8070 Zurich  
**credit-suisse.com**

This document was produced for information purposes and is for the exclusive use of the recipient. No guarantee is made regarding reliability or completeness of this document, nor will any liability be accepted for losses that may arise from its use. This document may not be distributed in the United States or given to any US persons (within the meaning of Regulation S under the US Securities Act of 1933, as amended). The same applies in any other jurisdiction except where compliant with the applicable laws.

Copyright © 2019 Credit Suisse Group AG and/or its affiliated companies. All rights reserved.