



## Factsheet International Structuring

Transforma AG  
Olgastrasse 10  
8001 Zürich  
Switzerland  
Phone: +41 43 222 58 48  
[www.transforma.ch](http://www.transforma.ch)

Transforma AG  
Gartenstrasse 4  
6300 Zug  
Switzerland  
Phone: +41 41 220 77 30  
[www.transforma.ch](http://www.transforma.ch)

Transforma AG  
Rue de la Confédération 5  
1204 Geneva  
Switzerland  
Phone: +41 22 700 86 68  
[www.transforma.ch](http://www.transforma.ch)

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# International Structuring

## Attractiveness of Switzerland when Internationalising

- Fully fledged economy with important and innovative players and investment opportunities in many industries such as pharmaceuticals, machinery, natural resources & commodities and financial services.
- Internationally compliant tax framework with attractive rates for companies and individuals.
- Access to European markets with free movement of people, goods, services, and finance through a comprehensive legal framework.
- Highly qualified, multilingual workforce.
- Favourable IP-management and specific R&D tax deductions.
- Location in the centre of Europe with high quality of life and excellent international connections.



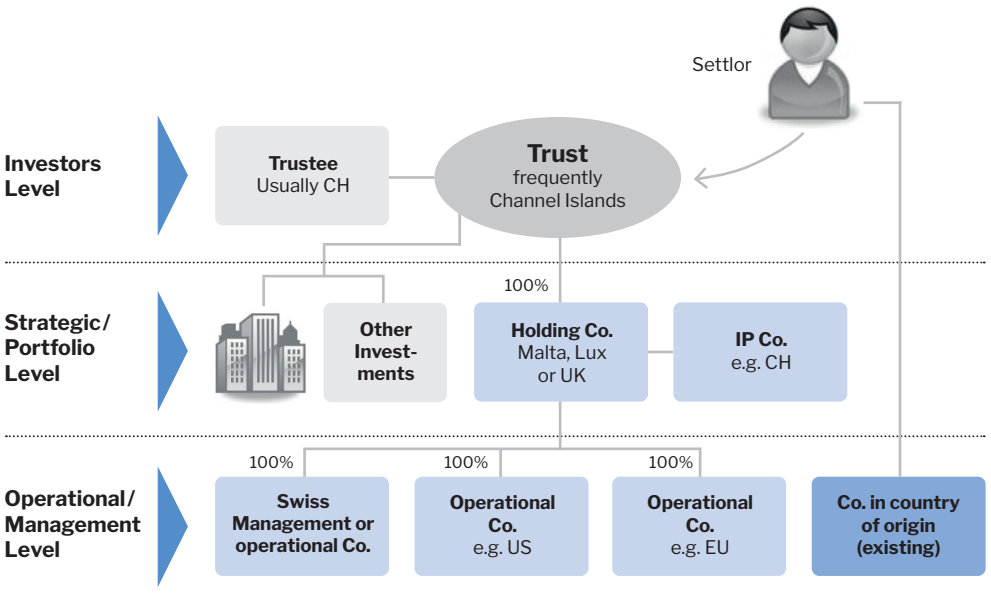
# A structure tailored to specific needs, but based on a blueprint

An international structure with a Swiss angle is tailored to specific needs. Based on Switzerland's legal and tax regime, it is normally built on a blueprint with the following key points:

- A solution at the **investors level**.  
A frequent solution for owners residing in a common law country is a trust in e.g. the Channel Islands or Mauritius, setup compliant with their resident country's rules.
- A solution at the **strategic / portfolio level**. A holding company in an advantageous country (typically in Malta, Luxembourg or UK) to manage participations

and group financing, protect and invest additional assets and optimize international withholding taxes on distributions and license.

- Operative companies for management or operational purposes at the **operational level** (e.g. Switzerland), with reasonable profit taxation, and potential IP or R&D involvement.
- Additional operational companies as needed, with entities in the owner's country of origin usually ring-fenced.



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## Key considerations when setting up

This structure can be tailored to suit any business, provided it adheres to legal requirements, makes sense from a business perspective, and accurately reflects the effective place of management situation. Key considerations when setting it up include:

