

Specification

OMTAX upload file specification

Swiss Tax Conference



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Table of contents

1	Introduction	5
1.1	Background	5
1.2	Purpose of the document	5
2	Information on the upload file	6
2.1	Objectives of the upload file	
2.2	Summary of the upload process	
2.3	Further information on the upload file and testing	
2.3.		
2.3.	•	
3	File structure	
3 3.1	File overview	
3.1. 3.1.		
3.1.	2 GeneralBusinessUnitInformation	7
3.1.	3 Elections	8
3.1.	4 ExchangeRate	9
3.1.	5 GeneralQDMTTTaxValues	9
3.2	Entities	12
3.2.	1 Entity	12
3.2.	•	
3.2.		
3.2.		
٥. ∠ .۰ 4	Procedure	
5	Contacts	24
List	t of figures	
Figu	ure1 : File overview	7
_		
List	t of tables	
Tab	ole1 : Root	7
	ble2 : GeneralBusinessUnitInformation	
	ple3 : Elections	
Tab	ole4:ExchangeRate	9
Tab	ole5 : GeneralQDMTTTaxValues	12
Tab	ole6 : Entity	12
	ole7: Identity	
	ble8 : CorporateGroupData	
1ab	ble9 : InvestmentEntityData	14
ıap	ole10 : ForeignEntityData	



Table11 : JointVentureData	. 15
Table12: MOCE data	
Table13: QDMTTTaxValues	. 15
Table14: IIRTaxValues	. 16
Table15: UTPRTaxValues	. 17
Table16 : CommonTaxValues	. 20
Table17 : AdjustedCoveredTaxes	. 22
Table18 : ElectionDateRange	. 22
Table19 : ElectionNamedDateRange	. 22
Table20 : Residence	. 22
Table21: NamedValue	. 23
Table22 : Adjustment	. 23
Table23: NamedAdjustment	. 23
Table24: Dates	. 23
Table25 : Contacts	. 24



1 Introduction

1.1 Background

Currently, company groups and their data have to be entered manually in OMTax. This includes both the organisational structures and the relevant tax values. As this information is in many cases already available in company systems and the manual effort should be minimised as far as possible, data import via an upload file should be made possible.

This document specifies the upload file as a basis for the companies or their system suppliers to implement the file themselves.

1.2 Purpose of the document

It was checked whether the GIR file can be used as the basis for the OMTax upload file. The review came to the conclusion that the needs of OMTax can only be covered to a small extent by GIR, or on the contrary: in order to fulfil the needs of OMTax, the existing standard would have to be greatly expanded. As this would lead to unnecessary complexity, it was decided to develop a separate file definition in XML format.

This document specifies the file format of the upload file. It is used to define the fields and provide an overview of the format. An XSD is generated on this basis, which is used to validate the upload file. The eCH-0018 standard serves as the best practice for defining this XML.



2 Information on the upload file

2.1 Objectives of the upload file

The upload file is intended to minimise as much as possible the effort required to enter the OMTax return in the corresponding application. This is achieved by using the upload file to upload general company data as well as individual entities and their tax-relevant data to the application.

2.2 Summary of the upload process

The process for uploading the file is roughly planned as follows (including the prerequisites and validation measures mentioned):

- Prerequisite: In order for the upload file to be uploaded in the OMTax application, the following prerequisites must first be fulfilled in OMTax:
 - The taxable company has been successfully registered by the company's employee.
 - The tax return has been initiated and details of the tax obligations, contact details, comments and attachments have been entered by the company employee. This information must also be entered manually in the application when using the upload file. The tax obligations in particular are an important prerequisite as they are used to correctly allocate the imported data. This data must be entered before the start of the data import.

Procedure:

- The company employee obtains the file with the required information from the relevant company system in accordance with the specification provided.
- The company employee logs into the OMTax application and manually uploads the upload file at the designated point in the application. The uploaded data replaces all data previously entered in the application.
- The employee checks or completes the data in the same way as the previous process and submits the declaration.
- Data validation: The imported content is validated (e.g. for completeness) in accordance with the
 manual process, i.e. when submitting the tax data, and any missing information is pointed out. The
 uploaded file is not explicitly validated.

2.3 Further information on the upload file and testing

2.3.1 Security

In accordance with the process described in section 2.2, the file is uploaded manually by the employee within the OMTax application. To do so, the employee must first log in. The upload takes place in a secure environment. No further security precautions are planned.

2.3.2 Testing

A test infrastructure will be available for testing the upload file implementation. This is the OMTax test infrastructure already used as part of the project: https://www.omtax-a.admin.ch/. This environment is available to companies for testing and also for reasons such as training purposes.

For logical reasons, test data can be created independently by companies as a basis for the tests. Accordingly, the OMTax project does not make any test data available to companies.



3 File structure

3.1 File overview

The file is divided into two sections. The first section contains general company information (in particular exchange rates and election rights). The second part contains the individual entities together with their tax-relevant data.

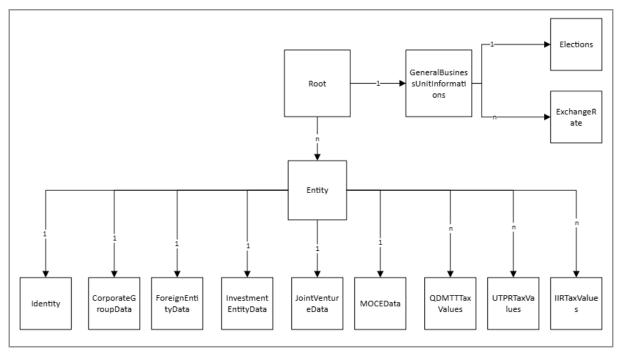


Figure1: File overview

3.1.1 Root

File name	Туре	Number	Description
GeneralBusinessU- nitInformation	GeneralBusinessU- nitInformation	1	General company information
Entities	Entity	*	Entities including tax-relevant data

Table1 : Root

3.1.2 GeneralBusinessUnitInformation

entity name	Туре	Quan- tity	Description
Elections	Elections	01	Election rights
ExchangeRates	ExchangeRate	*	Exchange rates
QdmttTaxValues	GeneralQdmttTaxVa- lues	01	General QDMTT tax data that is not assigned to any individual entity

Table 2: General Business Unit Information



3.1.3 Elections

Name	Туре	Quan- tity	Description
Article_3_2_6	Boolean	01	Total capital gain option (Article 3.2.6 Model Rules)
Article_7_3_1	Boolean	01	Distribution tax system option (Article 7.3.1 Model Rules)
Article_5_3_1	Boolean	01	Option not to utilise substance-based allowance (Article 5.3.1 Model Rules)
Article_4_6_1	Boolean	01	Option to insignificantly reduce the recognised taxes (Article 4.6.1 Model Rules)
Article_4_1_5	Boolean	01	Negative tax expense carried forward (Article 4.1.5 Model Rules)
OtherAnnualElections	String	*	Other annual elections
Article_3_2_1_c	ElectionDateRange	01	Option to include equity gains or losses (Article 3.2.1 (c) AR)
Article_3_2_8	ElectionDateRange	01	Right to choose intra-group transactions (Article 3.2.8 Model Rules)
Article_3_2_5	ElectionDateRange	01	Right to choose realisation principle (Article 3.2.5 Model Rules)
Article_3_2_2	ElectionDateRange	01	Right to elect share-based remuneration (Article 3.2.2 Model Rules)
Article_4_4_1	ElectionDateRange	1	Election not to allocate cross-border deferred tax (Article 4.4.1 Model Rules)
Other5YearElections	ElectionNamedDat- eRange	*	Other 5-year elections
Article_4_5	ElectionDateRange	01	GloBE loss election right (Article 4.5 Model Rules)
ElectionLocalCurrency	ElectionNamed- DateRange	01	Five-year election to use the local currency
ElectionLocalCur- rencyCurrency	String	01	Five-year election to use the local currency
OtherJurisdictionalEl- ections	ElectionNamed- DateRange	*	Other elections

Table3 : Elections



3.1.4 ExchangeRate

Name	Туре	Number	Description
Currency	String with 3 characters	1	Currency (e.g. AUD)
ExchangeRate	Decimal	1	Value of the foreign currency in CHF (e.g. EUR)
QDMTT	Boolean	1	Relevant for QDMTT
UTPR	Boolean	1	Relevant for UTPR
IIR	Boolean	1	Relevant for IIR

Table4 : ExchangeRate

3.1.5 GeneralQDMTTTaxValues

Name	Тур	Anzahl	Beschreibung
InvestmentEntities_Article_4_1_5_And_5_2_1	Decimal	1	s) Creation of excess negative tax expense carryforward (Article 4.1.5 Model Rules and Article 5.2.1 Model Rules) for investment entities
CorporateGroup_Article_4_1_5_And_5_2_1	Decimal	1	s) Creation of excess negative tax expense carryforward (Article 4.1.5 Model Rules and Article 5.2.1 Model Rules) for corporate groups
InvestmentEntitiesDe- creaseCoveredTaxes	Decimal	1	t) Decrease in taxes recognized (but not below zero) in the remaining balance of the excess negative tax expense carryforward (Article 4.1.5 Model Rules and Article 5.2.1 Model Rules) for investment entities



Name	Тур	Anzahl	Beschreibung
CorporateGroupDe- creaseCoveredTaxes	Decimal	1	t) Decrease in taxes recognized (but not below zero) in the remaining balance of the excess negative tax expense carryforward (Article 4.1.5 Model Rules and Article 5.2.1 Model Rules) for corporate groups
InvestmentEntities_Ar- ticle_4_1_2_b_And_4_ 5_3	Decimal	1	b) Deferred GloBE loss tax credits used in accordance with article 4.5.1 Model Rules (Article 4.1.2 (b) Model Rules together with Article 4.5.3 Model Rules) for investment entities
CorporateGroup_Article_4_1_2_b_And_4_5_3	Decimal	1	b) Deferred GloBE loss tax credits used in accordance with article 4.5.1 Model Rules (Ar- ticle 4.1.2 (b) Model Rules together with Ar- ticle 4.5.3 Model Rules) for corporate groups
InvestmentEntities_Article_4_1_5	Decimal	01	Additional current top- up tax in the event of a GloBE loss in a tax ju- risdiction (Article 4.1.5 Model Rules) for in- vestment entities
CorporateGroup_Article_4_1_5	Decimal	01	Additional current top- up tax in the event of a GloBE loss in a tax ju- risdiction (Article 4.1.5 Model Rules) for cor- porate groups
InvestmentEntities_Article_5_4_1_And_4_4_4	Decimal	01	Additional current top- up tax in the case of a deferred tax liability to be subsequently taxed (Article 5.4.1 Model Rules and Article 4.4.4 Model Rules) for in- vestment entities



Name	Тур	Anzahl	Beschreibung
CorporateGroup_Article_5_4_1_And_4_4_4	Decimal	01	Additional current top- up tax in the case of a deferred tax liability to be subsequently taxed (Article 5.4.1 Model Rules and Article 4.4.4 Model Rules) for cor- porate groups
InvestmentEntities_Article_5_4_1_And_4_6_1	Decimal	01	Additional current top- up tax in the event of a decrease in the recog- nised taxes (Article 5.4.1 Model Rules and Article 4.6.1 Model Rules) for investment entities
CorporateGroup_Article_5_4_1_And_4_6_1	Decimal	01	Additional current top- up tax in the event of a decrease in the recog- nised taxes (Article 5.4.1 Model Rules and Article 4.6.1 Model Rules) for corporate groups
InvestmentEntities_Article_5_4_1_And_4_6_4	Decimal	01	Additional current top- up tax for current tax expense not paid within three years (Ar- ticle 5.4.1 Model Rules and Article 4.6.4 Model Rules) for investment entities
CorporateGroup_Article_5_4_1_And_4_6_4	Decimal	01	Additional current top- up tax for current tax expense not paid within three years (Ar- ticle 5.4.1 Model Rules and Article 4.6.4 Model Rules) for corporate groups
InvestmentEnti- ties_OtherAdditionCur- rentTopUpTaxes	Decimal	01	Additional current top- up tax – other for in- vestment entities
Corporate- Group_OtherAddition- CurrentTopUpTaxes	Decimal	01	Additional current top- up tax – other for cor- porate groups



Name	Тур	Anzahl	Beschreibung
InvestmentEnti- ties_OtherNamedAddi- tionCurrentTopUpT- axes	NamedValue	*	Other additional current top-up tax for investment entities
Corporate- Group_OtherName- dAdditionCurrent- TopUpTaxes	NamedValue	*	Other additional cur- rent top-up tax for cor- porate groups

Table5 : GeneralQDMTTTaxValues

3.2 Entities

3.2.1 **Entity**

Entity Name	Туре	Quan- tity	Entity Description
Identity	Identity	1	Description of the company
CorporateGroupData	CorporateGroupData	01	Data for corporate group
InvestmentEntityData	InvestmentEntityData	01	Data for investment entities
ForeignEntityData	ForeignEntityData	01	Data for foreign business entity data
JointVentureData	JointVentureData	01	Data for joint venture
MOCEData	MOCEData	01	Data for MOCE
QDMTTTaxValues	QDMTTTaxValues	*	Data for QDMTT tax return for each canton
UTPRTaxValues	UTPRTaxValues	*	Data for UTPR tax return for each country
IIRTaxValues	IIRTaxValues	*	Data for the IIR tax return for each country

Table6 : Entity

3.2.2 Structure data

3.2.2.1 Identity

Name	Туре	Quan- tity	UID Description
UID	String	01	UID of the company
LEI	String	01	LEI of the company
Company name	String	1	Name of the company

Table7 : Identity



3.2.2.2 CorporateGroupData

Company name	Туре	Quan-	Description
		tity	
Article_8_2_1	Boolean	01	Election to apply the Simplified Cal- culations for NMCEs (Simplified Cal- culations Safe Harbour MR 8.2.1)
Article_3_2_1_i	Boolean	01	Debt cancellation option (Article 3.2.1 (i) Model Rules, Comment Section 86.1)
Article_4_4_7	Boolean	01	Option not claimed deferral (Article 4.4.7 Model Rules)
Ar- ticle_4_4_7_FiveYear	ElectionDateRange	01	Unclaimed Accrual Five-Year election (MR 4.4.7)
Article_4_5_6	ElectionDateRange	01	GloBE Loss Election (MR 4.5.6)
Article_1_5_3	ElectionDateRange	01	Option not to treat a unit as an exempt unit (Article 1.5.3 Model Rules)
Article_3_2_1_b	ElectionDateRange	01	Option to include exempt dividends (Article 3.2.1 (b) Model Rules)
Article_3_2_1_c	ElectionDateRange	01	Treatment of foreign exchange gains or losses (Article 3.2.1 (c) Model Rules)
Article_6_3_4_c_i	ElectionDateRange	01	Fair value option (Article 6.3.4 Model Rules) - Recognition in the financial year of the triggering event (Article 6.3.4 (c) (i) Model Rules)?
Article_6_3_4_c_ii	ElectionDateRange	01	Fair value option (Article 6.3.4 Model Rules) - Recognition over a 5-year period (Article 6.3.4 (c) (ii) Model Rules)?
OtherElections	ElectionNamedDat- eRange	*	Other election rights
TaxDomicile	String	1	Main tax domicile
Residences	Residence	*	Secondary tax domiciles
TangibleAssets	Integer	01	Value of the tangible assets in the currency of the tax return
Employees	Integer	01	Number of employees
Remark	String	01	Remark

Table8 : CorporateGroupData

3.2.2.3 InvestmentEntityData

Name	Туре	Quan- tity	Description
Article_7_4	Decimal	01	Attributable share in the investment company in % (Article 7.4 Model Rules)
FiscallyTransparent	Boolean	01	Is the investment company fiscally transparent?
Article_7_5	ElectionDateRange	01	Tax transparency option for invest- ment companies (Article 7.5 Model Rules)
Article_7_6	ElectionDateRange	01	Election right for taxable distributions (Article 7.6 Model Rules)
Residences	Residence	*	Tax domiciles in Switzerland
TaxDomicile	String	01	Main tax domicile
Country	String	*	ISO code of the country
Remark	String	01	Remark
ForeignCompany	Boolean	01	Foreign investment company
UTPR	Boolean	1	Relevant for UTPR
IIR	Boolean	1	Relevant for IIR

Table9 : InvestmentEntityData

3.2.2.4 ForeignEntityData

Name	Туре	Quan- tity	Description
Country	String	1	ISO code of the country
Remark	String	01	Remark
UTPR	Boolean	1	Relevant for UTPR
IIR	Boolean	1	Relevant for IIR

Table10 : ForeignEntityData

3.2.2.5 JointVentureData

Name	Туре	Quan- tity	Description Type
Currency	String	01	ISO code of the currency
Country	String	*	ISO code of the country
Remark	String	01	Remark
UTPR	Boolean	1	Relevant for UTPR



Name	Туре	Quan- tity	Description Type
IIR	Boolean	1	Relevant for IIR

Table11 : JointVentureData

3.2.2.6 MOCE Data

Name	Туре	Quan- tity	Number Description
Country	String	*	ISO code of the country
Remark	String	01	Remark
UTPR	Boolean	1	Relevant for UTPR
IIR	Boolean	1	Relevant for IIR

Table12 : MOCE data

3.2.3 Tax data

3.2.3.1 QDMTTTaxValues

Name	Туре	Quan- tity	Type Description
CommonTaxValues	CommonTaxValues	01	Tax values that are shared by all tax types
Canton	String	01	Canton to which the tax values apply

Table13 : QDMTTTaxValues

3.2.3.2 IIRTaxValues

Name	Туре	Quan- tity	Description
CommonTaxValues	CommonTaxValues	01	Tax values that are shared by all tax types
Country	String	01	Country to which the tax information applies
ReducedQualified- DomesticMini- mumTopUpTax	Decimal	01	Reduced by a recognised national minimum top-up tax
Arti- cle_2_3_1_And_2_3_ 2	Decimal	01	In the case of a partially owned parent company or an intermediate parent company: What amount should be credited (Article 2.3.1 Model Rules and Article 2.3.2 Model Rules)?



Name	Туре	Quan- tity	Description
Article_4_6_1_c	Decimal	01	For a joint venture group: What amount should be credited (Article 6.4.1 (c) Model Rules)?
Article_5_6	Decimal	01	In the case of a minority-owned business unit, what amount should be credited (Article 5.6 Model Rules)?
Article_2_2_1	Decimal	01	For a minority interest of < 20%, what amount should be credited (Article 2.2.1 Model Rules)?
Article_4_1_5	Decimal	01	Additional current top-up tax in the event of a GloBE loss in a tax jurisdiction (Article 4.1.5 Model Rules)
Arti- cle_5_4_1_And_4_4_ 4	Decimal	01	Additional current top-up tax in the case of a deferred tax liability to be subsequently taxed (Article 5.4.1 Model Rules and Article 4.4.4 Model Rules)
Arti- cle_5_4_1_And_4_6_ 1	Decimal	01	Additional current top-up tax in the event of a decrease in the recognised taxes (Article 5.4.1 Model Rules and Article 4.6.1 Model Rules)
Arti- cle_5_4_1_And_4_6_ 4	Decimal	01	Additional current top-up tax for current tax expense not paid within three years (Article 5.4.1 Model Rules and Article 4.6.4 Model Rules)
OtherAdditionCur- rentTopUpTaxes	Decimal	01	Additional current top-up tax - other
OtherNamedAddition- CurrentTopUpTaxes	NamedValue	*	Other additional current top-up tax

Table14 : IIRTaxValues

3.2.3.3 UTPRTaxValues

Name	Туре	Amount	Description
CommonTaxValues	CommonTaxValues	01	Tax values that are shared by all tax types
Country	String	1	Country to which the tax information applies
ReducedQualified- DomesticMini- mumTopUpTax	Decimal	01	Reduced by a recognised national minimum top-up tax



Name	Туре	Amount	Description
Arti- cle_2_3_1_And_2_3_ 2	Decimal	01	In the case of a partially owned parent company or an intermediate parent company, what amount should be credited (Article 2.3.1 Model Rules and Article 2.3.2 Model Rules)?
Article_4_6_1_c	Decimal	01	For a joint venture group, what amount should be credited (Article 6.4.1 (c) Model Rules)?
Article_5_6	Decimal	01	In the case of a minority-owned business unit, what amount should be credited (Article 5.6 Model Rules)?
Article_2_2_1	Decimal	01	For a minority interest of < 20%, what amount should be credited (Article 2.2.1 Model Rules)?
DeductionUtprOther- Juristiction	Decimal	01	Deduction of UTPR taxed by other tax jurisdictions
Article_4_1_5	Decimal	01	Additional current top-up tax in the event of a GloBE loss in a tax jurisdiction (Article 4.1.5 Model Rules)
Arti- cle_5_4_1_And_4_4_ 4	Decimal	01	Additional current top-up tax in the case of a deferred tax liability to be subsequently taxed (Article 5.4.1 Model Rules and Article 4.4.4 Model Rules)
Arti- cle_5_4_1_And_4_6_ 1	Decimal	01	Additional current top-up tax in the event of a decrease in the recognised taxes (Article 5.4.1 Model Rules and Article 4.6.1 Model Rules)
Arti- cle_5_4_1_And_4_6_ 4	Decimal	01	Additional current top-up tax for current tax expense not paid within three years (Article 5.4.1 Model Rules and Article 4.6.4 Model Rules)
OtherAdditionCur- rentTopUpTaxes	Decimal	01	Additional current top-up tax - other
OtherNamedAddition- CurrentTopUpTaxes	NamedValue	*	Other additional current top-up tax

Table15 : UTPRTaxValues

3.2.3.4 CommonTaxValues

CommonTaxValues Name	Туре	Quan- tity	Description
NetGlobeIncome	Decimal	01	Net profit or loss for the year



CommonTaxValues Name	Туре	Quan- tity	Description
Article_3_2_1_a_1	Decimal	01	(a) All recognised taxes accrued as an expense and all current and deferred recognised taxes included in income tax expense, including recognised taxes on income excluded from the GloBE profit or loss calculation
Article_3_2_1_a_2	Decimal	01	(a) Deferred tax assets relating to a loss in the financial year
Article_3_2_1_a_3	Decimal	01	(a) All recognised national minimum top-up tax accrued as an expense
Article_3_2_1_a_4	Decimal	01	(a) All taxes incurred under the GloBE rules, accrued as an expense
Article_3_2_1_a_5	Decimal	01	(a) All non-refundable imputation taxes, deferred as an expense
Article_3_2_1_b	Decimal	01	(b) Excluded dividends (Article 3.2.1 Model Rules)
Article_3_2_1_c	Decimal	01	(c) Excluded equity gains or losses (Article 3.2.1 (c) Model Rules)
Article_3_2_1_d	Decimal	01	(d) Gains or losses recognised under the revaluation method (Article 3.2.1 (d) Model Rules)
Article_3_2_1_e	Decimal	01	(e) Excluded gains or losses from the disposal of assets and liabilities pursuant to Article 6.3 Model Rules and Article 3.2.1 (e) Model Rules
Article_3_2_1_f	Decimal	01	(f) Asymmetric exchange rate gains or losses (Article 3.2.1 (f) Model Rules)
Article_3_2_1_g	Decimal	01	(g) Generally unauthorised expenses (Article 3.2.1 (g) Model Rules)
Article_3_2_1_h_PriorPeriodErrors	Decimal	01	(h) Prior period errors or changes in accounting policies (Article 3.2.1 (h) Model Rules)
Article_3_2_1_h_ChangeAccounting_Principles	Decimal	01	(i) Changes in accounting policies (Article 3.2.1 (h) Model Rules)
Article_3_2_1_i	Decimal	01	(j) Accrued pension expense (Article 3.2.1 (i) Model Rules)
Article_3_2_1	Decimal	01	(k) Debt cancellations (Article 3.2.1 Model Rules)



CommonTaxValues Name	Туре	Quan- tity	Description
Article_3_2_2	Decimal	01	(I) Share-based payments (Article 3.2.2 Model Rules)
Article_3_2_3	Decimal	01	(m) Adjustments to arm's length principle (Article 3.2.3 Model Rules)
Article_3_2_4	Decimal	01	(n) Qualifying tax credits (Article 3.2.4 Model Rules)
Article_3_2_5	Decimal	01	(o) Option for gains and losses realisation principle (Article 3.2.5 Model Rules)
Article_3_2_6	Decimal	01	(p) Option for total capital gain (Article 3.2.6 Model Rules)
Article_3_2_7	Decimal	01	(q) Intra-group financing agreements (Article 3.2.7 Model Rules)
Article_3_2_8	Decimal	01	(r) Option for transactions between business units in the same tax juris- diction (Article 3.2.8 Model Rules)
Article_3_2_9	Decimal	01	(s) Taxes of insurance undertakings charged to policyholders (Article 3.2.9 Model Rules)
Article_3_2_10	Decimal	01	(t) Increase/decrease in equity related to Additional Tier 1 capital (Article 3.2.10 Model Rules)
Article_3_2_11_And_6_2	Decimal	01	(u) Additions and disposals of business units (Article 3.2.11 Model Rules and Article 6.2 Model Rules)
Article_3_2_11_And_7_1	Decimal	01	(v) Reduction of the GloBE profit or loss of the ultimate parent company that is a transparent company (Article 3.2.11 Model Rules and Article 7.1 Model Rules)
Article_3_2_11_And_7_2	Decimal	01	(w) Reduction of the GloBE profit or loss of the ultimate parent company that is subject to a deductible dividend rule (Article 3.2.11 MA and Article 7.2 MA)
Article_3_2_11_And_7_6	Decimal	01	(x) Distribution tax system option (Article 3.2.11 Model Rules and Article 7.6 Model Rules)
OtherGlobeIncomeAdjustments	NamedVa- lue	01	Other adjustments



CommonTaxValues Name	Туре	Quan- tity	Description
Article_3_3	Decimal	01	(y) Revenues from international ship- ping (Article 3.3 Model Rules)
Article_9_1_3	Decimal	01	(z) Transactions between Constituent Entities (Article 9.1.3 Model Rules)
AdjustedCoveredTaxes	Ad- justedCove redTaxes	1	Adjusted covered taxes
Article_5_3_4	Decimal	01	Amount of tangible assets (Article 5.3.4 Model Rules)
Article_5_3_3	Decimal	01	Amount of wage costs (Article 5.3.3 Model Rules)

Table16 : CommonTaxValues

3.2.3.5 AdjustedCoveredTaxes

Name	Тур	Anzahl	Beschreibung
Article_4_3	Decimal	01	Total current tax expense in relation to recognised taxes after allocation in accordance with Article 4.3 Model Rules
Article_4_1_2_a	Adjustment	01	a) Recognised taxes that have been deferred as an expense in the determination of profit before tax in the financial statements (Article 4.1.2 (a) Model Rules)
Article_4_1_3_d_And_4_1_2_c	Adjustment	01	c) Recognised taxes paid in the financial year that are related to uncertainties regarding the tax treatment if the amounts concerned were treated as a reduction of recognised taxes in a previous financial year (Article 4.1.3 (d) Model Rules and Article 4.1.2 (c) Model Rules)
Article_4_1_2_d	Adjustment	01	d) Credits or refunds in respect of recognised tax credits available for payment that have been recognised as a reduction of current tax expense (Article 4.1.2 (d) Model Rules)
Article_3_2_1_c	Adjustment	01	e) Recognised tax benefits for transparent companies of recognised ownership interests (Article 3.2.1 (c) Model Rules)
Article_4_1_3_a	Adjustment	01	f) Current tax expense in respect of income excluded from the calculation



Name	Тур	Anzahl	Beschreibung
			of GloBE profit or loss (Article 4.1.3 (a) Model Rules)
Article_4_1_3_b	Adjustment	01	g) Credits or refunds in respect of un- recognised tax credits available for payment that have not been recog- nised as a reduction of current tax expense (Article 4.1.3 (b) Model Rules)
Article_4_1_3_c	Adjustment	01	h) Recognised taxes refunded or credited to a business entity that have not been treated as an adjustment to current tax expense in the financial statements unless they relate to a recognised tax credit available for payment (Article 4.1.3 (c) Model Rules)
Article_4_1_3_d	Adjustment	01	i) Current tax expense related to uncertainties regarding tax treatment (Article 4.1.3 (d) Model Rules)
Article_4_1_3_e	Adjustment	01	j) Current tax expense that is not expected to be paid within three years of the end of the financial year (Article 4.1.3 (e) Model Rules)
Article_4_6_1	Adjustment	01	k) Adjustments made after submission of the return (Article 4.6.1 Model Rules)
Article_3_2_6	Adjustment	01	I) Tax recognised in respect of net capital gains or losses (Article 3.2.6 Model Rules)
Article_7_1	Adjustment	01	m) Reduction of recognised taxes for the ultimate parent company that is a transparent company (Article 7.1 Model Rules)
Article_7_2_2	Adjustment	01	n) Reduction of recognised taxes for the ultimate parent company that is subject to a deductible dividend re- gime (Article 7.2.2 Model Rules)
Article_7_3	Adjustment	01	o) Option for eligible dividend tax schemes (Article 7.3 Model Rules)
Article_7_6	Adjustment	01	p) Option for taxable distributions from investment companies (Article 7.6 Model Rules)
Article_4_1_1_b	Adjustment	01	q) Total amount of the adjustment for deferred taxes (Article 4.1.1 (b) Model Rules)



Name	Тур	Anzahl	Beschreibung
Article_4_1_1_c	Adjustment	01	r) Increase or decrease in recognised taxes in equity or other comprehensive income in connection with amounts taxable under domestic tax regulations that are included in the calculation of GloBE profit or loss (Article 4.1.1 (c) Model Rules)
OtherAdjustments	NamedAd- justment	*	Other adjustment

Table17 : AdjustedCoveredTaxes

3.2.4 General data structures

3.2.4.1 ElectionDateRange

Election Name	Туре	Number	Description
Status	Boolean	1	Selection of whether this election right is available
ElectionYear	Date	01	Year in which the election right was exercised
RevocationYear	Date	01	Year of revocation

Table18 : ElectionDateRange

3.2.4.2 ElectionNamedDateRange

Election Name	Туре	Number	Description
name	String	1	String name
ElectionYear	Date	01	Year in which the election right was exercised
RevocationYear	Date	01	Year of revocation

Table19: ElectionNamedDateRange

3.2.4.3 Residence

Residence Name	Туре	Quan- tity	Description
Canton	String	1	Canton
DistributionPercentage	Decimal	01	Distribution according to Article 12 para. 3 Minimum Taxation Regulation in %
TaxDomicile	Boolean	1	Is main tax domicile

Table20 : Residence



3.2.4.4 NamedValue

name	Туре	Quan- tity Name Description	
NameValue	String 1 Description of the value		Description of the value
Value	Decimal	1 Value	

Table21 : NamedValue

3.2.4.5 Adjustment

Name	Туре	Quan- tity Name Description	
Additions	Decimal	01	Additions
Reductions	Decimal	01 Reduction	

Table22 : Adjustment

3.2.4.6 NamedAdjustment

Name	Туре	Quan- tity	Description
Name	String 1 Description of the p		Description of the position
Value	Adjustment	1	Adjustments

Table23 : NamedAdjustment

4 Procedure

The procedure for specification and implementation is listed below.

Step	Date	Remark
Provision of specification	Mid-July 2025	Provision of the OMTax upload file specification to interested parties.
Workshop	22 August 2025	Workshop to review the specification together with the interested companies and their system suppliers.
Testing	10. – 21. November 2025	Provision of the upload functionality within the OMTax test application for tests by companies and their system suppliers.
Go-live	12 December 2025	Provision of the upload functionality within the OMTax production application for use by companies.

Table24 : Dates



5 Contacts

The following contacts are available to companies interested in implementing the upload file and their system suppliers for questions about the upload file or OMTax in general:

Name	Company/Organ-isation	E-mail address	Responsibility
Andreas Linden- mann	Swiss Tax Con- ference	andreas.linden- mann@ssk.ewv-ete.ch	OMTax project manager, technical topics
Thomas Rohrer	emineo AG	thomas.rohrer@emineo.ch	Technical project manager on the part of the supplier

Table25 : Contacts