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Taxation and Investment in Ireland 2014

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1.0 Investment climate

1.1 Business environment

Ireland is a parliamentary democracy with a written constitution. A constitutional president with largely ceremonial duties is elected by universal suffrage. The parliament consists of the president and a house of representatives (*Dáil*) and a senate (*Seanad Éireann*). Executive power is exercised by the prime minister and the cabinet, while the legislation-making power rests with parliament.

Industry accounts for a higher level of output than is the case in most other developed economies, and most manufacturing is foreign-owned and profitable, resulting in large amounts of profits repatriated abroad. However, as manufacturing output growth has slowed and services output has accelerated in many sectors, the structure of the Irish economy is becoming more like that of other developed economies. Agriculture remains relatively more important in Ireland than in other west European economies, although it has been declining in importance in both relative and absolute terms.

The Irish economy relies heavily on foreign trade. The UK and the US are Ireland's largest trading partners.

As an EU member state, Ireland is subject to all EU regulations, except those for which exceptions have been specifically negotiated. Trade is governed by EU rules and the rules of the World Trade Organization (WTO). The EU has a single external tariff and a single market within its external borders. Restrictions on imports and exports apply in some areas.

Price controls

The government does not favor price controls, although they are used to some extent in regulated industries with weak competition, such as telecommunications, energy and postal services. Price controls have been used occasionally as a short-term measure to cap prices in a specific industry.

Intellectual property

The following types of intellectual property are legally recognized in Ireland: patents, copyrights, trademarks, and industrial designs and models, including computer programs and semiconductor designs. EU legislation establishes the framework.

Patents

Ireland is a signatory to the European Patent Convention (EPC) and the Patent Cooperation Treaty (PCT), which streamline the processes for filing patent applications and conducting novelty searches in participating states.

Applications for a European patent can be filed at the Irish Patents Office and all or any of the 36 member countries of the EPC may be designated in a European patent application. A PCT application designating Ireland is deemed to be an application for a European patent for Ireland and will be processed in accordance with the EPC.

Ireland recognizes two patent durations: a full-term patent, for a maximum of 20 years, and a short-term patent, for a maximum of 10 years. The criteria for a short-term patent are less strict but the item being patented must be "not clearly lacking an inventive step," according to the Irish Patents Office. Short-term patents do not require a search report, are subject to fees reduced by 50% and can be granted in less than 12 months. It is possible to apply for both types of patent on the same product, in which case the short-term patent becomes void when the full-term patent comes into effect.

Infringement proceedings must be initiated in the High Court for full-term patents and in the Circuit Court for short-term patents. If infringement is proven, the court may grant a permanent injunction and damages. Infringement proceedings may be initiated only after a patent is granted but damages may be claimed for infringement occurring after publication of the specification. The exclusive licensee has the same right as the patent holder to initiate legal proceedings against the infringement of a patent.

Copyrights

Ireland has transposed a number of EU directives concerning copyright into Irish law and brought Irish law into conformity with the Berne Convention (Paris Act), the Rome Convention, the Trade-Related Aspects of Intellectual Property Rights agreement, the World Intellectual Property Organization (WIPO) Copyright Treaty and the WIPO Performances and Phonograms Treaty. The copyright law protects original literary, dramatic, musical or artistic works, sound recordings, films, broadcasts or cable programs, the typographical arrangement of published editions and original databases. Copyrighted material in digital form is protected in the same way as other material in other media, including when it is sent over the internet or stored on web servers.

A copyright expires 70 years after the death of the author, except in the case of sound recordings, cable programs and typeset publications, where it expires 50 years after the first lawful broadcast, transmission or publication. Reproduction of a copyrighted three-dimensional work in two dimensions is permitted and vice versa.

Registration of a copyright is not required, but a number of organizations exist to protect the interests of (and collect royalties for) copyright holders in different fields, notably writing, the performing arts, music, publishing and sound recordings. Performers, musicians and artists have a statutory right to payment of a fee whenever sound recordings of which they were part are broadcast or used in public. The Patents Office maintains a register of licensing bodies for copyright and performers' property. Disputes between licensors and licensees can be referred to the Controller of Patents, Designs and Trade Marks. Breach of copyright is a criminal offense. Offenders are liable to a substantial fine or face a prison term of up to five years.

Trademarks

For protection under Irish trademark law, the sign must be: (1) capable of being represented graphically; and (2) capable of distinguishing goods and services of one undertaking from those of another. Trademark and design registration can also be obtained from the EU's Office for Harmonization in the Internal Market (OHIM). Trademark and design protection obtained from OHIM is valid throughout the EU and can be applied for through the Irish Patents Office. It is valid for 10 years, which is renewable in the case of trademarks and renewable four times for a period of five years each time in the case of designs. EU law also protects unregistered designs but only for three years and only against deliberate copying. This protection applies from the date of disclosure of designs to the public within the EU. International trademark protection is available under the WIPO's Madrid Protocol, which applies in Ireland. Applications via the Irish Patents Office can designate any or all Madrid Protocol countries and automatically obtain protection in those countries for a single fee.

Industrial designs and models

Industrial designs are regulated by the Industrial Designs Act. To be registerable, a design must be new and have individual character. The maximum period of protection for registered designs is 25 years. Initial registration is for five years and renewal is possible up to four times for a further five years each time. The act provides for the filing of a multiple application, which may consist of up to 100 designs.

Electronic materials

The Data Protection Acts provide protection for computerized records of personal data. Companies must have designated data controllers and must register details of data held with the Data Protection Commissioner. Relevant EU legislation prohibits the transfer of data to countries that do not have an adequate standard of protection and have not concluded "safe harbor" agreements with the EU, which provide equivalent ad hoc protection for EU nationals. Countries meeting the requirements for the transfer of data are the countries of the European Economic Area (EEA, consisting of the EU plus Iceland, Liechtenstein and Norway), Argentina, Canada, Guernsey, Isle of Man, Switzerland and the US.

1.2 Currency

Ireland is part of the Eurozone and uses the Euro (EUR) as its currency.

Countries participating in the Economic and Monetary Union			
Austria	France	Latvia	Slovakia
Belgium	Germany	Luxembourg	Slovenia
Cyprus	Greece	Malta	Spain
Estonia	Ireland	Netherlands	
Finland	Italy	Portugal	

1.3 Banking and financing

Ireland has a well-developed and sophisticated banking and financial services sector.

Institutions in the banking and finance sector fall into two categories: institutions serving the domestic market, a segment that is highly concentrated and has been undergoing rationalization; and financial institutions set up to serve the offshore market, a segment that has been growing rapidly. The major Irish banks also are active in the offshore segment.

Banking and finance regulation is based on EU rules, in particular the directives on banking, insurance and capital adequacy. According to EU legislation, any credit institution licensed by an EEA member state may offer financial services in Ireland on the basis of home country supervision. The banking and finance sector is regulated by the central bank and the Financial Services Authority of Ireland (IFSRA), which licenses banks and other financial services providers, including insurers.

The “minimum competency requirements” for retail financial services set out the knowledge requirements for various retail financial products, which are divided into six categories. In each category, certain recognized qualifications must be attained to achieve compliance. In addition, Ireland’s banks, along with those of the rest of the EU, will move to a more risk-based approach to capital adequacy on the basis of a new capital-requirement directive (CRD IV) implementing the Basel III accord. The main features of this are enhanced capital and liquidity requirements.

As a member of the Euro area, Ireland is subject to the monetary and payments policy of the European Central Bank (ECB) and it is linked to the ECB’s real-time gross settlement system for high-value cross-border payments (TARGET) in Euros within the Euro area and to Denmark, Poland, Sweden and the UK.

The financial center is Dublin.

1.4 Foreign investment

Ireland is a prime location for many of the world’s leading businesses owing to its focused pro-business policy framework, which promotes a highly successful, open and competitive business environment. The Irish government is committed to maintaining an environment conducive to foreign investment. The Industrial Development Agency (IDA Ireland) is the primary government agency with responsibility for the promotion of foreign direct investment into the country.

Foreign investors generally are treated the same as Irish investors. No special permission is required for foreigners planning to acquire an existing business in Ireland or shares in an Irish company. There generally are no restrictions on the amount of foreign investment allowed. Licenses and/or environmental approvals are needed for a wide range of activities, including aquaculture, mining and carbon emissions by energy-intensive industries. In some cases, the approval of a central government agency is required; in others, permits must be obtained from the local authority.

Nontax incentive packages, which are sponsored by IDA Ireland, may include capital grants, interest subsidies, and loan guarantees and grants for rent reduction, employment, training, R&D and technology acquisition. These incentives are chiefly determined by the location and the quality of employment created. IDA Ireland monitors grant recipients closely, withholding or seeking repayment of grants if job commitments are not met.

IDA Ireland has a property portfolio of business and technology parks in major cities and is proactive in attracting and supporting investors. It favors advanced manufacturing projects in information and communications technology, pharmaceuticals and biopharmaceuticals, medical technology, engineering and consumer products and high value internationally-traded service sectors such as software, financial services, shared services and customer support.

1.5 Tax incentives

Ireland's low corporate tax rate (12.5% for trading profits), an enhanced IP regime, a generous R&D tax credit regime, extensive exemptions from dividend and interest withholding tax, a participation exemption, the absence of controlled foreign company (CFC) rules and the existence of incentive packages that maximize EU financial assistance and the efficient use of EU funds, make Ireland an attractive jurisdiction in Europe for a range of activities. Government incentives target foreign investors offering sustained high-skilled jobs and net exports with significant local content. The government also favors joint ventures between foreign and local investors with complementary skills, and is increasingly focusing on strengthening Ireland's indigenous technology base.

1.6 Exchange controls

There are no exchange controls or restrictions on the repatriation of earnings, capital, royalties or interest. Repatriation payments can be made in any currency. Both residents and nonresidents may hold bank accounts in any currency. Approval is not required for foreign investment or capital importation.

2.0 Setting up a business

2.1 Principal forms of business entity

The Companies Act and related statutory instruments generally govern the forms of entity available in Ireland. (A bill currently going through the legislative review process in Ireland will substantially change current company law. This legislation, known as the Companies Bill 2012, is due to be enacted in either late 2014 or early 2015.)

Private and public limited liability companies are the two main forms of corporate organization. Private limited companies are the most commonly used entity for foreign investors because they are less costly to set up and easier to operate. Foreign investors also may choose to set up a local operation by establishing a branch in Ireland. Such branch representative offices may sometimes not be taxable in Ireland, either as a result of their activities or tax treaty relief.

Other company forms that may be of interest to investors are the following:

- *European Company (SE)*, which requires a minimum capital of EUR 120,000, operates across the EU as a single operation and can transfer its headquarters from one country to another at will.
- *Undertaking for Collective Investment in Transferable Securities (UCITS)*, a public limited company set up solely to invest in transferable securities of capital (raised from the public) that operates on the principle of risk-spreading. UCITS are authorized by one EU member state and allowed to operate throughout the EU.
- *Common Contractual Fund (CCF)*, which enables institutional investors to pool assets, for example in pension funds for multinational companies operating in several jurisdictions. Small individual funds are also able to diversify their risk more readily.
- *Real Estate Investment Trust (REIT)* companies were introduced in Finance Act 2013. Subject to certain conditions, including a requirement to distribute 85% of property income by way of a property dividend, the regime provides a tax exemption in respect of the income and chargeable gains of a property rental business. To qualify for the exemption, a REIT must derive 75% of its aggregate income from the property rental business. It may carry on other "residual" business but the exemption applies only to the income and gains of the property rental business. An additional condition is that the REIT must be listed on the main market of a recognized stock exchange in the EU.

UCITS and CCFs must be registered with the central bank and the Financial Services Authority of Ireland.

The selection of a corporate structure for an investment in Ireland will be influenced by tax considerations, such as the Irish tax rate applying to operations, the group's home country tax considerations and the group's future plans for repatriating profits earned in Ireland back to the home country.

Formalities for setting up a company

Setting up a private or public limited liability company is straightforward and can be completed within one week if a standard set of memorandum and articles of association is used.

The main steps to set up a company are to complete the requisite forms, i.e. verify that the proposed name is not already in use, provide details of the directors/secretary and shareholders and submit this information to the Companies Registration Office, together with the memorandum of association.

The memorandum of association sets out the proposed activities of the company, as required by the Companies Act 1963. The memorandum should state the name of the company, limits on members' liability, the amount of authorized share capital and the firm's objectives or powers. If no articles of association are registered, the provisions of Table A of the Companies Act 1963 apply by default. Articles of association may be company-specific or based on standard sets available from accountancy firms. All limited companies must file accounts with the Registrar of Companies for public inspection.

The name of a public limited company must end with the letters “plc”.

Forms of entity

Requirements of private and public limited companies

Capital: *Public:* Minimum allotted share capital is EUR 38,092.14; 25% of the shares allotted, together with all premiums, must be paid up. *Private:* There is a minimum of one share and no minimum amount of share capital.

Founders and shareholders: *Public:* There is a minimum of seven shareholders; there are no nationality or residence requirements. *Private:* There is a minimum of one shareholder and a maximum of 99 (excluding employees); there are no nationality or residence requirements.

Board of directors: *Both:* There is a minimum of two directors and a secretary (who may be one of the directors). At least one director must be an EEA resident. If there is no EEA resident director, a bond insuring the company for an amount of EUR 25,395 may be required by the Companies Registration Office, unless the company holds a certificate from the Registrar of Companies specifying a link with economic activities taking place in Ireland. The total fee payable for the bond is EUR 1,957.50 and it covers a period of two years.

Management: *Both:* The management of a company generally is delegated to the board of directors. There is no requirement that labor be represented on the board or in management.

Taxes and fees: *Both:* The official company registration fee is EUR 100 and legal fees start at around EUR 750. No tax is due on bond issuance. There is an annual fee of EUR 40 for filing accounts with the annual return.

Types of share: *Public:* Shares may be registered or bearer (but the latter are rare), ordinary or preferred. Only par value shares may be issued. *Private:* Shares must be registered; they may be ordinary or preferred but they may not be issued to the public.

Control: *Both:* A simple majority rules in ordinary business decisions; major changes in corporate purpose or organization require a 75% vote in favor.

Branch of a foreign corporation

Foreign investors may also choose to set up a local operation by establishing a branch in Ireland. To set up a branch, a foreign company must submit a Form F12 if the foreign company is European or a Form F13 if the company is non-European, together with the following documents, to the Registrar of Companies:

- A certified copy of the memorandum of association;
- A copy of the certificate of incorporation (translated, if required);
- The names, addresses and nationalities of the directors and the secretary;
- The names and addresses of the persons in Ireland authorized to represent the company, ensure compliance and accept service on behalf of the company; and
- A copy of the most recent accounting documents.

The branch must file the financial statements of its parent entity with the Registrar of Companies annually.

Branch representative offices sometimes may not be taxable in Ireland, either as a result of their activities or tax treaty relief.

2.2 Regulation of business

Mergers and acquisitions

Merger activity in Ireland is governed by the Competition Authority, which must be notified of mergers in which (1) at least two of the merging enterprises conduct business in Ireland; (2) each of two or more of the enterprises has a worldwide turnover of not less than EUR 40 million; and (3) at least one of the enterprises has a turnover in Ireland of not less than EUR 40 million.

The Competition Authority oversees a two-stage approval process: mergers can either be cleared at Phase 1 or subjected to a more detailed Phase 2 investigation (“full investigation”). The

Authority has 30 days to clear a merger at Phase 1, while a Phase 2 determination must be made within four months of notification.

The Competition Authority approves or rejects mergers based on whether the merger or acquisition results in a substantial lessening of competition in markets for goods or services in Ireland. If the Authority blocks a merger, the minister may not unblock it; if the Authority approves a merger, either absolutely or conditionally, the minister may block it or may apply new or more stringent conditions.

Merger activity in Ireland also is subject to the EU Merger Control Regulation. The EU has jurisdiction in two cases:

- Where the combined aggregate worldwide turnover of all of the enterprises exceeds EUR 5 billion and the aggregate EU-wide turnover of at least two of the enterprises exceeds EUR 250 million (unless each of the enterprises achieves more than two-thirds of its aggregate EU-wide turnover in a single EU member state); and
- Where the aggregate global turnover of the enterprises concerned exceeds EUR 2.5 billion; aggregate global turnover in each of at least three EU member states exceeds EUR 100 million; aggregate turnover of at least two enterprises in each of these three member states exceeds EUR 25 million; and aggregate EU-wide turnover of at least two of the enterprises exceeds EUR 100 million (unless each of the enterprises achieves more than two-thirds of its aggregate EU-wide turnover in a single EU member state).

The European Commission has authority to refer such deals back to the Irish government for consideration if the only real impact will be in Ireland. Firms involved in a merger of companies not normally large enough to warrant Commission attention may apply to the Commission if the deal would otherwise require notification in at least three EU countries.

Monopolies and restraint of trade

The Competition Act deals with monopolies, market dominance and mergers and acquisitions, and prohibits abuse or extension of a dominant position. Monopolies and market dominance are not illegal per se but a company can be broken up in the event of abuse or anti-competitive extension. Concerted practices, such as those that restrain trade, are also illegal.

Any party aggrieved by abuse of a dominant position has a right of action in the High Court for an injunction or declaration or damages, including exemplary damages. The Court has authority to require the adjustment of a dominant market position by the sale of assets or otherwise.

A number of public services are state monopolies, including some services that have been privatized or partially privatized in other European countries, such as airport management, railways and postal services. However, EU rules place strict limits on the ability of these monopolies to receive state subsidies and many former monopolies face increasing competition from EU deregulation policies. Telecommunications have been fully deregulated. Electricity and gas supply, air and rail travel and postal services are being progressively deregulated.

2.3 Accounting, filing and auditing requirements

Irish law requires all companies to prepare annual audited financial statements, with an audit exemption for small companies. The audit exemption, however, does not apply to subsidiary or parent companies and, therefore, is not available to most multinational enterprises.

Audited financial statements generally must be approved within nine months of the company's year-end. There are no requirements for a company to use the calendar year. Once approved, financial statements of companies with limited liability status must be filed with the Companies Office, where they are available to the public. Companies with unlimited status are not required to file their accounts but must still prepare audited financial statements.

3.0 Business taxation

3.1 Overview

The main emphasis of the Irish tax regime is on a single 12.5% corporate tax rate for active trading companies and the Irish government has committed itself to the retention of this EU-approved rate. The 12.5% rate applies to all active trading profits and contrasts with some other jurisdictions that offer full or partial tax holidays only to select companies. In addition to corporation tax, companies in Ireland are subject to capital gains tax, stamp duty, value added tax (VAT) and customs duties.

As mentioned above, Ireland is an attractive jurisdiction for a range of activities, including regional headquarters and holding companies. Factors contributing to this environment include the following:

- The low corporation tax rate of 12.5% on trading profits.
- Intellectual property regime.
- Extensive exemptions from dividend, interest and royalty withholding tax.
- Capital gains tax exemption on the disposal of shares.
- Holding company regime.
- Generous R&D tax credit regime.
- Capital allowances for expenditure on intangible assets.
- The absence of CFC and thin capitalization rules.
- Special expat regime for foreign executives relocating to Ireland.
- A broad tax treaty network.
- The existence of incentive packages that maximize EU financial assistance and efficient use of EU funds.
- Irish tax relief for interest on borrowings that are used to acquire share capital of qualifying companies or to lend to qualifying companies.
- No capital duty or net wealth taxes.
- An open and transparent tax system.

Ireland has implemented the EU parent-subsidiary, interest and royalties, merger and savings directives, the latter of which requires the exchange of information between tax administrations when interest payments are made in one EU member state to an individual resident in another member state. Irish tax legislation provides various forms of relief to reduce the tax costs of restructurings, amalgamations and transfers of assets within a group and incorporates the common EU framework applicable to mergers, divisions, transfers of assets and exchanges of shares.

Ireland also has a system of group relief that allows the transfer of certain tax losses and other tax attributes, as well as the tax-free transfer of assets between group companies.

The tax authority in Ireland is the Revenue Commissioners, whose primary duty is the assessment and collection of taxes and duties.

Ireland Quick Tax Facts for Companies	
Corporate income tax rate	12.5%/25%
Branch tax rate	12.5%/25%
Capital gains tax rate	0%/33%/40%
Basis	Worldwide
Participation exemption	Yes, for capital gains

Loss relief	
- Carryforward	Unlimited
- Carryback	One year
Double taxation relief	Yes
Tax consolidation	No, but group relief is available for certain losses
Transfer pricing rules	Yes
Thin capitalization rules	No, but certain interest payments from subsidiaries may be recharacterized as dividends
Controlled foreign company rules	No
General anti-avoidance rule	Yes
Tax year	Fiscal year
Advance payment of tax	Yes
Return due date	Nine months after accounting year end, but not later than eight months and 23 days after company's year end
Withholding tax	
- Dividends	0%/20%
- Interest	0%/20%
- Royalties	0%/20%
- Branch remittance tax	No
Tonnage tax	Varies
Capital duty	No
Real property tax	0.18%/0.25%
Stamp duty	1%-2%
Share transfer tax	1% stamp duty on transfer of Irish shares, but group exemptions apply
Real estate transfer tax	No
Relevant contract tax	0%/20%/35%
Social security contributions	Up to 10.75%
VAT	0%/9%/13.5%/23%

3.2 Residence

A company is resident if it is incorporated in Ireland (with certain exceptions) or managed and controlled at the director level in Ireland. A company incorporated or resident abroad may be liable for Irish corporate tax if it carries on a trade in Ireland through a branch or agency.

3.3 Taxable income and rates

A company resident in Ireland for tax purposes is liable for Irish corporate tax on its worldwide income, including business profits, dividends (except in certain circumstances), interest, rents, royalties and capital gains. A company incorporated or resident abroad may be liable to Irish corporate tax if it carries on a trade in Ireland through a branch or agency. In cases where the company is resident in a country that has concluded a tax treaty with Ireland, liability to corporate tax will depend on whether the company carries on a trade in Ireland through a permanent establishment (PE). Where a nonresident company carries on a trade through an Irish branch (or a

PE), it will be chargeable to corporation tax on trading income arising, directly or indirectly, through or from the branch; any income from property or rights used by, or held by or for the branch; and any chargeable gains on branch assets.

The tax rates in Ireland are as follows:

- The standard rate of corporation tax is 12.5%, which broadly applies to trading profits, including overseas dividends from trading sources (i.e. dividends from trading companies in the EU or a treaty country, or from trading companies in nontreaty countries with which Ireland has ratified the Convention on Mutual Assistance on Tax Matters), but excluding certain land dealing activities and income from minerals and petroleum activities. Dividends received from EU/EEA subsidiaries may carry underlying credit relief and a potential notional credit, thereby eliminating the Irish corporate tax on such dividends.
- Passive income, including certain dividends, interest, rents and royalty income, is taxable at a higher rate of 25%.
- Income from certain trading activities (e.g. dealing in and developing land other than qualifying full developed land, the exploitation of oil, gas and mineral resources, and dealing in licenses) also is taxable at the 25% rate.

There is a three-year corporate tax exemption for new companies starting up in the period 2009-2014. The value of the relief is based on the amount of employer's social charge paid by a company in an accounting period, subject to a maximum of EUR 5,000 per employee and an overall limit of EUR 40,000. If the amount of qualifying employer's social charge paid by a company in an accounting period is lower than the reduction in the corporation tax liability, the relief will be based on the lower amount.

Taxable income defined

Corporation tax is charged on the profits of a company, which consist of business or trading income (including income from active financing, leasing, licensing, manufacturing, procurement and R&D), investment income and chargeable gains. Income generally is calculated for corporate tax purposes by adjusting the net profit before tax shown in the audited financial statements. Certain expenses are specifically disallowed. Expenditure of a capital nature normally is not deductible but capital allowances may be available on capital expenditure.

Foreign tax paid on profits and income streams taxable in Ireland is allowed as a deduction or credit. As discussed below, credit is given either unilaterally or under the provisions of a relevant tax treaty. Where no such agreement exists or unilateral credit relief is not available, a deduction is granted in calculating taxable profits.

Distributions (dividends) received by an Irish resident company from another Irish company are not included in taxable income. Dividends received from a nonresident company are taxable in Ireland (although relief may be available through a foreign tax credit for actual, and in some situations notional, tax paid).

Closely held companies may be subject to a 20% surcharge on estate and investment income if such income is not distributed within 18 months of the end of the accounting period in which the income is earned. Close "service" companies are liable to a surcharge of 15% on 50% of their undistributed trading income. (Most Irish resident companies owned by Irish shareholders that are private companies are "close" companies, i.e. more than 50% of full distributable income goes to five or fewer —defined as individuals having an interest in the income or capital of the company— or to participators who are directors.)

Foreign exchange gains and losses of a company that arise or are incurred for trade purposes are taxable (or deductible) in the calculation of taxable income, whether they are realized or unrealized.

Deductions

The deductions available in calculating profits are determined by the nature of the profits.

A company generally is entitled to a deduction for revenue expenditure against profits. Certain capital expenditure, such as investment in plant and machinery, may qualify for capital allowances. There is no deduction for the depreciation of capital assets.

Deductions are available for trading activities, provided the expenses are incurred wholly and exclusively for the purposes of the trade and generally are determined on the basis of the financial statements.

The following expenses are nondeductible:

- Entertainment expenses (100% nondeductible);
- Auto leasing expenses (the allowance of 12.5% of net cost per year is restricted for cars valued at more than EUR 24,000, with a further restriction for cars with higher CO2 emissions leased after 1 July 2008; expenses related to private use are nondeductible);
- Depreciation (100% nondeductible, but a comprehensive system of capital allowances, or tax depreciation, is substituted – see below);
- Dividends and distributions; and
- Expenses incurred for purposes other than the company's trade.

In general, deductions are available to investment companies in respect of management expenses and certain interest payments.

Companies generally are entitled to deduct payments of interest (except interest treated as a distribution – see below).

Intangible assets: For capital expenditure incurred after 7 May 2009 on the provision or acquisition of intangible assets (e.g. brands, trade names and copyrights) for the purposes of a trade, allowances are provided over a number of years for this expenditure. The aggregate amount of allowances and related interest expense in an accounting period may not exceed 80% of the trading income from the relevant trade. Therefore, at a minimum, 20% of income will be subject to tax. This regime also applies to certain categories of software.

Companies operating in foreign currency: Companies with an operating currency other than the Euro are subject to certain rules concerning the treatment of capital expenditure and trading losses. For purposes of calculating tax depreciation, capital expenditure remains in the operating currency of the company. The company's income after offsetting tax depreciation is converted into Euro, thereby preserving the value of the capital expenditure against exchange fluctuations.

In addition, losses are carried forward in a company's operational currency. If profits are earned in a future accounting period, the operational currency equivalent of the profits in Euro will be offset against the loss carried forward. This preserves the value of the losses against exchange rate fluctuations.

Foreign exchange transactions, including hedging contracts, count as taxable income if properly incorporated in a company's accounts. For example, if a company uses a liability in a foreign currency to fund the acquisition in the same foreign currency of a minimum 25% shareholding in a subsidiary, a company may discount the effects of currency fluctuations for tax purposes. Companies must elect to match the foreign currency gain or loss on the asset with the foreign-currency gain or loss on the liability within three weeks of the investment.

R&D: A tax credit of 25% of qualifying incremental R&D expenditure incurred, in excess of qualifying R&D expenditure incurred in a base year (2003) can be offset against a company's corporation tax liability in the year in which the expenditure is incurred. For accounting periods commencing on or after 1 January 2013, the first EUR 200,000 of group expenditure on R&D is excluded from the incremental basis. The credit is available in addition to any deductions for the R&D expenditure, resulting in a cumulative benefit of up to 37.5%.

A credit of 25% also is available for relevant expenditure incurred on a building/structure. Relevant expenditure is broadly defined as expenditure on the portion of the building used for qualifying R&D activities, provided at least 35% of the building is used for these activities over a four-year period. The credit available on the qualifying portion of the expenditure is deductible in full in the year the expenditure is incurred. The credit is available together with capital allowances.

To qualify for the credit, the following conditions must be satisfied:

- The R&D activities must be carried out in the EEA;
- The expenditure must not be deductible in any other country; and

- The R&D must be carried out in-house, although an amount up to 5% of the total expenditure paid to a university or institute of higher education, or 10% of total expenditure paid to a third-party subcontractor, qualifies for the credit.

The credit may be carried back to the previous year if there is insufficient current year corporate tax. If the credit is still unutilized after the carryback, the company may claim a cash payment from the tax authorities for the excess over a three-year period (on claims made within 12 months from the end of the accounting period in which the qualifying expenditure is incurred) or offset the excess credit against payroll taxes, subject to certain limits.

The amount of credit to be provided as a cash payment is limited to the greater of:

- The corporation tax payable by the company for accounting periods ending in the 10 years prior to the relevant period; or
- The aggregate of payroll liabilities for the relevant period and the preceding accounting period.

Scientific research: Expenses, including capital expenditure on scientific research, may be charged against trading income in the year in which the costs are incurred.

Patents: Capital expenditure for the purchase or acquisition of patent rights may be written off in equal amounts over 17 years or the remaining life of the patent, whichever is shorter. The cost of registration or renewal of IP rights is deductible. This relief does not apply where patents are acquired after 7 May 2011; the new IP regime for intangible assets will apply instead (as outlined above).

Depreciation

Depreciation charged in the financial statements of a corporation is nondeductible for tax purposes. Instead, a system of annual capital allowances or tax depreciation is used, as follows:

- Certain qualifying industrial buildings: 4%;
- Plant and machinery (including computer equipment): 12.5%;
- Vehicles: 12.5%;
- Investment in oil and gas (under a license): 100%; and
- Intellectual property (as defined): as per the depreciation in the financial statements or a minimum of 6.66% per annum.

Expenditure on plant and machinery is subject to an annual 12.5% straight-line allowance for a period of eight years. Allowances on business cars also are calculated on this basis, subject to maximum qualifying expenditure of EUR 24,000. The EUR 24,000 limit is further reduced if the CO₂ emissions of the car exceed 155g/km.

On the disposal of plant and machinery for which capital allowances have been claimed, a balancing charge or allowance applies, depending on the difference between the amount received on disposal and the tax written-down value of the asset. No balancing charge is made in respect of capital expenditure on plant and machinery where the disposal proceeds for the plant or machinery are less than EUR 2,000.

Industrial buildings are written down at 4% per annum on a straight-line basis over the tax life of the building. Certain buildings in tax-designated areas are treated as industrial buildings for tax purposes.

100% capital allowances in the year of purchase are available for expenditure incurred by a company on qualifying energy-efficient equipment purchased for the purposes of the trade during the three years from 1 January 2011.

Losses

Relief for losses is available by way of a deduction. Losses may be carried forward indefinitely against trading profits of the same trade. Trading losses may be carried back for one year.

Trading losses may be offset against trading income in the accounting period (normally one year, but not necessarily a calendar year) in which they are incurred and in the accounting period immediately preceding the period in which they are incurred. These losses are offset on a Euro-for-

Euro basis. Trading losses may be offset against nontrading income and capital (“chargeable”) gains, but only on a value basis. For example, a company’s trading loss will be allowed at the 12.5% rate against income liable at the 25% rate. However, such a company will need trading losses equal to twice the amount of passive income to eliminate its tax liability on that income. Losses may be group relieved, provided a 75% relationship exists between the company surrendering the losses and the company claiming the losses (as described below). Unused trading losses may be carried forward indefinitely against trading profits.

Losses on land not held for development purposes may be offset against capital gains but the relief is limited to the company that holds the asset and is not available to pass through to the group. This relief may not be carried back but may be carried forward. Losses on the disposal of land held for development purposes may be offset against capital gains on other assets.

There are no provisions in Irish legislation for the consolidation of profits and losses. However, Ireland grants relief for losses incurred by companies in a group. Companies are considered part of a group if one is a 75% subsidiary of another or both are 75% subsidiaries of a third company where all companies (and intermediaries, if shares are held indirectly through a series of companies) are tax resident in an EEA country or a country with which Ireland has entered into a tax treaty, or listed on a stock exchange recognized by Irish Revenue. Group relief is restricted to current year trading losses (including losses on leasing operations) arising in Ireland, including excess charges on income, excess management expenses (for investment companies) and certain excess capital allowances.

3.4 Capital gains taxation

Companies resident in Ireland for tax purposes are liable to tax on their worldwide gains. Nonresident companies are liable to tax only in respect of gains arising on the disposal of land, minerals or mineral rights in Ireland or of assets used for purposes of a trade conducted through a branch or agency in Ireland. A nonresident company also is liable for the tax on the disposal of shares not quoted on a stock exchange that derive most of their value directly or indirectly from land, minerals or mineral rights in Ireland.

Profits arising from the disposal of assets by companies are taxed as profit, i.e. at the standard corporate tax rate of 12.5% but the profit is adjusted such that the effective rate of tax is the capital gains tax rate (currently 33%). Where the gain is on the sale of development land or where a nonresident disposes of a nontrading asset, capital gains tax applies at the rate of 33% (although disposals of certain foreign investment products are subject to a rate of 40%).

The cost of acquisition or improvement of an asset is deductible from the nominal gain. The gain on share sales is calculated on a first-in, first-out basis. Trading losses may be offset against capital gains for the current or previous year, except where the gain is in respect of development land. Losses on the disposal of development land may be offset against capital gains on any type of asset.

Capital assets may be transferred between Irish resident group companies without liability for capital gains tax.

Under Ireland’s participation exemption, gains derived from the sale of shareholdings in other companies are not taxable if the other company is EU resident or resident in a country that has concluded a tax treaty with Ireland and the Irish company:

- Held at least 5% of the shares in the company for a continuous period of at least 12 months ending within the 24 months preceding the disposal; and
- Is a trading entity or a member of a trading group.

Losses on such holdings may not be offset against gains.

Overall, these provisions make it attractive to set up holding companies and corporate headquarters in Ireland, particularly given that Ireland has no CFC legislation.

Foreign exchange gains or losses on hedging instruments associated with capital borrowing are included in taxable income and excluded from the calculation of capital gains. Gains or losses on holdings of foreign currency for trade purposes are treated in the same way. Gains on the sale of Irish government securities, securities issued by state-sponsored bodies and guaranteed by the

government and securities issued by local governments generally are exempt from capital gains tax.

3.5 Double taxation relief

Unilateral relief

Foreign taxes paid by an Irish resident company (or EU branch), whether imposed directly or by way of withholding, may be creditable in Ireland either unilaterally or under the provisions of a tax treaty. Where no treaty exists or unilateral credit relief is not available, deductions are granted in calculating taxable profits. The calculation of the credit depends on the nature of the income item, but is limited to the Irish tax due on the particular item of income, computed on a net basis.

The pooling of credits for foreign dividend income is available. Any surplus double tax credits attributable to foreign dividends taxable at the 12.5% rate are not available against tax on foreign dividends subject to the 25% rate.

An additional tax credit is available for dividends paid on or after 1 January 2013 by certain companies, including, for example, those resident in an EU/EEA member state, with which Ireland has a tax treaty (EU/EEA countries). The additional foreign credit allows for increased double taxation relief when the existing credit for foreign tax on the relevant dividend is less than the amount that would be computed by reference to the nominal or headline rate of tax in the country from which the dividend is paid.

Ireland also allows the pooling of foreign branch profits. Where the foreign tax on the profits of a branch exceeds the Irish tax on such profits, the credit is limited to the Irish tax on the profits. The pooling mechanism allows credit to be granted for any surplus foreign tax. Thus, where a company has two overseas branches, the foreign taxes paid in both countries can be used as a credit against the Irish tax computed on the same profits.

Tax treaties

Ireland has an extensive tax treaty network and, as noted above, foreign taxes paid on profits and income streams taxable in Ireland are allowed as a deduction or credit. Credit is given either unilaterally or under the provisions of a relevant treaty. Where no such agreement exists or unilateral credit relief is not available, deductions are granted in calculating taxable profits.

Ireland's treaties generally are based on the OECD model treaty. They generally provide for relief from double taxation on most types of income, limit the taxation by one state of companies resident in the other contracting state and protect companies resident in one state from discriminatory taxation in the other state. The treaties generally also contain OECD-compliant exchange of information provisions.

Ireland operates a self-assessment system in respect of the collection of taxes and tax returns for companies and individuals. Therefore, the benefits of tax treaties are relatively straightforward to claim under the self-assessment system. However, it is not possible to claim a correlative adjustment for double taxation relief under the self-assessment system unless specifically agreed to by the Irish Revenue.

Ireland Tax Treaty Network			
Albania	Finland	Luxembourg	Russia
Armenia	France	Macedonia	Saudi Arabia
Australia	Georgia	Malaysia	Serbia
Austria	Germany	Malta	Singapore
Bahrain	Greece	Mexico	Slovakia
Belarus	Hong Kong	Moldova	Slovenia
Belgium	Hungary	Montenegro	South Africa
Bosnia & Herzegovina	Iceland	Morocco	Spain

Bulgaria	India	Netherlands	Sweden
Canada	Israel	New Zealand	Switzerland
Chile	Italy	Norway	Turkey
China	Japan	Pakistan	United Arab Emirates
Croatia	Jersey	Panama	United Kingdom
Cyprus	Korea	Poland	United States
Czech Republic	Kuwait	Portugal	Uzbekistan
Denmark	Latvia	Qatar	Vietnam
Egypt	Lithuania	Romania	Zambia
Estonia			

3.6 Anti-avoidance rules

Transfer pricing

Transfer pricing rules based on the OECD guidelines have applied in Ireland since 1 January 2011. The objective of the law is to ensure that an arm's length price is charged in arrangements involving the supply or acquisition of goods, services, money or intangible assets between connected persons when the profits or losses of either company are chargeable to Irish tax as trading profits or losses. Transfer pricing methodologies as set out in the OECD guidelines should be used to determine the arm's length price. "Grandfathering" provisions exist for arrangements entered into before 1 July 2010. The term "arrangement" is broadly defined as any agreement or arrangement of any kind, whether or not it is, or is intended to be, legally enforceable.

Corporations are deemed to be connected where there is at least a 50% ownership relationship, but may be connected in other circumstances.

The law applies to both domestic and cross-border trading transactions between companies and to Irish branches of foreign companies that are within the charge to Irish tax on their trading activities. Transactions between head offices and branches do not fall within the scope of the transfer pricing law.

The transfer pricing regime does not apply to activities that are nontrading in nature, e.g. financing activities such as interest-free loans that are nontrading in nature or to isolated intellectual property transactions.

Small and medium-sized companies are outside the scope of the transfer pricing provisions. A small/medium-sized entity is one with a staff head count of less than 250 and that has either an annual turnover of EUR 50 million or less or an annual balance sheet total of EUR 43 million or less in assets, with these figures assessed annually on a group-wide basis. Income can be adjusted upwards or expenditure downwards, so these provisions do not give rise to an Irish tax disadvantage for the Irish exchequer. A tax treaty must be used if an Irish company seeks a downward adjustment to its income because of an overseas transfer pricing adjustment that increases income in the overseas counterparty company.

Companies are required to have available records that would reasonably be required for the purpose of determining whether the trading income of a company is computed by virtue of the arm's length principle. Documentation should be prepared at the time the terms of the transaction are agreed and should be available by the due date for filing the corporate tax return.

No guidelines on advance pricing agreements (APAs) have been issued.

Thin capitalization

Ireland does not have specific thin capitalization legislation. However, interest payments made by a company to a nonresident parent that owns at least 75% of the Irish company generally are reclassified as dividend distributions. Exceptions to this rule apply to payments made in the ordinary course of a trade carried on by the company to a parent resident in an EU or tax treaty country, and certain payments made by companies conducting activities in Shannon and the

International Financial Services Center. In many cases, an election needs to be made to benefit from the exemption to have the payments not treated as distributions.

Controlled foreign companies

Ireland does not have CFC rules.

General anti-avoidance rule

The Irish tax code contains a general and broadly drafted anti-avoidance provision. In broad terms, the legislation provides that, where a person has entered into a "tax avoidance transaction," the Revenue Commissioners can disallow the tax advantage resulting from such a transaction. If the transaction was undertaken primarily for non-tax purposes, however, it should not be regarded as a tax avoidance transaction.

3.7 Administration

Tax year

The accounting period of a company for tax purposes is 12 months or the period for which accounts are prepared, if shorter.

Filing and payment

Ireland operates a self-assessment system, under which a taxpayer must determine its liability to corporation tax. A company must file a tax return within nine months of the end of the accounting period, but no later than eight months and 23 days from the company's year-end. Failure to do so gives rise to penalties and loss of reliefs.

A preliminary corporate tax payment is payable during the accounting period, amounting to 100% of the corporate tax liability. To avoid an interest charge arising on underpayment, the amount to be paid as preliminary tax must be not less than 90%, with the balance payable on filing the return.

Companies with a tax liability of more than EUR 200,000 in their previous accounting year must pay preliminary corporation tax in two installments (on 23 June and 23 November of the accounting period for companies with a calendar year end). The amount payable on 23 June is 50% of the preceding year's liability or 50% of the current year's liability, with the balance payable on 23 November. To avoid interest charges, the amount paid by 23 June must be either 50% of the preceding year's tax liability or 45% of the current year liability and the total amount paid by 23 November must be 90% of the total liability for the relevant year.

All companies must file tax returns and pay corporation tax liabilities electronically.

Consolidated returns

As noted above, there are no provisions in Irish tax legislation for consolidation of group profits and losses. However, Irish trading losses may be group-relieved between qualifying group companies resident in the EU by way of group relief, provided a 75% relationship exists between the company surrendering the losses and the company claiming the losses.

Statute of limitations

The time limit is four years commencing from the end of the chargeable period in which the taxpayer has submitted a return. No enquiries may be made or other actions taken by the Irish Revenue Commissioners after the end of that period, unless the Inspector has reasonable grounds for believing (at the time he or she makes the enquiries) that the return is inaccurate owing to fraud or negligence. The statute of limitations for the collection of tax also is four years.

Tax authorities

The tax authorities in Ireland are the Revenue Commissioners, whose primary duty is the assessment and collection of taxes and duties. Revenue's mandate derives from obligations imposed by statute and by the government, and as a result of Ireland's membership of the EU. In broad terms, their duties include:

- Assessing, collecting and managing taxes and duties that account for over 93% of Exchequer revenue;

- Administering the customs regime for the control of imports and exports and collection of duties and levies on behalf of the EU;
- Working in cooperation with other state agencies in the fight against drugs and in other cross-departmental initiatives;
- Carrying out agency work for other departments;
- Collection of Pay Related Social Insurance (PRSI) for the Department of Social Protection; and
- Provision of policy advice on taxation issues.

Rulings

Certain holding/headquarter entities can request an advance ruling on Irish tax residence status, the taxation of directors and certain other tax matters. It is possible to obtain a trading opinion from the Irish Revenue on whether the 12.5% rate applies to certain activities.

The Revenue Commissioners have issued updated guidance regarding the circumstances under which requests for advance opinions and confirmations will be granted. These guidelines are welcome, as there have been several cases where Revenue have refused to give an opinion on complex issues leading to some uncertainty regarding the tax position of certain multinationals with a presence in Ireland. As part of the guidance, Revenue have set out that, where appropriate, an opinion/confirmation will contain a provision setting out the period for which the opinion/confirmation will apply, which normally will be a maximum of seven years.

3.8 Other taxes on business

Tonnage tax

Certain shipping companies may elect to have their profits charged to tonnage tax rather than corporation tax, subject to meeting certain requirements. The tax charge is levied annually, based on the tonnage of the ships operated by the company.

4.0 Withholding taxes

4.1 Dividends

Dividends and other profit distributions made by a resident company to a nonresident generally are subject to a 20% withholding tax. However, the rate can be reduced to nil if certain formalities are met and (i) the recipient is an individual resident in a treaty country or an EU member state; or (ii) the recipient is a company and the following requirements are met:

- The company is under the control of persons resident in a treaty country or in an EU member state; or
- The principal class of shares of the company or of another company of which it is a 75% subsidiary is regularly traded on the stock exchange in a treaty country or an EU member state; or
- It is resident in a treaty country or an EU member state and is not under the control of a person or persons who are Irish tax residents.

4.2 Interest

A 20% withholding tax generally is levied on annual interest payments made to a nonresident company unless a lower rate applies under a tax treaty, the interest is paid to a qualifying company under the EU interest and royalties directive or the interest payment is specifically exempt under one of the exemptions under domestic legislation.

4.3 Royalties

A 20% withholding tax is imposed on patent royalties and payments made to a nonresident company, unless the rate is reduced by a tax treaty, or the EU interest and royalties directive applies. Other types of royalty are not subject to withholding tax.

Where certain conditions are satisfied, it is possible to obtain pre-clearance from Irish Revenue that royalty payments may be made without the deduction of withholding tax.

4.4 Branch remittance tax

Ireland does not impose withholding tax on the repatriation of branch profits to a foreign head office.

4.5 Wage tax/social security contributions

Employee income taxes generally are collected under the PAYE (Pay As You Earn) system, whereby tax is calculated and withheld from salaries by the employer.

The USC (Universal Social Charge) applies to gross income (including notional pay) and payments are made via the PAYE system.

Irish social security contributions are referred to as PRSI contributions. Both employee PRSI (4%) and employer (10.75%) contributions are payable, and payments are made through the PAYE system.

The onus lies on the employer to calculate and remit the relevant PAYE/PRSI/USC in respect of employee remuneration.

5.0 Indirect taxes

5.1 Value added tax

VAT is levied, with certain exceptions, on the value of all goods and services supplied in Ireland by a taxable business. VAT also is payable on most imported goods and services.

The standard rate of VAT is 23%. Reduced rates of 9% and 13.5% are levied on certain goods and services. The 9% rate was initially introduced on 1 July 2009 until 31 December 2013 but has been extended indefinitely. This reduced rate applies mainly to tourism related goods and services i.e. hotel accommodation, catering services, admissions to performances and use of sporting facilities.

A taxable business must account for relevant VAT liabilities in respect of its Irish-based taxable turnover but has the right to claim a deduction for VAT incurred on its own purchases, acquisitions and imports on which VAT is levied. In most cases, credit is available for VAT paid on goods and services purchased. The net tax due or refundable on sales/purchases normally is settled bimonthly with the authorities, although agreement can be made to settle on an alternative calendar cycle in certain circumstances.

A business that is not established or registered for VAT in Ireland but that incurs Irish VAT, may recover that VAT by submitting a claim to the Irish tax authorities. An EU directive in force from 2010 sets out the procedure to request recovery of VAT incurred in other EU member states by businesses that are established and registered for VAT within the EU.

The main relief from VAT takes the form of either zero-rating or exemption. The principal exempt items include medical and related services and the provision of financial services. Zero-rated goods and services include export of goods, children's clothing and certain food items.

Companies whose turnover from zero-rated intra-Community supplies of goods, exports outside the EU and supplies of certain contract work, exceeds, or is likely to exceed, 75% of their total annual turnover, can be authorized by the Revenue Commissioners to receive goods and services (except the supply or hire of any passenger motor vehicles, food, drink, entertainment, etc.) from Irish and foreign suppliers free of VAT. This reduces administration and eliminates the need to obtain a VAT refund.

Businesses that carry on VAT chargeable activities must register with the Revenue Commissioners where the annual value of the goods supplied within Ireland exceeds EUR 75,000, the annual value of services exceeds EUR 37,500 or the annual value of intra-EU acquisitions exceeds EUR 41,000.

VAT returns generally are filed every two months and the tax due is paid at that time.

5.2 Capital tax

Ireland does not levy capital tax.

5.3 Real estate tax

Local authorities levy annual local property taxes (rates) on commercial property (but not on dwellings). Rates are payable per EUR 1 valuation of the property, which also is determined by the local authority (see Section 6.5 for residential property tax).

5.4 Transfer tax

See below under Stamp duty.

5.5 Stamp duty

Stamp duty is payable by the purchaser/transferee on the transfer of property and most securities. Stamp duty on nonresidential property transfers is payable at a rate of 2%. Stamp duty on residential property with a price up to EUR 1 million is 1%, with 2% payable on the balance, if any. Stamp duty on the grant of a lease is payable at rates of between 1% and 12% on the average annual rent under the lease and will be payable in the usual way on any premium paid. Stamp duty

on the transfer of shares and marketable securities is payable at 1%. Relieving provisions may apply to some types of security (in particular, sovereigns and quasi-sovereigns); in the case of a share-for-share swap or a share-for-undertaking swap, subject to the necessary conditions being satisfied; or in the case of intergroup transfers. Transfers between companies where one of the companies owns 90% of the other, directly or indirectly, are exempt from stamp duty.

There are stamp taxes on mortgages and on the transfer of bonds.

5.6 Customs and excise duties

Goods imported from outside the EU are subject to customs duty at the appropriate rate specified by the EU's common customs tariff. The rate of duty is based on an international harmonized classification system. The EU has preferential tariff agreements with certain countries and country groupings, which result in the rates being reduced or eliminated. Border controls between EU member states do not apply, so goods once imported or produced in the EU can be imported into Ireland from other EU member states duty-free.

Excise duties and other taxes vary depending on the goods and are payable in addition to any customs duty. Excise duties are imposed on mineral oils, alcoholic beverages and tobacco products. There are some arrangements under which goods may be imported without payment of duty. For example, approval may be obtained to import goods duty-free from outside the EU for processing and re-exportation to non-EU countries or for retention within the EU.

5.7 Environmental taxes

An environment levy is payable on plastic bags.

Carbon tax is levied on the amount of carbon emitted on the combustion of certain fuels. The tax is based on a fixed price per unit measurement; the fixed price depends on the type of fuel. The carbon tax applies to kerosene, marked gas oil, liquid petroleum gas, fuel oil and natural gas. The tax has applied to solid fuels, such as coal and peat, from 1 May 2013.

Other environmental taxes include WEEE (Waste of Electrical and Electronic Equipment), electricity tax payable on nondomestic use of electricity, registration tax on motor vehicles, landfill levy and water charges payable on the supply of water to users through the public water system. The Air Travel Tax was reduced to zero with effect from 1 April 2014 to boost the number of travelers to Ireland.

5.8 Other taxes

Relevant Contracts Tax

Relevant Contracts Tax (RCT) is a withholding tax mechanism to ensure those involved in construction, forestry and meat processing operations are tax compliant. The legislation obliges a person (principal contractor) to retain tax at 0%, 20% or 35% of the amount payable to contractors engaged to carry out relevant operations. The rate applicable is determined by the contractor's Irish tax status for each payment. Prior approval is required to ensure the correct tax (if any) is withheld.

Broadly speaking, principal contractors may include property developers, building companies and all associated building trades, as well as individuals who are connected with these businesses. All government bodies, local authorities, public utilities, boards and bodies established under statute, are deemed to be principal contractors under current legislation. Principal contractors also include all gas, water, electric/hydraulic power, dock, canal and railway undertakings.

Those involved in the installation, alteration or repair of telecom equipment or systems are now also obliged to retain RCT.

Where a person or company subcontracts all or part of a relevant contract, they are deemed to be a principal and should retain RCT on payments to contractors. The definition of "relevant operations," where RCT should be retained is extremely broad and is not restricted to those involved in the above industries.

6.0 Taxes on individuals

The personal tax burden in Ireland is average when compared with other countries, although employees must also pay social insurance contributions and corporate executives generally must fund private healthcare and pension provisions. There is no net wealth tax, but individuals are subject to a capital acquisitions tax, withholding tax and a deposit interest withholding tax.

Ireland Quick Tax Facts for Individuals	
Income tax rates	Progressive to 41%
Universal social charge	Progressive to 7%/10% (for the self-employed) plus additional 3% surcharge on individuals with non PAYE income exceeding EUR 100,000
Capital gains tax rate	33%
Basis	Worldwide
Double taxation relief	Yes
Tax year	Calendar year
Return due date	31 October (extended to mid-November for certain individuals filing online)
Withholding tax	
– Dividends	0%/20%/41%
– Interest	0%/20%/41%
– Royalties	0%/20%
Social security	4%
Net wealth tax	No
Capital acquisitions tax	33%
Rates (for income tax)	Varies
Local property tax	0.18%/0.25%
VAT	9%/13.5%/23%

6.1 Residence

Residence, ordinary residence and domicile are considered when determining an individual's liability to Irish tax. An individual is treated as being tax resident in Ireland if (i) he/she is physically present in Ireland for 183 days or more in a tax year; or (ii) he/she spends a combined total of 280 days or more in Ireland over the current and preceding tax years. The individual will not be treated as resident under the second test for any tax year during which he/she spends less than 30 days in Ireland. A day is counted for residence purposes if the individual is present in the state at any time during the day.

An individual is regarded as ordinarily resident in Ireland in a tax year if he/she has been an Irish resident for each of the three preceding tax years. Once the individual becomes ordinarily resident in Ireland, he/she does not cease to be ordinarily resident for a tax year unless he/she has been nonresident in Ireland for each of the preceding three tax years.

Domicile is a legal concept and is not defined in Irish tax legislation. It is a complex term and is primarily a question of fact—based on the notion of an individual's permanent home to which that person intends ultimately to return. A person can be considered domiciled in the country that is the individual's permanent home even when he/she is temporarily resident in another country. An individual can never be without a domicile. Generally, an individual is domiciled in his/her country

of nationality and the country in which the greater part of his/her life is spent, i.e. the domicile of origin. Once an individual has reached the age of majority, "domicile of origin" can be abandoned and a "domicile of choice" can be acquired. In this situation, factors of presence and intention would be required.

6.2 Taxable income and rates

Taxable income is based on a "schedular" system, which, in turn, is based on the source of the income, for example, income from employment, income from the exercise of a trade or profession and investment income.

Once an individual's income that is liable to Irish tax has been identified, the tax is calculated and any tax credits available are deducted from the tax figure determined.

A husband and wife may choose to be assessed separately. When a couple choose separate assessment, they may transfer unused tax credits to the other spouse. Couples may also opt to be assessed as two single individuals, in which case credits may not be transferred.

Taxable income

Generally, all forms of compensation, whether in cash or benefits in kind, are taxable as income.

An individual who is resident and domiciled in Ireland (regardless of their ordinary residence status) is liable to Irish income tax on worldwide income.

An individual who is resident but not domiciled in Ireland is liable to Irish income tax as follows:

- *Employment income:* Such individuals are liable to Irish income tax on Irish employment income in full and non-Irish employment income to the extent their duties relate to Irish workdays and to the extent they remit their income relating to non-Irish workdays to Ireland. The income tax due on the foreign employment income relating to duties performed in Ireland is collected through the PAYE system. The foreign employer is responsible for remitting the PAYE due to the Irish tax authorities.
- *Investment income:* Such individuals are liable to Irish income tax on investment income from Irish sources. Investment income from other countries is not taxable, provided that the income is not remitted into the state.

The remittance basis applies for a nondomiciled individual, regardless of residence/ordinary residence status.

An individual who is ordinarily resident but not resident or domiciled in Ireland, is liable to income tax on Irish-source employment or trading income and investment income exceeding EUR 3,810. Expatriates who have returned to their home country are unlikely to be affected unless they have retained major investments in Ireland.

An individual who is nonresident in Ireland is liable to income tax on Irish-source income, but may be subject to relief available under a tax treaty.

Capital gains

An Irish resident or ordinarily resident and domiciled individual is liable to Irish capital gains tax on the gains arising on the disposal of worldwide chargeable assets. A non-Irish domiciled individual who is resident or ordinarily resident in Ireland is liable to capital gains tax on gains arising on the disposal of Irish chargeable assets and on the gains from the sale of non-Irish assets to the extent the proceeds are remitted into Ireland. An individual who is not resident and not ordinarily resident in Ireland is liable to capital gains tax on gains arising on the disposal of Irish specified assets, i.e. land and buildings in the country.

Deductions and reliefs

Personal tax credits are available to each individual, which reduce income tax due on taxable income. Other reliefs are as follows:

Benefits in kind received from an employer by an employee whose remuneration (including benefits in kind) is less than EUR 1,905 in a tax year are tax-free; if remuneration exceeds this amount, the benefits in kind are taxable. In general, an employer must calculate the tax liability on the benefit in kind and deduct this through the PAYE system.

There are a number of Revenue-approved share schemes that allow favorable tax treatment for employees:

- Where an employer grants an employee an option on shares through a Revenue-approved Save As You Earn (SAYE) share option scheme, the employee will not be chargeable to income tax on the exercise of the option, but will be chargeable to capital gains tax on the full gain on disposal of the shares. Through a Revenue-approved SAYE plan, an employee saves a fixed sum out of net pay for a predetermined period, after which the employee has enough capital to fund the exercise of the option and acquire shares in the company. Through these types of scheme, shares can be acquired by employees at a discount of up to 25% of the market value of the share at the beginning of the plan and tax-free interest is payable on savings. PRSI (employee only) and the Universal Social Charge (USC) apply to share awards made under a Revenue-approved SAYE plan and are collected via the payroll system.
- A Revenue-approved profit scheme allows an employee to receive shares up to a maximum value of EUR 12,700 per annum from an employer without triggering an income tax liability. Contributions made by the employer to an approved scheme are treated as an allowable trading expense. The shares must be awarded to all employees on similar terms. The shares must be held by the employee for a period of at least three years to avoid an income tax liability. PRSI (employee only) and the USC apply to share awards made under a Revenue-approved profit scheme and are collected via the payroll system.
- Share awards (including share options) made under unapproved share plans are subject to income tax as well as employee PRSI and the USC. The collection mechanism will depend on the type of plan.
- There is no employer PRSI liability on employer share plan remuneration unless there are cash payments involved.
- Under the Employment and Investment Incentive Scheme (EIIS), relief from income tax is available by way of a deduction from income for individuals who invest in qualifying companies where certain conditions are satisfied as follows:
 - The company must be resident in Ireland or resident in the EEA with an establishment in Ireland carrying out qualifying activities;
 - The company must be a micro, small or medium sized enterprise;
 - The shares cannot be listed on a stock exchange;
 - The minimum investment by an individual is EUR 250 and the maximum EUR 150,000;
 - The lifetime company investment limit is EUR 10 million;
 - The annual amount that can be raised by companies is EUR 2.5 million; and
 - The period for which shares must be held is three years.

Tax relief on mortgage interest repayments is deducted at source by the mortgage provider, thus reducing an individual's mortgage interest repayments. Similarly, medical insurance premiums paid to recognized health insurers are reduced by an amount equal to the standard rate of tax, and the insurer reclaims the benefit of the tax relief from the Revenue Commissioners.

Rates

The rates of personal income tax in Ireland are 20% (standard rate) and progressive to 41% (marginal rate).

The standard rate of capital gains tax is 33%. The first EUR 1,270 of a gain is exempt from capital gains tax for each individual (the exemption is not transferrable between spouses). A gain accruing to an individual on the disposal of tangible movable property where the consideration is EUR 2,540 or less is exempt from capital gains tax. Gains on the sale of an individual's principal private residence are not subject to capital gains tax, provided the qualification criteria are met.

A 20% withholding tax is levied on dividend and interest payments made by Irish resident companies to Irish resident and nonresident individuals, unless the rate is reduced under a tax treaty. An exemption is granted to residents of EU and tax treaty countries.

Interest payments made by Irish deposit takers to Irish resident individuals are subject to Deposit Interest Retention Tax (DIRT) at a rate of 41%.

6.3 Inheritance and gift tax

Capital acquisitions tax (CAT) is a tax imposed on gifts and inheritances at a rate of 33%. The CAT is charged on the beneficiary, although various exemption thresholds apply, depending on the relationship between the donor/deceased and the beneficiary.

In general, a charge to CAT arises on gifts or inheritances of foreign located assets if either the donor/deceased or the beneficiary is resident or ordinarily resident in Ireland in the tax year in which the date of the gift or inheritance falls. However, if they are not Irish domiciled, neither the donor/deceased nor the beneficiary will be considered resident for this purpose where they have not been resident in Ireland for each of the five tax years preceding the tax year in which the date of the gift or inheritance falls. Gifts or inheritances of Irish-situated property remain within the charge to CAT, regardless of the domicile or residence of the donor/deceased or beneficiary. Shares in Irish-incorporated companies constitute Irish property for this purpose.

6.4 Net wealth tax

Ireland does not levy a net wealth tax.

6.5 Real property tax

Local authorities levy annual local property taxes (rates) on commercial property. Rates are payable per EUR 1 valuation of the property, which also is determined by the local authority.

A local property tax (LPT), an annual tax payable in respect of residential property, has applied since 1 July 2013 and replaces the previous household charge, which was abolished. The tax is collected by the Revenue and is self-assessed. Liability for LPT arises where a person owns residential property in Ireland on 1 November of the relevant year. The LPT will be based on the market value of the residential property on the valuation date (1 May 2013) for four years of assessment (e.g. 2013 until 2016). The rate is 0.18% for property up to a market value of EUR 1 million and 0.25% on the excess over EUR 1 million. Certain property is exempt from LPT, including residential property that is used wholly as a dwelling liable to commercial rates.

An annual Non-Principal Private Residence (NPPR) charge of EUR 200 is levied on residential property not used as the owner's sole or main residence. The liability to the charge is determined by the basis of ownership of the property on 31 March each year, the "liability date." The charge must be paid by 30 June each year to avoid late payment charges.

6.6 Social security contributions

Both employee PRSI (4%) and employer (10.75%) contributions are payable. In general, the contributions are made through the PAYE system. Individuals who earn less than EUR 18,304 in a tax year (EUR 352 per week) are not required to make PRSI contributions.

6.7 Other taxes

Universal Social Charge

The USC is a tax payable on gross income (including notional pay) where the gross income, after any relief for capital allowances and certain trading losses but before pension contributions, exceeds EUR 10,036. For employed individuals, the rates of USC are 2% on gross income up to EUR 10,036; 4% on gross income between EUR 10,036 and EUR 16,016; and 7% on gross income in excess of EUR 16,016. There is a cap of 4% for individuals over the age of 70 whose aggregate income for the year does not exceed EUR 60,000. There is a surcharge of 3% on individuals who have non-PAYE income exceeding EUR 100,000 per annum.

All individuals whose gross income exceeds the minimum threshold of EUR 10,036 are liable to pay the USC. Once an individual's income exceeds the minimum threshold, the USC is payable on the full amount of the individual's income.

The USC is a separate charge to income tax and no reliefs or tax credits are allowable against it. Excess or unused tax credits cannot be used to reduce an individual's USC liability.

6.8 Taxation of foreign employment

Business travelers to Ireland who spend less than 183 days in the country, are resident in a country that has concluded a tax treaty with Ireland and who satisfy other conditions may be exempt from both PAYE and income tax in Ireland. An application to the Irish Revenue is required to take advantage of the exemption from PAYE.

Business travelers to Ireland who are resident in a country with which Ireland has a tax treaty and who spend less than 60 work days in Ireland in a tax year (and a continuous period of not more than 60 work days in Ireland in any event) are exempt from PAYE and income tax and no application to the authorities is required. Business travelers to Ireland who are resident in a country that has not concluded a treaty with Ireland and who spend 30 work days or less in Ireland in a tax year are exempt from PAYE/income tax and no application to the authorities is required.

Special Assignment Relief Program

The Special Assignment Relief Program (SARP) provides relief from income tax (but not USC or PRSI) for individuals who have been assigned at the request of their employer to work in Ireland. Returning workers who have been outside Ireland for at least five tax years also are considered new arrivals for purposes of this relief. Subject to conditions, the relief is available for employees arriving between 2012 and 2014 and is available for five consecutive tax years.

The relief allows a relevant amount of compensation otherwise liable to tax in Ireland to be excluded from income tax (but not USC or PRSI). The relevant amount is valued at 30% of compensation between the upper and lower thresholds of EUR 500,000 and EUR 75,000, respectively.

In determining whether an individual is entitled to the relief, the amount of compensation must exceed EUR 75,000, excluding:

- Benefits in kind, including company cars and preferential loans;
- Termination/ex-gratia payments;
- Bonus payments whether contractual or otherwise;
- Stock/equity options; and
- Other share-based remuneration.

However, once it is determined that the individual qualifies for the relief, these types of compensation can be included for the purpose of calculating the relief. Additional conditions apply for both the employee and the employer in order to obtain the relief and care must be taken to ensure that the detailed conditions are adhered to, including the tax residence position of both the employee and the employer (or associated employer) at various times.

The benefit of this relief may be claimed through the PAYE system; however, such employees will automatically become chargeable persons for the year of the claim, resulting in a tax filing obligation.

In addition to the exclusion of a relevant amount from tax, an employer may also bear the cost of certain items for a relevant employee without creating an additional tax cost.

6.9 Other employment income reliefs

Foreign Earnings Deduction

The Foreign Earnings Deduction (FED) is a relief from income tax (but not USC or PRSI) for individuals who temporarily carry out duties of their employment in a relevant state. A relevant state includes the BRICS countries (Brazil, Russia, India, China and South Africa), Algeria, the Democratic Republic of Congo, Egypt, Ghana, Kenya, Nigeria, Senegal and Tanzania. The deduction is subject to a maximum claim of EUR 35,000 and is available for the 2012, 2013 and 2014 tax years.

To receive this deduction, the employee must spend at least 60 days working in a relevant country in a tax year or in a continuous 12-month period straddling two years. These “qualifying days” must include a period of at least four consecutive days spent working in a relevant state.

The deduction does not apply to employees paid out of the public revenue of the state, e.g. civil servants, *Gardai* and members of the defense forces or individuals employed with any board, authority or similar body established by or under statute.

The deduction is calculated based on the amount of time spent working in a relevant state.

The deduction is claimed at the end of the tax year when making an annual return of income for that year. However, an employee may not claim a deduction where he/she claims another relief, e.g. split-year relief, Trans-Border Relief, Special Assignment Relief Program, a R&D incentive or the limited remittance basis that still exists.

R&D credit

In certain circumstances, companies that are in receipt of an R&D credit may surrender a part of their R&D credit against key employees’ income tax (subject to the credit not reducing the employees’ effective tax rate below 23%). The relief can be awarded only to key R&D employees, e.g. typically those who perform 50% or more of their employment duties undertaking R&D. The credit cannot be used to reduce the employee’s liability to USC and PRSI.

6.10 Compliance

The tax year for individuals is the calendar year.

Ireland operates a self-assessment system under which each individual is required to file a tax return. The return must be filed by 31 October of the year following the tax year. There is an extended deadline of mid-November for individuals who file and pay their taxes via Revenue’s Online Service System.

A self-employed individual or an individual in receipt of personal investment income falls within the scope of the self-assessment system in Ireland and is referred to as a chargeable person. Under this system, a chargeable person is obliged to file a tax return and pay tax by specified dates (including a prepayment of at least 90% of the final tax due by 31 October in the year of assessment).

An individual who is employed in Ireland pays his/her income tax liability either on a weekly or monthly basis under the PAYE system. Under this system, tax is calculated and withheld from earnings by the employer.

7.0 Labor environment

7.1 Employee rights and remuneration

Much of Ireland's labor legislation is driven by developments in the EU. Labor legislation should present no special difficulties to employers but it is strictly enforced.

The contract between employer and employee in Ireland traditionally has been based on common law, but there is a significant regulatory overlay, including a requirement to provide a written statement of terms and conditions of employment within two months of hiring. Specific rules apply to fixed-term contracts.

National pay agreements and the minimum wage may have to be taken into account when setting remuneration. Men and women must receive equal pay for equal work. It is illegal to discriminate on the basis of gender, marital status, family status, sexual orientation, religion, age, disability (mental and physical), race (color, nationality and ethnic origin) or membership of the traveling community. Part-time workers cannot be treated less favorably than comparable full-time employees with respect to their terms and conditions of employment (with certain exceptions).

Labor relations are governed by the Industrial Relations Acts. These define trade disputes; nullify immunities for disputes involving one worker where procedures have not been followed; confine picketing to an employer's place of business; restrict secondary picketing and regulate collective bargaining. The Labor Court is able to issue binding recommendations on pay and conditions at companies where trade union recognition has been withheld by employers and where all voluntary procedural avenues have failed. Employees have the right to bargain, even in the absence of a trade union. The courts are the ultimate arbiters in this case of whether terms and conditions are fair.

Trade unions do not have a statutory right to recognition but continue to push for this right.

Minimum notice terms apply for any employee who has been in continuous service for more than 13 weeks. Employees are protected by law against unfair dismissal and may refer a claim to an external adjudicative body if they believe they were unfairly dismissed. An employee that is made redundant may be entitled to a statutory redundancy payment if certain requirements are met under the legislation. In certain situations, an ex-gratia payment in excess of the statutory redundancy can be made. Rights acquired with one employer are automatically transferred to a new employer when the change results from transfer of the business for which the employee works, as in the case of a merger or takeover.

The Worker Participation (State Enterprises) Acts provide for worker participation below board level in the management of state enterprises. Ireland has implemented the European Works Council Directive, which imposes worker consultation and information requirements on companies with more than 1,000 employees in the EU and with at least two plants and at least 150 employees in two different member states. Ireland has implemented the directive on minimum requirements for the right to information and consultation of employees in undertakings.

Working hours

The maximum average work week is 48 hours, but some exceptions are allowed. Although the legal maximum for basic pay is a 48-hour week, generally the standard working week in collective agreements is 39 hours. Collective agreements can also provide for rates of pay for overtime; for example, the current registered employment agreement for the construction industry provides for overtime rates of pay of time-and-a-half until midnight Monday to Friday and double time thereafter.

Maternity leave is 26 weeks. During that time, the state pays the employee a maternity allowance, provided the employee has made the requisite PRSI contributions.

7.2 Wages and benefits

A minimum wage of EUR 8.65 per hour applies. An individual under the age of 18, an employee who is over the age of 18 and has less than three years' work experience or an employee who is in one of the first three years of training may receive a lower wage.

Social insurance

PRSI is compulsory for all employed persons aged 16-66. The social insurance scheme covers healthcare and retirement funding. Retirement pensions begin at age 65 for employees covered by the social insurance scheme. These are funded by employer and employee contributions.

Both employee (4%) and employer (10.75%) PRSI contributions are payable. In general, the contributions are made through the PAYE system. Individuals who earn less than EUR 18,304 in a tax year (EUR 352 per week) are not required to make PRSI contributions.

Social insurance covers unemployment, disability, maternity, lay-offs, retirement and workers' compensation. Employers usually carry separate insurance to cover liability for accidental injury to employees, accidental injury to third parties and accidents resulting from defective products (product liability). Social insurance contributions made in Ireland may count towards entitlements in other EEA countries and in countries with which Ireland has bilateral social security agreements.

Employees who are ill and out of work for more than three days may receive illness benefits through the social welfare system, provided they have made the requisite PRSI contributions. Many employers also have a contributory group insurance scheme to supplement state benefits.

Other benefits

Employees are entitled by law to four paid weeks of holiday a year. There are nine paid statutory public holidays annually.

Most large firms also provide private pension schemes, which are often linked to life insurance coverage. The employer usually funds a portion of the pension costs in such schemes, up to a maximum of 15% of annual salary. However, funding from the employer may not be less than one-sixth of the cost of providing pension benefits for the employee. Typically, employees contribute 5%-7.5% of salary. Tax relief is available on both employer and employee contributions.

7.3 Termination of employment

Employees (whether full or part-time) must be informed within 28 days of being hired of the procedures that will apply if they are dismissed. Temporary workers hired through employment agencies are deemed to be employees of the company using their services for the purposes of the Unfair Dismissals Act 1977-2007.

Employees with at least one year of continuous service are protected from dismissal but an employee does not require one year of continuous service to be protected if he/she is dismissed on grounds such as: trade union membership or activities; religious or political opinions; race, color, sexual orientation, age or membership of the traveling community; and in cases where an employee is a party or witness to legal proceedings taken against the employer. An employee may not be dismissed if she is pregnant, has recently given birth or is absent on maternity leave or for natal care. Employees also cannot be dismissed if they are on adoptive leave, parental leave, *force majeure* or carer's leave, or have instituted a claim under the National Minimum Wage Acts. Forms of redress for an unfair dismissal include reengagement, reinstatement and compensation.

Employees also are protected against a threat of dismissal as a result of collective redundancies. An employer contemplating such a move must first consult with representatives of the employees affected. The employer also must notify the Department of Enterprise, Trade and Employment 30 days before the proposed redundancies, during which time the department may request a discussion of ways to alleviate the social consequences. The definition of a collective redundancy depends on the size of the business, but can apply to as few as five employees fired over a period of 30 days. Employers must consult employees about redundancies even where there is no trade union or staff association. Companies must provide precise information on efforts to minimize job losses and their consequences through social measures. Employees have the right to make representations to the Employment Appeals Tribunal in any dispute over implementation.

Rules governing lump sum redundancy payments apply to employees insured under the Social Welfare Acts who are aged over 16 years, irrespective of the number of hours worked per week, but they must have been employed for at least two continuous years.

The payment required is two full weeks' pay for each year of employment plus one additional week of pay, whatever the total entitlement. There is a ceiling on the weekly pay rate used for the calculation of EUR 600 per week.

7.4 Labor-management relations

The main labor organization in Ireland is the Irish Congress of Trade Unions. The Industrial Relations Acts set up mechanisms to resolve disputes that arise when a company refuses to enter into collective bargaining with a union in good faith. The Labor Court can impose what it regards as a fair solution on employers.

Registered employment agreements (REAs) are common. These are collective agreements made either between a trade union or unions and an individual employer or employers' organization or by a registered Joint Industrial Council. They cover pay and conditions of employment of a class, type or group of workers, such as those employed by a particular company but more frequently those in a whole industry. Registration with the Labor Court makes the provisions of the agreement binding, not only on the parties to the negotiation but also to others in the group covered by the agreement. Each REA must contain a disputes procedure, which is binding. The court also keeps a register of rates of pay agreed by joint labor committees and contained in employment regulation orders made by the Labor Court.

7.5 Employment of foreigners

An employer must hold an employment permit if it employs a non-EEA national in Ireland.

Various types of employment permit exist (e.g. work permits and green card permits) and the type of permit required will depend on the salary offered to the employee and the employee's job title. Where an employee is seconded by his/her foreign employer to work or train in a related Irish entity, an application may be made for an Intra-Company Transfer permit. Under a spousal scheme, the spouse of an individual with an Irish work permit may apply for a spousal work permit once he/she has obtained a job offer from an Irish employer.

8.0 Deloitte International Tax Source

The Deloitte International Tax Source (DITS) is a free online database that places up-to-date worldwide tax rates and other crucial tax information within easy reach.

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