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International Tax
Ireland Highlights 2024

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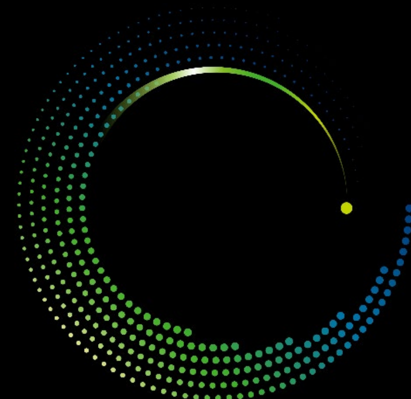

Recent developments

For the latest tax developments relating to Ireland, see Deloitte tax@hand.

Investment basics

Currency: Euro (EUR)

Foreign exchange control: There is no foreign exchange control in Ireland, and no restrictions are imposed on the import or export of capital. Repatriation payments may be made in any currency. Both residents and nonresidents may hold bank accounts in any currency.

Accounting principles/financial statements: EU IFRS/current GAAP apply. Financial statements must be prepared annually.

Principal business entities: These are the public and private limited liability company, partnership, sole proprietorship, and branch of a foreign corporation. The public limited company and private limited company are the two main forms of corporate organization in Ireland, and there are two types of private limited company: the private company limited by shares and the designated activity company. There also are other companies, such as an unlimited company, a company limited by guarantee, an owners' management company, and a European public limited liability company ("Societas Europaea").

Corporate taxation

Rates	
Corporate income tax rate	12.5% (trading)/25% (nontrading)
Branch tax rate	12.5% (trading)/25% (nontrading)
Capital gains tax rate	33% (main rate)/12.5% (venture capital funds)/40% (foreign life insurance policies and investment products)

Residence: A company is resident in Ireland if it is managed and controlled in Ireland or, in certain circumstances, if it is incorporated in Ireland. Specifically, companies incorporated in Ireland as from 1 January 2015 are deemed to be resident in Ireland, while companies incorporated before that date are deemed to be resident in Ireland as from 1 January 2021 (subject to some exceptions that may apply where there has been a change of ownership, which can result in the

company being treated as resident in Ireland as from the date the ownership changed). However, these incorporation-based residence rules do not apply to Irish incorporated companies that are resident in a treaty jurisdiction under the terms of a tax treaty between Ireland and that jurisdiction (competent authority approval confirming place of residence may be required), nor will they apply to non-Irish incorporated companies that are resident in Ireland by virtue of management and control.

Basis: Resident companies are subject to corporation tax on worldwide profits and gains; foreign-source income derived by resident companies is subject to corporation tax in the same way as Irish-source income. A resident company carrying on business abroad through a branch or permanent establishment generally is subject to tax in Ireland on the profits of the foreign business.

Where a company is not resident in Ireland and does not operate a branch in Ireland, it is liable to tax on Irish-source income and capital gains tax in respect of specified assets (i.e., land and buildings located in Ireland or shares deriving the greater part of their value from such assets). Where such company is chargeable to tax under Schedule D, Case V (rental income on Irish property) in respect of any profits or gains, it is chargeable to corporation tax on those profits or gains (as well as any capital gain on the disposal of such property). As capital gains are re-grossed in calculating the corporation tax liability, the effective rate on such chargeable gains is 33%.

Where a foreign company operates an Irish branch or agency, it is subject to Irish corporation tax on trading income arising directly or indirectly through or from the branch or agency, any income from property or rights used by, or held by or for, the branch or agency (e.g., patent royalties received by a branch), and chargeable gains attributable to the branch or agency.

Taxable income: Corporation tax is imposed on a company's profits, which consist of business/trading income and passive income. Normal business expenses incurred in a trade may be deducted in computing taxable income.

Rate

General

The corporation tax rate is 12.5% for trading income and 25% for nontrading income. Certain dividends from EU and tax treaty jurisdictions are taxed at the 12.5% rate.

Surtax

There is no surtax.

Alternative minimum tax

There is no alternative minimum tax.

Global minimum tax (Pillar Two)

Ireland has transposed into its domestic legislation the EU "Pillar Two" directive that is designed to ensure a global minimum level of taxation of 15% for multinational enterprise groups and large-scale domestic groups within the EU with annual consolidated revenue of at least EUR 750 million. The IIR (income inclusion rule) applies for fiscal years beginning on or after 31 December 2023 and the UTPR (sometimes referred to as the undertaxed profit(s) rule or the undertaxed payments rule) applies for fiscal years beginning on or after 31 December 2024. Ireland also has opted to adopt a

qualified domestic top-up tax (sometimes referred to as a QDMTT), applicable for fiscal years beginning on or after 31 December 2023.

Taxation of dividends: Dividends received by a resident company from another resident company are exempt from corporation tax. Dividends received from a nonresident company are subject to corporation tax in the period in which the dividends are payable, but a credit for underlying corporation and withholding tax generally is available for foreign tax paid. Dividends received from a company resident in an EU member state may qualify for an enhanced credit up to the rate of tax on profits in that member state.

Capital gains: Capital gains are generally taxed at the rate of 33%; a 12.5% rate applies to gains from venture capital funds and a 40% rate applies to gains from foreign life insurance policies and investment products. Gains on the sale of substantial shareholdings in companies resident in EU member states or tax treaty jurisdictions are exempt if certain conditions are fulfilled (see "Participation exemption," below).

Losses: Trading losses may be carried back to the immediately preceding period of equal length or carried forward indefinitely. Losses carried forward may be offset only against profits arising from the same trade.

Foreign tax relief: Foreign tax paid generally may be credited against Irish tax on the same profits, but the credit is limited to the amount of Irish tax payable on the foreign income. Dividends received from a company resident in an EU member state may qualify for an enhanced credit up to the rate of tax on profits in that member state. The pooling of credits for foreign dividend income is available. Any surplus 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. The pooling of credits for foreign branches also is available.

Participation exemption: A participation exemption may apply to capital gains derived by a resident company on the disposal of a substantial shareholding in another resident company, a company resident in another EU member state, or a company resident in a jurisdiction that has concluded a tax treaty with Ireland. To qualify for the exemption, the resident holding company must have a participation of at least 5%, the investee must be a trading company or a member of a "trading group," and the participation must have been held for a continuous 12-month period ending within the two years before the date of disposal of the shares. A participation exemption for certain foreign dividends is expected to be introduced in 2024 to apply as from 1 January 2025.

Holding company regime: See "Participation exemption," above.

Incentives: The research and development (R&D) tax credit is a key incentive for companies performing R&D in Ireland. The R&D tax credit is increased from 25% to 30% of qualifying R&D expenditure incurred for accounting periods beginning on or after 1 January 2024. The R&D tax credit is available in three annual installments. The company must specify for each installment if the installment, or a portion of it, is to be treated as an overpayment of tax or paid to the company by the tax authorities.

The three annual installments are calculated as follows:

- The first installment is the greater of EUR 50,000 (or the amount of the R&D tax credit claims, if lower) or 50% of the amount of the R&D tax credit;
- The second installment is three-fifths of the remaining balance of the R&D tax credit; and
- The third installment is the remaining balance of the R&D tax credit in respect of the accounting period, i.e., the tax credit claimed, less the sum of the first and second installment amounts.

Other developments in regard to the R&D tax credit include:

- For companies within scope of the Pillar Two rules, the R&D tax credit will be part of the GloBE income;

- There is a requirement for companies that have not claimed an R&D credit in the last three years to notify the tax authorities with a prescribed form at least 90 days prior to making a claim; and
- Unused R&D tax credits may be transferred as part of a trade transfer in certain restructurings.

For startup companies, there is an exemption from corporation tax on income and gains up to specific limits for either three or five years where a new qualifying trade commences between 1 January 2009 and 31 December 2026.

Tax relief is provided for capital expenditure incurred by companies on the provision or acquisition of intangible assets for the purposes of a trade and related interest deduction. The relief applies to intangible assets, such as brands, trade names, know-how, copyrights, and other intangibles. In addition, certain acquisitions of customer lists also qualify for tax relief, provided they are not transferred directly or indirectly in connection with the transfer of a trade as a going concern. The tax relief is available against trading income derived from the exploitation of the intangible assets and allows for profits from the exploitation of the intangible assets to be set off up to a limit of 80%.

Relief for investment in eligible digital games is available to qualifying digital games development companies. The relief is in the form of a corporation tax credit calculated by reference to expenditure incurred on the development, production, and testing of a digital game. A company cannot claim the digital games corporation tax credit if the value of the qualifying expenditure in respect of a completed game is less than EUR 100,000. The credit available is 32% of the lowest of eligible expenditure, 80% of total qualifying expenditure, or EUR 25 million. Companies may request a payment of the credit from the tax authorities or may offset the credit against corporation tax; therefore, the credit is a qualifying refundable credit under the Pillar Two rules.

The knowledge development box regime provides that profits from patented inventions and copyrighted software (qualifying assets) earned by a resident company, to the extent they relate to R&D undertaken by that company, may be effectively taxed at a rate of 10%.

The accelerated capital allowance is a tax incentive for companies paying corporation tax that invest in new energy efficient equipment. The tax incentive allows companies to deduct 100% of the purchase value of qualifying energy efficient equipment against their profits in the year of purchase. The relief is available until 31 December 2025.

The tax credit for film producers has been extended through 2028. The tax credit is 32% of the lower of eligible expenditure, 80% of total qualifying film production costs, or EUR 125,000 million. If the tax credit is greater than the corporation tax due, the tax authorities will pay the difference.

Compliance for corporations

Tax year: The tax year is the shorter of 12 months or the period for which accounts are prepared. The tax accounting period may not exceed 12 months.

Consolidated returns: Consolidated returns are not permitted; each company is required to file a separate return. However, losses may be relieved between group members resident in the EU (post-Brexit, companies resident in the UK with an Irish branch should continue to qualify for group relief). Companies are considered part of a group if one is at least a 75% subsidiary of another, or both are at least 75% subsidiaries of the same parent.

Filing and payment: Ireland operates a self-assessment regime. The tax return, together with iXBRL-tagged financial statements, must be filed within nine months of the tax year end, but no later than the 23rd day of the ninth month to avoid penalties. In certain circumstances, the due date for iXBRL filings (only) is extended by three months.

A preliminary corporation tax payment totaling 90% to 100% of the corporation tax liability is payable during the tax year, with any balance of the corporation tax liability payable upon filing the return (to avoid interest charges, the preliminary corporation tax paid must be no less than 90% of the corporation tax liability for the tax year).

Companies with corporation tax liability of more than EUR 200,000 in their previous tax year must pay preliminary corporation tax in two installments (on 21 June and 21 November for companies with a calendar year end). The amount payable on 21 June is 50% of the preceding year tax liability or 45% of the current year tax liability, with the balance payable on 21 November (to avoid interest charges, the amount paid by 21 June must be either 50% of the preceding year tax liability or 45% of the current year tax liability, and the total amount paid by 21 November must be no less than 90% of the corporation tax liability for the relevant tax year).

Most companies must file and pay using Irish Revenue's online service system.

Under the Pillar Two rules, specific returns, filing obligations, and deadlines apply.

Penalties: Various penalties apply for failure to comply with the filing and payment requirements. Businesses that availed themselves of the debt warehousing scheme have until 1 May 2024 to agree to a phased payment arrangement with the tax authorities for the warehoused debt.

Rulings: The tax legislation includes a number of specific provisions for which advance statutory clearance may be sought. A ruling obtained from Irish Revenue may be valid for up to five years. Also, under a non-statutory clearance procedure, the tax authorities' view of the tax consequences of specific transactions may be sought on a named basis, with full disclosure, where there is both commercial significance and material uncertainty.

Individual taxation

Rates		
Individual income tax rate (single person)	**Taxable income (EUR)**	**Rate**
	Up to 42,000	20%
	Over 42,000	40%
Universal social charge rate	**Gross income (EUR)**	
	Up to 12,012	0.5%
	12,013–25,760	2%
	25,761–70,044	4%
	Over 70,044	8%
Capital gains tax rate		33%/15%/40%

Residence: Individuals are resident in Ireland if they are present in Ireland for 183 days or more in a tax year or 280 days or more in the current tax year and the preceding tax year combined (with at least 30 days in a tax year). Individuals are considered ordinarily resident if they were resident in Ireland during the previous three consecutive tax years. A day is counted for residence purposes if an individual is present in Ireland at any time during the day.

Basis: Irish resident individuals are taxed on their worldwide income and capital gains, as are nonresident individuals who are Irish domiciled and are "ordinarily resident" (as defined). Other nonresidents are taxed on Irish-source income and gains from immovable property in Ireland. A nonresident also is subject to tax on foreign investment income of EUR 3,810 or more in any tax year for which they are ordinarily resident in Ireland. Certain reliefs, such as the remittance basis of tax and Special Assignee Relief Program, may apply for resident individuals.

Taxable income: Income is taxed under a schedular system. Employment income, which includes most benefits, is taxable. Profits derived by an individual carrying on a trade or profession are taxed in a similar manner as profits derived by companies.

The Key Employee Engagement Programme (KEEP) is a tax efficient share option scheme available to employees of small and medium-sized enterprises, applicable in respect of share options granted during the period from 1 January 2018 to 31 December 2025. Subject to satisfying certain conditions, any gain realized by employees on the exercise of a KEEP option is exempt from income tax, universal social charge (USC), and pay-related social insurance (PRSI).

Rates: Progressive income tax rates of 20% and 40% are imposed, depending on the level of taxable income. The rate of the USC is 0.5% on gross income up to EUR 12,012; 2% on gross income of EUR 12,013 to EUR 25,760; 4% on gross income of EUR 25,761 to EUR 70,044; and 8% on gross income exceeding EUR 70,044. There is an additional 3% USC surcharge where an individual's non-PAYE (Pay-As-You-Earn) income is more than EUR 100,000 a year. Reduced USC rates apply in certain circumstances.

Capital gains: Capital gains tax at 33% (15% or 40% in certain instances) is charged on gains derived from the disposal of assets. Individuals who own significant minority shareholdings in innovative startup companies for at least three years may avail themselves of an effective reduced rate of capital gains tax of 16% (18% for partnerships). The relief may be applied on a gain of up to twice the value of their initial investment and is subject to a lifetime limit of EUR 3 million.

Deductions and allowances: Subject to certain restrictions, deductions are granted for medical expenses and employer-paid health insurance, retirement annuities, etc. Personal tax credits are available for taxpayers and their spouse/civil partner, children, and dependents. A deduction of 30% of vouched expenses for electricity, heating, and internet services for days spent working from home may be claimed by remote workers. A rent tax credit valued at EUR 750 per year is available in respect of rent paid on a principal private residence. The total value of tax-free benefits or vouchers (maximum two) an employer can give an employee per year is EUR 1,000. A temporary mortgage interest relief of 20% (capped at EUR 1,250) is available for qualifying homeowners on the increase in mortgage interest paid on a qualifying loan in 2023 over interest paid in 2022. It will operate as a credit offset against the 2023 income tax liability paid in 2024. A temporary tax relief for qualifying individual landlords of rented residential property for years 2024 to 2027 is available by way of an income tax credit (capped at EUR 600 for 2024).

Individuals who make qualifying investments in qualifying companies (through the employment investment incentive, startup refunds for entrepreneurs, or startup capital initiative) may be able to claim income tax relief on the amount invested (maximum investment amount of EUR 500,000 annually).

Foreign tax relief: Foreign tax paid generally may be credited against Irish tax on the same income, but the credit is limited to the amount of Irish tax payable on the foreign income.

Compliance for individuals

Tax year: The tax year is the calendar year.

Filing status: Married couples and civil partners living together may choose to file jointly or separately.

Filing and payment: Tax on employment income is withheld by the employer under the PAYE system and remitted to the tax authorities. Income not subject to PAYE is self-assessed; the individual must file a tax return by 31 October of the year following the year of assessment and make a preliminary tax payment for the current tax year with this filing. Individuals who file and pay using Irish Revenue's online service are granted an additional period (approximately 14 days, but this is determined by Irish Revenue on an annual basis) to meet the above obligations.

Penalties: Interest, penalties, and surcharges may apply for failure to comply with the filing and payment requirements.

Rulings: Tax legislation includes a number of specific provisions for which advance statutory clearance may be sought. A ruling obtained from Irish Revenue may be valid for up to five years. Also, under a non-statutory clearance procedure, the tax authorities' view of the tax consequences of specific transactions may be sought on a named basis, with full disclosure, where there is both commercial significance and material uncertainty.

Withholding tax

Rates

Type of payment	Residents		Nonresidents	
	Company	Individual	Company	Individual
Dividends	0%/25%	0%/25%	0%/25%	0%/25%
Interest	0%/20%/33%	0%/20%/33%	0%/20%/33%	0%/20%/33%
Royalties	0%/20%	0%/20%	0%/20%	0%/20%

Dividends: Dividends generally are subject to a 25% withholding tax, unless a specific exemption under domestic legislation applies or, in the case of dividends paid to nonresidents, the rate is reduced under an applicable tax treaty or the dividends are exempt from withholding tax under the EU parent-subsidiary directive.

Interest: Interest generally is subject to a 20% withholding tax, unless a specific exemption under domestic legislation applies or, in the case of interest paid to nonresidents, the rate is reduced under an applicable tax treaty or the interest is exempt from withholding under the EU interest and royalties directive. Interest paid to deposit holders of certain Irish banks is subject to withholding tax (referred to as "DIRT") at 33%, unless the financial institution is authorized to pay the interest gross.

Royalties: The withholding tax rate is 20% on patent royalties and royalties considered to be pure income profit for the recipient, unless a specific exemption under domestic legislation applies or, in the case of such royalties paid to nonresidents, the rate is reduced under an applicable tax treaty or the payment is exempt from withholding under the EU interest and royalties directive. Royalties other than patent royalties and royalties considered to be pure income profit for the recipient are exempt.

Fees for technical services: There is no withholding on fees for technical services.

Branch remittance tax: There is no branch remittance tax.

Other:

Relevant contract tax

Relevant contract tax is a withholding tax that applies to certain payments by principal contractors to subcontractors in the construction, forestry, and meat-processing industries. The rates of tax are 0%, 20%, and 35%. An individual or company may be deemed to be a principal contractor where they subcontract all or part of a relevant contract under which they are a subcontractor for RCT purposes.

Professional services withholding tax

Professional services withholding tax (PSWT) is a tax that applies to payments by state and semi-state bodies ("accountable persons") for certain professional services. An accountable person must deduct PSWT at the rate of 20%

from payments made for certain professional services provided by residents or nonresidents, submit PSWT returns to the tax authorities, and pay the PSWT deducted.

Anti-avoidance rules

Transfer pricing: The arm's length principle generally should be observed, and transfer pricing rules apply to certain transactions. A tax deduction is not available for any amount paid or payable by a person to a connected person in another jurisdiction for adjustments made to the profits of that connected person for which relief is available under the provisions of a tax treaty with Ireland, or for a similar adjustment made to the profits of a connected company not resident in a tax treaty jurisdiction. For tax years commencing on or after 1 January 2023, the definition of "transfer pricing guidelines" refers to the OECD transfer pricing guidelines published on 22 January 2022.

Interest deduction limitations: There is no specific thin capitalization legislation; however, in certain cases, interest paid by a non-trading company to a nonresident parent company that owns at least 75% of the Irish payer could be reclassified as a dividend. The EU Anti-Tax Avoidance Directive (ATAD) on interest deduction limitations, which has been transposed into Irish law, limits deductibility for excess borrowing costs to 30% of the taxpayer's EBITDA (earnings before interest, taxes, depreciation, and amortization), subject to certain group threshold provisions and de minimis levels.

Controlled foreign companies: Controlled foreign company (CFC) rules apply. Under these rules, a CFC's undistributed income, which may arise from non-genuine arrangements put in place for the essential purpose of obtaining a tax advantage, is attributed to the controlling company or a connected company in Ireland, where relevant Irish activities are carried out. Such activities are where the controlling company or the connected company carries out "significant people functions" or "key entrepreneurial risk-taking functions" in Ireland. The CFC rules are subject to a number of exemptions where certain conditions are satisfied. However, specific exemptions (effective tax rate exemption, low profit margin exemption, and low accounting profit exemption) will not apply where the CFC is resident in a jurisdiction listed in annex I of the EU list of noncooperative jurisdictions.

Anti-hybrid rules: Ireland introduced anti-hybrid rules in line with ATAD 2. The rules generally apply to associated entities and operate by neutralizing hybrid mismatch outcomes such as "double deduction" or "deduction without inclusion" mismatches either through a disallowance of the deduction or the application of a tax charge. The anti-hybrid rules also can apply to non-associated entities where a "structured arrangement" is involved, i.e., where a mismatch outcome is either priced into the terms of an arrangement or an arrangement is designed to produce a mismatch outcome. The anti-hybrid rules also can apply in cases of payments to non-EU payees, where the payment directly or indirectly funds a mismatch outcome elsewhere but has not been neutralized by the operation of foreign anti-hybrid rules ("imported mismatch outcomes"). Anti-reverse hybrid rules are also provided for in Irish law to address tax mismatches that arise in certain circumstances where an entity is a reverse hybrid entity.

Economic substance requirements: The CFC rules contain substantial substance-based requirements. Further, the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting (BEPS MLI) provides for a principal purpose test whereby a general anti-avoidance clause is introduced into any tax treaty where the treaty partner jurisdiction also chooses a principal purpose test option, essentially a general anti-avoidance rule within each treaty similar in nature to the Irish domestic general anti-avoidance rule. Therefore, a treaty partner that has adopted the BEPS MLI would have to adhere to this provision in order to claim treaty benefits in respect of dividends, interest, and royalties.

Disclosure requirements: Certain tax arrangements that result in an Irish tax advantage and fall within certain limited prescribed hallmarks must be disclosed to the Irish tax authorities, and the user must note the use of such arrangements

on the tax return. In addition, cross-border arrangements that meet any of the hallmarks outlined in the EU directive on the mandatory automatic exchange of information on reportable cross-border arrangements (DAC 6) must be disclosed to the Irish tax authorities as part of the EU's disclosure regime.

Country-by-country (CbC) reporting applies in Ireland, and companies with global revenue of EUR 750 million or more are required to file a CbC report.

The EU reporting obligation for digital platforms (DAC 7) applies in Ireland. Platform operators were required to register with the tax authorities by 30 November 2023. If, after 30 November 2023, a platform operator meets one of the specific conditions, they also are required to register by the end of the month after the month they meet one of the conditions.

Exit tax: An exit tax charge applies on unrealized gains of companies that migrate or transfer assets offshore, without an actual disposal, such that they leave the scope of Irish tax. The rate of exit tax is 12.5% but is subject to an anti-avoidance provision that applies a higher rate of 33% in certain circumstances.

General anti-avoidance rule: There is a statutory general anti-avoidance rule.

Other: Special rules will apply to certain outbound payments of interest, royalties, and dividends made on or after 1 April 2024 to associated entities in a specified territory. For arrangements that were in place on or before 19 October 2023, the new rules will apply as from 1 January 2025. The aim is to prevent double nontaxation applying to outbound payments to specified territories, which are jurisdictions that (i) are on the EU list of noncooperative jurisdictions, (ii) have no tax, or (iii) have a zero rate of tax. Generally, the new rules will limit the operation of certain Irish withholding tax exemptions in respect of the payments within scope. There also is a reporting obligation.

A tax charge may apply to an Irish domiciled individual who disposes of certain assets while outside the current capital gains tax charge. However, if the person is not within the charge subject to capital gains tax under the normal rules for more than five years, then a tax charge cannot arise. The assets include holdings in a company which, when the person ceases to be chargeable in Ireland, represent 5% or more by value of the issued share capital of the company or has a value in excess of EUR 500,000.

Value added tax

Rates	
Standard rate	23%
Reduced rate	0%/4.8%/9%/13.5%

Taxable transactions: VAT is chargeable on the supply of taxable goods and services in Ireland, on the importation of goods into Ireland, and generally on the intra-Community acquisition of goods from suppliers in other EU member states. VAT also is chargeable on certain deemed supplies.

Rates: The standard VAT rate is 23% with reduced rates of 0%, 4.8%, 9%, and 13.5%. Certain supplies are exempt from VAT or zero-rated. The VAT rate on electricity and gas is kept at 9% until 31 October 2024.

Registration: As from 1 January 2024, the registration threshold for VAT purposes is EUR 80,000 per year for suppliers of goods only, or for suppliers of goods and services where 90% of turnover is from the supply of goods (excluding goods that are not zero-rated but are produced from zero-rated raw materials). A threshold of EUR 40,000 per year applies for the suppliers of services only. Other thresholds apply in certain circumstances.

Filing and payment: VAT returns and payments generally are required to be filed every two months. The due date for filing and payment is the 23rd day of the month following the VAT period.

Other taxes on corporations and individuals

Unless otherwise stated, the taxes in this section apply both to companies and individuals and are imposed at the national level.

Social security contributions: Employers are required to make PRSI contributions by deducting up to 11.05% from the salary of employees (for 2023, the rate is due to increase to 11.15% as from 1 October 2024). Employed and self-employed individuals are required to make PRSI contributions, with the amount based on the individual's salary. Employed individuals also are required to make PRSI contributions that are dependent on the type of work and the level of earnings.

Payroll tax: There is no payroll tax.

Capital duty: There is no capital duty.

Real property tax: The municipal authorities impose "rates" on the occupation of commercial real property (which are deductible in calculating the corporation tax liability). Residential real estate is subject to an annual local property tax at a base rate of 0.18% (which can be adjusted by local authorities) on values up to EUR 1 million, and at 0.25% on values over EUR 1 million. Valuation bands apply. This tax is not deductible in calculating the corporation tax or individual income tax liability. In certain situations, reduced rates apply.

Vacant home tax is an annual tax that applies to residential properties in use as a dwelling for less than 30 days in a 12-month chargeable period. An exemption may be available in certain circumstances. The rate for chargeable periods commencing between 1 November 2023 and 31 October 2024 is five times the rate of the local property tax.

Residential zoned land tax is an annual tax that is calculated at 3% of the market value of land within its scope. Certain properties are excluded from the tax, such as existing residential properties liable for local property tax. Registration will open in early December 2024, and the first due date is 1 February 2025.

Transfer tax: There is no transfer tax.

Stamp duty: Stamp duty at rates ranging from 1% to 7.5% is imposed on the transfer of property, with the 7.5% applying to the transfer of nonresidential property. A 10% stamp duty rate applies on the acquisition of individual residential units, such as houses and duplexes (but not apartments), where a person acquires at least 10 such units during any 12-month period. The 10% rate does not apply where the residential unit within scope is leased to certain social housing providers on the same day that the unit is acquired. There also is an exemption from stamp duty on short-term residential leases of houses and apartments where the term of the lease is for less than 35 years, or is for an indefinite term, and the annual rent is less than EUR 50,000.

Net wealth/worth tax: There is no net wealth tax or net worth tax.

Inheritance/estate tax: A capital acquisitions tax may apply on gifts and inheritances at a rate of 33%. There are certain reliefs and exemptions available.

Other: Shipping companies may opt to pay tonnage tax in lieu of the normal corporation tax.

A revised levy applies to AIB, Bank of Ireland, EBS, and PTSB. The levy applies at the rate of 0.112% on the value of deposits held by each bank on 31 December 2022, to the extent that such deposits are "eligible deposits" within the meaning of EU law.

Tax treaties: Ireland has concluded over 75 tax treaties. The Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting (BEPS MLI) entered into force for Ireland on 1 May 2019.

For information on Ireland's tax treaty network, visit Deloitte International Tax Source.

Tax authorities: Office of the Revenue Commissioners

Contact us:

Louise Kelly
Email: lokelly@deloitte.ie

Tom Maguire
Email: tmaguire@deloitte.ie

Karen Frawley
Email: kfrawley@deloitte.ie

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