

Ireland as a location for group treasury



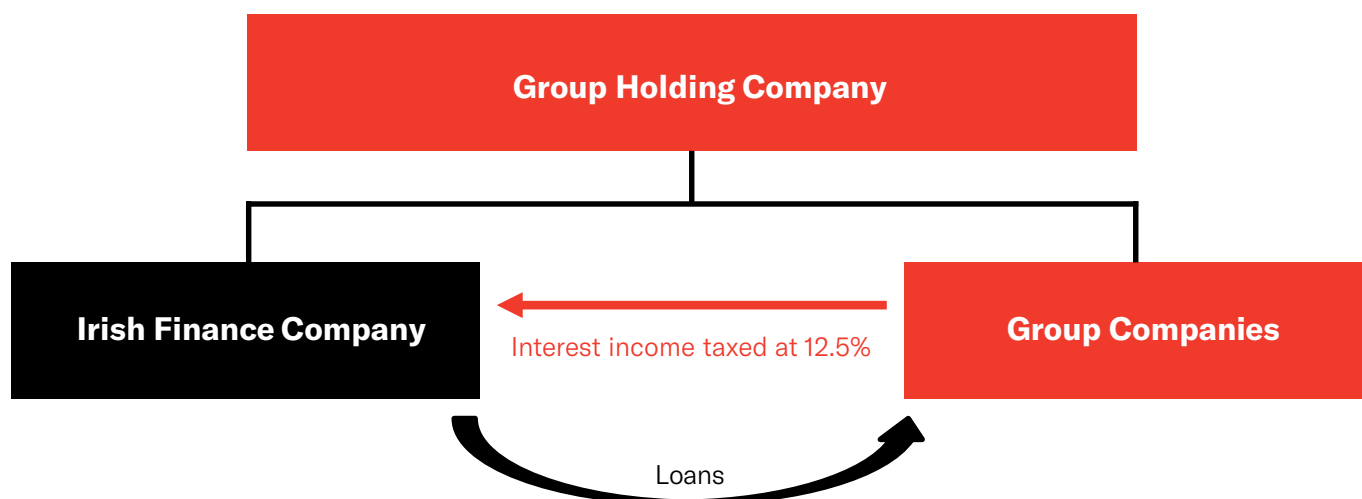
International tax changes, such as those introduced as a result of BEPS and EU ATAD, have required many multinational groups to consider their current financing and treasury arrangements, and in some cases consider relocating their treasury operations.

The identification of a suitable jurisdiction in which to base future treasury operations is key. Changes in international tax law require there to be substance and real economic activity in the treasury company location. Therefore, careful consideration needs to be given to the organisation's ability to establish and maintain a sustainable level of real treasury substance in the jurisdiction where it is ultimately decided to establish or expand treasury and intragroup financing operations.

Why Ireland?

Ireland is an extremely attractive location for corporate treasury activities. The key benefits Ireland offers are:

- Ireland has a well developed and experienced corporate treasury industry and is a centre of excellence for treasury managers
- A well-established international financial centre
- Highly skilled and educated workforce
- The only English speaking country in the Eurozone (and the EU post-Brexit)
- Fully compliant with the Single European Payments Area (SEPA) regulations
- Common law jurisdiction
- Flexibility in financial reporting



Tax Benefits

In addition to the commercial advantages outlined above, there are **a number of tax benefits** which make Ireland an attractive solution for establishing or expanding treasury operations:

- 12.5% Corporate Income Tax rate for trading operations
- Withholding tax exemptions on interest and dividend payments
- Unilateral credit relief for foreign withholding taxes, coupled with pooling for intragroup interest
- Access to an extensive and expanding double tax treaty network
- Stable and transparent tax regime
- Membership of the EU and OECD meaning it is not considered an “offshore” jurisdiction
- No Capital Duty on share/loan issuances. Various Stamp Duty exemptions for financial instruments

How Can We Help?

BDO currently act as tax advisors to a number of groups with treasury operations established in Ireland, and we have extensive experience in assisting clients develop efficient investment structures.

We can assist with the following:

- Development of tax efficient investment structures
- Obtaining a Revenue trading determination
- Incorporation and implementation
- Management of ongoing compliance

For further information please contact,

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