RBK

Executive Relocation Ireland

2026

Contents

Disclaimer

While every effort has been made to ensure the accuracy of information within the guide at the time of going to print in July 2026, RBK does not accept any responsibility for any errors, omissions or misinformation whatsoever in this guide and shall have no liability whatsoever.

The information contained in this publication is not intended to be an advice on any particular matter. No reader should act on the basis of any matter contained in this publication without considering appropriate professional advice.

This guide is aimed primarily at individuals who are relocating to or from Ireland and their employers.

Part A deals with the key tax considerations and practical issues facing individuals who are transferring to Ireland. Part A will also look at other considerations for people who are coming to Ireland from overseas.

Part B is aimed at Irish executives who are temporarily relocating abroad and addresses issues in relation to their Irish tax position while they are overseas and on their return to Ireland.

Introduction

Relocating to or from Ireland is one of the biggest financial and personal decisions an executive will make.

Welcome to the 2026 edition of "Executive Relocation Ireland", a guide which is designed to help executives and their families deal with the many issues that arise when moving to or from Ireland.

Whether you are taking up a new role in Ireland or moving abroad, a relocation affects almost every part of your financial life. Your tax residence and domicile, how your income and investments are structured, your pension planning and even the timing of your move can all have a lasting effect, and getting the right advice early on can make a real difference.

This guide is a practical starting point. It sets out the main tax and financial planning matters to think about, along with the key questions you should be asking yourself before, during and after a move.

While the guide is focused on tax and financial planning, including areas such as residence, pensions and cross-border matters, it also touches at a high level on the wider practical issues. These practical issues include immigration, health and schooling, which are worth building into your planning. When considering a move it impacts more than just finances and tax, it means uprooting your family and moving away from your support structure so these matters need to be taken into account.

Every relocation is different, and the guidance here is general in nature. It is not a substitute for advice tailored to your own circumstances.

As trusted advisers to individuals and businesses moving to and from Ireland, RBK Business Advisers are here to help you plan your move with confidence.

Ronan McGivern

Head of Tax

International Tax & Business Advisory Partner

PART A

COMING TO IRELAND

1 Living in Ireland

1.1 Overview of Entry Requirements

Individuals relocating to Ireland must comply with immigration requirements, which vary depending on nationality.

> **EEA, EU and Swiss nationals:** No employment permit is required to live and work in Ireland.
> **Non-EEA nationals:** Typically require an employment permit and, in some cases, an entry visa before travelling to Ireland.

From an employer perspective, immigration status is a critical dependency and should be factored into workforce planning, start dates, and onboarding timelines.

RBK have a dedicated team who work with international and domestic businesses and individuals in securing many different types of permits. Non-EEA nationals must generally hold a valid employment permit to work in Ireland.

The most common permit types include:

> **Critical Skills Employment Permit:** Available to highly skilled workers who are in significant short supply in the Irish labour market e.g. ICT professionals, professional engineers and technologists
> **General Employment Permits:** A Non-EU/EEA national can be employed under a General Employment permit where a skills shortage has been identified by an Irish employer after having carried out a labour market needs test
> **Intra-company Transfer Permits:** Facilitates the transfer of senior management, key personnel or trainees who are Non-EU/ EEA Nationals from an overseas branch of a multinational corporation to its Irish branch
> **Contract for Services Employment Permit:** Designed for situations where a foreign-based company has won a contract to provide services to an Irish entity on a contract for services basis and to facilitate the transfer of non-EEA employees to work on the Irish contract in Ireland
> **Van der Elst Visa:** Enables non-EEA nationals employed by an EU-based company to temporarily provide services in Ireland without the need for a separate Irish employment permit.

Eligibility for all permits is subject to specific criteria, including salary levels, role classification, and, in some cases, prior length of service.

Visa Requirements

In addition to an employment permit, some non-EEA nationals require a visa to enter Ireland. The list of countries whose citizens do not require a visa to enter Ireland is defined in the Immigration Act 2004 (Visas).

> **Short Stay (C) Visa**
> Allows entry for up to 90 days (e.g. business visits or short-term assignments).
> **Long Stay (D) Visa**
> Required for individuals intending to remain in Ireland for more than 90 days, including those taking up employment.

Visa applications are submitted through the relevant Irish embassy or consulate in the individual's country of residence.

Registration Requirements

Non-EEA nationals who remain in Ireland for longer than 90 days must register with Irish immigration authorities:

> Individuals are required to obtain an Irish Residence Permit (IRP)
> Registration confirms the individual's legal right to reside and work in Ireland
> This process is time-bound and must be completed promptly after arrival

Failure to register can result in compliance issues for both the employee and employer.

Key Legislative Developments

The Employment Permits Act 2024 introduced several changes aimed at increasing flexibility within the Irish labour market and improving the efficiency of the permit system.

Key developments include:

> **Increased mobility for permit holders**
> Employees on certain permits may change employer after a defined period, subject to conditions.
> **Introduction of Seasonal Employment Permits**
> A pilot scheme is expected to facilitate employment in sectors with recurring seasonal demand.
> **6-Month Activation Requirement**
> Employment must commence within six months of permit approval, placing greater emphasis on effective onboarding timelines.
> **Expanded Contract for Services Provisions**
> The scope of eligibility has been broadened to include sub-contracting arrangements.
> **50:50 Rule:**
> The 50:50 rule will now be waived for employers who do not have employees at the time of application.
> The 50:50 rule will now only be triggered when a second application is made for an employment permit for the same employer.

From a HR perspective, these changes provide greater flexibility but also require careful monitoring to ensure ongoing compliance.

HR Considerations for Employers

While immigration compliance is a critical component of relocation, successful assignments depend equally on effective people management.

Key HR considerations include:

> **Workforce Planning**
> Immigration processing times should be built into hiring and relocation timelines.
> **Onboarding and Compliance**
> Employees must not commence work until the appropriate permissions are in place.
> **Employee Support**
> Relocating employees may require assistance with accommodation, banking, schooling, and integration into the local environment.
> **Policy Alignment**
> Ensure relocation and assignment policies are clear, consistent, and aligned with both Irish legal requirements and global mobility frameworks.
> **Cost Management**
> Employers should consider the full cost of relocation, including permits, visas, tax implications, and employee support measures.

A structured and proactive HR approach can significantly reduce risk, improve employee experience and support assignment success.

The tax year in Ireland is the calendar year i.e. ends on 31st December.

1.2 Currency / Exchange Controls

Ireland is a member of the EU and since January 2002 and has adopted the Euro as the national currency. There are no exchange controls restricting the movement of funds to or from Ireland.

1.3 Office/Retail/Bank Hours

Opening hours for offices and shops in Ireland are generally 9am - 5.30pm Monday to Friday (excluding public holidays). Shops also open on Saturday (and in some cases Sundays) and in larger towns or cities shops will open late some nights during the week. Banking hours vary, but most banks are normally open from 9.30am to 4pm Monday to Friday. Most banks issue ATM cards and offer telephone banking services which enable access to funds 24 hours a day.

1.4 Health Services

An individual who is ordinarily resident (1 year test for this purpose) in Ireland may be entitled to free health care by the State if they satisfy a means test (which depends largely on the applicant's level of total income).

Free health care may also be provided by the State where the applicant is from another country covered by EU regulations, provided certain conditions are met.

The level of free health care provided by the State for those who do not satisfy the means test is limited to public hospital services subject to certain charges, maternity and infant care services, partial subsidisation of the cost of prescribed drugs and medicines over certain limits and free drugs and medicines for certain specified illnesses.

Temporary visitors from another EU country are entitled to urgent necessary treatment without charge provided they have the European Health Insurance Card (EHIC). Apart from the State scheme, there are various private insurance schemes, which an employee can join to help subsidise medical/hospital expenses.

A benefit in kind (i.e. taxable emolument) will arise if the employer pays a private medical insurance premium on behalf of the employee. The employee is however entitled to a partial credit for tax purposes for the premium amount.

1.5 Social Security

Please see Section 3.8 which deals with your liability to Irish social security contributions on secondment to Ireland. The payment of social security contributions gives potential entitlement to a number of benefits, including a state pension, redundancy payments and unemployment, sickness and invalidity benefits.

The level of some benefits is dependent on the level of earnings and in certain cases you may not qualify for benefits until contributions have been made for a minimum period. Under EU law child benefit is payable by the State under whose legislation you are insured. Therefore, if you continue making social insurance contributions in your home country, that country will pay child benefit in the normal way.

If your family moves to another European Economic Area State in which you are working, then arrangements would be made for child benefit to be paid there. In general, a person working in Ireland pays Irish social insurance. There are, however a few exceptions which apply where a person comes from a foreign country to work in Ireland for a foreign employer. See further Section 3.8.

1.6 Schooling

In Ireland, all children are required by law to attend a school full time between the ages of 6 and 16.

There is a mix of religious, private and state schools at all levels. Children arriving from other countries can choose which school to attend, subject to a space being available.

1.7 Driver's Licence

If you hold a full driver's licence issued by another EU member state you can drive in Ireland. If you hold a licence from any other country you will have to apply for an Irish provisional licence and take an Irish driving test during your first year here. However, certain countries outside the EU have reciprocal agreements with Ireland which allows individuals coming to Ireland from these counties to exchange their licence for an Irish licence.

1.8 Pension Arrangements

Will your stay in Ireland affect your pension entitlements? Will you and/or your employer continue to make contributions to your pension scheme in your home country and if so, what are the tax implications?

Are you looking to access a foreign pension scheme and will there be tax implications in Ireland of doing so? Particular care is required where an individual is looking to access their foreign pension while resident in Ireland, e.g. 401(k) from the USA, as doing so can have Irish tax implications.

It it is important to obtain specialist tax advice in advance of doing so. If contributions will be suspended, do you and your employer need to make some alternative arrangement in order to protect your contribution record and eventual pension entitlement?

In general, it is possible for an employer to make generous contributions to a pension for an employee, in certain circumstances these contributions can even match the employee's salary. This is a very important area and one on which you should always take specific advice.

Auto-Enrolment Retirement Savings System

Ireland introduced a new auto-enrolment pension scheme, known as "My Future Fund," which came into effect in January 2026. This initiative aims to address the pension savings gap, ensuring that more employees have access to retirement benefits.

This scheme is mandatory to join for any employee not already in an active company pension scheme.

Key features include:

- Employees meeting certain age and earnings thresholds will be automatically enrolled
- Contributions will be made by the employee, employer, and the State
- Employees may opt out after an initial participation period

From an employer perspective, this will introduce additional compliance and cost considerations, particularly for organisations without an existing pension scheme.

1.9 Tax Year

The tax year in Ireland is the calendar year i.e. ends on 31st December.

2 Taxation of Employment Income

2.1 Payroll Deductions - The General Rule

The tax authority in Ireland is the Revenue Commissioners (referred to as “Revenue”). The Pay As You Earn (PAYE) system is used by employers for deducting and remitting to the Revenue the Irish income tax due on the employee’s remuneration. Income attributable to the performance of duties in Ireland is within the scope of the PAYE system regardless of where the employer is resident or where the salary is paid from/to.

However, the portion of a salary paid by an non-Irish employer to an overseas bank account that relates to duties performed outside Ireland is not within the scope of the PAYE system (although it may be chargeable to Irish tax in the hands of the employee depending on his residency status (see further Section 3.2). It is necessary for employers to register with Revenue for the purposes of the PAYE system. To register for PAYE purposes the employer must complete Form TR1 or TR2. Where emoluments are paid by an intermediary acting on behalf of an employer the intermediary applies the PAYE system. However, the obligation to operate PAYE remains with the employer where the intermediary fails to operate such system.

RBK offers a competitive payroll bureau service which eliminates all of the above administration issues for employers.

2.2 Employment Exercised Wholly in Ireland

If the employment is exercised wholly in Ireland all of the income is chargeable to tax in Ireland and is within the PAYE system.

2.3 Employment Exercised in Ireland and Overseas

If the non-Irish employment is exercised partially in Ireland and partially outside the State it is necessary to determine the portion of income attributable to the performance in Ireland of the duties of that employment (subject to PAYE).

Where the amount of income referable to the Irish duties is not readily ascertainable the employer can apply for a direction from Revenue as to the proportion of the income that should be within the PAYE system.

2.4 Temporary Assignees from Treaty Countries

The fact that an employee may be temporarily working in Ireland and relieved from the charge to Irish tax under the terms of the relevant double taxation agreement (see further Section 2.7) does not mean that the employer need not operate the PAYE system on the employee’s income referable to Irish duties. However, Revenue does not require an employer to operate Irish PAYE if the following criteria are satisfied:

> The individual is resident in a country with which Ireland has a Double Taxation Agreement and is not resident in Ireland for tax purposes in the relevant year.

> There is a genuine foreign office or employment.

> The individual is not paid by, or on behalf of, an employer resident in Ireland.

> The cost of the office or employment is not borne, directly or indirectly, by a permanent establishment in Ireland of the foreign employer.

> The duties of that office or employment are performed in Ireland for not more than 60 working days in the year of assessment, and in any event for a continuous period of not more than 60 days.

Alternatively where temporary assignees of Treaty countries satisfy all of the above conditions (with the exception of the last condition above) and are:

> present in Ireland for a period not exceeding 183 days in the year of assessment; and

> suffer withholding taxes at source in their home country on the income attributable to the performance of the duties of the employment in Ireland then

Revenue will not require an employer to operate the Irish PAYE system in respect of the temporary assignee, provided certain administrative requirements are met which include registering as an employer for PAYE purposes in Ireland and obtaining advance approval from Irish Revenue not to operate PAYE.

2.5 Non-Treaty Countries - Identical Duties

Where a non-resident employee from a non-treaty country performs incidental duties in Ireland for a period of not more than 30 days in aggregate in a tax year, PAYE need not be deducted in respect of income attributable to such duties.

2.6 Tax Equalisation

In many instances internationally mobile employees enter into either a tax equalisation arrangement or a tax protection arrangement with their employer when they are seconded, transferred or assigned to work in another jurisdiction. Where the employee can avail of the remittance basis (refer 3.2.1) this can lead to substantial tax savings for the employer, if an appropriate equalisation agreement is in place. We have set out below the Irish tax treatment where such an arrangement exists.

> A tax equalisation agreement may take various forms, and in general, refers to an arrangement between an employer and employee to provide that the employee is no better or no worse off in personal tax terms than if he/she had not relocated.

> Hypothetical tax is an estimate of the tax that the employee would have paid had he/she not relocated as this is very often used as the base for determining the gross pay for tax purposes in the new country where the employee is based. Where an employer pays tax on behalf of an employee under a tax equalisation arrangement the net take home pay should be regrossed for the purposes of calculating the tax due under the PAYE system.

Example

Joe is a US national. His salary after tax in the US in 2025 was €85,000. He is transferred to Ireland for 1 year with effect from 1st January 2026. His employer has agreed that he will receive take home pay of €85,000 in 2026. If Joe is single and qualifies for the single persons standard rate band, single persons tax credit and the PAYE tax credit, his gross salary in 2026 needs to be €142,560 in order that he receives net take home pay of €85,000 (see computation below).

Gross Salary	**€142,560**
Tax	
€32,800 at 20%	€6,560
€93,400 at 41%	€45,002
Tax before credits	€51,562
Credits (single)	€1,650
PAYE	€1,650
Universal Social Charge	€9,298
Tax after Credits	€57,560
Net Salary	**€85,000**

In some instances a tax equalisation arrangement between an employee and his employer may contain an agreement that the employee will reimburse certain refunds of tax to the employer. Such an agreement is a matter for the employer and the employee.

For Irish tax purposes earnings include salary, fees, bonuses and other compensation.

2.7 Employee Issues

An individual's liability to income tax in Ireland is generally determined by reference to his residence position. However, income attributable to the performance in Ireland of duties of an employment is chargeable to tax in Ireland under our domestic law regardless of the residency position of the individual.

Generally, under the terms of the Employment Article of Double Taxation Agreements between Ireland and other countries, the income attributable to the performance in Ireland of duties of an employment may be relieved from the charge to Irish tax. The terms of the particular tax treaty would need to be reviewed but in general where temporary assignees of Treaty countries are present in the State for periods not exceeding 183 days and where the salary is borne by a foreign employer and not borne by a permanent establishment (effectively a branch) of that employer in Ireland, the exemption from Irish tax applies. Even if the exemption applies under the treaty, PAYE may still need to be deducted by the employer (see Section 2.4 above) and, in such circumstances a refund of PAYE will need to be claimed when submitting the individual's tax return.

Non-Irish source employment income attributable to the performance of duties outside the State, qualifies for the remittance basis of taxation (see further – Section 3.2.1). Essentially this means that the income is not taxable until it is remitted into Ireland.

2.8 Earnings

For Irish tax purposes earnings include salary, fees, bonuses and other compensation together with:

- Personal expenses which are either incurred by you and are reimbursed by your employer or paid directly by your employer. However certain vouched relocation expenses paid for or reimbursed by your employer along with subsistence expenses up to a certain limit may not be taxable. Specific advice should be obtained in relation the expenses that may be paid to temporary assignees tax free as there are conditions to be satisfied.
- Tax liabilities which are met or reimbursed by your employer.
- Foreign service allowances for housing, children's education, cost of living allowance (Cola), etc.
- Employer's contributions to employee incentive schemes such as stock savings and deferred income plans. Your employer's contributions to pension scheme are not included if the scheme meets Revenue approval. This is another important area on which to take specific advice.
- Benefits in kind – The general rule is that the amount to be taxed is the cash equivalent of the benefit. Special rules apply for calculating the value of company cars and certain employer loans. This is a very complex area but one where it is possible to generate substantial tax savings by getting appropriate advice on structuring your benefit package. Special rules also apply to share options and share purchase schemes. The taxation of share option gains for "mobile" employees is notoriously complex. If you have share options that may be exercised in the short term or during your stay in Ireland it is important that you seek advice on the tax implications in Ireland and your home country so that you can avail of any tax mitigation opportunities prior to your move.

2.9 Special Assignee Relief Programme (SARP)

SARP relief provides for income tax relief on a portion of income earned by employees who are assigned by the relevant employer to work in Ireland for that employer (or for an associated company of that relevant employer). The Finance Act 2022 extended this relief for a further 3 years until 31st December 2025. The individual must have previously worked for that relevant employer for a minimum of 6 months in a country with which Ireland has a double taxation agreement immediately prior to arriving in Ireland.

Where certain conditions are satisfied, an employee can make a claim to have 30% of his or her income between €125,000 (lower threshold) and €1 million (upper threshold) disregarded for Irish income tax purposes. Finance Act 2022 increased the lower limit from €75,000 to €100,000 and Finance Act 2025 increased the lower limit to €125,000. However, such disregarded income for income tax purposes is not exempt from the Universal Social Charge (USC). The relief is available for a maximum period of five years. In addition, employees who qualify for relief under this section may also receive free of tax certain expenses of travel and certain costs associated with the education of their children.

The Finance Act 2025 extends SARP for a further five years until 31 December 2030 and the annual end of year employer return filing deadline is being extended from 23 February to 30 June following the end of the tax year. Where the notification occurs after 90 days but before 180 days, the relief will apply for only four consecutive years rather than five.

3 Taxation of Other Income and Gains

Married couples who are jointly taxed can in most cases combine their personal allowances and tax credits.

3.1 Introduction and Key Concepts
Prior to registering for taxes in Ireland you will need to obtain a personal public service (PPS) number. In order to obtain a PPS number you can apply online at mywelfare.ie, alternatively you may be able to visit your local Social Welfare office to obtain one. You will be asked to produce the following documents:

- Birth Certificate
- Passport
- Documents supporting your address

The extent of your liability to tax in Ireland will depend on your residence position. The key definitions are set out below and how they impact on your tax status is set out in Section 3.2.

Residence

An individual will be regarded as resident in Ireland for a tax year if he/she:

- Is present for 183 days or more in Ireland for that tax year.
- Is present for 280 days in Ireland combining the number of days spent here in the tax year and the preceding tax year (provided he/she is here for more than 30 days in each year).

A day is counted if you are present in Ireland for any part of a day.

Ordinary residence

An individual will be ordinarily resident in Ireland if he/she has been a resident for each of the 3 preceding tax years. An individual who commences residence in Ireland becomes ordinarily resident here from the beginning of the 4th tax year. An individual who is ordinarily resident in Ireland remains so until the end of the third consecutive tax year in which the individual is not resident.

Domicile

Domicile is a concept distinct from nationality, residence or ordinary residence. It means, broadly, that place an individual regards as his/ her permanent home i.e. the place to which he/ she intends eventually to return. Each individual acquires a domicile of origin at birth and this remains with the individual for his/her lifetime unless steps are taken to sever all ties with this jurisdiction. A foreign national taking up employment in Ireland for a defined period who always intends to return home does not normally acquire Irish domicile. Care is required here and RBK would be happy to assist you in making a determination.

3.2 Remittance Basis - Resident Not Domiciled

The general rule is that Irish resident individuals are liable to Irish tax on worldwide income and gains.

However, individuals who are Irish resident but not Irish domiciled (which includes the majority of those coming to Ireland to work on secondment) are normally liable to Irish tax on non-Irish sourced income only to the extent that the income is remitted to (i.e. physically brought into) Ireland. This is known as the remittance basis of taxation. Foreign employment income referable to exercise of duties in Ireland is regarded as Irish source for this purpose.

The remittance basis of taxation also applies to non domiciles in respect of capital gains.

Any accumulated savings held by an individual on the last day of the tax year prior to becoming Irish resident is generally deemed to be capital and can be remitted into Ireland without incurring an Irish income tax liability. It is extremely important to engage in careful structuring of your affairs prior to becoming tax resident in Ireland. We at RBK would be happy to advise you in relation to such matters.

3.2.1 Non-Resident

Non-Irish residents are generally liable to tax only in respect of Irish source income and gains arising on the sale of Irish specified assets. In the case of income from employment they are only liable to Irish tax to the extent that the earnings are for duties carried out in Ireland. This is subject to the provisions of any applicable Double Taxation Agreement.

3.2.2 Ordinarily Resident

An individual who is not resident but remains ordinarily resident is liable to Irish income tax and capital gains tax on worldwide assets, subject to the remittance basis for non domiciled individuals and any relief available under a Double Taxation Agreement that Ireland has with another jurisdiction.

The following is automatically excluded:

- Income from a trade or profession where no part is carried on in Ireland.
- Employment income where all duties are performed abroad, apart from incidental duties in Ireland (Revenue treats up to 30 days employment duties per year as incidental).
- Other income (foreign investment income) where it is less than €3,810 per year.

3.3 Submitting Income Tax Returns

A self assessment system for income tax and capital gains tax exists and applies to anyone who is self employed, a director of a company, or anyone whose income is not taxed through the PAYE system and includes those availing of SARP relief. Advice should be sought to determine whether you might have a filing obligation in Ireland.. It also applies to anyone with capital gains even if all their income is taxed under PAYE. Payment on account, known as preliminary tax, must be paid on 31st October each year.

Under the self assessment system the following pay and file obligations must be met by 31st October annually:

- Payment of preliminary income tax for the current year.
- Payment of balance of income tax for the previous year.
- Filing of income and capital gains tax returns for the previous year.

Payment of capital gains tax (on disposals made from 1st January to 30th November) is due by 15th December.

In addition, by 31st January following the end of a tax year you must make payment of capital gains tax on disposals made in December of the prior tax year.

3.4 Rates of Tax and Personal Allowances

Income taxes are levied at progressive rates on your taxable income for the year. All resident individuals are entitled to a personal tax credit. Married couples who are jointly taxed can in most cases combine their personal allowances and tax credits. This will not always be possible if one spouse is not Irish resident. There are also other allowances and credits available depending on the tax payer's status and age.

Chargeable gains in excess of an annual exempt threshold (€1,270) are subject to capital gains tax at 33%.

Current Irish tax rates and allowances are set out in Appendix 1.

3.5 Employment Income

Please see Section 2.

3.6 Investment Income

Irish residents are normally liable to tax on interest and dividends from all sources. If the recipient is Irish resident but not Irish domiciled the remittance basis applies to interest or dividends from a foreign source i.e. only taxed here if remitted. Irish source interest is usually paid after deduction of tax of 33%, and Irish dividends are paid net of withholding tax (25%).

For certain interest from deposits there is no further tax due. Income from Irish situated rental properties is liable to tax regardless of the residency status of the recipient. If the recipient is resident but not domiciled the remittance basis applies to income from property situated outside Ireland.

However there are specific Irish tax rules surrounding offshore funds and the below is a brief overview of the tax treatment. However, ultimately, the below is just for guidance purposes.

Generally income from an offshore fund or gain on disposal of an offshore fund is taxable at a rate of 38% from January 2026.

In addition to this, Irish tax legislation also sets out a 'deemed disposal' of certain offshore funds every 8 years. Therefore, for certain funds, every 8 years you are deemed to have disposed of your holdings in an offshore fund and you are taxable at a rate of 38% on the gain. When you eventually dispose of your holding in the offshore fund, the tax previously paid on the deemed disposal is deducted from the tax due on the actual disposal.

Please note this 8 year deemed disposal rule only applies to certain offshore funds. Please also note the tax treatment depends highly on the type of offshore fund, for example, funds domiciled in a "bad" jurisdiction (e.g. non EU/EEA country or country ROI does not hold a DTA with) are subject to higher tax rates.

Another point to note on offshore funds is that generally a loss that arises on the disposal of an offshore fund cannot be offset against other gains made.

3.7 Double Tax Relief

If you are liable to Irish tax on income or gains that are also taxable in another country double tax relief may be given either by Ireland or the other country to give credit for taxes paid in the other country on income or gains. Where double tax relief is given by Ireland the amount of foreign tax credit is limited to the amount of Irish tax payable on the same income or gains. Any excess of foreign tax credit cannot be set against Irish tax for further income or gains.

3.8 Social Insurance Contribution

A person working in Ireland is normally liable to pay Pay Related Social Insurance ('PRSI') and the Universal Social Charge ('USC') on their earnings. PRSI rates and USC rates are set out in Appendix 1. PRSI and the USC are normally paid under the PAYE system. Special rules usually apply for those coming to Ireland on secondment and who cannot claim an exemption from employee and employer Irish social security.

Such individuals generally pay PRSI through the special collection system. Ireland is party to a number of social security agreements.

In addition, Ireland is subject to the provisions of EU Regulation 1408/71. This legislation covers the EU member states, Iceland, Lichtenstein, Norway and Switzerland. These agreements allow individuals who are posted to/from Ireland to remain within his/her home country social security regime.

It usually also provides complete exemption from host social security costs for both the employee and the employer. In such instances it may be possible to apply for a Certificate of Coverage/A1 Certificate. To protect your entitlement to benefits, both in Ireland and your home country, it is important to establish the exact position and comply with the appropriate procedures, (which vary depending on which country is involved), as soon as possible after your arrival in Ireland.

3.9 Capital Gains Tax

Capital gains are taxed at a rate of 33%. An individual who is resident or ordinarily resident is liable to capital gains tax on his worldwide assets (subject to any relief that may apply under a Double Tax Treaty). Non-domiciled persons may be able to avail of the remittance basis in respect of non-Irish capital gains i.e. only taxed to the extent that proceeds are remitted here.

3.10 Gift and Inheritance Tax

Capital acquisitions tax (CAT) is a capital tax charged on the recipient of gifts and inheritances. Certain tax free thresholds apply depending on the relationship of the beneficiary to the donor. The amount of the gift/inheritance in excess of the applicable tax free threshold is liable to CAT at a rate of 33%.

The general rules are that gifts and inheritances are taxable where:

- The disponer (person making gift/bequest) is resident or ordinarily resident in Ireland at the date of this disposition; or
- The donee (recipient) is resident or ordinarily resident in Ireland at the date of the gift/ inheritance; or
- The property comprised in the gift/inheritance is located in Ireland, regardless of the residence of the disponer or donee.

To limit Irish taxation of gifts and inheritances of non-Irish property made or received by persons who are resident in Ireland on a temporary basis, foreign domiciled persons will not be regarded as resident or ordinarily resident in Ireland on a date unless:

- That person has been resident in Ireland for the five consecutive tax years immediately preceding the tax year in which the gift/inheritance occurs; and
- That person is either resident or ordinarily resident in Ireland at the date of the gift/ inheritance.

This is an extremely complex area and advice should be sought where charges to tax might arise.

PART B

LEAVING IRELAND

1 Managing your Affairs While Overseas

This section is aimed at people who are being posted from Ireland (the home country) to work in another country (the host country). Our goal is to outline practical matters which you and your employer should consider in regard to your posting, and to highlight the key tax aspects of the transfer.

1.1 Your Home

The main options available to you are to either sell your home, let it, or leave it unoccupied.

The tax implications of renting out your property are set out in Section 2 below and in Part A, Section 3.6. There is a tax relief, known as principal private residence relief, which may apply to exempt or substantially reduce any capital gains tax on sale of your home. Regardless of whether any gain is taxable, it may be necessary to obtain a capital gains tax clearance certificate to avoid a purchaser having to withhold tax on payment of the purchase price.

1.2 Health Insurance

Cover is usually available, depending on the type of insurance, for medical treatment necessitated by an accident or sudden illness arising during a temporary stay abroad.
Temporary usually means 6 months or less. As well as this cover, most health insurance companies operate a worldwide medical emergency assistance and advice service.

If you are transferring abroad for an extended period different considerations apply. If your health insurance provider is a member of the Federation of Health Funds (FHF) you can arrange to cancel the insurance in Ireland and transfer to another FHF member fund, subject to certain conditions, during your stay abroad. This will enable you to make sure that there is no break in the insurance and as far as possible provides immediate cover without any new member restrictions.

When going to another EU country you should obtain a European Health Insurance card from the Department of Social Protection which will entitle you to emergency medical treatment without charge.

1.3 Driver's Licence

A holder of a full Irish driver's licence can drive using this licence in any EU member country. When travelling outside the EU you should check with the individual embassy to see if there is a reciprocal agreement in respect of that country or alternatively obtain an international driver's licence.

1.4 Your Investment Portfolio

Are the necessary arrangements in place for someone to manage your investment portfolio while you are away? We would recommend that your portfolio be reviewed from a tax perspective prior to your move as some investments which are tax effective if you are Irish resident may be far less effective if you are non-resident (and vice versa).

1.5 Share Scheme/Share Option

If you are a member of an employee share scheme you should take specific advice regarding the commercial and tax implications of your move. This may influence the timing of the exercise of any options.

1.6 Pension Arrangements

If you intend to leave Ireland permanently or to work for a new employer, what impact will this have on pension entitlements and what is the most tax efficient way to structure your pension contributions going forward? This is an area on which you should seek specific advice.

1.7 Social Security

As noted at Part A, Section 3.8 above, certain regulations are in operation to safe guard the social welfare entitlements of individuals moving from one country to another.
This is achieved by allowing social security contributions paid in one country to assist a claimant to qualify for certain benefits in the other country.

2 Taxation While Overseas

2.1 Host Country Taxation

The first question an individual considering an overseas assignment normally asks is if they have to pay foreign tax and if so at what rate. If you are working in a foreign country for an extended period, it is likely that you will be liable to foreign tax to some extent. It is not possible in this guide to give an indication of potential liabilities for specific countries given that tax systems throughout the world differ so much.

However, the general rule is that most foreign jurisdictions will levy tax on at least the income earned in that jurisdiction. In certain countries it is possible that you may be liable to foreign tax on your worldwide income. You should meet with an experienced local tax advisor to identify the tax costs related to your worldwide remuneration as well as tax compliance rules and payment obligations in the assignment location. Again, specific tailored local advice can ease the administrative burden and costs and can also substantially reduce tax costs by putting in place an optimum employment contract structure, salary and benefit package, pension arrangements, accommodation arrangements, etc.

RBK is a member of LEA Global, BOKS International and Mobile Workforce Collaborative which have offices throughout the world and with them we can provide you with the information you need on the relevant country's tax regime.

2.2 Tax Position in Ireland Whilst Overseas

In addition to considering your tax liability overseas you will also need to consider the impact of your posting on your Irish tax liability. Again, with forward planning there are ways in which your tax liability can be reduced. Please refer to Part A, Section 3.2, for further details on how to determine your liability to Irish tax. We have set out below the key issues that will arise from an income tax perspective.

Becoming non-resident

Please refer to Part A, Section 3.2. Individuals must be non-resident for 3 consecutive tax years before they lose their ordinarily resident status. Ordinary residents are taxed as if they were residents i.e. taxed on their worldwide income.

However, they are not taxed on the following sources:

> A trade or profession, no part of which is carried on in Ireland.

> An office or employment, all of the duties of which are performed outside Ireland (apart from incidental duties).

> Other foreign sources which do not exceed €3,810. In addition, the relevant double tax treaty may provide relief from the Irish tax charge – see further below.

An individual who is both non-resident and non- ordinarily resident will normally only be liable to Irish income tax on Irish income sources. In the case of income from employment the Irish tax liability is limited to earnings from duties carried out in Ireland subject to any relief available under a double taxation agreement.

See further Section 3.2 and below.

Employment Related Income

As noted above, an Irish resident individual is normally taxed on worldwide income. Under the look-back rule (refer Part A, Section 3.1) an individual may be tax resident in Ireland in a particular tax year even if they leave Ireland early in that year. On first principles this means that employment income earned for the full calendar year is taxable in Ireland – where the individual is working overseas the salary is likely to be taxed there also.

There is a statutory relief, known as the "split year treatment" which provides that, where an individual leaves Ireland with the intention and in such circumstances that he/she will not be resident for the following tax year, he/she is not taxable on earnings from an employment exercised outside Ireland after the date of departure from Ireland. In most cases this can lead to a tax refund due to unused personal tax credits. Income (other than employment income) remains taxable for the entire tax year.

If you exercise share options whilst abroad which were granted while you were a resident in Ireland you may be liable to Irish tax on the exercise of that option or sale of the shares, subject to double tax relief. Again, this is an area in which you should seek specialist tax advice.

Foreign Earnings Deduction (FED)

The Foreign Earnings Deduction (FED) is a tax relief available to employees of Irish companies who spend time working abroad in certain qualifying countries (see below). The relief was introduced in Finance Act 2012 and extended in subsequent Finance Acts to support efforts by Irish companies to expand into these emerging markets. It is available to Irish resident individuals who spend at least 30 "qualifying days" working outside Ireland from 2026 to 2030 in any of the qualifying countries in a continuous 12 month period.

Qualifying Countries - FED				
From 1 January 2026				
Brazil	Senegal	Singapore	Indonesia	Columbia
Russia	Tanzania	Republic of Korea	Vietnam	Pakistan
India	Kenya	Saudi Arabia	Thailand	The Philippines
China	Nigeria	United Arab Emirates	Chile	Turkey
South Africa	Ghana	Qatar	Oman	
Egypt	Democratic Republic of the Congo	Bahrain	Kuwait	
Algeria	Japan	Malaysia	Mexico	

The deduction is subject to a maximum claim of €50,000 and shall apply for the tax years 2026 to 2030.

For the tax years 2026 to 2030, where an individual spends a day in a qualifying country then this day will be treated as a "qualifying day" as long as the presence in the qualifying country is "reasonably required" for the purposes of the performance of the duties of the office or employment. The individual must have a minimum of 30 qualifying days in a year in order to qualify for the relief.

Investment Income

Interest paid by Irish banks, building societies and similar financial institutions will be paid gross i.e. no withholding tax (DIRT) will be deducted if a non-resident makes the appropriate non-residents declaration to the bank or other financial institution. Income from rental properties situated in Ireland is liable to tax regardless of the residency status of the recipient. Irish source dividends paid to non-residents and non-ordinarily resident individuals who are resident in an EU/Treaty country may be paid free of withholding tax and maybe exempt from Irish income tax provided certain conditions are met.

Capital Gains Tax

An individual ordinarily resident and domiciled in Ireland but who is no longer resident in Ireland remains subject to Irish capital gains tax and chargeable gains arising on disposal of worldwide assets subject to relief that may be available under a tax treaty. An individual who is neither resident nor ordinarily resident in Ireland is only liable to Irish capital gains tax on the disposal of certain specified Irish assets which include Irish land and buildings or shares deriving their values from Irish land and buildings.

Domicile Levy

Finance Act 2010 introduced a new ‘domicile levy’ on individuals who are Irish domiciled but are neither resident nor ordinarily resident, in certain circumstances. Where such an individual has;

> an Irish income tax liability of less than €200,000
> worldwide income exceeding €1m and
> Irish property worth more than €5m

the levy will apply to ensure that the individual pays a least €200,000 tax in Ireland.

Interaction of Irish and Foreign Taxes

If you cease to be resident in Ireland for tax purposes it is likely that you will become resident in another jurisdiction and therefore liable to tax in that jurisdiction. There may be a double tax agreement between Ireland and the other country and this will apply to determine which country has the right to tax your income and capital gains. In this way you should not be taxed twice on the same income or gains.

If there is no double tax agreement between Ireland and the other country and the income is taxable in both jurisdictions, some measure of relief is usually given by deducting the tax paid and taxing only the net income.

Inheritance/Gift Tax (“CAT”)

See further sections Part A, Section 3.10 on the territoriality rules for Irish CAT. The host country may impose gift or inheritance taxes and you should obtain professional advice in relation to your estate planning to take account of Irish and foreign tax issues. As with other taxes, double tax relief may be available but there are only two tax treaties that refer to CAT and these are with the UK and the US. Limited unilateral relief is available where there is no treaty in place.

3 Returning to Ireland

There are many issues that need to be considered before you return to Ireland and appropriate tax advice should be taken to ensure that any available tax planning opportunities are utilised. These include:

3.1 The Timing of Your Return

There may be tax advantages available depending on the date of your return within the tax year.

3.2 Capital Gains

Subject to foreign tax implications, if you are not ordinarily resident in Ireland you may wish to consider realising any significant accrued capital gains in the tax year before returning to Ireland. Similarly, you should postpone realising any losses until Irish residence is resumed. However, an individual who disposes of certain shareholdings during a period of non-residence (temporary non-residence) may be liable to Irish CGT on a gain arising in respect of the disposal of such shareholdings under the following conditions:

Where the individual was:

> Irish resident and domiciled, and
> ceased to be Irish resident and ordinarily resident, and
> left Ireland for a period of not more than 5 years, and
> returns and resumes their Irish residence after a period of not more than 5 years,

Again because the timing is critical to mitigate tax liabilities, specific advice should be obtained.

3.3 Investment Portfolio

There may be advantages available by leaving certain investments offshore if you are returning to Ireland and at that stage you are not ordinarily resident in Ireland. Also, the composition of your investment portfolio should be reviewed as certain investments which were tax efficient whilst non-resident may not be efficient on your return (and vice versa).

How RBK can help you

Moving location can be stressful for both employees and employers. At RBK we can assist both parties with the move and ease some of the administration headache. We can also advise on how best to time and structure the secondment to reduce your tax liability. Specific areas we can advise on include:

- Structuring your remuneration package tax efficiently
- Tax planning on pensions and share options
- Structuring bank accounts to avail of the remittance basis
- Tax administration and compliance
- Payroll Bureau services
- HR Solutions

International Alliances

At RBK, we recognise that the movement of key talent across borders is a defining feature of modern business. As executives relocate to and from Ireland, they face a complex web of tax residency rules, social security obligations, and compliance requirements that span multiple jurisdictions. Our specialists provide tailored guidance on the personal and corporate implications of each move.

Through our membership of international alliances, we can connect clients with trusted professional firms in jurisdictions around the world.

LEA Global

Our membership of the LEA Global enables us to effectively operate as a world wide firm who can also advise on dividend repatriation, transfer pricing and controlled foreign company legislation in your home state and how they would interact with your investment in Ireland.

LEA Global, is an international professional association of independently owned accounting and consulting firms. LEA Global enables member firms such as RBK to access the resources of global professional services in accounting and consulting firms around the world to assist deliver professional and advisory services.

For more on LEA Global, visit: https://www.leaglobal.com/

BOKS International

RBK recently joined BOKS International as an independent member.

BOKS International is a fast-growing alliance operating across the accounting, legal, tax, and HR disciplines. RBK's membership of BOKS International will provide outreach for our clients to a member base of quality-assured firms ensuring our clients receive the expertise they need anywhere in the world in the quickest possible time.

Whether clients require basic compliance or complex specialist advice, RBK and BOKS International can support clients with all of their domestic and cross-border needs. As an independent member of BOKS International, RBK are your one-stop shop for global professional services

For more on BOKS International, visit: www.boks-international.com.

Mobile Workforce Collaborative

RBK is a Mobile Workforce Collaborative (MWC) Participating firm. MWC participating firms provide a comprehensive, seamless and consistent solution to manage your worldwide workforce mobility needs.

MWC firms have an extended reach in over 140 countries. This community of firms are experts in navigating the complexities of cross-border employee mobility, with capabilities in tax, relocation, immigration and other specialized mobility matters.

For more on Mobile Workforce Collaborative, visit: https://mwc.global/

How Can RBK Help?

RBK chartered accountants and business advisers is one of Ireland's leading business advisory and accountancy firms, with over 65 years of experience providing professional services.

Established in 1958, RBK is Ireland's largest independently branded accounting firm, with over 300 staff and offices in Dublin, Athlone, Roscommon and Castlebar.

RBK offers a comprehensive range of audit, accounting, taxation and business advisory services including corporate finance, corporate compliance, payroll, HR, accounting and software, corporate recovery and wealth management solutions to both domestic and international clients.

RBK has established itself as a leader in professional services by continuously adapting to the evolving business, technological, and societal landscapes. The firm's commitment to providing high-quality, responsive and practical solutions allows clients to achieve their maximum potential efficiently.

Ronan McGivern
Head of Tax, International Taxation & Business Advisory Partner
T: +353 (0)1 6440100
E: rmcgivern@rbk.ie

Yvonne Clarke
Head of HR Solutions
T: +353 (0)90 6480600
E: yclarke@rbk.ie

Richard McAufield
Taxation Associate Partner
T: +353 (0)1 6440100
E: rmcaufield@rbk.ie

Patrick Keegan
Wealth Management Director
T: +353 (0)1 6440100
E: pkeegan@rbk.ie

Trusted Advisers, We’re by your side.

Appendices

Appendix

Table A1 Income Tax Rates

Bands of Taxable Income	2026
Single/widowed without dependent children	€44,000 @ 20% Balance @40%
Single/widowed qualifying for Single Person Child Carer Credit	€48,000 @ 20% Balance @40%
Married Couple (one income)	€53,000 @ 20% Balance @40%
Married couple (two incomes)	€53,000 @ 20% (with an increase of €35,000 max) Balance @40%

* In the case of a married couple with two incomes the standard rate band is transferable between them up to €88,000 (the band for two income married couples).

In effect this means that up to €35,000 may be transferred between them, if one spouse earns less than €35,000 there is a loss of some of the benefit of the higher band.

Table A2 Income Exemption Limits

Income Exemption Limits	2026
Single/widowed (65 years of age or older)	€18,000
Married (65 years of age or older)	€36,000
Additional for first two dependent children	€575 per child
Additional for each additional child	€830
Marginal Relief Tax Rate	40% *

* Marginal Relief Tax Rate only applies to persons 65 years of age or over.

Table A3 Tax Credits

Tax Credits	2026
Single Person	€2,000
Married Person or Civil Partner	€4,000
Widowed Person or Surviving Civil Partner with dependent children	€2,000
Widowed Person or Surviving Civil Partner without dependent children	€2,540
Widowed Person or Surviving Civil Partner - bereavement year	€4,000
Widowed Parent 1st year after death	€3,600
Widowed Parent 2nd year after death	€3,150
Widowed Parent 3rd year after death	€2,270
Widowed Parent 4th year after death	€2,250
Widowed Parent 5th year after death	€1,800
Single Person Child Carer Credit	€1,900
Age Tax Credit if single, widowed or surviving civil partner	€245
Age Tax Credit if married or in a civil partnership	€490
Home Carer's Tax Credit (max.)	€1,950
Employed Person taking care of incapacitated individual (max.)	€75,000
Employee PAYE Tax Credit	€2,000
Earned Income Tax Credit (max.)	€2,000
Incapacitated Child Tax Credit	€3,800
Dependent Relative	€305
Dependent Relative Income Limit	€18,028
Blind Tax Credit - single person	€1,950
Blind Tax Credit - one spouse or civil partner blind	€1,950
Blind Tax Credit - both spouses or civil partners blind	€3,900
Guide Dog - allowance	€825
Rent Tax Credit - single person (max.)	€1,000
Rent Tax Credit - jointly assessed married couple or civil partners (max.)	€2,000
Mortgage Interest Tax Relief	€1,250

Social Insurance Contributions

Pay Related Social Insurance (PRSI) is payable by employers, employees and self employed persons. Employers and employees pay PRSI on the employee's salary after deduction of any contributions to an approved pension scheme. The rate can vary.

Employer's and employee's PRSI is charged on all earnings from employments, including benefits in kind. The only allowable deductions are contributions paid to an approved employee superannuation scheme and certain permanent health insurance policies.

Table A5 **Rates to September 2026** - *Employees (earning over €552 per week or equivalent)*

Class A1 - Most employed persons		
Earnings	*Employer*	*Employee*
Income	11.25%	4.2%

Class K1 - Persons in receipt of occupational pensions		
Earnings	*Employer*	*Employee*
All Income	Nil	4.2%

Table A6 **Rates from 1 October 2026** - *Employees (earning over €552 per week or equivalent)*

Class A1 - Most employed persons		
Earnings	*Employer*	*Employee*
Income	11.40%	4.35%

Class K1 - Persons in receipt of occupational pensions		
Earnings	*Employer*	*Employee*
All Income	Nil	4.35%

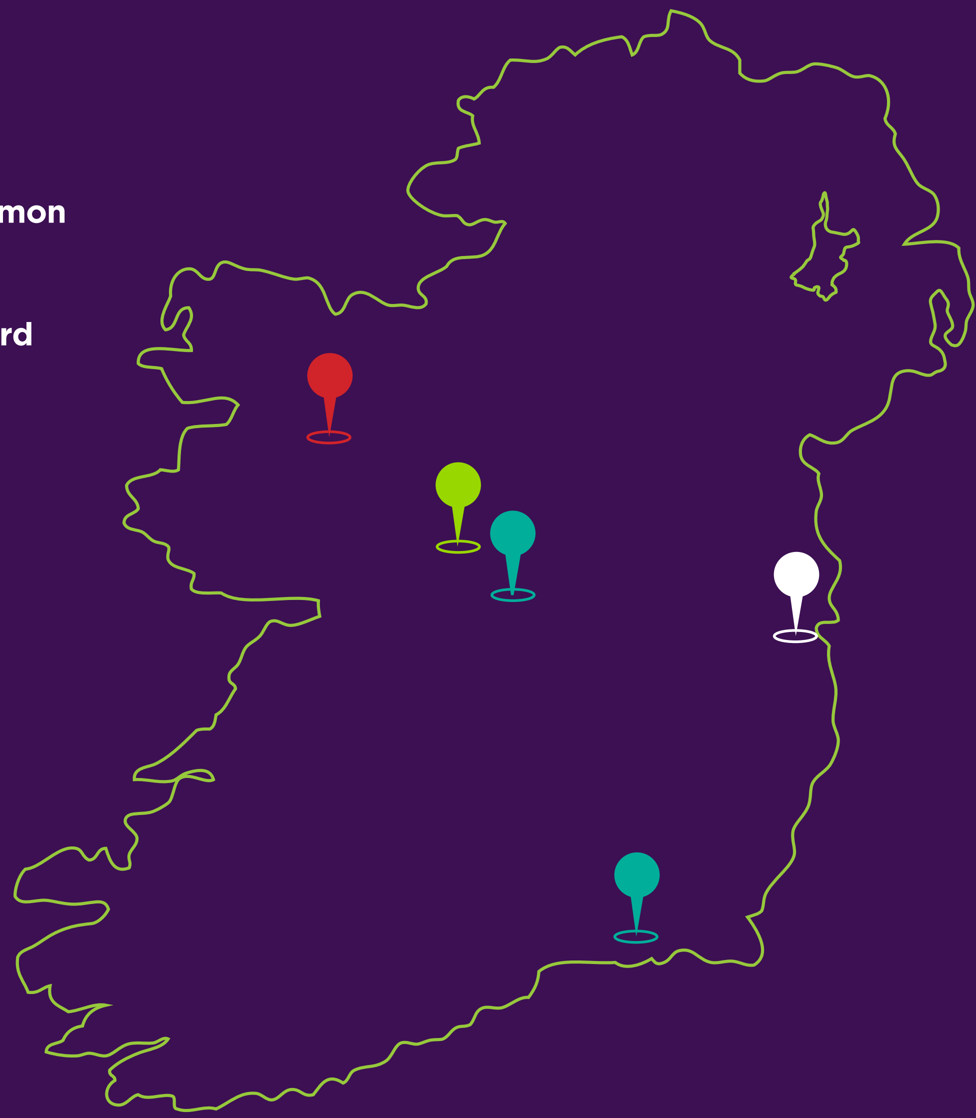
Table A7 **Universal Social Charge (USC)**

Universal Social Charge	2026
Income Thresholds	*Rate*
First €12,012	1%
Next €16,688	2%
Next €41,344	3%
Balance	8%

* There is a surcharge of 3% on individuals who have non-PAYE income that exceeds €100,000 in a year, regardless of age.

RBK Office Locations

- Athlone
- Castlebar
- Dublin
- Roscommon
- Waterford



RBK Office Locations

DUBLIN

Termini,
3 Arkle Road,
Sandyford,
Dublin, D18 C9C5,
Ireland.

Tel: +353 (0)1 6440100

ATHLONE

RBK House,
Irishtown,
Athlone,
Co. Westmeath, N37 XP52,
Ireland.

Tel: +353 (0)90 6480600

ROSCOMMON

RBK House,
Castle Street,
Roscommon,
Co. Roscommon, F42 NR79,
Ireland.

Tel: +353 (0)90 6626750

CASTLEBAR

Breaffy Road,
Castlebar,
Co. Mayo, F23 DY67
Ireland.

Tel: +353 (0)94 9022622