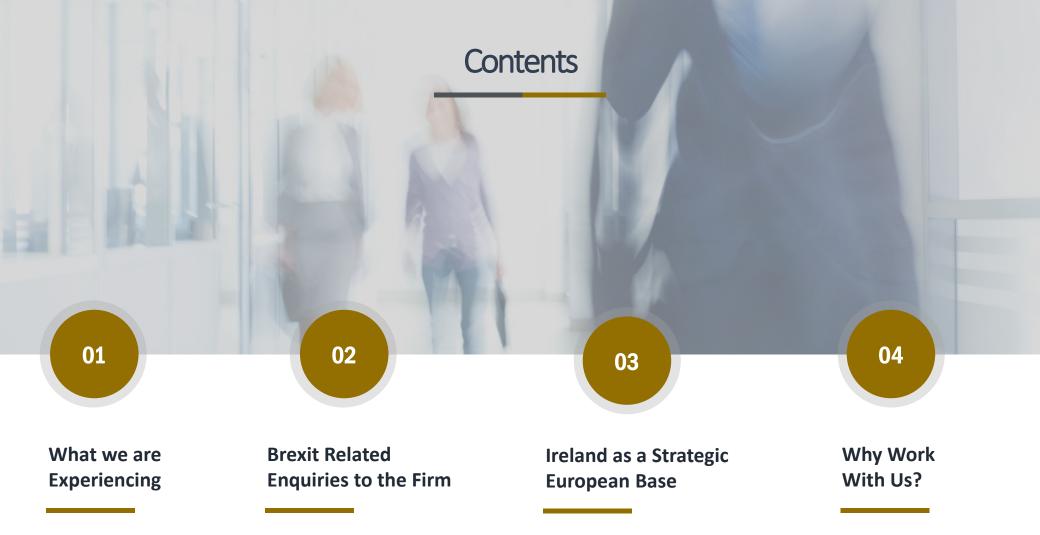


The Brexit Effect

Our views on what Brexit may mean for Irish business



# **UK Based** Companies

Risks associated with the UK's exit from the European Union

UK based companies across all industry sectors are assessing the likely risks that will result from Brexit in the short and long term. Businesses are actively planning and preparing for potential changes to trade and custom regulations and to workforce mobility.

### Trade Concerns



#### Free movement of goods

- Duties
- Tariffs
- VAT

#### **Provisions of Services**

- VAT
- Withholding Taxes

### Workforce Concerns



- Workforce mobility and the free movement of people
- Immigration policies
- Employment taxes

# Brexit Related Enquiries to the Firm

Many companies believe that being positioned in the EU is essential to carrying out business Europe and are therefore considering Irish based companies into their group structures. Enquiries we have received have included:

### A UK Company trading in the UK and throughout Europe

The Company's European business is carried out through a licence/franchise model and is in the receipt of franchise fees from its European franchisees.

The Company plans to continue its UK businesses as normal but wants to protect its European licence/franchise operations from the risks associated with the UK's exit from the European Union. VAT and Withholding Taxes are among the matters of concern for the Company.

We have been asked to advise on the relocation of the European licence/franchise element of the business to Ireland and to provide advice on the qualifying criteria required for the Irish Corporate Tax rate of 12.5% in respect to its European profits.

# A UK Company selling its goods in the UK and throughout Europe

Following the decision of the UK to exit the European Union the Company was concerned about the impact this would have on their business.

The Company is looking for advice in relation to potentially relocating its European Sales Division to Ireland in order to protect it from the risks associated with VAT, duties and tariffs.

Additional advice is also required on future extraction of profits and on the criteria to be met for profits within its new Irish Company to qualify for the Irish Corporate Tax rate of 12.5%.

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# Ireland as a Strategic European Base

Ireland is clearly the obvious location for companies seeking a European base

#### Europe

- Our continued commitment to the European Union
- Our ability to guarantee access to the European market
- The only English speaking country in the Eurozone

#### The UK

- Closest neighbours to the UK
- Similarity between Irish Law and UK Law



### Skilled and mobile workforce

 Availability of multinational and multilingual skilled labour

# Our 'best-in-class' corporation tax regime

- 12.5% Corporate Tax Rate
- 25% R&D Tax Credit
- 6.25% Knowledge Development Box
- **Excellent IP Amortisation** Regime

Crowleys

# Why Work With Us

We always deliver to our promises



### Subject matter experts

Our talented tax people are proven subject matter experts in specialist tax areas including corporate taxation, structuring of tax-based investments withholding taxes and dividends.

## Always available

By having a dedicated team of tax experts we can ensure that we are always on-hand to answer crucial questions at the point when they are needed.

# Reputation through delivery

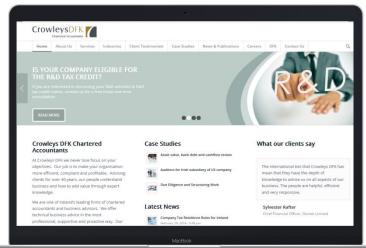
At Crowleys DFK we have built our reputation on our ability to deliver professional services based our promises.

We will work closely with all of your key people to ensure we understand what you need to achieve from our relationship. This will then ensure we always deliver on our promises.

CrowleysDFK

# **Connect** With Us

# www.crowleysdfk.ie











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This publication is intended only as a general guide and should not be used as a substitute for professional advice.

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