

Overview of tax rates on Fund Investments – Individual

Type/location of fund	Report purchase on tax return?	Tax rate on income	Tax rate on sale	Tax rate on death	Liable to USC	Liable to PRSI	CAT/CGT credit
Irish gross fund (non IFSC)	No	33%/36% (section 739E)	36% (section 739E)	36% (section 739B/739E)	No	No	Yes on death [section 739G(5)]
Irish personal portfolio policy	No	56% (section 739E)	56% (section 739E)	56% (section 739B/739E)	No	Yes (income only)	No – tax is income tax
EU/EEA/DTA country located funds*	Yes (section 747C)	33%/36%/41% (section 747D)	36% (section 747E)	36% [section 747B(3)] 56% (section 747E)	No	No PRSI on income or disposals (SI 428 of 2004)	Yes – section 747E(5)
Personal portfolio policy	Yes (section 747C)	56%/74% (section 747D)	56% (section 747E)		No		
All other funds:							
• Non distributing/ other funds	Yes (section 896)	41%	41% [section 745(1)]	41% [section 741(3)]	Yes	Yes	No – income tax
• Distributing funds (Revenue approved)	Yes (section 896)	41%	40% (section 747A)	40% [section 741(3)/747A(3)]	Yes	Yes (income only)	Yes – section 747A(4) CGT
Foreign life policies:							
• EU/EEA etc – normal*	Yes (section 730I)	33%/ 36%/41% (730J)	36% (section 730K(1))	No	No	Both normal and personal portfolio:	Yes – section 730K(5)
– personal portfolio*	Yes (section 730I)	33%/56%/74% (730J)	56% (section 730K)	No	No	No PRSI on income or disposals (SI 428 of 2004)	Yes – section 730K(5)
Other countries – normal	No	41%	40% [section 594(2)] – but cannot be sheltered by CGT losses	40% [section 594(1)(iv)]?	No	Yes- on income only	Yes – CGT payable
Equities	No	41%	33%	None	Yes on income	Yes (income only)	Yes

*The above does not include the rules on pre 93 policies which may be taxed at 40% under section 593.

Overview of tax rates on Fund Investments - Company

Type/location of fund	Report purchase of investment on tax return?	Tax rate on income (deducted by fund)	Tax rate on sale	Gain liable to surcharge?
Irish life policy	No	25%	25% (section 730F) PPIU n/a for company	No
Irish gross fund (non IFSC)	No	25% (section 739E) (may need to be included on CT return as income) [section 739G(2)]	25% (section 739E)	Definitely if relevant payment or tax not deducted by fund section 739G(2)(c) and (f) Probably in all other cases – treated as an “annual payment”
EU/EEA/DTA country located funds	Yes (section 747C)	25% (section 747D)	25% (section 747E)	Yes –as Case IV income (section 747E)
All other funds:				
• Non distributing/other funds	Yes (section 896)	25%	25% [section 745 (1)]	Yes – as Case IV income (section 745)
• Distributing funds (Revenue approved)	Yes (section 896)	25%	40% (section 747A)	No – CGT (on income only)
Foreign life policies:				
• EU / EEA etc – normal	Yes (section 730I)	25% (section 730J)	25% (section 730K(1))	Yes – as Case IV income (section 730K)
– personal portfolio	Yes (section 730I)	25% (section 730J)	25% [section 730K(1)]	Yes – as Case IV income
• Other countries	No	25%	40% [section 594(2)]	No – CGT
Equities	No	25%	33%	No