ELYSIUM WEALTH ADVISORS

GROUP OF COMPANIES

RESIDENCE · BUSINESS · TAX

MOVING TO IRELAND

Residence, company formation and taxation for non-EU citizens

CLIENT GUIDE

Updated 25 August 2026

For non-EU citizens, internationally mobile families and business owners

Executive overview

A non-EEA national may generally incorporate and own an Irish company, but company ownership does not by itself provide permission to live or work in Ireland. The immigration route, corporate structure and personal extraction strategy must be planned together.

> **KEY PRINCIPLE** Irish company law and Irish immigration law operate independently. A person can own shares or hold a directorship without acquiring an Irish residence right.

At a glance

Question	General position
Can a non-EEA national own an Irish LTD?	Yes. Foreign ownership is generally permitted.
Does incorporation grant residence?	No. A separate immigration permission is required.
Can the owner work in Ireland?	Only if the person holds a permission allowing that work or business activity.
Can a Stamp 0 holder manage the company?	Normally no. Stamp 0 generally prohibits work, business, trade and professional activity.
Can an entrepreneur use STEP?	Potentially, if the proposal is innovative, adequately funded and capable of international growth.
Main company tax rate?	12.5% on qualifying active trading profits; 25% generally applies to non-trading income.

Who this guide is for

- Non-EEA founders planning to relocate to Ireland and build an Irish business.
- International entrepreneurs who want an Irish company but may continue living abroad.
- Financially independent individuals considering Stamp 0 alongside passive company ownership.
- Families assessing employment, study or family-reunification routes.

Important terminology

Irish immigration guidance generally refers to “non-EEA nationals” rather than simply “non-EU citizens”. The EEA comprises the EU Member States, Iceland, Liechtenstein and Norway. Switzerland has separate arrangements. British citizens are outside the EU but retain special rights in Ireland through the Common Travel Area.

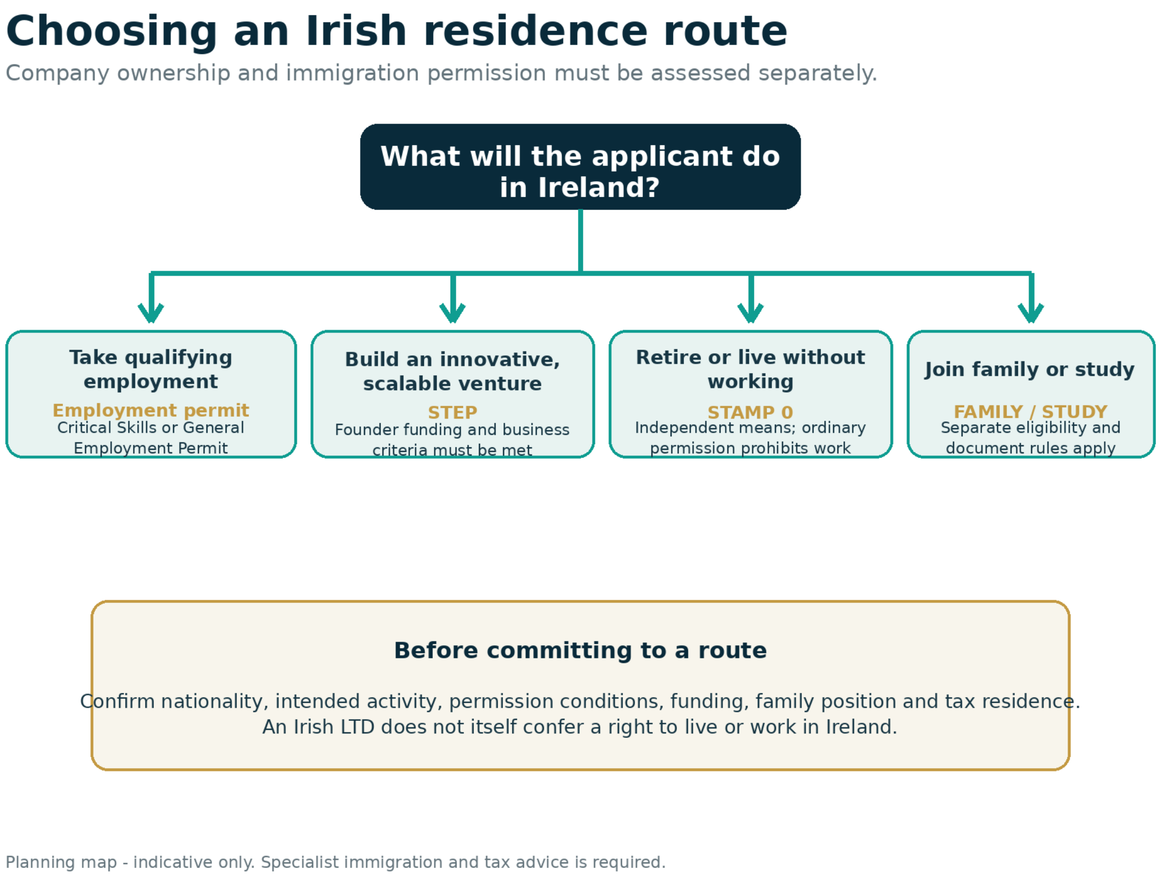

Figure 1. Indicative residence-route decision map.

1. Main routes to Irish residence

The correct route depends on nationality, intended activity, qualifications, family relationships, funding and whether the individual will work in Ireland.

Employment permits

For many applicants, employment is the most practical route. A genuine Irish job offer and an eligible employment permit are usually required before commencing work.

Route	Typical features	Residence implications
Critical Skills Employment Permit	Eligible high-skill occupation, qualifying remuneration and normally a two-year job offer.	Designed to support longer-term residence; a later Stamp 4 may be available.
General Employment Permit	Eligible occupation, remuneration requirements and often a Labour Market Needs Test.	Tied more closely to the qualifying employment and permit conditions.
Intra-Company Transfer	Transfer of qualifying senior management, key personnel or trainees from a connected overseas entity.	Temporary permission linked to the group assignment.

OWNER-MANAGED COMPANY A newly formed company cannot automatically sponsor its founder. The authorities will examine the genuine employer-employee relationship, role, salary, ownership and control, business substance, workforce ratio and ability to pay.

Family reunification

A qualifying person may apply to join an Irish, EEA/Swiss, British or lawfully resident non-EEA family member. Requirements can include proof of relationship, sponsor eligibility, income thresholds, suitable accommodation, private medical insurance and, for adult relatives, evidence of dependency.

Study

A non-EEA student generally needs acceptance on an eligible full-time daytime programme, sufficient funds, course fees and private medical insurance. Student permission is temporary and is not equivalent to permanent residence. For one academic year, official guidance generally requires immediate access to at least €10,000 for living costs, in addition to fees, with equivalent funding available for later years.

British citizens

Although British citizens are no longer EU citizens, the Common Travel Area allows them to live and work in Ireland without an Irish employment permit or residence visa. Different rules apply to their non-EEA family members.

2. Retirement and independent means: Stamp 0

Stamp 0 may be available to a financially independent person wishing to retire or live in Ireland without working. Approval should be obtained before moving to Ireland.

Indicative financial and supporting requirements

- Individual annual income of approximately €50,000.
- Access to a substantial lump sum for major unforeseen expenses. Official guidance indicates a sum comparable to the cost of a residential dwelling in Ireland.
- Financial evidence verified by an Irish-based accountancy firm.
- Comprehensive private medical insurance with full private-hospital cover.
- Police clearance certificate and health declaration.
- Full financial self-sufficiency without reliance on Irish State benefits or publicly funded services.

BUSINESS RESTRICTION Stamp 0 normally prohibits employment, self-employment and engagement in a business, trade or profession unless the permission letter expressly provides otherwise.

Passive ownership versus active management

Activity	Likely position under ordinary Stamp 0 conditions
Holding shares as an investment	Potentially possible, subject to the permission and tax advice.
Receiving investment returns	Potentially possible, with Irish and cross-border tax consequences.
Managing daily operations	Normally prohibited.
Providing services to the company	Normally prohibited.
Drawing salary or director fees for work	Normally inconsistent with Stamp 0.
Acting only as a passive investor	May be possible, but the facts and permission wording should be reviewed.

Long-term residence caution

Stamp 0 is temporary and does not normally count toward Ireland's employment-permit-based Long Term Residency scheme. Immigration residence, long-term residence, citizenship residence and tax residence are separate tests.

3. Start-up Entrepreneur Programme (STEP)

STEP is the principal residence route designed for non-EEA founders establishing an innovative, high-potential business in Ireland. Incorporating an ordinary company is not enough; the business proposal itself must qualify.

Core requirements

- At least €50,000 of available funding for the first founder, with additional funding requirements where relevant for additional founders.
- An innovative business proposal with potential for international markets and significant growth.
- Evidence that the founder has the skills and experience to execute the plan.
- Good character and no disqualifying criminal convictions.
- Financial self-sufficiency and appropriate private medical insurance.
- A commitment to establish the approved business and work in it full-time.

What STEP is intended to support

More likely to fit STEP	Generally less likely to fit STEP
Innovative technology or intellectual-property-led venture	Ordinary local consultancy
Product or service with international market potential	Retail shop or local personal services
Scalable model with credible employment potential	Restaurant, catering or conventional hospitality business
Strong founder capability and documented funding	Passive property or investment-holding vehicle

CONDITION OF PERMISSION A successful applicant must establish the business described in the STEP application, work on it full-time and must not take unrelated employment.

Recommended application evidence

- Detailed business plan, market analysis and commercialisation strategy.
- Funding evidence and source-of-funds documentation.
- Founder CV, qualifications and relevant track record.
- Financial forecasts, hiring plan and Irish economic rationale.
- Intellectual property, prototype, client validation or investor evidence where available.

4. Establishing an Irish private limited company

The usual vehicle is a private company limited by shares, commonly called an LTD. It has separate legal personality and shareholders' liability is generally limited to unpaid amounts on their shares.

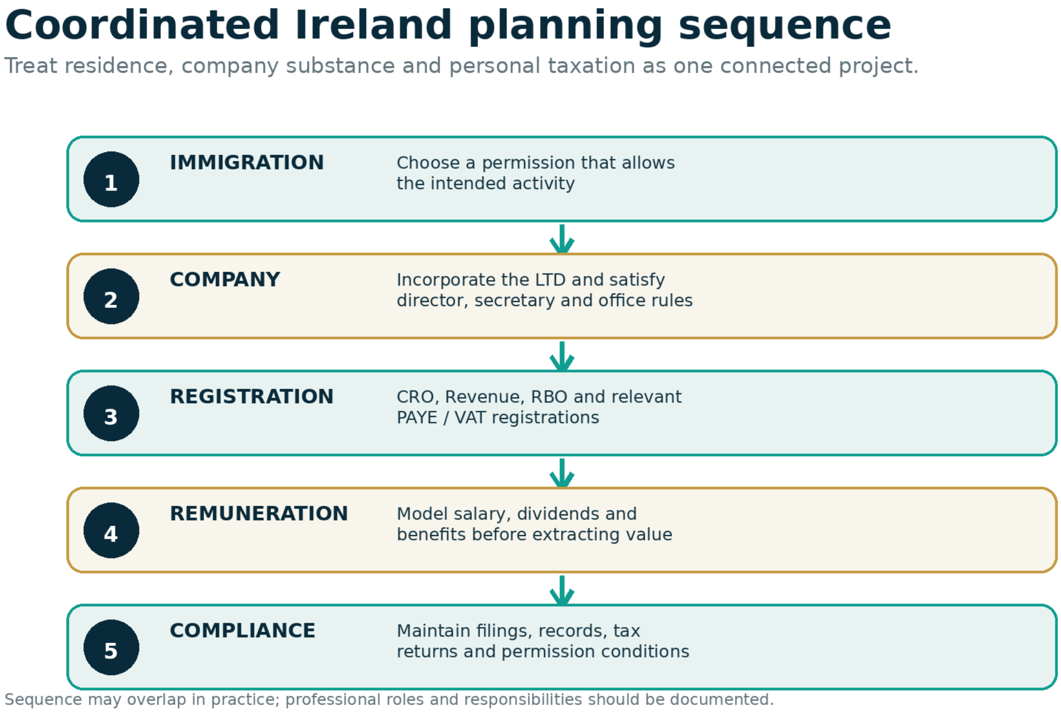

Figure 2. Coordinated implementation sequence.

Core formation requirements

Requirement	Practical point
Company name	Must be acceptable to the Companies Registration Office (CRO).
Constitution	An LTD uses a one-document constitution and may conduct any lawful business.
Shareholder	One shareholder is permitted; non-EEA ownership is generally possible.
Director	At least one director aged 18 or over.
Company secretary	Required. If the LTD has only one director, the secretary must be a different person.
Registered office	A physical registered office address in Ireland is required.
Business activity	The principal activity and relevant classification must be stated.
Beneficial ownership	The company must maintain and file beneficial-owner information.

EEA-resident director requirement

An Irish company should normally have at least one director resident in an EEA State. If it has no EEA-resident director, it will generally need a Section 137 bond. A later exemption may be possible where the company obtains certification of a real and continuous economic link with Ireland.

> **UK DIRECTORS** A UK-resident director does not satisfy the EEA-resident-director requirement following Brexit, although British citizens have separate immigration rights in Ireland.

Registration and ongoing obligations

1. File the incorporation application and constitution with the CRO.
2. Obtain the CRO number and register the company with Revenue.
3. Register for Corporation Tax and, where relevant, PAYE, VAT and Relevant Contracts Tax.
4. Register beneficial ownership within the applicable deadline; current RBO guidance states within five months of incorporation.
5. Maintain accounting records, file annual CRO returns and submit tax returns through ROS.

5. Company taxation

An Irish-incorporated company is generally regarded as Irish tax-resident unless a relevant double-taxation agreement treats it as resident elsewhere. Management, control and cross-border operations require specialist analysis.

Principal company tax rates

Income or gain	Indicative 2026 treatment
Qualifying active trading profit	12.5% Corporation Tax
Non-trading income, including most rental and investment income	25% Corporation Tax
Most chargeable gains	Effective rate generally equivalent to 33%
In-scope large multinational groups	Pillar Two minimum effective rate of 15% may apply

Trading-profit illustration

Calculation	Amount
Taxable active trading profit	€100,000
Corporation Tax at 12.5%	€12,500
After-tax profit retained or available for lawful distribution	€87,500

If the €87,500 remains in the company, the shareholder does not normally pay personal Income Tax merely because the company earned the profit. Personal taxation generally arises when value is extracted as salary, dividends, benefits, loans or another distribution.

Close-company surcharges

Many owner-managed companies are “close companies”. Additional surcharges can apply to certain undistributed investment, estate or professional-service income. This is particularly relevant to consultancy and professional-service companies that retain profits.

> **PLANNING POINT** The 12.5% trading rate should not be presented as the owner’s final tax rate. Personal tax may arise when profits are extracted, and special surcharges can apply to retained income.

6. Personal Income Tax, USC and PRSI

The following rates illustrate the position for 2026. The final liability depends on residence, domicile, marital status, other income, available credits, social-insurance classification and treaty relief.

Income Tax bands

Taxpayer category	20% standard-rate band	Balance
Single person	First €44,000	40%
Married/civil partners - one income	First €53,000	40%
Married/civil partners - two incomes	€53,000 plus the lower of €35,000 or lower earner’s income	40%

Common 2026 tax credits

Credit	Maximum
Single Person Tax Credit	€2,000
Married/Civil Partner Tax Credit	€4,000
Employee Tax Credit	€2,000
Earned Income Tax Credit	€2,000

A proprietary director’s entitlement to the Employee or Earned Income Tax Credit depends on the facts. A person controlling directly or indirectly more than 15% of the company is generally treated as a proprietary director for tax-return purposes.

Universal Social Charge (USC)

2026 income band	USC rate
First €12,012	0.5%
Next €16,688	2%
Next €41,344	3%
Balance above €70,044	8%

Where total income does not exceed €13,000, the individual is generally exempt from USC. If income exceeds that threshold, USC normally applies to the full amount under the relevant bands. PRSI may apply separately according to the person’s classification and circumstances.

7. Salary and dividends

Owner-directors commonly extract value through salary, dividends, employer pension contributions or a combination. Each route has different company, personal tax, cash-flow and immigration consequences.

Salary

- Normally deductible in calculating company trading profit where incurred wholly and exclusively for the trade and commercially supportable.
- Subject to PAYE Income Tax, USC and the appropriate PRSI treatment.
- Must be processed through payroll; employer PRSI may be an additional company cost.
- Creates earned remuneration that may support pension planning, subject to applicable rules.

Illustrative €50,000 salary

Calculation	Approximate amount
Gross salary	€50,000
Income Tax before credits	€11,200
Illustrative credits	(€4,000)
Income Tax	€7,200
USC	Approximately €1,033
Net before PRSI	Approximately €41,767

This illustration assumes a single person, no other income and both the €2,000 Personal Tax Credit and €2,000 Employee Tax Credit. The credit and PRSI position must be confirmed for the particular director.

Dividends

- Paid from distributable profits remaining after Corporation Tax.
- Not deductible when calculating company trading profit.
- Irish resident companies normally withhold Dividend Withholding Tax at 25%.
- An Irish-resident shareholder declares the gross dividend and receives credit for tax withheld.
- Income Tax, USC and potentially PRSI can apply at the shareholder's marginal rates.

8. Combined company and shareholder illustration

This simplified example shows the potential combined tax where all after-tax trading profit is distributed to a single Irish-resident shareholder. It is not a recommendation or personal tax calculation.

Stage	Approximate amount
Company taxable trading profit	€100,000
Corporation Tax at 12.5%	(€12,500)
Gross dividend available	€87,500
Personal Income Tax after assumed €2,000 Personal Tax Credit	(€24,200)
USC	(€3,031)
Illustrative PRSI at 4.1%	(€3,588)
Approximate net amount retained personally	€56,681

EFFECTIVE RESULT On these assumptions, combined company and personal taxes are approximately €43,319, or 43.3% of the original €100,000 company profit.

How Dividend Withholding Tax fits

The company would initially withhold €21,875, equal to 25% of the €87,500 gross dividend. This withholding is credited against the shareholder’s final Income Tax liability; it is not an additional tax on top of the calculation above. The shareholder may need to pay a balancing amount through the tax-return system.

Salary versus dividend comparison

Salary	Dividend
Normally deductible for the company	Not deductible for the company
PAYE, USC and PRSI may apply	Income Tax, USC and potentially PRSI apply
Employer PRSI may apply	25% Dividend Withholding Tax normally applies
Requires payroll reporting	Requires distributable reserves and corporate approval
May support pension contribution planning	Does not constitute pensionable salary

9. Recommended planning sequence

The sequence matters. Incorporating first and addressing immigration later can create a company that the founder is not legally permitted to operate in Ireland.

1. Confirm nationality and whether an Irish entry visa or preclearance is required.
2. Identify the immigration route before committing to relocation, employment or business activity.
3. Test whether STEP is realistic or whether an employment, family or other permission is required.
4. Define ownership, directorship, company-secretary and EEA-resident-director arrangements.
5. Prepare the business plan, funding evidence, source-of-funds file and operating forecast.
6. Incorporate through the CRO and complete Revenue and beneficial-ownership registrations.
7. Agree a compliant remuneration and pension strategy with Irish tax advisers.
8. Review personal and company residence, treaty exposure and continuing obligations in other countries.
9. Register the individual's immigration permission after arrival where required and comply with its conditions.

Documents commonly required

Immigration and personal	Company and commercial
Passport and civil-status documents	Company constitution and CRO filings
Police clearance and health evidence	Business plan and financial forecasts
Private medical insurance	Funding and source-of-funds evidence
Proof of income, funds and accommodation	Director, secretary and registered-office details
Employment, family or study evidence	Revenue, payroll, VAT and RBO registrations

DO NOT RELY ON INCORPORATION A CRO certificate proves that the company exists. It does not prove that a non-EEA founder has permission to enter Ireland, live there, work for the company or manage it.

10. Cross-border and advisory considerations

Tax residence is separate from immigration residence

An Irish immigration permission does not determine the person’s tax residence. Conversely, a person may become Irish tax-resident without holding permanent immigration status. Irish residence, ordinary residence, domicile and double-taxation agreements can affect the final result.

Operating from another country

An Irish company managed from abroad can create dual-residence, permanent-establishment, payroll, social-security and VAT issues. The individual’s home country may also tax salary, director fees, dividends or capital gains. Treaty relief and reporting must be reviewed before trading begins.

Regulated and professional activities

Company registration does not replace professional licences or regulatory permissions. Financial services, insurance, legal work, healthcare, recruitment and other regulated activities may require separate Irish or EU authorisation.

Questions to resolve before proceeding

- What is the applicant’s nationality and current country of tax residence?
- Will the person work actively in Ireland or remain a passive shareholder?
- Is the proposed venture genuinely innovative and internationally scalable?
- How much funding is available and can its source be documented?
- Who will serve as director, secretary and EEA-resident director?
- Will profits be retained, paid as salary, contributed to pension arrangements or distributed as dividends?
- Does the person have continuing tax, company or social-security exposure elsewhere?

> **PROFESSIONAL REVIEW** Immigration, corporate, tax and regulatory advice should be coordinated. A structure that works for tax may not satisfy immigration conditions, and an immigration route may restrict the intended company role.

About the Founder - Gary Day

Founder and Senior Wealth Advisor

A DISCIPLINED INTERNATIONAL PERSPECTIVE Gary combines military discipline with decades of experience helping internationally mobile clients navigate cross-border financial decisions.

Gary Day is the Founder and a Senior Wealth Advisor at Elysium Wealth Advisors, bringing over 25 years of international financial-services experience across the United Kingdom, Europe and the Middle East.

Gary began his professional career in the British Army before moving into financial services in 1990. That background shaped the disciplined, structured and analytical approach that continues to underpin his work in wealth advisory and financial planning.

He has held senior advisory and leadership roles within FCA-regulated firms in the UK and has extensive experience advising expatriates, internationally mobile professionals and high-net-worth individuals. His work focuses on bringing clarity and coordination to complex, multi-jurisdictional financial arrangements.

Core areas of expertise

- Cross-border financial planning
- Estate and succession planning, including UAE wills
- Pension structuring and transfers
- Investment portfolio design and analysis
- Individual and corporate protection planning

Professional qualifications and specialist education

PROFESSIONAL QUALIFICATIONS	Level 4 Diploma in Financial Services; Financial Planning Certificate; CF2 Investment and Risk.
SPECIALIST ADVICE	Mortgage Advice; Equity Release; Long-Term Care; Level 6 Award in Pension Transfers.
INVESTMENT & MARKETS	Hedge Funds, Equity Portfolio Management and Fixed Income Portfolio Management - New York Institute of Finance.
INTERNATIONAL STUDY	Programmes through KU Leuven, HarvardX and the IMF, together with specialist Islamic banking, insurance and investment certifications.

Gary regularly works with clients across the EU, the UAE and other international markets, supporting Elysium Wealth Advisors' commitment to bespoke, client-centred planning.

Gary Day

Founder and Senior Wealth Advisor

A DISCIPLINED INTERNATIONAL PERSPECTIVE

Gary combines military discipline with more than 25 years of international financial-services experience, supporting internationally mobile clients with structured cross-border planning.

Founder profile | Elysium Wealth Advisors Group of Companies

Official sources and further information

Immigration Service Delivery - Coming to live in Ireland

Immigration Service Delivery - Retiring to Ireland / Stamp 0

Immigration Service Delivery - Start-up Entrepreneur Programme

Immigration Service Delivery - Immigration permission stamps

Department of Enterprise - Employment permits

Companies Registration Office - Registering a company

Companies Registration Office - Directors and secretaries

Register of Beneficial Ownership

Revenue - Corporation Tax basis of charge

Revenue - 2026 personal tax rates, bands and reliefs

Revenue - 2026 USC rates

Revenue - Dividend income

Important notice

This guide provides a general overview based on official information available on 25 August 2026. It is not legal, immigration, tax, accounting, investment or regulatory advice. Rules, thresholds and administrative practices may change, and individual outcomes depend on facts not covered here. No action should be taken without advice from appropriately qualified Irish immigration, legal and tax professionals. Elysium Wealth Advisors does not warrant that an application will be approved or that a particular tax treatment will apply.

About this guide

Prepared as a client education document by Elysium Wealth Advisors Group of Companies. The guide is designed to support an initial professional discussion and should be supplemented by a written, case-specific assessment.

WhatsApp contacts

To arrange an initial discussion, contact Elysium Wealth Advisors using the most convenient regional WhatsApp number:

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