Ireland; Liechtenstein

Ireland and Liechtenstein Initial Tax Treaty

23 February 2024

Report from IBFD Tax Treaties Unit

On 21 February 2024, Ireland and Liechtenstein initialled an income and capital tax treaty. The new treaty is in line with the latest international standards, following the OECD/G20 Base Erosion and Profit Shifting (BEPS) recommendations.

Within the treaty, in order to promote cross border investment, dividends (except for real estate investment trusts (REITs), interests and royalties are exempt from withholding tax. The treaty also covers the treatment of pension funds, investment funds, asset structures and non-profit organizations. Furthermore, the treaty contains an arbitration clause for complicated double taxation cases. The exchange of information will continue to take place under the Protocol to the 2004 Savings Directive Agreement (2015). The treaty contains a provision on enforcement assistance in the collection of taxes as well. Further developments will be reported as they occur.

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