



# KEY FEATURES OF THE IRISH ICAV

## WHAT IS THE ICAV?

The Irish Collective Investment Vehicle (“ICAV”) is a new form of collective investment vehicle, introduced in March 2015. It is a corporate vehicle for both UCITS and Alternative Investment Funds (AIFs). It sits alongside existing fund structures - Unit Trusts, Common Contractual Funds, Investment Limited Partnerships and Part XIII Investments Companies.

The ICAV is governed by bespoke legislation designed specifically with the needs of investment funds in mind. A fund established as an ICAV is not impacted by amendments to certain pieces of European and domestic company legislation that are targeted at trading companies rather than investment funds.

The ICAV benefits from the same favourable tax treatment applicable to other corporate funds and unit trusts, but with the added advantage of being able to “check-the-box” for US tax purposes.

## KEY FEATURES OF THE ICAV

- HAY 7YbhfU 6Ub\_ jg Vch hAY fY [jghU]cb UbX hAY g dYfj jgcfmUi hcf]hmZcf hAY 75J
- HAY 75J \Ug jhg ck b`Y [jgUh] Y fY [ja Y k \]W Ybg fYg hUh jh jg bch ja dUWYX Vm Vta dUbm Uk WUb [YgXYg] [bYX Zcf cfX] bUfmVta dUb]Yg
- 5b 75J a UmVY YghUW jgYX Ug Ub i a VFY U ghfi Vfi fY k jh U bi a VFY cZ g VI Z bXg UbX gUFY WUggYg 5b i a VFY U 75J \Ug gY [fY [UhYX ]UW] ]hm VYk Yyb g VI Z bXg h jg dgg]VY hc dYdUFY gYdUFUHY UWti bhg Zcf YUW g VI Z bX

- HAY Yghcfj ck b`g UfYg jh hAY 75J UbX hAY 75J jg UVY hc jgg Y UnX fYXYa gUFYg Vtbh]bi U`miUWtfX]b [hc] bj Yghcf XYa UbX Hli g` hAY 75J jg bc X]ZZYfYbh hc ch Yf cdYb! YbXYX Vt`YVW]j Y ]bj Ygha Ybh]gWYa Yg` hAY 75J a UmUgc VY YghUW jgYX Ug U WcgYX YbXYX gWYa Yz g V`VW]hc 7YbhfU 6Ub\_ fYei jfYa Ybh]fY [UfX]b [ WcgYX! YbXYX Z bXg
- HAY 75J \Ug U [cj Yfb]b [ XcW a Ybh\_ bck b` Ug Ub Hghfi a Ybh cZ HbVtdcfU]cb f] E` E` HAY E` = jg hAY Vtbh]h h]cbU XcW a Ybh cZ hAY 75J z` gja ]Uf hc hAY AYa cfUbXi a UbX 5fh]WYg cZ 5ggcVW]cb cZ Ub Hj Ygha Ybh]ca dUbm
- HAY 75J a i gh \Uj Y U VcUfX cZ X]fYVWcfj hc [cj Yfb ]hg UZZU]fg` k ]h U`fYei jfYa Ybh Zcf U`a ]b]a i a cZ hk c` X]fYVWcfj
- HAY VcUfX cZ X]fYVWcfj cZ Ub 75J a UmX]gdYbgY k ]h hAY \c`X]b [ cZ Ub Ubbi U` [YbYfU a Yfh]b [ Vm [ ]j ]b [ k f] hYb bch]W hc U` cZ hAY 75J jg gUFY \c`XYfg
- 5b 75J jg bch fYei jfYX hc gdfYUX f]g` z` i b` ]Y Ub ]bj Ygha Ybh]Vta dUbm
- 5b 75J a UmVY` ]ghYX cb U`ghcW` YI WUb] Y`

## TAXATION OF THE ICAV

ICAVs are subject to the same attractive Irish tax regime that applies to other Irish funds, as follows:

- No Irish taxation at fund level.
- 41% exit tax on distributions to Irish investors but no Irish exit tax on distributions to non-Irish or Irish exempt investors (e.g. pension funds).
- 20% IREF tax on distributions derived from Irish property, subject to exemption for certain investor types.
- No transfer taxes on the issue, redemption or transfer of shares.
- Exemption from VAT for many services required by a fund, including fund management services.
- Access to Ireland's double tax treaty network (74 signed, with 73 in effect) minimizing the effect of foreign withholding taxes on returns on its investment.

## IRELAND AS A LOCATION FOR INVESTMENT FUNDS

For more than 25 years, Ireland has been a leading domicile for internationally distributed investment funds, covering the widest range of fund types. International fund promoters are attracted to Ireland due to its open, transparent and well regulated investment environment, its strong emphasis on investor protection, its efficient tax structure and dynamic and innovative business culture.

Did you know:

- Ireland has the largest number of stock exchange listed investment funds. With over 7,000 classes listed, Euronext Dublin is recognised worldwide as the leading centre for listing investment funds. Investment managers from over 40 global locations list their funds on Euronext Dublin.
- Over 40% of global hedge fund assets are services in Ireland, making it the largest hedge fund administration centre in the world and Europe's leading hedge fund domicile.
- Ireland is a leading domicile for exchange traded funds. Irish domiciled ETFs represent approximately 50% of the total European ETF market.

### FOR MORE INFORMATION:



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