	Ireland	UK	France	Switzerland	Luxembourg	Denmark	Sweden	Netherlands	Czech
Healy Consultants preference	**1**	**2**	**3**	**4**	**5**	**6**			
Corporate Structure									
Recommended type of business entity?	Private limited company	Private limited company	SARL	GmbH	SARL	ApS	AB	BV	SRO
How long to incorporate?	1 week	1 week	2 weeks	3 weeks	3 weeks	1 week	2 weeks	3 weeks	4 weeks
Physical office space required	No	No	No	No	No	No	No	Yes	Yes
Minimum number of shareholders?	1	1	1	1	1	1	1	1	1
Minimum paid up share capital of this company?	€1	£1	€1	€18,500	€12,500	€7,000	€5,000	€1	€1
Preference shares allowed?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Minimum number of directors?	1	1	1	1	1	1	2	1	1

	Ireland	UK	France	Switzerland	Luxembourg	Denmark	Sweden	Netherlands	Czech
Resident director required?	Yes	No	No	Yes	Yes	No	No	No	No
Corporate bank account in country of incorporation required?	No	No	Yes	Yes	Yes	Yes	Yes	No	Yes
Recommended corporate bank account location?	Dublin	London	France	Switzerland	Luxembourg	Denmark	Sweden	Amsterdam	Germany
Corporate tax considerations									
Can the holding company also receive trading income?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Standard corporate income tax on trading income?	13%	20%	33.33%	12-24%	21%	22%	22%	25%	19%
Corporation income tax on dividends received from overseas subsidiaries? (Under PE if applicable)	0% (from EU subsidiaries)	0%	2%	0%	0%	0%	0%	0%	0%
Corporate income tax on interest received from overseas?	25%	20%	33%	18% (effective)	21%	22%	22%	25%	19%
Withholding tax on distributed dividends to overseas owners?	20%	0%	30%	35%	15%	27%	30%	15%	15%

	Ireland	UK	France	Switzerland	Luxembourg	Denmark	Sweden	Netherlands	Czech
Non black-listed jurisdiction?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Number of double taxation avoidance agreements signed?	72	125	123	80	75	75	80	95	70
Links to list of DTAAS?	link	link	link	link	link	link	link	link	link
Mandatory to file annual financial statements?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Mandatory annual audit for company?	No	No	No	No	No	No	No	No	No
Threshold for VAT registration?	€75,000	€100,000	None	€90,000	None	€7,000	None	None	€40,000
IP box regime	Yes	Yes	Yes	Yes	Yes	No	No	Yes	No
CFC rules	No	Yes	Yes	No	No	Yes	No	No	Yes
Thin Capitalization rules	No	Yes	Yes	Yes	No	Yes	Yes	No	No

	Ireland	UK	France	Switzerland	Luxembourg	Denmark	Sweden	Netherlands	Czech
Holding company regime considerations									
Holding company regime in this country?	Yes	Yes	Yes	Yes	Yes	Yes	Yes (if the investment is not passive)	Yes	Yes (treaty countries)
Reduced corporate income tax rate under the regime?	Yes	Yes	Yes	Yes	Yes	Yes	Yes (if the investment is not passive)	Yes	Yes (treaty countries)
Can hire local employees?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Can rent a local office?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Can have local sales?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Minimum ownership of subsidiary for holding regime eligibility for PE applicability?	5%	10%	5%	10%	10%	10%	10%	5%	10%
How long must subsidiary be owned for participation exemption?	1 year	1 year	2 years	1 year	1 year	1 year	1 year	1 year	1 year
Must show subsidiary's tax return?	No	No	No	No	No	No	No	No	No

	Austria	Belgium	Belarus	Bulgaria	Cyprus	Hungary	Latvia	Lithuania	Malta	Slovakia
Corporate Structure										
Recommended type of business entity?	GmbH	SPRL	Private limited company	OOD	LLC	KFT	SIA	UAB	LLC	SRO
How long to incorporate?	5 weeks	2 weeks	4 weeks	2 weeks	2 weeks	2 weeks	2 weeks	2 weeks	2 weeks	2 weeks
Physical office space required	No	Yes	No	No	No	No	No	No	No	No
Minimum number of shareholders?	1	1	1	1	1	1	1	1	2	1
Minimum paid up share capital of this company?	€5,000	€6,200	€1	€1	€1	€5,000	€1	€2,500	€233	€2,500
Preference shares allowed?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Minimum number of directors?	1	1	1	1	1	1	1	1	1	1
Resident director required?	No	No	No	No	No	No	No	No	No	No

	Austria	Belgium	Belarus	Bulgaria	Cyprus	Hungary	Latvia	Lithuania	Malta	Slovakia
Corporate bank account in country of incorporation required?	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Recommended corporate bank account location?	Austria	Brussels	Germany	Bulgaria	London	Hungary	Latvia	Lithuania	Malta	Slovakia
Corporate tax considerations										
Can the holding company also receive trading income?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Standard corporate income tax on trading income?	25%	33%	18%	10%	12.5%	10% / 19%	15%	15%	35%	22%
Corporation income tax on dividends received from overseas subsidiaries? (Under PE if applicable)	0%	2%	12%	0%	0%	0%	0%	0%	0%	0%
Corporate income tax on interest received from overseas?	25%	33%	18%	10%	30%	10% / 19%	15%	15%	35%	22%
Withholding tax on distributed dividends to overseas owners?	28%	27%	12%	5%	0%	companies -0% / individuals-15%	0%	15%	0%	0%

	Austria	Belgium	Belarus	Bulgaria	Cyprus	Hungary	Latvia	Lithuania	Malta	Slovakia
Non black-listed jurisdiction?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Number of double taxation avoidance agreements signed?	90	90	70	60	58	77	58	53	71	65
Links to list of DTAAS?	link	link	link	link	link	link	link	link	link	link
Mandatory to file annual financial statements?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Mandatory annual audit for company?	No	No	No	No	No	No	No	No	No	No
Threshold for VAT registration?	€ 30,000	€25,000	All amounts	€25,000	€15,600	All amounts	€50,000	€45,000	€14,000	€50,000
IP box regime	No	Yes	No	No	Yes	Yes	No	No	Yes	No
CFC rules	No	No	No	No	No	Yes	No	Yes	No	No
Thin Capitalization rules	No	Yes	Yes	Yes	No	Yes	Yes	Yes	No	Yes

	Austria	Belgium	Belarus	Bulgaria	Cyprus	Hungary	Latvia	Lithuania	Malta	Slovakia
Holding company regime considerations										
Holding company regime in this country?	Yes	Yes	No	Yes (EU only)	Yes	Yes	Yes	No	Yes	Yes (treaty countries)
Reduced corporate income tax rate under the regime?	Yes	Yes	No	Yes (EU only)	Yes	Yes	Yes	No	Yes	Yes (treaty countries)
Can hire local employees?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Can rent a local office?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Can have local sales?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Minimum ownership of subsidiary for holding regime eligibility for PE applicability?	10%	10%	No	No	10%	10%	10%	10%	10%	No
How long must subsidiary be owned for participation exemption?	1 year	1 year	No	No	1 year	1 year	1 year	1 year	6 months	No
Must show subsidiary's tax return?	No	No	No	No	No	No	No	No	No	No

	Austria	Belgium	Belarus	Bulgaria	Cyprus	Hungary	Latvia	Lithuania	Malta	Slovakia