

1. Who are you:

Individual/Business

2. Are you making a submission in relation to the proposals for a:

Designated Withholder (DW)

3. Please tick the sectors that apply to you:

Platform economy

4. After reading about the proposed new eWHT system, how would you describe your overall reaction?

Very negative - I do not support the proposed direction

5. What aspects of the proposed model appeal most to you, and why?

We support the objective of effective tax collection and measures that improve compliance. However, we have significant concerns about the proposed withholding model as currently set out, including the potential to create material friction for self-employed workers and to alter the nature of the platform-worker relationship by inserting real-time tax deductions into the payment experience. However, we would strongly encourage that any new approach is developed in a way that builds on existing, already-implemented EU reporting infrastructure, particularly DAC7. Platforms have recently completed extensive DAC7 implementation work to collect, verify and report seller information and transaction-level consideration in a standardised way. Before introducing a new withholding regime that would materially alter payment flows and create significant new operational dependencies, tax authorities should first make full use of the DAC7 data now available across the EU to assess whether a compliance gap remains, where it sits (for example, among specific cohorts or business models), and what targeted interventions would be most effective. In our view, the best feature of the proposed direction is therefore the potential to leverage existing platform reporting data and digital tools to enhance compliance, provided the approach avoids duplication with DAC7, aligns definitions and data fields where possible, and focuses on evidence of need rather than layering a second, parallel regime by default.

6. What concerns or reservations do you have about the proposed approach?

We have significant reservations regarding the proposed designation of platform operators as withholding agents. In our view, the model, as currently described, risks transferring substantial operational complexity, liability and enforcement risk to intermediaries in a way that may be disproportionate to the incremental compliance gains. Our principal concerns are as follows:

Disproportionate compliance and technology burden on intermediaries: The proposed model would require platforms to integrate real-time withholding into payment flows, including the capability to request, receive and apply Revenue-issued deduction instructions at the point of payment. This introduces a level of technical and operational dependency that is materially more complex than existing reporting obligations and creates new risks to payment reliability. Platforms have recently invested significantly in implementing DAC7 reporting, including building systems to collect, verify and report seller information and consideration data. Introducing an additional regime with different definitions, cadence and operational requirements risks duplication and inconsistency, and would require substantial further build and ongoing compliance resourcing.

Transfer of tax liability and enforcement risk from the State to private entities: Designating platforms as withholding agents shifts the practical burden of collection and compliance from the State onto private intermediaries that do not ultimately earn the underlying income. Where the applicable rate is determined by Revenue, there should be clear protection for platforms that apply Revenue instructions correctly, as well as clarity on the allocation of liability for under-withholding due to incorrect or changing taxpayer circumstances. Without robust safe-harbours and clear correction processes, the proposal risks creating an outcome where platforms are exposed to penalties and disputes for factors outside their control.

Lack of clarity on refunds, credits, cancellations, and error correction: The consultation materials do not yet provide sufficient detail on the treatment of common operational scenarios such as cancellations, partial refunds, fare adjustments, chargebacks, incentives, corrections and end-of-period reconciliation. In platform settings these scenarios arise frequently and can occur days or weeks after the initial transaction. A workable model would require clear rules on (i) when withholding must be reversed, (ii) how adjustments are reflected in the worker's tax position, (iii) how disputes are handled, and (iv) the time limits and process for corrections without creating continuous retrospective liability for the platform.

Cash-flow impacts on sellers, particularly those with high input costs: Many platform workers, including in transport, incur substantial ongoing costs (fuel, insurance, vehicle finance, maintenance and regulatory compliance). A withholding model applied to gross receipts, without a reliable and timely mechanism to reflect legitimate business expenses, risks reducing net cash availability during the year

and may create financial strain, particularly for those on lower margins. This could have unintended behavioural impacts (including incentives to seek off-platform work or reduce platform activity), and may increase support burden and disputes where workers perceive deductions as inaccurate or opaque. Enforcement and under-collection risk where non-resident platforms fail to remit withheld tax: We are concerned that the proposal may not achieve its stated aims where non-resident platforms do not comply, or where enforcement against entities without a clear Irish presence is difficult. If compliance is uneven, the model risks creating an unlevel playing field, penalising compliant operators and potentially driving activity to less compliant providers. It would be important to understand how Revenue intends to ensure consistent compliance across resident and non-resident operators and how the model would prevent under-collection arising from non-remittance. Potential adverse impact on Ireland's competitiveness as a platform-friendly jurisdiction: Ireland has benefited from being an attractive location for digital and platform businesses. A regime that is operationally complex and creates real-time dependencies may reduce Ireland's competitiveness relative to other jurisdictions, particularly if comparable measures are not introduced consistently across the EU. This concern is amplified if the Irish model diverges from DAC7 definitions and processes, as platforms that operate across multiple EU markets would need to build and maintain Ireland-specific payment and reporting logic. Risk of blurring the distinction between self-employed platform work and PAYE employment: The proposed model risks creating a PAYE-like user experience for self-employed individuals, even where the underlying legal relationship is that of independent contracting. We are concerned this may generate confusion for workers and counterparties and could be interpreted, in practice, as a signal about employment status. Any eWHT regime should therefore be designed and communicated explicitly as a tax collection mechanism only, and should not be treated as determinative or indicative of employment status for any other legal or regulatory purpose. Revenue should provide clear guidance confirming that a platform's role as a designated withholder does not, of itself, imply an employer-employee relationship or change the application of existing employment status tests. It is also important that any approach preserves the flexibility that many self-employed workers rely on, including the ability to work across multiple platforms and sources of income without friction or unintended barriers. In summary, in its current form, the proposal risks introducing complexity and risk that outweigh the intended benefits. We would encourage Revenue and the Department of Finance to (i) make fuller use of DAC7 data to evidence the scale and nature of any compliance gap, (ii) consider more targeted interventions where gaps are identified, and (iii) if proceeding with withholding, ensure robust safe-harbours, clear rules for adjustments and reversals, and strong alignment with existing DAC7 definitions and reporting fields to minimise duplication and mismatch. We also encourage Revenue to explore alternative

withholding points, such as regulated Irish banks or payment institutions, which may better align responsibility with control of funds and reduce enforcement and operational risk.

7. The proposed eWHT model seeks to expand withholding tax to payments to service providers where a suitable withholder exists. How do you feel generally about this type of expansion?

We understand the policy rationale for withholding mechanisms in circumstances where there is a clear and stable withholding point and where the withholder is appropriately placed to administer deductions, handle adjustments, and manage the associated compliance obligations. However, we do not consider it proportionate to extend withholding obligations to intermediaries that merely facilitate transactions and payments between third parties. Platform operators are not generally well placed to act as withholders in the same way as employers or regulated financial institutions. Platforms often facilitate high volumes of low-value transactions, operate multi-sided models with frequent adjustments (for example cancellations, refunds, chargebacks and incentives), and do not have full visibility of a service provider's broader tax position. Introducing withholding at the platform level would materially change payment flows, create significant real-time operational dependencies, and transfer compliance risk and potential liability to entities that are not the underlying taxpayer. If the objective is to identify a suitable withholder, a more appropriate route would be to focus on actors that are already structured and regulated to perform withholding functions, such as banks and other regulated payment institutions, or to apply targeted withholding only where a clear compliance gap has been evidenced. Any expansion should therefore be grounded in evidence of need, minimise duplication with existing DAC7 reporting, and avoid imposing disproportionate burdens on payment facilitators.

8. In relation to PSWT specifically, this currently applies to payments made by state and semi-state bodies for certain services. Do you have a view on how it is targeted and if the types of payments it applies to should be reviewed?

Bolt does not have a specific view on the targeting of PSWT, as it applies to payments by state and semi-state bodies. We would note, however, that PSWT illustrates the importance of clear scoping and limiting withholding obligations to entities that are appropriately placed to administer them.

9. Please indicate if you currently operate:

10. From the perspective of a DW, how does the current application of PSWT and/or RCT impact on your business operations?

Bolt does not currently operate PSWT and/or RCT as a designated withholder, so these regimes do not have a direct impact on our business operations.

11. If you are a Platform Operator, does your organisation have any experience of applying taxes to transactions, for services operating on your platform, in other jurisdictions? If yes, please provide information of the jurisdiction and details of the tax.

We operate across multiple jurisdictions and have experience complying with tax rules that apply to transactions facilitated through our platform. In our experience, real-time income tax withholding by platforms is not common internationally and, where it

12. From the perspective of a DW, what are your views on the application of RCT and/or PSWT, as the case may be?

Bolt does not operate RCT and/or PSWT as a designated withholder, so we do not have direct experience of applying these regimes. We would note, however, that RCT and PSWT are targeted regimes applied to defined sectors and/or payers, with obligations generally placed on clearly identifiable, regulated and resident entities.

13. What is your understanding of the withholding tax model of tax collection of RCT and PSWT and why it is applied to payments?

Bolt does not operate RCT or PSWT as a designated withholder, so we do not have a specific view beyond a general understanding of these targeted withholding regimes.

14. The proposal aims to embed eWHT processes directly into accounting, payroll, or other business management systems. How beneficial do you think this would be for your business?

For our business, embedding eWHT processes into accounting, payroll or other management systems would provide limited benefit and would introduce significant operational and technology complexity. Platform models involve high volumes of low-value transactions and frequent adjustments (including cancellations, refunds and chargebacks), and they are not structured around a payroll relationship. As a result, implementation would require substantial engineering build, new controls and ongoing operational resourcing to integrate real-time withholding into payment flows. Any potential efficiency benefits would be dependent on clear and stable technical specifications, robust contingency arrangements for system downtime, and workable processes for reversals and corrections. In the absence of these, embedding eWHT into core systems risks introducing additional points of failure in payment operations and increasing compliance and dispute burdens, rather than delivering meaningful efficiencies.

15. In your view, what opportunities could embedding eWHT within natural business systems create for your business or the wider industry?

For our business model, we do not see meaningful opportunities arising from embedding eWHT within natural business systems. The principal effect would be to add an additional compliance layer into payment operations, rather than to enable productivity gains or innovation. At an industry level, the only potential opportunity would be if any digitalisation reduced administrative friction for service providers and improved certainty through clearer, more timely visibility of tax positions. However, that benefit would depend on a model that is proportionate, stable and aligned with existing reporting frameworks (including DAC7), and on clear processes for refunds, adjustments and error correction. In its current form, we consider the proposal is more likely to increase complexity and operational risk than to create new opportunities for platforms or the wider sector.

16. What challenges do you think your business might face in adopting this embedded within natural systems approach?

Adopting an embedded eWHT approach would create significant challenges for our business, primarily because it would require integrating a real-time withholding and remittance function into payment systems that are designed to facilitate high volumes of transactions rather than to operate as payroll or tax administration infrastructure. Disproportionate compliance burden and material changes to core payment systems: The proposal would require platforms to build and maintain real-time integrations with Revenue systems to calculate, withhold, report and remit tax at the point of payment. For a platform, this is not a simple “bolt-on” reporting

change. It would require redesign of key payment components, including payout generation logic, balance and settlement logic, and related partner payments and billing processes, alongside new operational controls and support processes. Increased operational and technology costs, with uncertain sizing at this stage: Implementation would require substantial engineering build and testing, ongoing maintenance, cybersecurity controls, and specialist tax and operational support capability. At present, it is not possible to estimate costs with confidence without detailed technical specifications and scoping, as the impact would span multiple systems and teams. However, the requirement to operate real-time interactions with Revenue systems would be expected to be substantial. Transaction fee and settlement impacts in a live remittance model: If the model requires live transactions to Revenue each time a payout or cashout occurs, this could increase transaction volumes materially and, in turn, increase payment processing costs (for example, by effectively adding an additional payment leg per payout). That would introduce additional cost and reconciliation requirements within payment operations. Failure scenarios, reversals and error correction (high operational risk): A live remittance model raises complex failure and reversal scenarios that are common in payment operations. For example, a payout to a service provider may fail, be returned, or be reversed after initiation, while the corresponding tax amount may already have been remitted to Revenue. The consultation materials do not yet provide clarity on how such situations would be handled in practice, including whether a refund or credit process would be available, the timescales involved, and how the service provider's tax position would be corrected. Without clear, workable rules, the embedded approach risks creating persistent reconciliation issues and disputes. Likely cost impacts for service providers and consumers: The costs of building and operating a real-time withholding function would be ongoing. In a two-sided marketplace, these additional costs are likely to affect pricing dynamics and may ultimately be reflected in higher costs for service providers and/or consumers, with potential implications for competition and affordability. Increased support burden and potential deterioration in service provider experience: embedding withholding into payouts would likely generate increased support contacts from service providers, particularly where withholding amounts vary, where adjustments occur, or where corrections are required. In addition, introducing real-time deductions may be perceived as PAYE-like by self-employed workers, increasing confusion and disputes even where legal status is unchanged. This would create ongoing support and communications burdens and could adversely affect trust in the payment experience. These challenges are significantly reduced where withholding is operated by a regulated entity with direct control over funds (for example, banks/payment institutions), rather than by platforms as intermediaries.

17. What is the estimated number of payments that you make to SPs each month?

We make approximately 3,000 outgoing payments per week to the taxi drivers that operate via our platform. This equates to between 12,000 and 13,000 payments per month on average.

18. Do you currently use software for processing payments and or managing the finances of your business? If so, what packages do you use?

Yes. For transactions with service providers, we use an internal system to manage balances, generate payouts and cashouts, with a direct integration to our banking and payment processing partners to execute payments. For enterprise finance and accounting

19. Are you an employer for PAYE? If so, which software package do you use to report payroll taxes to Revenue?

20. Please indicate if you currently receive payments which are subject to deduction of:

21. Where you are currently subject to PSWT and/or RCT, how does the current application of withholding taxes impact on your business operations?

22. From the perspective of a SP, what are your views on the application of RCT and/or PSWT, as the case may be?

23. What is your understanding of the withholding tax model of tax collection of RCT and PSWT and why it is applied to payments?

Bolt does not operate RCT or PSWT as a designated withholder, so we do not have a specific view beyond a general understanding of these targeted withholding regimes.

- 24. Where you are an SP operating as a corporate/partnership or other entity, do the current rates that apply to PSWT and RCT reflect your actual liability on the income received?**
- 25. The proposal aims to embed taxation directly into how you get paid by the DW. How beneficial do you think this would be for your business?**
- 26. Where you are an SP operating as an individual worker, the proposal aims to implement personalised deduction rates (PDR), which means you will pay tax on your income as you go, similar to how employees are taxed under PAYE. What impact do you think PDR will have on your cashflow and financial management?**
- 27. Do you think this new regime, including the PDR will have a positive effect on your end of year Income Tax return filing and preliminary tax payment obligations?**
- 28. The accuracy of PDR is improved by the regular reporting by you to Revenue of your income and business expenses. How likely are you to report your income and expenses to improve the accuracy of your PDR?**
- 29. What changes do you expect to have to implement in your business in order to be ready for the proposed eWHT regime?**

To be ready for the proposed eWHT regime, we would need to implement material changes across our payments, finance and operational support functions. The regime would not be a minor compliance adjustment: it would require integrating a real-time withholding and remittance function into core payment flows and redesigning key systems and controls. In particular, we would expect to need to:

- Rebuild core payments logic to incorporate withholding into payout and cashout flows, including changes to payout generation logic, balance management and settlement processes, and associated partner payments and billing functions.
- Build and maintain a real-time API integration with Revenue, including security, authentication, monitoring and incident management, and define contingency processes for downtime or degraded performance.
- Implement end-to-end

reconciliation and reporting controls, including the ability to align each payout event with the corresponding withholding outcome and remittance status, and to manage monthly returns and corrections where required. - Develop robust processes for reversals and adjustments, covering cancellations, refunds, chargebacks, failed payouts, returned payments, and any post-transaction fare or incentive adjustments, with clear mechanisms for correcting both the tax position and the payment position. - Expand operational support capacity and governance, including customer support playbooks for service provider queries, escalation and dispute handling, and enhanced compliance and audit readiness. - Update partner communications and product transparency, to explain deductions clearly to service providers and to minimise confusion, particularly given the potential for a PAYE-like user experience despite a self-employed relationship. The scale and cost of these changes cannot be estimated reliably without detailed technical specifications and operational rules (including the treatment of failures, refunds and correction mechanisms). However, the proposed model would require significant engineering and operational investment and would materially increase complexity and risk within payment operations. In sectors where pricing is regulated or otherwise constrained, there is limited flexibility to absorb additional compliance costs. As a result, there is a risk that such costs are ultimately borne by service providers through reduced net earnings. This is particularly relevant in the Irish passenger transport context, where fares are regulated and the scope to offset additional compliance costs is limited.

30. What benefits do you expect the new regime to have on your business processes, costs and delivery of your business services?

We do not expect the proposed eWHT regime to deliver material benefits to our business processes, costs or service delivery. The practical effect would be to introduce a new operational tax collection function into core payment flows, requiring additional engineering build, ongoing maintenance, reconciliation and customer support capacity. In our view, the regime is more likely to increase complexity, costs and operational risk, including dependency on real-time external processes, than to improve efficiency or service delivery. Any potential wider benefits would primarily relate to tax administration and compliance outcomes for the state of Ireland, rather than improvements to platform operations or customer experience.

31. What would you consider a reasonable timeframe for your business to adapt to the proposed new system?

A reasonable timeframe would need to include not only implementation time, but also a meaningful period for technical specification, testing and operational readiness. In particular, we would expect: - A sandbox/test environment to be available well in advance of any mandatory go-live, with stable technical documentation, certification testing and clear rules for error handling, reversals and downtime. - A phased implementation approach, allowing sufficient time for internal scoping across payments, product, finance, tax, legal and customer support functions, followed by build, integration and end-to-end testing. Given the scale of system changes required to embed real-time withholding into core payout and settlement flows, and the cross-functional nature of the work, we consider at least 12 months would be required from the point at which final requirements and a stable testing environment are available. This should be accompanied by a grace period during which compliance expectations focus on bedding-in, issue resolution and iterative refinement, rather than immediate enforcement, recognising the operational risk of introducing real-time dependencies into payment systems. An alternative model that does not require real-time platform integration (for example, withholding at the point funds are credited to a designated account) would materially reduce implementation timelines and operational risk.

32. How confident are you that your business could adapt to the new system within a reasonable timeframe?

We cannot yet provide a meaningful confidence level, as there is currently insufficient guidance on the detailed technical specifications and operational rules required to implement the regime. In particular, our ability to assess feasibility depends on clarity regarding API requirements, downtime contingencies, and the treatment of refunds, cancellations, failed payouts, reversals and error correction. Once these elements are defined and a testing environment is available, we would be better placed to assess our ability to adapt within a reasonable timeframe.

33. In terms of the management of your business, which outcomes from this new regime are the most important for you? (Select a maximum of 3)

Greater certainty in relation to your tax affairs

Better visibility and control of information held by Revenue

Other (please specify): While accuracy and visibility are important objectives, we do not expect the proposed eWHT model to reduce administrative workload or integrate seamlessly for platforms. For our business, the regime would introduce significant addi

34. What supports from Revenue would be of most benefit to you in transitioning to the new regime? (Select a maximum of 3)

Helpdesk or dedicated Revenue contact

Clear guidance for software providers and a testing environment

All of the above would be relevant. In addition, early engagement on alternative collection models (including bank/payment-institution based approaches) would be helpful to assess feasibility and proportionality.

35. Is there anything else you'd like to share about how the proposed eWHT system could best meet the needs of your business or sector?

The proposed eWHT model raises significant issues for the platform sector because it would embed a real-time withholding function into payment systems that are designed to facilitate high volumes of transactions, frequent adjustments, and rapid settlement, rather than to operate as payroll or tax administration infrastructure. Before introducing a new withholding regime, Revenue should make full use of DAC7 data already being reported and exchanged to evidence the scale and nature of any compliance gap and to target interventions proportionately. Any design should also reflect the reality of self-employed platform work, including that workers must cover significant operating costs throughout the year, and that operating eWHT should not be treated as indicative of an employer-employee relationship or restrict the ability to work across multiple platforms. Disproportionate compliance burden on platforms: The proposal would require platforms to build and maintain real-time integrations with Revenue systems to calculate, withhold, report and remit tax at the point of payment. This is a material shift from a reporting model to an operational tax collection role, and it would impose ongoing obligations that go beyond the platform's role as an intermediary facilitating transactions between service providers and customers. Increased operational and technology costs and new points of failure: Implementation would require substantial engineering build and testing, ongoing maintenance, cybersecurity controls, operational support processes and specialist tax compliance capability. The embedded model also introduces additional operational risk, including dependency on the availability and performance of external systems, and the need for clear contingency arrangements to avoid disruption to payments and settlement. Complexity around adjustments and customer support impacts: Platform transactions often involve cancellations, refunds, chargebacks, fare adjustments and incentive payments. Without clear and workable rules for reversals and corrections, the embedded approach risks creating

persistent reconciliation issues, increased disputes and a significant customer support burden, both for platforms and for service providers. Risk of shifting activity off-platform and undermining compliance objectives: Reduced net payouts, increased friction and uncertainty around corrections may incentivise some service providers to bypass platforms or shift activity to more informal channels. This would undermine the policy intent of improving compliance and could also reduce consumer protection by pushing activity away from more transparent and accountable digital channels. Likely cost impacts for service providers and consumers: The costs of building and operating a real-time withholding function are material and ongoing. As a general matter, such costs are likely to affect pricing dynamics in two-sided marketplaces and may ultimately be reflected in higher costs for service providers and/or consumers, with potential implications for competition and affordability. If Revenue proceeds with an eWHT regime for platforms, it would be important to provide stable technical specifications and a sandbox environment, clear and efficient processes for reversals and corrections (including failed payouts and returned payments), appropriate safe-harbours where platforms apply Revenue instructions correctly, and an implementation approach that avoids creating incentives for off-platform activity. As an alternative to designating platforms as withholding agents, Revenue should also consider whether withholding could be operated by a regulated Irish financial intermediary (for example, through designated bank accounts or payment institutions), where the entity has direct control of the funds and established compliance and reporting processes. This could reduce enforcement risk (including in relation to non-resident platforms), minimise duplicative data collection, and avoid embedding real-time tax remittance dependencies into platform payment flows.

