

## Exchange Traded Funds (ETFs)

### Part 27-01A-03

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This document should be read in conjunction with Chapter 1A, 2, 3 & 4 of Part 27 TCA 1997 and in conjunction with Tax and Duty Manual [Part 27-01a-02](#), Tax and Duty Manual [Part 27-04-01](#) and Tax and Duty Manual [TDM Part 27-02-01](#).

**Revenue**



Cáin agus Custaim na hÉireann  
Irish Tax and Customs

The information in this document is provided as a guide only and is not professional advice, including legal advice. It should not be assumed that the guidance is comprehensive or that it provides a definitive answer in every case.

## Introduction

The term “Exchange Traded Fund” or “ETF” is a general investment industry term that refers to a wide range of investments. ETF investments can take many different legal and regulatory forms even where they are established within the same jurisdiction.

An ETF is an investment fund that is traded on a regulated stock exchange. A typical ETF can be compared to a tracker fund in that it will seek to replicate a particular index.

## The taxation of investments in ETFs

The purpose of this Tax and Duty Manual (TDM) is to guide investors to the relevant TDMs that will advise further on the tax treatment of an ETF:

1. For further information with respect to the tax treatment of Irish domiciled ETFs refer to [TDM Part 27-01a-02](#) (Investment Undertakings) and [TDM Part 27-04-01](#) (Offshore Funds: Taxation of Income and Gains from the EU, EEA and OECD member states);
2. For further information with respect to the tax treatment of ETFs domiciled in the EU, EEA or an OECD<sup>1</sup> member state, refer to [TDM Part 27-04-01](#) (Offshore Funds: Taxation of Income and Gains from the EU, EEA and OECD member states);
3. For further information with respect to the tax treatment of ETFs domiciled in other territories (other than EU, EEA or OECD member states) refer to [TDM Part 27-02-01](#) (Offshore Funds: Taxation of Income and Gains from certain offshore states).

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<sup>1</sup> Prior guidance confirmed that investments in ETFs domiciled in the USA, the EEA or in an OECD member state (other than the USA) with which Ireland has a double taxation treaty, follows precisely the treatment that would apply to share investments generally. That confirmation does not apply to such investments with effect from 1 January 2022.