

Investigation exposes how vulnerable Ireland is

 Just 80 firms account for
Amount of IP soars from 90 per cent of IP held here

\$386 bn to nearly \$1 trillion



Killian Woods Business Journalist of the Year

The

numbers

of the \$967bn in IP is

US-based multinationals

rise in pre-tax profits

annual profit booked by

Microsoft Round Island One

Unlimited Company in 2020,

on which it paid no tax here

of IP moved into Ireland by

the Coca-Cola Company in

controlled by a cohort of just

80 Irish subsidiaries of mainly

recorded in Ireland since 2012

lmost \$1 trillion of intellectual property (IP) has been held in the country by multinational corporations as part of sophisticated tax avoidance schemes, a Business Post investigation into Ireland's Tax Mirage this weekend reveals.

The vast majority of the \$967 billion of intangible assets, largely IP, was moved in the past decade and 90 per cent of the total is controlled by a cohort of just 80 Irish subsidiaries of mainly US-based multinationals

The Tax Mirage investigation reveals the "clear risk" posed to the future of Ireland's economy by Donald Trump, the US president, who has unleashed an unprecedented trade war on America's allies in recent months.

The investigation, carried out by the Business Post in conjunction with professor Aidan Regan and his team at University College Dublin (UCD) as part of their Democracy Challenged project, shows that at the peak in 2021, more than \$967 billion worth of intangible assets was held in Ireland.

Just seven years earlier, the figure stood at \$386 billion. The investigation is based on analysis of Moody's Orbis database, which has access to 550 million private company entities.

An analysis of the dataset shows the fate of Ireland's corporate tax base is largely dependent on 80 companies, predominantly US multinationals, which control 90 per cent of the IP assets.

The movement of IP has led to a spike in pre-tax profits being recorded in Ireland. Since 2012, annual pre-tax profits recorded in Ireland have risen by 207 per cent to more than \$210 billion in 2022.

The value of intangibles held by technology companies in the Orbis dataset surged from \$41.2 billion in 2014 to \$341.96 billion in 2023, fuelled by Microsoft, VMware, Salesforce, Analog Devices, Microchip Technology Inc, Oracle

Corp, Adobe Inc, Workday Inc and Dell Technologies.

In 2019, Microsoft Ireland Research Unlimited Company disclosed that it $owned\,\$33.8\,billion\,in\,intangible\,assets.$ The following year, its Irish parent firm Microsoft Round Island One Unlimited Company booked an annual profit of \$315 billion and paid no tax on that sum in Ireland because "the company is a tax resident in Bermuda"

A spokeswoman for Microsoft said the company has been operating and investing in Ireland for 40 years and is

"a long-time taxpayer, employer, and contributor to the Irish economy".

"Our tax structure reflects our complex giodai dusiness, and we are fully compliant with all local laws and regulations in the countries in which we operate,"

In 2020, Salesforce Inc shifted \$23.5 billion worth of IP into an Irish subsidiary, while in that year VMware Inc also moved \$39 billion worth of IP into an Irish entity, which allowed its parent firm to book a \$4.9 billion tax benefit in the US.

The Coca-Cola Company also moved more than \$25 billion of IP to Ireland

Allergan, prior to the firm's takeover by Abbvie in 2020, was at one stage the biggest holder of intangible assets in Ireland, controlling \$121 billion through two subsidiaries in 2015.

In recent years, the total value of the intangible assets held by Irish-registered companies has fallen to around \$900 billion due in part to the amortisation of the IP by companies, which can earn tax benefits.

Worldwide attention has focused on Ireland since Howard Lutnick, the US commerce secretary, said the country was running a "tax scam" with its treatment of corporate tax revenues.

Seamus Coffey, the chair of the Irish Fiscal Advisory Council, said the findings of the investigation show the "scale of intangible assets in Ireland is huge"

"We get some indication of intellectual property from the Central Statistics Office figures for GDP, the amount of depreciation in Ireland's national accounts, and the capital stock figures that the CSO produces," Coffey said. "They're redacted, so the detail is limited. This shows the scale of intangible assets in Ireland is huge.

Coffey said the investigation demonstrates "there is a clear risk for Ireland".

"If Donald Trump was to impose tariffs, it might make it less attractive to locate manufacturing abroad, but it would also make it less attractive to locate intellectual property abroad," he said.

Pearse Doherty, Sinn Féin's finance spokesperson, said the investigation demonstrates "the vulnerability" of Irish corporation tax receipts because of the "scale of the concentration of intellectual property in Ireland. Some of this IP was onshored not through any attractiveness of the Irish economy, but because of the determination by the US administration in relation to its own tax regime, which created an environment to see an explosion of onshoring, that reduced the tax liability of these global companies."

Ireland's Tax Mirage - A Special Investigation, was edited by Peter O'Dwyer, Head of News





Revealed: 12 companies with among the most intangible assets



Raghu Raghuram, chief executive of VMware

VMware

\$4.9 billion: the tax benefit to VMware Inc from moving \$39 billion of IP to Ireland







Joaquin Duato, chief executive of J&J

Johnson & Johnson

\$24.3 billion: the value of intangible assets reported by Johnson & Johnson Irish subsidiaries when first publicly disclosed in 2017



Ireland by Adobe in 2020



workday.

Workday

\$4 billion: the value of intangible assets owned by Workday's Irish subsidiary in 2024



Michael Dell, chief executive of Dell

Dell Technologies

\$7.5 billion: the value of IP bought by a Dell firm in Ireland, which gave it commercialisation rights outside of the US

THRUE SCATEOR RELAND'S MRAGE



Killian Business

icrosoft president Brad Smith wanted to make one thing clear when he jetted into Dublin to accept a special recognition award for the tech giant in early

"Leaders change, policies change, but I will say this to each of you and to everyone in Ireland and across Europe, when it comes to our company, our partnership with Ireland, and our support for Europe is steadfast," Smith said. "You can count on that."

Ireland has indeed been able to count on Microsoft, which has consistently grown since it first set up in Ireland in 1989 and boasts 4,000 workers here. It has not just been able to count on the

A remarkable 90 per cent of the \$967bn of intangible assets were held by just 80 Irish-based firms

company for valuable employment but increasingly for the huge sums of Irish corporation tax it has been paying. Since 2017, according to company

filings, one firm in Microsoft's network

of Irish subsidiaries has paid more than

\$12 billion in Irish corporation tax. It wasn't the only multinational paying increasingly more Irish corporation tax, which has risen from just over €4

billion in 2013 to €21.4 billion in 2022. While some of that boon for the Irish exchequer was the result of companies expanding their presence here, much of it was tied up a flood of intangible assets – such as intellectual property (IP) that helps make up the value of a multinational – brought onshore over

the period as part of complex tax plan-

ning strategies.

For the first time ever, the Business Post, in conjunction with professor Aidan Regan and his team at UCD, can reveal the true scale of Ireland's corporation tax mirage, and the colossal shift in intangible assets that underpinned it.

While the owners of those assets pay all the tax they owe where it is owed, their tax planning has shifted where those payments are made and created a mirage of supernormal corporation tax receipts for Ireland.

Our research shows that at the peak in 2021, more than \$967 billion worth of intangible assets resided in Ireland, which were predominantly owned by the Irish subsidiaries of foreign multinationals. A truly eye-watering figure and more than double the \$386 billion recorded just seven years earlier.

These intangible assets have given Irish-based subsidiaries of US firms a claim over valuable IP, including patents, trademarks and copyright, and justified them shifting billions of dollars' worth of profits through Ireland.

While Ireland benefited enormously from companies paying more taxes, oth-

er countries, including the US, lost out. Now Ireland's day of reckoning is perhaps dawning as US president Donald Trump looks to upend the global economic system, and with it the basis of Ireland's remarkable growth story.

Unprecedented detail

A new investigation by this publication in conjunction with Regan, a professor of political economy at University College Dublin, and his colleagues Linus Zechlin and Lakshi Memon, both doctoral researchers, has uncovered never-before-seen details of the revenues, profits and intangible assets recorded by multinationals in Ireland.

An analysis of Moody's Orbis database, which has access to 550 million private company entities, reveals a sharp rise in intangible assets being reported by Irish-registered firms from early in the last decade, and continuing through the period during which the double Irish tax loophole was closed and changes to US tax policy were introduced.

The value of intangibles held by tech firms in the dataset surged from \$41.2 billion in 2014 to \$341.96 billion in 2023.

The Orbis data, which has been verified by this newspaper using publicly available 10-K financial reports and Companies Registration Office (CRO) filings, shows huge surges in the profitability of the parent companies of some of the biggest firms in the world, as their Irish subsidiaries increasingly played host to IP and other intangibles, as well as the licences to exploit that IP.

Since 2012, annual pre-tax profits recorded in Ireland have risen by 207 per

cent to more than \$210 billion in 2022. This huge rise in pre-tax profits has coincided with a large increase in the declaration of intangible assets in Ireland by multinationals.

In 2014, the total value of intangible assets held by Irish-based firms was \$386 billion. In the following years, the value rapidly grew to a peak of \$967 billion in 2021 and has levelled off at near \$900 billion in recent years.

Remarkably, we can show that 90 per cent of those assets are held by just 80 firms based in Ireland, an extraordinary concentration among the 8,000 Irish-registered firms examined, and cause for concern among policymakers given the vulnerability at the heart of the economic model it exposes.

Many of these 80 firms are US multinationals, which are expected to face pressure from Trump to repatriate IP in Ireland back to the US. If they did, it could cause a massive shock to Ireland's corporation tax take, much of which has been derived from taxing profits generated from this IP.

Ireland has been accused of facilitating the efforts of these US multinationals to route profits and hold IP in Ireland to minimise tax liabilities

All the companies in our investiga-

The who, what, where and when of our supercharged tax bonanza

PETER O'DWYER AND KILLIAN WOODS

What was the double

It was a complex and wildly popular tax planning strategy involving the use of two Irish subsidiary companies to shift profits. It was employed by multinational corporations to reduce their tax liability. Its closure was announced by the then finance minister Michael Noonan in 2015 with a phaseout period until 2020.

Why was it closed?

Ireland was coming under scrutiny globally for its role in facilitating legal, but controversial, tax avoidance measures. Ultimately, the pressure became too much and Noonan closed the loophole - although he did introduce very favourable capital allowances for intellectual property (IP) at around the same time.

What's intellectual property?

IP is a form of intangible asset which

includes patents, trademarks and copyrights. It is hugely lucrative and the basis of much of the value of corporations

What are intangible

Intangible assets are a broader class of asset which includes IP, licences, brand reputation, goodwill and proprietary software.

If you're familiar with a balance sheet you'll see intangible assets under the fixed assets column, alongside tangible assets - property, machinery etc - and

Why are intangible assets and IP important in the context of tax and the Irish economy?

Where intangible assets are located – and the licences to exploit assets like IP dictates where much of a corporation's profits are earned and therefore where

it pays its taxes.

Ireland has benefited from a huge onshoring of IP, or companies moving their IP to Ireland, over the last decade. This has supercharged Irish corporation tax receipts and distorted GDP figures, so much so that we had to come up with new measures such as GNI* to measure the country's economic health.

The government has long-since accepted that much of our bumper corporation tax income is windfall in nature, meaning they won't necessarily reoccur.

What value of intangible assets was moved here?

Our research shows the value of intangible assets held by Irish subsidiaries of foreign, and largely US, companies grew from \$386.8 billion (€338.68 billion) in 2014 to over \$889 billion in 2023, having hit a peak of \$967.58 billion in 2021. While some of that is down to more companies reporting their IP and other intangibles, it shows a huge surge in assets being moved here, consistent with a growing body of academic research.

Indeed, in 2023, Michael McGrath, the then finance minister, said: "In the same way that intellectual property was brought to Ireland by pressing a button on a keyboard, it can be taken out of Ireland in a manner that is also very easy to do." Now, for the first time, we know the

Why has the figure declined since 2021?

scale of that transfer.

Companies can amortise the value of their assets. This is an accounting practice, like depreciation, which spreads the cost of an intangible asset over its lifetime. In this way, the value declines over time. This is likely to be behind the bulk of the decline. By amortising the value of the asset, companies can also cut their tax bills.

Why did companies move their intangible assets to Ireland on such a huge scale?

There was a confluence of events. To

retain foreign investment after the end but the real jobs and production on the of the double Irish, Ireland passed a set of tax incentives meant to attract IP of multinational firms.

The phaseout of the double Irish coincided with the implementation of the Tax and Jobs Act (TCJA) of 2017 in the US, which introduced major reforms to US taxation of foreign income.

The TCJA inadvertently created incentives for firms, largely in the pharmaceutical sector, to move intangibles away from the US.

But the major pharma and tech companies employ a lot of people in Ireland?

They do. The positive impact of foreign multinationals has been transformative for the Irish economy over decades and its impact can be seen in communities right across the country and in the national accounts through job creation, corporation tax, income tax and the significant knock-on effects for other businesses. Irish FDI is a success story, ground don't account for the huge profits booked through Ireland and resultant tax revenues.

So, why does it all matter?

This was all hugely important before Donald Trump returned to the White House given what it means for the vulnerability of the Irish economy and the state's tax receipts.

It also matters more broadly as these tax strategies have negative impacts in other countries.

But with Donald Trump back in power in the United States. the risk has ratcheted up. Howard Lutnick, the US commerce secretary, has decried Ireland's "tax scam", while Trump has specifically targeted the Irish pharma sector in his comments.

They want those jobs and tax revenues back. It's unlikely that the imposition of tariffs will achieve that goal, but changes in US tax policy could. Remember what McGrath said: a button on a keyboard is

in Irish subsidiaries



Satya Nadella, chief executive of Microsoft

Microsoft

\$315 billion: profit Microsoft Round Island One Unlimited Company booked in 2020, with no tax owing in Ireland on it

Allergan

\$122 billion: the value of intangible assets owned by two of Allergan's Irish subsidiaries in 2015





Marc Benioff, chief executive of Salesforce

Salesforce

\$23.5 billion: the increase in value of intellectual property owned by Salesforce's Irish subsidiary

Oracle \$11.3 billion: the value of intellectual property Oracle Corp shifted into its



Larry Ellison, chairman of Oracle

MICROCHIP

Microchip Technology Incorporated

6,163,272%: increase in value of IP owned by the Irish subsidiary of Microchip Technology in 2018

Analog Devices

\$61 million: a realised tax benefit booked by Analog Devices Inc after moving IP into Ireland



tion, and many more besides, insist they pay all the tax they owe where it is owed.

It's clear Ireland has been used as a key centre for, entirely legal, tax planning - and reaped the rewards of it as corporation tax receipts surged by €24 billion in just a decade.

The Department of Finance has warned the Irish government it would face a €31 billion exchequer deficit by the end of the decade if corporate tax receipts fell back to just 2020 levels, when the annual corporate tax take sat at around the €10 billion mark.

Now, with the return of Trump to the White House, the potential shock officials have for years warned about is looming larger than ever.

His administration, including Howard Lutnick, US secretary of commerce, has singled out Ireland for running what he has described as a "tax scam" and is aware of the mechanisms US firms have used in Ireland to minimise tax

They plan punitive measures to make them bring their profits and intellectual property home, including tariffs on goods imported into the US and new policies under the America First trade policy that would ensure firms are not incentivised to offshore IP.

The big IP movers

The Moody's Orbis database, which was used to interrogate tens of thousands of financials for Irish-based entities, has for the first time put clear figures on how much specific multinationals have ramped up the amount of revenue, profits and intellectual property being booked through Ireland.

Coca-Cola

- · European Refreshments Unlimited Company, a Coca-Cola Irish subsidiary based above the SouthGate Shopping Centre outside Drogheda, has moved trademarks, patents and licenses worth considerable sums to Ireland
- In 2016, the company recorded intangible assets worth \$87.5 million in Ireland. In the following year, intellectual property registered by European Refreshments Unlimited Company rose to \$25.6 billion.
- Since the movement of trademarks to Ireland, the Irish subsidiary's profits before tax in Ireland have risen significantly. Between 2017 and 2023, the Irish subsidiary made \$13.4 billion worth of pre-tax profits.

- · One of the biggest movements of intangible assets in the past decade was recorded by VMware International Unlimited Company, which develops cloud infrastructure technology.
- In 2020, intangible assets owned by

\$967bn 🕊 The total value of intangible assets held by Irish subsidiaries of US MNCs

in 2021 (peak year)



150.15%

intangible assets held by Irish subsidiaries of US MNCs between 2014 and 2021

Intangible assets growth



The value of intangible assets held by the Irish subsidiaries of US technology MNCs grew from \$41.2bn in 2014 to \$341.96 billion in 2023

Irish corporation tax receipts growth



the company rose from \$17,000 to \$39 billion after it acquired IP from VMware Bermuda Unlimited Company.

At a group level, VMware Inc in the US recognised a massive benefit from this movement. Annual filings for the company in 2021 showed a "discrete tax benefit of \$4.9 billion was recognised" as a result of the "book and tax basis difference on the IP transferred to an Irish subsidiary"

Pharma giants

- · Irish-based subsidiaries of the pharma giants Johnson & Johnson and Allergan have booked large intangible assets in Ireland in the last 10 years. At their peak in 2017, two Irish subsidiaries of Johnson & Johnson recorded combined intangible assets worth \$24.3 billion.
- Two of Allergan's Irish subsidiaries at one stage were the biggest owners of intangible assets in Ireland, controlling a combined \$121.8 billion in 2015. Allergan was acquired by AbbVie in 2020.

Salesforce and Adobe

• In 2020, Salesforce moved \$24 billion

worth of intellectual property into Sfdc Ireland Limited, while Adobe also shifted \$10 billion worth of IP into its Irish subsidiary, Adobe Systems Software Ireland Limited, in that same year.

Microsoft and other tech firms

- · Microsoft started to record increasing fortunes in the past decade in its Irishbased subsidiaries.
- · Since 2014, Microsoft Ireland Operations Limited recorded \$390 billion in revenue and made collective pre-tax profits of \$21.2 billion. That company owns no intangible
- assets, but its immediate parent firm Microsoft Ireland Research Unlimited Company has owned close to \$30 billion worth of intellectual property since 2017. Microsoft Ireland Research Unlimited
- Company has not published financial accounts with the CRO prior to 2017, which means it is not possible to gauge the value of intangibles owned by the firm before 2017. However, it's clear it has been one of the biggest holders of these assets ever since.
- The parent firm of both the aforementioned Microsoft subsidiaries is

Irish-registered Microsoft Round Island One Unlimited Company, which booked an annual profit of \$315 billion in 2020 and paid no tax on that sum in Ireland because "the company is a tax resident in Bermuda"

Big moves in IP were also recorded by Irish subsidiaries linked to Analog Devices, Oracle, Dell Technologies and Workday.

The Business Post asked each company to comment on why they have such a large value of intangible assets in Ireland. Most firms did not respond. A spokesman Salesforce said it had no comment to make.

A spokeswoman for Microsoft said the company has been operating and investing in Ireland for 40 years and is "a long-time taxpayer, employer, and contributor to the Irish economy"

"Our tax structure reflects our complex global business, and we are fully compliant with all local laws and regulations in the countries in which we operate."

A spokeswoman for Workday said 80 per cent of its employees in Dublin are focused on product and technology development. "We're proud of our strong presence in Ireland as we continue to grow our business, support the local economy, and operate in full compliance with Irish law.'

All this activity has happened in the wake of the abolition of the double Irish tax scheme, for which successive governments in Ireland came under fire.

Foreign leaders criticised the structure, claiming it enabled aggressive tax avoidance and meant Ireland effectively functioned as a "tax haven".

In 2014, Barack Obama criticised American firms for becoming "magically" Irish, and said US firms which availed of tax avoidance rules were "gaming the system". Soon afterwards, Michael Noonan, the then finance minister, buckled under internation al pressure.

The end of the double Irish prompted Irish policymakers to create tax incentives aimed at encouraging the movement of intellectual property to Ireland.

Trump's Tax and Jobs Act (TCJA) of 2017 also introduced major reforms that helped some of this activity to prosper by, in some instances, incentivising large multinationals to shift intangibles offshore.

The insights revealed by the Moody's Orbis dataset show US multinationals have, in many instances, doubled down on their use of Irish financial structures since the ending of the double Irish and passing of the TCJA.

The story of Ireland's role in international tax avoidance and profit-shifting has long been known. Now, we know the true scale of that story. The stakes could hardly be higher as Ireland moves firmly into the crosshairs of Trump's

Case Study

VMware's Irish engine turns global growth into local losses

AIDAN REGAN

'n 2019, VMware International Unlimited Company (VMIUC) looked like a textbook Irish subsidiary of a successful US tech

Based in Cork and then owned by Dell Technologies, it recorded \$4.5 billion (€3.97 billion) in annual revenue, \$1.6 billion in gross profit, and paid Irish corporate tax in full.

Its tax payments ranged between \$43 million and \$92 million annually. It had no long-term debt and carried no intangible assets on its

Then came 2020, and with it a financial transformation that turned a profitable software business into a loss-making tax vehicle. That year, VMIUC acquired global commercial rights to VMware's intellectual property from its parent, VMware Bermuda Unlimited Company.

Bermuda

Although incorporated in Ireland, the parent company was tax resident in Bermuda, the former destination for profits under the now-retired

In the post-double Irish era, the profits couldn't stay offshore. When the rights to VMware's IP were onshored to Ireland, the income streams had to come with it. The result was a sharp surge in intangible assets on VMIUC's balance sheet.

Almost overnight, according to Moody's Orbis database, VMware International Unlimited Company booked \$39 billion in intangible assets the result of a colossal intra-group IP transfer.

It was an internal accounting move with very real tax consequences. For those who enjoy cocktail party stats: that's a 229 million per cent increase in a single year.

The \$39 billion IP move, which was mainly financed by a \$37 billion intercompany loan note, allowed the Irish subsidiary's parent firm VM ware Inc to book a "discrete tax benefit of \$4.9 billion"

VMware issued debt to itself to acquire its own IP, booked the licence as a capital asset, and then used amortisation and interest deductions to erode its taxable income.

Ireland's generous capital allowances regime allows VMIUC to amortise the \$39 billion over time, potentially up to 30 years. Beginning in 2020, the company claimed annual deductions start-

ing at close to \$1 billion, rising to \$1.4 billion. It also paid more than \$1 billion each year in interest on the internal loans used to finance the IP transaction. Combined, these deductions were sufficient to eliminate its taxable profits.

Meanwhile, the business itself continued to grow. By 2023, VMIUC's revenue had risen to \$6.4 billion, and gross profit had more than doubled compared to 2014.

But in the accounts, VMIUC appeared to be deeply unprofitable. From 2020 to 2023, it has reported annual pre-tax losses ranging from \$831 million to \$1.57 billion. With its tax base effectively erased, VMIUC not only ceased paying corporate tax, it began accumulating tax credits, worth \$101 million in 2023 alone.

Acquisition

That same year, Broadcom acquired VMware. The deal included VMI-UC, along with the global rights to monetise VMware's IP. The legal ownership of the intellectual property remained in the United States, split between Broadcom Inc and VMware LLC.

However, the commercial rights stayed in Ireland, which are presently booked as \$35.8 billion in intangible assets on VMIUC's balance

Our analysis, using historical IP data from Orbis, shows that VMIUC holds no patents. But since 2020, it has remained consistently in the top five intangible

asset owners in Ireland. Broadcom's intellectual property is concentrated in the United States and Singapore. What the Irish entity holds is most likely an exclusive economic li-

cence: the right to exploit VMware's software worldwide. This is not a legal title, but under Irish tax law it qualifies as an intangible asset, and a powerful one. The strategy rests on a simple mechanism: one IP, two balance sheets. This is the politics of accounting: converting commercial IP

rights into tax-deductible assets. These intangible assets are notoriously difficult to value, allowing significant discretion in how they are priced and reported. This dual treatment of IP is central to understanding how profit shifting operates in modern global capitalism. The rights to monetise VM-

ware's IP are located in Ireland. Global software revenues pass through VMIUC's $40 \mathrm{\ subsidiaries}$ worldwide. But because Irish law permits extensive amortisation and

interest deductions on self-acquired intangibles, companies can systematically eliminate taxable income. This is the post-double Irish playbook in action. Many US multinationals onshore IP rights into Ireland, and then offset the resulting in-

come with internal financial charges In some cases, a significant portion of income remains taxable. In others, like VMware, the outcome is near-total tax disappearance. VMIUC has not concealed this legal-accounting strategy. Its filings are

transparent. The structure is legal. But the effect is unmistakable. In 2019, the company was profitable and taxable. From 2020, it has been engineered into a loss-maker for the global corporate group. This is not due to operational failure, but to financial design. The IP stays in the United States. The deductions are booked in Ireland. Somewhere in between, a large part of the tax obligation often vanishes. One IP. Two balance sheets.

VMware did not respond to a request for comment from the

The forensic investigation:

How our analysis of key data points led to a focus on a dozen companies

AIDAN REGAN AND PETER O'DWYER

his investigation is based on research from the Democracy Challenged project at University College Dublin (UCD), funded by the European Research Council (ERC). The team is carrying out forensic financial investigations into how US multinationals use Ireland to house intellectual

property (IP) and shift global profits. For this week's Business Post analysis, we extracted data from Moody's Orbis Historical and Orbis IP-Historical databases (formerly Bureau van Dijk's) We focused on all Irish-registered firms that report intangible assets and hold IP rights. After manually cleaning and correcting the dataset, we narrowed the analysis to the top 1 per cent of firms by asset value.

The findings revealed a striking concentration. Just 80 companies control more than 90 per cent of all declared intangible assets in Ireland.

Nearly all are subsidiaries of US-

90% of intangible assets held by 80 firms

This amounts to 1% of Irish-registered firms examined from the Moody's



based multinational groups.

Using this master dataset, the Business Post identified the 50 firms with the highest value of intangible assets in Ireland in 2023, and reviewed trends over the past decade to refine the list to firms that both hold significant assets and have seen the sharpest increases

over time. This led us to focus on a dozen firms.

The Business Post identified key financial data points for each of the groups and manually verified each figure by cross-referencing with publicly available 10-K filings. It also used filings to the Irish Companies RegisThe UCD team also analysed pat-

tration Office (CRO) to cross-reference

figures contained in the Orbis database. ent transactions and reconstructed group-level financials, including total profits and domestic and global effective tax rates. This formed the basis for a series of detailed, case-based investigations into how these companies allocate profits and minimise taxes, while often

paying significantly more in Ireland. The effect of this has been the Irish tax mirage: the creation of bumper corporation tax receipts built on transitory assets that are movable.

ysis, the team also produced broader sectoral research covering the technology and pharmaceutical sectors. While multinational disclosures are often incomplete, particularly at the subsidiary level in Ireland, the data

provides a robust and reliable view

of both the headline figures and un-

Alongside company-specific anal-

derlying trends. Research was conducted by Aidan Regan, Linus Zechlin and Lakshmi Menon of UCD.