

Tax Valuations: Challenging Times

Duration: 1.5 hours
Location: Online (Zoom)
Date: Wednesday, 14 May 2025
Time: 11.00-12.30
Speaker: Marie Flynn & Sarah Kirwan, *PwC Private*

Topics include:

- General principles of tax valuations
- Insight into current Revenue activity around valuations as a whole. The types of activity and circumstances that trigger valuation queries
- The challenge of giving a definitive answer to a valuation query
- The subjective nature of valuations and the importance of documenting the methodology used to arrive at a valuation, including consideration of all relevant factors
- The practical impact of Revenue's external valuation panel
- The treatment of minority discounts across the tax heads – IT, CAT, CGT, SD
- Recent TAC determinations
- Learnings from recent interactions with Revenue
- Recent insights on valuing different classes of shares and share rights
- Case studies and worked examples

Speakers' Bio

Marie Flynn is a Tax Director in PwC's Private Client Team and Head of Management Incentivisation in PwC with over twenty years' experience in UK and Irish taxation, both in practice and with HMRC. She specialises primarily in advising management teams on all aspects of share incentivisation (including share valuations) and high net worth individuals/families and partnerships on a variety of planning/structuring projects and in particular in the area of tax-based valuations. Marie is a Chartered Tax Adviser (CTA) in Ireland and the UK and has written articles and presented on a variety of topics including valuations, equity incentives, tax issues for non-domiciled individuals, professional partnerships and real estate. Marie is a member of the PwC European Management Shareholder Network and the PwC International Private Wealth Network. Marie is also Chair of the Irish Pro-Share Association (IPSA) and leads the IPSA working party on Employee Ownership Trusts.

Sarah Kirwan is a director in PwC's Private Client Team with fourteen year's experience in Irish taxation. Sarah is a Chartered Tax Adviser (CTA) and specialises in the management incentivisation area (including tax share valuations) for key employees/senior management for both owner managed business and large corporates and in advising high net worth individuals across a number of tax heads. Sarah has written a number of articles on various aspects of incentivisation and in particular on tax valuations. Sarah is a member of the PwC European Management Share Network and has vast experience in the area of incentivisation (including tax based valuations) in a number of locations across the globe.