Executive Overview: The Irish Contractor AI Venture & GPU Pod

Eliminating the 52.35% Personal Tax Wall & 15% Close Company Surcharge With Pre-Tax Compute & UAE Engineering

€8k–€15k
Month-1 0%-Tax Hardware DLA Buyback

€3,000/yr
Dual-Director Tax-Free CleverCards

100% OpEx
Year-1 Deduction on Dubai GPU Pod

10% CGT
Irish Entrepreneur Relief Exit Tax

- **Target Audience:** Independent IT, Security, Cloud & AI Contractors in Ireland billing €500–€850+/day through an Irish Personal Limited Company (LTD) or switching from an Umbrella company.
- **The Core Problem:** Leaving €40,000–€60,000 trapped inside an Irish LTD triggers the 15% Professional Services Close Company Surcharge after 18 months, while drawing it as salary loses 52.35% to Income Tax, USC, and Class S PRSI.
- **The Turnkey Solution:** Instead of losing half your upside to Revenue or locking 100% in an illiquid pension until age 50+, your Irish LTD subscribes to a Dedicated 96GB GPU Node + Fractional Dubai AI Engineer as a 100% Year-1 deductible B2B operational expense (Section 81 TCA 1997).
- **Immediate Month-1 Cash Unlock:** We structure your 1-page Hardware Asset Transfer Resolution so your Irish LTD buys your existing personal home lab/workstation (€8,000–€15,000) via a Director's Loan Account (DLA)—paying you €8k–€15k in cash at 0% Income Tax, 0% USC, and 0% PRSI.

1. Why Buying GPUs or Hiring Locally in Ireland Traps Contractors

The Accounting Gap Between Physical Capital Purchases (12.5%/yr) and 100% Deductible Dubai Lab OpEx

12.5% / yr
Slow 8-Year Irish Capital Allowance

+7.5%–10%
Effective Close Company Surcharge Hit

100% Yr-1
Deductible B2B Compute/Eng Lease

0% UAE CT
Dubai Lab Tax Rate (

- **The Irish Hardware 'Paper Profit' Trap:** If your Irish LTD spends €22,400 cash buying physical GPU servers outright, Section 284 TCA 1997 only lets you deduct 12.5% (€2,800) in Year 1—leaving €19,600 of 'paper profit' exposed to the Close Company Surcharge even though your bank cash is gone!
- **Why Naive Self-Owned Dubai Companies Fail:** Registering your own standalone UAE Free Zone company costs €6,000–€8,000/yr in license/visa/audit overhead and risks Irish Revenue 'Central Management & Control' challenges if you live in Ireland.
- **The Lab-as-a-Service Breakthrough:** Because our Dubai

2. The 5-Bucket Irish Contractor Tax & Cash Optimization Blueprint

How a €150,000/Year (€600/Day) Irish Contract Achieves up to 94.5% Total Wealth Retention

Allocation Bucket (On €150,000 Gross Contract)	Annual Flow	Irish Tax Paid	Net Value Retained & Purpose
1. Your Irish Director Salary (20% Band Ceiling)	€44,000 / yr	-€8,280 (18.8%)	€35,720 Net Cash (Zero euro taxed at 40% IT)
2. Month-1 Hardware DLA Buyback (Existing Rig)	€12,000–€13,500	€0 (0% Tax)	100% Tax-Free Loan Repayment to Your Personal IBAN
3. Dual-Director Small Benefit Cards + Travel/eWork	€8,400 / yr	€0 (0% Tax)	2 × €1,500 CleverCards (€3k) + €5,400 Mileage/eWork
4. Dubai AI Lab Pod (96GB GPU + UAE Engineer)	€42,000–€54,000	€0 (100% OpEx)	Builds Your B2B AI SaaS + Dedicated 96GB GPU Node
5. Self-Directed Irish PRSA + Running Costs	€30,100–€42,100	€0 (0% Tax)	Zeroes Out Remaining Irish Corp Tax & Surcharge

- **Co-Director / Spouse Optimization:** Appointing a spouse or partner as non-executive Co-Director & Company Secretary waives the €1,600 Section 137 bond and unlocks a second €1,500 tax-free Small Benefit card (€3,000/yr total at 0% tax/USC/PRSI).
- **Section 766 Refundable R&D Tax Credit (30%–35%):** Qualifying novel AI/security architecture development inside your Irish LTD is eligible for Ireland's 30%–35% payable R&D cash credit from Revenue.

3. Expected Use of Your Deployed 96GB GPU: Personal, R&D & Commercial

Full Bare-Metal Root Access + Turnkey Commercial Monetization While You Work Your Day Contract

96GB GDDR7
Dedicated RTX PRO 6000 + 192GB DDR5

40–50 hrs/mo
Dedicated UAE Python/AI Engineer

3 Usage Modes
Personal Dev + R&D + Commercial SaaS

Sub-Lease
Idle GPU Compute Credits Your Bill

- **1. Personal & Day-Contract Accelerator Usage (Air-Gapped Root Access):** Run unquantized/NVFP4 frontier coding and security models locally (Qwen3.8-Flash-Next 125B, GLM-5.3-Flash 320B, MiMo-V2.6-Flash 95.1% CyberGym, Nemotron 3.5 Super 3M-token context) at €0 token cost with zero cloud telemetry.
- **2. Proprietary R&D & Product Build (40–50 hrs/mo UAE Engineer Included):** While you bill your €600+/day client contract in Dublin, your dedicated engineer in our Dubai hub wires our 850+ Python MCP tools, 4.7M-turn Qdrant RAG engine, and 50k OSINT lattice into your own vertical SaaS product.
- **3. Commercial B2B SaaS Hosting (Hardware MIG Slicing):** Partition your 96GB card using hardware Multi-Instance GPU (MIG)—dedicating 24GB to host 4–8 commercial SME Voice AI receptionists (€2,250/mo each) while keeping 72GB for your heavy LLM/R&D workloads.
- **4. Idle Compute Sub-Lease Buyback:** Whenever your GPU node is idle overnight, our Dubai Lab can allocate its compute to commercial batch compliance/OSINT jobs and credit the revenue directly against your monthly pod invoice.

4. The Commercial Engine: Selling 24/7 AI Voice & Security Pods

Turning Your Pre-Tax Contractor Pod Into a Cash-Flowing Software Company Eligible for 10% CGT Exit

€2,250/mo
Per SME Voice/Ops Client Hosted

£3k–£5k
Per 48-Hr Air-Gapped Compliance Audit

3 Years
Holding Period for 10% Irish CGT Exit

+110%
More Buying Power vs Post-Tax Pay

- **Revenue Stream A — 24/7 SME AI Voice & Ops Subscriptions:** Host private, sub-400ms Voice & WhatsApp AI agents for property managers, recruitment firms, and clinics (€1,500 setup + €2,250/mo), backed by our Dubai human escalation desk.
- **Revenue Stream B — 48-Hour Air-Gapped Security & Regulatory Gap Sprints:** Use Nemotron 3.5 Super (3M context) + Qdrant RAG on your air-gapped 96GB node to ingest client policy/code dumps and generate DORA, ISO 27001, or UK TSA gap matrices in 48 hours (£3,000–£5,000 per sprint).
- **The 3-Year 10% CGT Wealth Exit:** By building a genuine trading software/AI asset inside your company over 3+ years, accumulated value qualifies for Irish Revised Entrepreneur Relief at 10% Capital Gains Tax (up to €1M lifetime) instead of 52.35% income tax.

5. Contractor Unit Economics & Immediate Month-1 Onboarding

No Tax-Year Wait Required — Unlock Your €8k–€15k 0%-Tax Hardware Cash on Your Next Monthly Invoice

Metric (On €48,000/yr / €4,000/mo Slice of Contract)	Option A: Draw as Personal Salary	Option B: Subscribe to Contractor AI & GPU Pod
Gross Contract Revenue Slice Deployed	€48,000 / yr (€4,000 / mo)	€48,000 / yr (€4,000 / mo B2B Invoice)
Irish Income Tax, USC & Class S PRSI	-€25,128 Lost (52.35% Tax)	€0 Tax (100% Year-1 Deductible B2B OpEx)
Irish 15% Close Company Surcharge	€0	€0 (Reduces Taxable Profit Before Year-End)
Net Capital Working for You	Only €22,872 Left After Tax	Full €48,000 Value (+110% More Buying Power)
Hardware + Engineering Delivered	1 Rig Only; €0 Left for Engineer	Dedicated 96GB GPU + MCP/RAG Stack + 50 hrs/mo UAE Dev
Month-1 Personal Cash Unlock (DLA)	€0	+€8,000 to €15,000 Cash at 0% Tax (Home Lab Buyback)

- **Immediate Timeline (Any Month):** Unlike PAYE EIIS investors, an Irish LTD deducts B2B OpEx against its corporate accounting year immediately.
- **3-Step Launch This Week:** Step 1 (Run your day rate through our 5-Bucket Calculator) → Step 2 (Sign the 1-Page Hardware Asset Transfer Resolution for €8k–€15k 0%-tax drawdown) → Step 3 (Provision your 96GB GPU partition & Dubai engineer in 7 days).