



STATUTORY INSTRUMENTS.

**S.I. No. 687 of 2025**

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FINANCE ACT 2025 (SECTION 19) (COMMENCEMENT) ORDER 2025

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I, SIMON HARRIS, Minister for Finance, in exercise of the powers conferred on me by section 19(2) of the Finance Act 2025 (No. 18 of 2025), hereby order as follows:

1. This Order may be cited as the Finance Act 2025 (Section 19) (Commencement) Order 2025.
2. The 1<sup>st</sup> day of January 2026 is appointed as the day on which paragraphs (b) and (c) of section 19(1) of the Finance Act 2025 (No. 18 of 2025) shall come into operation.



GIVEN under my Official Seal,  
30 December, 2025.

SIMON HARRIS,  
Minister for Finance.

## EXPLANATORY NOTE

*(This note is not part of the Instrument and does not purport to be a legal interpretation.)*

This Order commences paragraphs (b) and (c) of section 19(1) of the Finance Act 2025 (No. 18 of 2025).

Section 19(1) amends section 128F of the Taxes Consolidation Act 1997 which provides for the Key Employee Engagement Programme. The Key Employee Engagement Programme provides for a relief from income tax, USC and PRSI on any gain realised on the exercise of a qualifying share option.

The relief currently applies to qualifying share options exercised on or before 31 December 2025. Section 19 extends the relief by three years so that it will apply to qualifying shares exercised on or before 31 December 2028.

In its current form, the relief is available in respect of share options granted to employees of micro, small and medium enterprises (within the meaning of the Annex to Commission Recommendation 2003/361/EC of 6 May 2003). Finance Act 2025 makes no changes to the current conditions of the Key Employee Engagement Programme.

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