



# Growth begins with choosing the right partner.

Partner in progress

Eindhoven, March 2025

**Crowe Foederer  
&**

**Brainport Eindhoven: The Innovation Engine of the Netherlands**





# Introduction Crowe Foederer

# Crowe Foederer

**Who are we?** Crowe Foederer is a multidisciplinary professional services firm offering a broad range of services including accountancy, tax (advice), consultancy, audit, assurance, and work authorization/immigration services.

**Mission:** We support organizations in their operational and strategic needs and challenges through a multidisciplinary approach that combines personal interaction, continuous investment in talent, and the deployment of to the point, high-quality technological solutions.

**Vision:** To be a leading organization known for its multidisciplinary quality approach. We aim to harness the power of high-end technological solutions to address the business challenges of companies and institutions effectively.

## Key values and ambitions:

- Quality improvement and control;
- Technology and Data Analytics;
- Client Focus;
- Social Responsibility; *and*
- Workplace and culture



# Crowe Foederer – the Netherlands

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## *Governance, Partners & Staff*

Partners	50+
Staff	<u>650+</u>
Total Partners & Staff	700+



**€ 90** million revenue

#10 Network firm

#17 Largest Dutch accounting firm

Member of tier 1 professional organizations

# Impression of our services

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## Audit

- General audit
- Assurance & investigation
- IT Audit

## Consultancy

- Strategy & change management
  - Strategy
  - Interim management
  - Commercial excellence
- Project management/PMO
- Process optimization

## Corporate Finance

- M&A
- Exit-Ready
- Debt Advisory
- Valuation
- Transaction Services

## Financial services

- Administration services
- Financial statements
- Reports & forecasting
- Tax refund
- Advisory

## HR Services: Smart HR

- **Support:** smart payroll, HR advise, outsourcing, interim HR-services, recruitment, assessments & personality-analyzes
- **Advisory:** pension, employee benefits, labor law, talent-management, payroll tax & social security
- **Technology & Data analytics:** HR & Payroll software, smart analytics portal
- **Global HR:** global mobility, global payroll, global payroll & HR coordination, global technology

## Tax

- Corporate tax
- Indirect tax/ customs
- Transfer Pricing
- Private wealth
- Payroll tax & social security
- Tax risk management

## Technology

- Consultancy ICT management, security
- IT Audit
- IT Implementation financial software
- Data analysis
- System integrator & hosting provider services

# Crowe Foederer's offices – the Netherlands

- Headquarters located in Eindhoven
- Other offices:
  - Amsterdam
  - Oostzaan
  - Lelystad
  - Den Bosch (new)
  - Bladel
  - Roermond
  - Venlo
  - Venray



# About Crowe Network ('Crowe Global')

Crowe Foederer is a member of Crowe Global, a leading international network in the field of accountancy, tax advice, legal advice, advisory, risk consulting and payroll services.

**140+**  
Countries

**4%**  
Year on Year  
Growth

**5.3B USD**  
Global Revenue



**800+**  
Offices

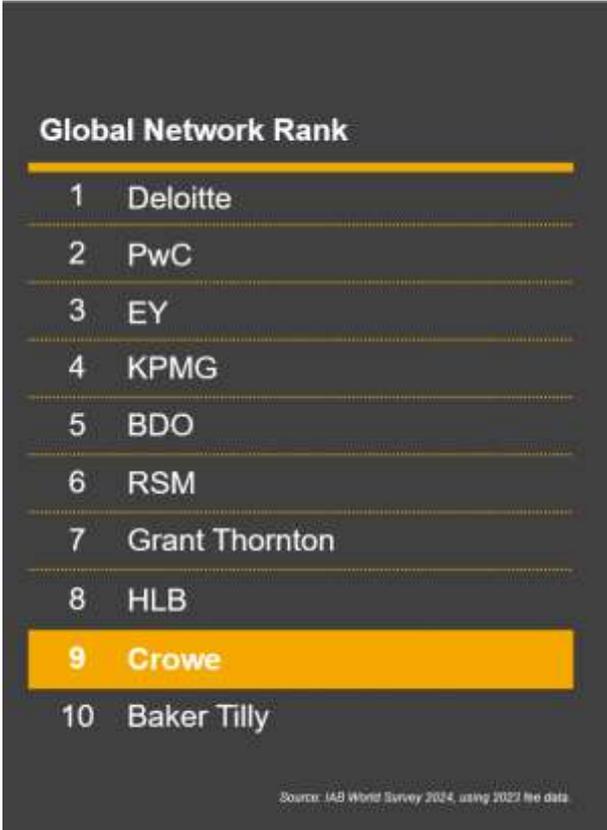
**4.000+**  
Partners

**40.300+**  
People around the  
world

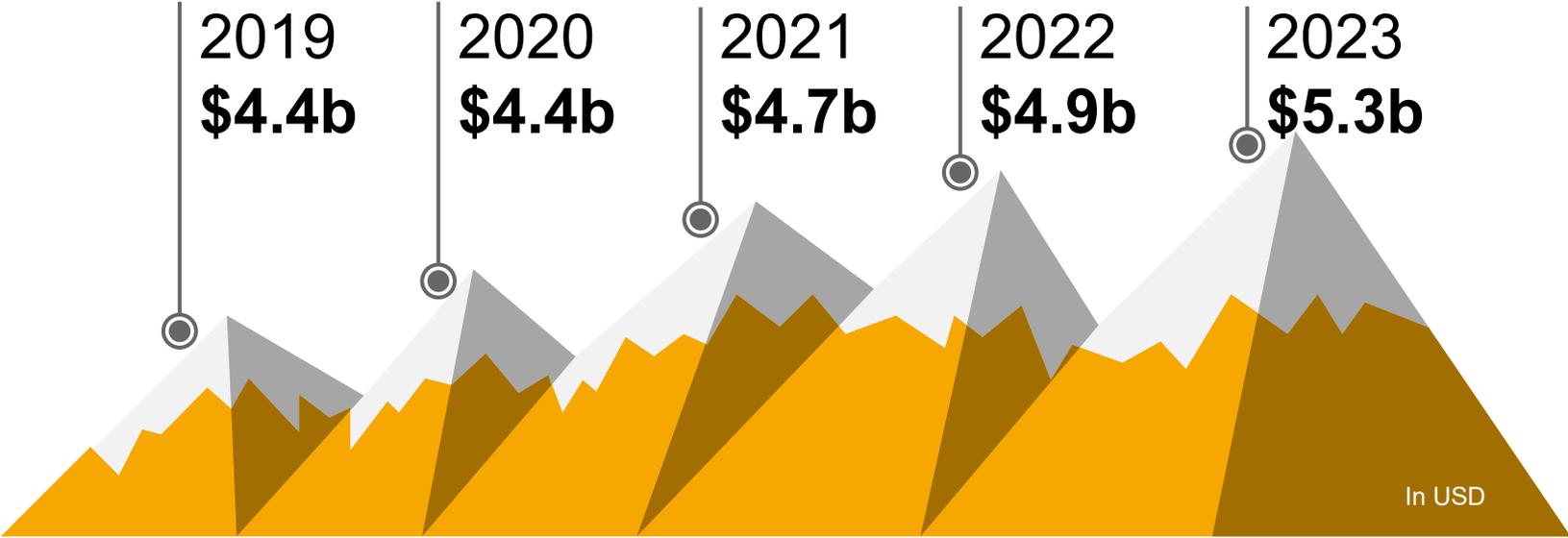
# Crowe Global Network

**2024**  
Top 10  
**Global Networks**

Ranked 9th among global networks



# Crowe Global - Achieving new heights





# Doing business in Brainport Eindhoven

# Somewhere green and peaceful...

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# What is Brainport?

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- Brainport is a successful partnership between 21 regional municipalities and cities, companies and research institutions located in the Southeast of the Netherlands ('Zuid Oost Brabant')
- By working together and sharing knowledge, Brainport grows bigger, smarter and stronger

## Reasons for establishing in Brainport

- **40%** of all R&D/innovative activities in the Netherlands take place in Brainport Eindhoven
- The city of Eindhoven ranks **5th** as European city of the future with the most economic potential (*FDI Intelligence*)
- **7th** position in the world rankings of most innovative countries (*Bloomberg*)
- The Netherlands is the **2nd** most favored nation for high tech companies (*Bloomberg*)
- Availability of the **smartest minds** at the High Tech Campus, the Automotive Campus and the Eindhoven University of Technology (TU/e)
- **Unique business collaborations** possible in one of the most inventive cities in the world
- **High patent density** in Eindhoven: Phillips, Signify, NXP and ASML among the top applicants

# High Tech Campus

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# High Tech Campus

“The smartest km<sup>2</sup> in The Netherlands with **more than 300 companies and institutes** and **some 12.500 researchers, developers and entrepreneurs** working on developing future technologies and products. (...) Located at the heart of Brainport, Campus companies are responsible for nearly 40% of all Dutch patent applications.”



# Automotive Campus

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**AUTOMOTIVE  
CAMPUS**

# Automotive Campus

- A place where **smart, safe and sustainable mobility solutions** for people, road and vehicles are created for the present and the future
- An **(inter)national hotspot** for everything related to automotive and mobility concepts
- An unique work- and learning environment



# Business Environment

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# Foreign countries investing in Brainport

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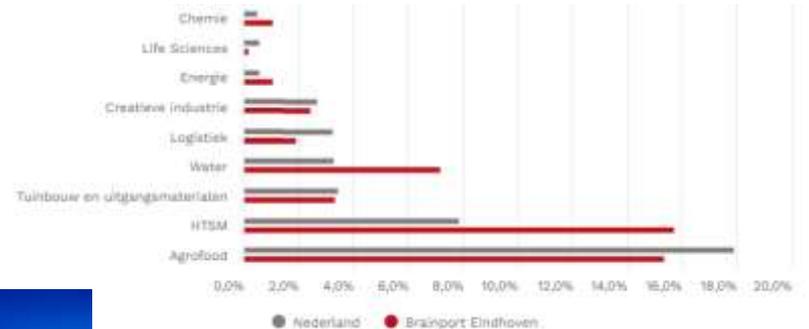
- In 2024, **19 new foreign companies** established themselves in the Brainport region (in 2023: 23)
- The **top 5 countries** with the most new establishments in the period 2018-2022:
  1. United States
  2. China
  3. India
  4. Turkey
  5. Germany
- **Japan** is an upcoming country with 2 new establishments in 2023 (in 2022: 4)
- **Germany** is the most important import and export partner of the Brainport Region
- However, Taiwan is **the biggest importer of high tech equipment** out of the Brainport Region

# Most thriving industries in the Brainport Region

- Current largest industries are **Creative Industry**, **Agrofood** and **High Tech Systems and Materials (HTSM)**
- **Fastest growers** are Agrofood and HTSM



Fastest growers (2022)



# Excellent infrastructure & accessibility

- The biggest airport of the Netherlands is **Amsterdam Airport Schiphol**
- **Three other airports** in the Netherlands: Eindhoven (mid-south), Lelystad (mid) and Rotterdam (west)
- An **extensive railway network** in the Netherlands that basically connects all major cities and towns
- The biggest port of Europe is **the Port of Rotterdam**
- Separate, smooth and well-maintained bicycle paths to ensure **a safe bike trip**
- In conclusion, **transportation by land, sea or foot** is not a problem in the Netherlands
- Ranked **3rd** as European city of the future on connectivity



# Ease of doing business in the Netherlands

- Dutch corporate law provides a **flexible framework** for the incorporation and organization of companies. The corporate law system provide a **wide range of legal entities** and partnerships
- Specifically setting up a **Dutch B.V.** can be realized in a short time frame and without e.g. minimal capital requirements. Flexibility exists e.g. regarding the capital structure, types of shares (profit rights, decision making), representation of the company, etc.
- For innovative and/or start-up businesses, the corporate system provides for a flexible **joint-ventures/partnerships**, both with and without legal personality
- Under conditions, Dutch laws allow the use of **foreign legal entities** in the Netherlands (branch of a foreign legal entity or the legal entity itself)
- Alternatively, for legal entities in the EU, it is possible to convert into a Dutch legal entity without ceasing to exist (**cross-border conversion**)



# Highly skilled, productive and multilingual workforce

- The Netherlands is #1 according to the EF English Proficiency Index when it comes to English skills
- According to the World Economic Forum, the Netherlands has the most competitive economy of Europe
- About 37% in the Netherlands is **highly educated** according to the Central Bureau of Statistics (CBS). This is above the European average
- The Dutch government offers 'red carpet' fast-track procedures for qualifying Highly Skilled Migrants towards residential and work authorization
- For non-EU students who graduated in the Netherlands or from one of the top 200 universities worldwide, it is optional to apply for an 'Orientation Year Permit' under favourable salary criteria



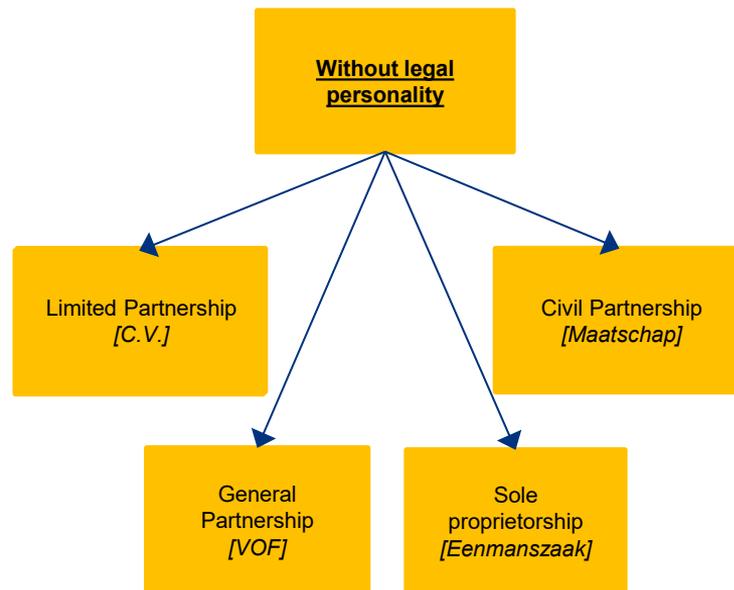
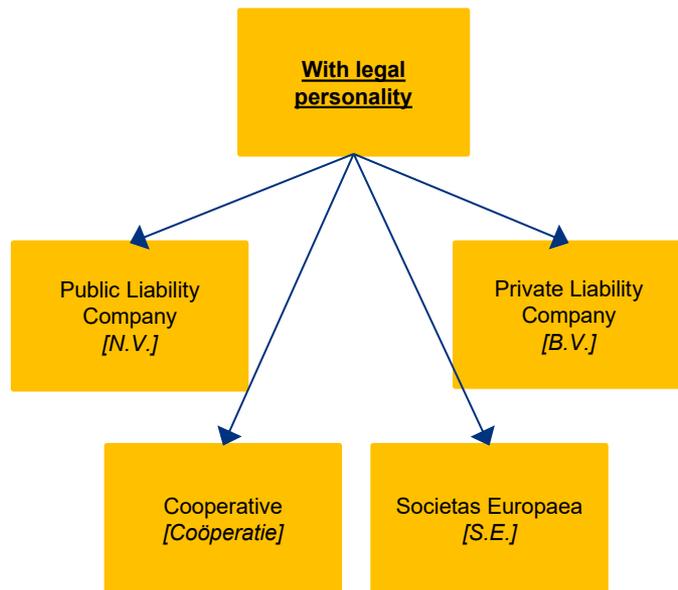
Ranking	World	Europe	Netherlands
CWTS <a href="#">Leiden Ranking 2023</a> Collaborative publications with industry (IP industry, min. 5000 pub)	6	2	1
THE (Times Higher Education) <a href="#">World University ranking 2023</a> (overall)	201-250		11
By subject (2023)			
- Engineering & Technology	31		
- Computer Science	29		
Academic <a href="#">Rankings of World Universities 2022</a>	201-250		11
QS World University <a href="#">Ranking 2024</a>	124	50	4





# Starting business in The Netherlands

# Dutch legal forms



### Common Dutch legal forms

#### Branch

- Permanent establishment of a foreign company from which Dutch business operations are carried out
- Foreign company is liable for claims incurred by actions carried out by the branch

#### B.V.

- Can be incorporated by one or more shareholders (foreign/domestic) in a short period of time.
- No minimum share capital;
- Sufficient if at least one share with voting rights is held by the shareholder of the BV
- Only registered shares can be issued.
- Board of directors obliged to keep an up-to-date shareholders' register
- Besides ordinary shares, priority shares and preference shares can be issued
- Normally, the management structure consists of a board of directors
- Under circumstances, a supervisory board may be installed
- Large entities are subject to the 'structure regime', bringing various additional conditions (e.g. the obligation to appoint a supervisory board with specific powers)

#### N.V.

- The N.V. shows strong resemblances with the B.V.
- A N.V. must have an authorized capital. At least 20% of the authorized capital must be issued and at least 25% of the par value of the issued shares must be paid up.
- The issued and paid-up capital of a N.V. must amount to at least € 45.000.
- Besides registered shares, a N.V. may also issue bearer shares.
- Bearer shares must be fully paid up and are freely transferable. Registered shares have to be transferred by executing a deed of transfer before a civil-law notary.
- A N.V. is also authorized to issue share certificates.

# Highlights Corporate Income Tax (CIT) & Other Tax Incentives

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### CIT rates

- 19% CIT rate for profits up to € 200.000 and 25,8% for the remainder

### Relief for losses

- Carry back: 1 year
- Carry forward: unlimited

### Fiscal unity

- Multiple entities treated as one taxable entity for CIT purposes
- Advantages a.o. compensation of results within unity, transfers of assets, transactions and loan positions non-visible within the unity (i.e. non-tax events)

### Innovation box regime

- ETR of 9% for income derived from a self- developed intangible asset (WBSO declaration/registered patent needed)

### Participation exemption

- Full CIT exemption for dividends and capital gains received from 'qualifying ( $\geq 5\%$ ) participations'. No minimum holding period.

### Tax Treaty Network

- The Netherlands has a very extensive double tax treaty network to avoid double taxation.
- Also, The Netherlands is part of the MLI signatory group, so that treaty application will be modernised in the near future.
- The Netherlands has a favorable tax treaty with China.

### Ruling practice

- Certainty in advance with Advance Tax Rulings (ATR's) or Advance Pricing Agreements (APA's)

### No withholding tax

- Only withholding tax on dividend, royalty or interest in situations of abuse.

## Other relevant tax incentives:

### R&D tax credit

- Incentive for entrepreneurs to invest in research & development.
- 32% / 14% wage tax reduction.
- Different tax reduction rates/amount for start-ups and self-employed entrepreneurs.

### MIA/Vamil

- Under certain conditions tax relief schemes for environmentally friendly investments
- Tax relief of up to 36% of the investments costs
- Freedom to decide when to write off 75% of investments costs (results in a cash advantage)

### Energy Investment Allowance

- Under certain conditions tax relief program for sustainable energy

# Personnel aspects

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# Personnel – various (1)

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## *30% ruling*

- The Netherlands has a knowledge driven economy and relies on a highly skilled, multilingual workforce, both domestic as foreign. This also applies for the Eindhoven area where historically a lot of expats are employed;
- For foreign workers/expats a special tax benefit may apply substantially lowering the tax burden on labour income: the 30% ruling based on which, under conditions, 30% of an employee's salary may be paid out tax-free as compensation for costs;
  - This facility may also apply for work performed outside the Netherlands, as long as the income is taxable in the Netherlands (based on domestic laws and tax treaties);
  - Conditions relate to the employee's professional position (level of salary), status of the employer and the employee's prior employment/stay in The Netherlands.

## *Foreign Nationals (Employment) Act / working permits*

- Employees originating from the EU/EEA and Switzerland do not need a residence or work permit to be allowed to work/reside in the Netherlands;
- Non-EU employees usually require special permission from the Dutch Immigration Service (IND) in the form of a residence and work permit to be allowed to work and reside in the Netherlands
- Under the Foreign Nationals (Employment) Act, the employer should apply for the permit. The employer acts as the sponsor for the foreign employee, ensuring that all conditions are and remain fulfilled;
- What type of permit is required or possible, typically depends on an employee's salary, age, academic achievements, and duration of stay (under or over 90 days)
- For employer that are 'Recognized Sponsors' with the IND special conditions apply in the sense they have access to fast-track procedures (2-3 weeks) with little to no red tape, whereas a regular immigration process can take up to 10-12 weeks

# Personnel – various (2)

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## *Labour laws*

- The Dutch employment market is regulated by various laws regarding the position of the employee and the employer;
- These rules are based on the concept of 'behaving according to the standard of good employer- and good employeeship';
- Most common is that the relationship between an employer and employee is laid down (although an oral agreement is also legally binding) in an employment agreement, containing the obligation to perform labour in person in return for payments and the authority of the employer to give instructions to the employee on how to perform the work;
- When entering into an employment agreement with a Dutch employer it is advisable to closely consider the most important stipulations, such as probation time, applicable Collective labour agreement, wage (there are minimum wage rules), duration, probation period, termination of agreement, competition/non-solicitation clauses, pension and social security clause etc.

## *Social security*

- In The Netherlands, both the employee and the employer are obliged to contribute to the social security system;
- The system comprises of three classes: (1) national insurances – these are collected through the income tax to a maximum income of EUR 38,098, (2) employee's insurance – this is paid by the employer (for unemployment and disability) and (3) health insurance – the employee should individually conclude a health insurance with a Dutch health insurance company and is also obliged to contribute through salary.



# Thank You

For more information and to find out opportunities for your company, please contact:



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