LEXIS MIDDLE EAST

GULF TAX

www.lexis.ae Spring 2025

FEATURE BRASS TACKS ON DMTT
Domestic Minimum Top Up Tax in the GCC

PROFILE VAT
Harsh Bhatia of Grant Thornton UAE

ANY QUESTIONS
Is tax automation required in the UAE?

A ROUND UP OF TAX DEVELOPMENTS ACROSS THE MIDDLE EAST

YOUR RIGHTS ON RETT

Saudi Real Estate Transaction Tax Reform

Your Trusted Legal Partner in Doha

At Hamad Alyafei Law Firm, we're more than just a law firm—we're pioneers in Qatar's legal landscape. With a prestigious client base and a proven reputation for excellence, we're committed to delivering innovative, tailored solutions that evolve with your needs.

Our mission?

To be your go-to legal partner, offering expertise built on trust, integrity, and strategic precision. With a dedicated team working tirelessly to secure exceptional results, we ensure your legal challenges are met with determination and fairness.

Hamad Alyafei Law Firm—where success is shaped by experience and driven by results.

www.alyafeilaw.com

LEXIS MIDDLE EAST
GULF TAX

The Lexis Middle East Gulf Tax magazine is produced by the Lexis Middle East Law online legal and business research service. To find out if you qualify to be added to our regular circulation go to: www.lexis.ae

Follow us on Twitter: https://twitter.com/lexismiddleeast

ADVISORY BOARD
Mubeen Khadir
Ashfaque Patel
Arubah Ahmad
Salah Gueydi
Halil Erdem
Rami Alhadhrami
Roberto Scalia
Laurent Bertin
Siegert Slagman

EDITORIAL
Editor
Claire Melvin
+44 (0) 20 7347 3521
claire.melvin@lexisnexis.co.uk

SUBSCRIBE
To join our free controlled circulation contact Tanya Jain
tanya.jain@lexisnexis.com

MIDDLE EAST REGIONAL SALES
Abbey Bergin
abbey.bergin@lexisnexis.com
+97145601200

PRODUCTION
Senior Designer
Jack Witherden

ENQUIRIES
UK
LexisNexis, Quadrant House,
Sutton, Surrey, SM2 5AS
Tel: +44 (0)20 8686 9141 or
Fax: +44 (0)208 212 1988

France
LexisNexis SA,
141 Rue de Javel,
75015, Paris
France
Tel: +33 (0) 1 45 58 90 43

This product comes from sustainable forest sources.

Reproduction, copying or extracting by any means of the whole or part of this publication must not be undertaken without the written permission of the publishers.

This publication is intended to be a general guide and cannot be a substitute for professional advice. Neither the authors nor the publisher accept any responsibility for loss occasioned to any person acting or refraining from acting as a result of material contained in this publication.

© 2025 Reed Elsevier.

LexisNexis®

Mubeen Khadir

Mourad Chatar

Arubah Ahmad

Salah Gueydi

Halil Erdem

Rami Alhadhrami

Roberto Scalia

Laurent Bertin

Siegert Slagman

LONG WAITS, QUICK CHANGES

There are times when tax law can be a bit like buses, particularly in this region...as you can find yourself waiting for ages for a particular new tax law on a specific subject to appear, and when it does, it is followed in quick succession by a whole host of other new laws at the same time. This may be said to be the case with Real Estate Transaction Tax Law in Saudi Arabia, which we cover in this issue. Implementing Regulations on this area were first issued by Saudi Arabia Ministerial Decision No. 712/1442 back in 2020, and there have been a number of amendments to these Regulations since then. However, strangely an actual law on this subject was not issued until towards the end of last year, which has now also been followed by a short consultation on new Implementing Regulations. Another area where this has also been the case has been Domestic Minimum Top Up Tax - a subject we also cover in this issue, despite having covered it recently. When we last covered this subject at the end of last year legislators in Bahrain had just issued a new Law on this subject but there were still many unanswered questions on how it would operate there and in other GCC countries. Towards the very end of last year - that all changed dramatically. Bahrain has now issued the implementing regulations which explain this law, the procedural framework has been put in place, and the first deadline for registration has already passed. There has also been a whole host of similar legislative changes in Oman, Kuwait and UAE which have been issued in quick succession, with more change on the way. All this goes to show that these days in the GCC region taxpayers need to keep a close eye on developments and be ready to adapt to significant changes in the law at very short notice.

Claire Melvin - Editor

CONTENTS

FEATURE: YOUR RIGHTS ON RETT p2
Saudi Real Estate Transaction Tax (RETT) law change

FEATURE: DOWN TO BRASS TACKS ON DMTT p6
Bahrain's leading approach on Domestic Minimum Top Up Tax and l its Influence on other GCC Countries

TAX NEWS ROUND-UP p10
Tax treaties, and Regulatory round up

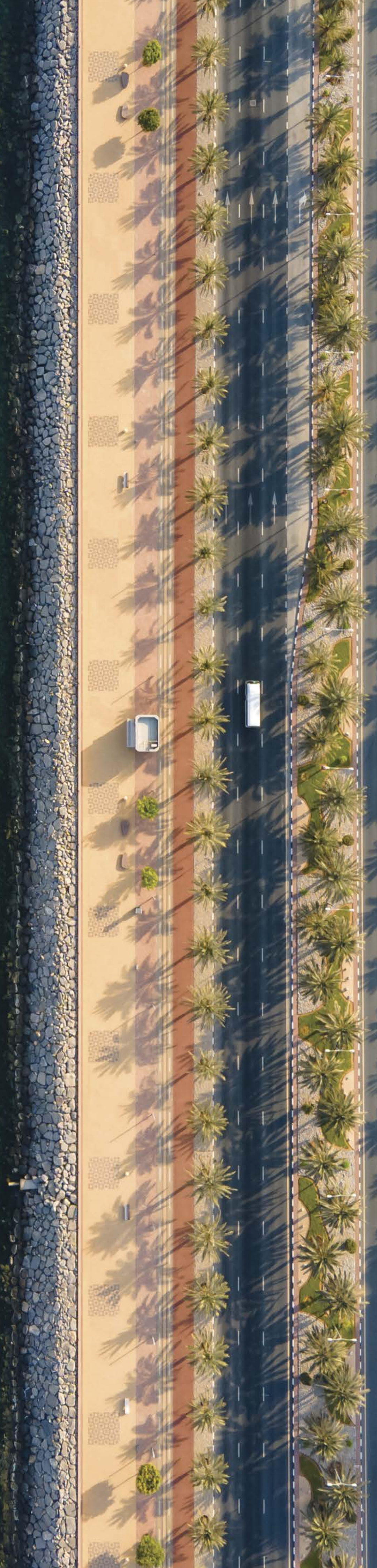
PRACTICAL FOCUS p12
VAT and Crypto mining

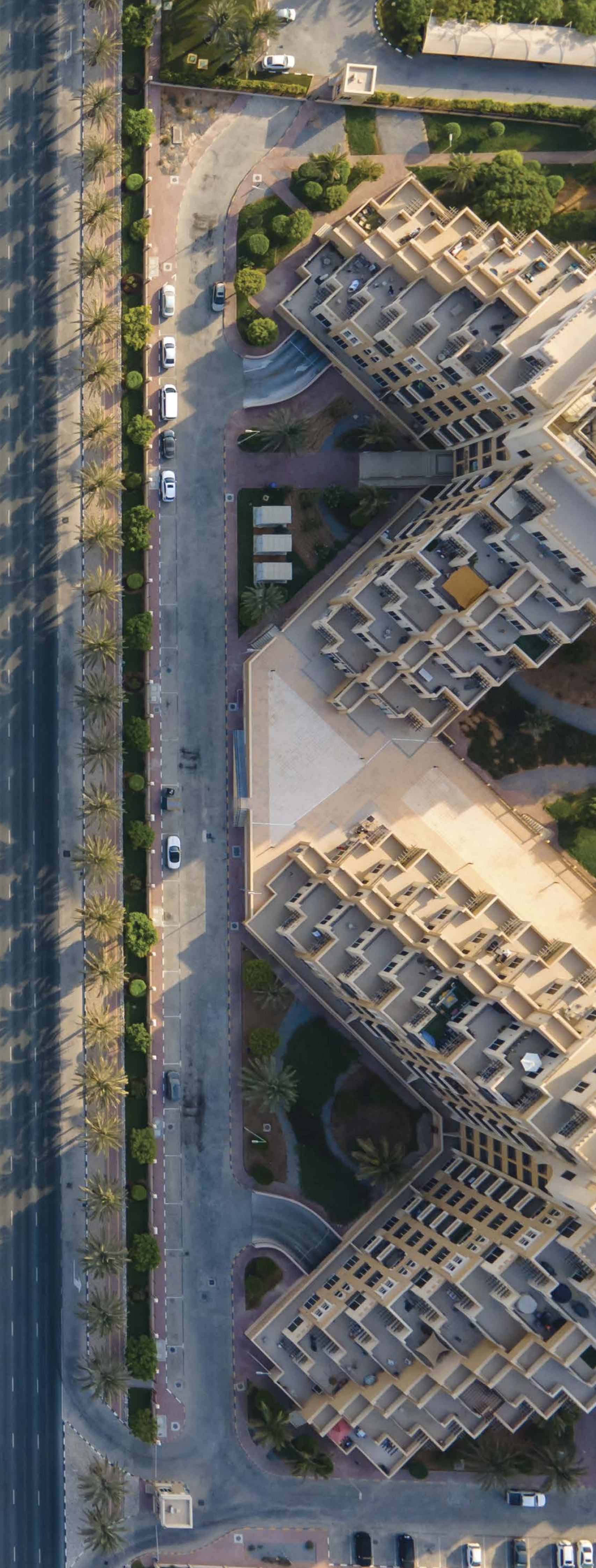
TAX PROFESSIONAL PROFILE p14
Harsh Bhatia > Grant Thornton
A Director of VAT discusses dealing with UAE VAT changes

ANY QUESTIONS? p16
Is tax automation required in the UAE?

YOUR RIGHTS ON RETT

Real Estate Transaction Tax (RETT) was introduced in 2020 in Saudi Arabia as Dr Fatma Salah, Mohamed Riad and Amera Gamal of Riad & Riad explain, new legislation about to be introduced and its Executive Regulations, will clarify how this works.




© Getty images/iStockphoto

"Since 2020 a number of measures have been taken in Saudi Arabia to reform the way real estate transactions are taxed there," states Fatma Salah. "These began with Saudi Arabia Ministerial Decision No. 712/1442 which exempted Real Estate Transactions from VAT and instead imposed a 5% real estate transactions tax (RETT). In September 2024, the RETT Law under Saudi Arabia Cabinet Decision No. 239/1446 On the Approval of the Real Estate Dispositions Tax Law was issued in order to provide the legal basis and framework for the administration, collection, and enforcement of RETT."

"It has also introduced new exemptions, clarified the definition and valuation of transactions, specified how the liability and payment of RETT works, and outlined the appeal process and penalties for non-compliance."

"Saudi Arabia Cabinet Decision No. 239/1446 comes into force 180 days after it was published on 11 October 2024 which is 9 April 2025," Mohamed Riad adds. "The Executive Regulations of the Law will be issued within 180 days following the issuance of the Law and will outline operational and procedural matters. A draft of these Regulations has now been issued in a consultation which is scheduled to end on 15 March 2025."

DEFINING REAL ESTATE TRANSACTIONS

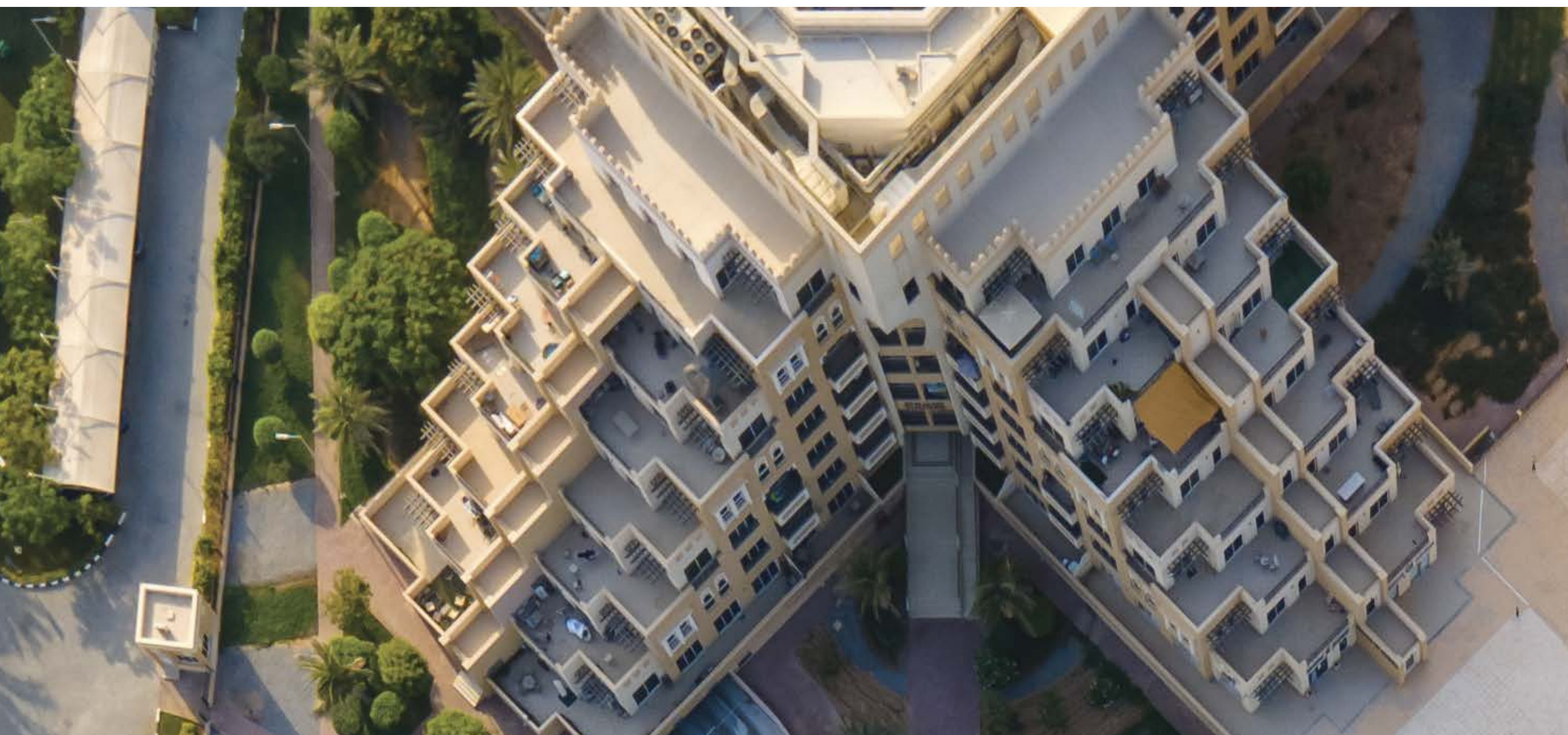
"A key element in Saudi Arabia Cabinet Decision No. 239/1446, is the definition of real estate transactions," states Amera Gamal. "These are defined as 'any transaction that directly or indirectly transfers ownership of a property, conveys its benefits permanently, or conveys benefits for a duration exceeding 50 years'. This is a broad definition which will include a wide range of transactions, ensuring that both direct and indirect transfers of ownership or long-term benefits are covered."

COMPETENT ADMINISTRATIVE AUTHORITY

"The Zakat, Tax and Customs Authority (ZATCA) is responsible for the administration of RETT and for imposing the penalties as stipulated in Saudi Arabia Cabinet Decision No. 239/1446," states Salah. "It also has the authority to verify the RETT amounts within a three-year period. In addition, ZATCA can adjust the RETT amount if it is deemed lower than the fair market value, estimate the value for transactions which have unspecified values and calculate the RETT for transactions which are undocumented or undisclosed. In doing so, ZATCA may obtain help from certified real estate appraisers."

RETT RATE

"Under Article 2 of Saudi Arabia Cabinet Decision No. 239/1446, a 5% RETT rate is imposed on all real estate regardless of the property's condition or use," Riad states. "RETT applies to both full and partial



transactions, including those that have not been notarised. It is calculated based on the gross transaction value agreed upon by the parties, provided this aligns with the fair market value. Pursuant to Saudi Arabia Cabinet Decision No. 239/1446 real estate transactions are subject to RETT only once, provided that the parties involved in the transaction, the real estate in question, and the transaction value remain unchanged. This means the same transaction cannot be taxed multiple times under the same conditions."

Dr Fatma Salah
Riad & Riad

Mohamed Riad
Riad & Riad

DUE DATE AND RETT PAYMENT

"Under Saudi Arabia Cabinet Decision No. 239/1446, RETT is due on the date of the transaction, which is considered to be the date of notarisation," Gamal explains. "However, the Regulations are expected to specify the due date for transactions which have not been notarised. RETT must be paid to ZATCA either on or before the relevant due date. There will also be certain cases where the RETT can be paid later than the due date. There are details on exemptions and the real estate transaction date in the draft regulations so more information on these areas should be specified in the Executive Regulations."

KEY POINTS

RETT Introduction
A 5% Real Estate Transactions Tax (RETT) replaces VAT on real estate transactions, as a result of Saudi Arabia Ministerial Decision No.712/1442.

New RETT Law
Saudi Arabia Cabinet Decision No. 239/1446 establishes the legal framework for RETT in Saudi Arabia including exemptions, definitions, and penalties.

LIABILITY AND REFUNDS

"Under Saudi Arabia Cabinet Decision No. 239/1446, the property seller is treated as the taxpayer responsible for paying the RETT on the due date," Salah states.

"However, the purchaser can be held jointly responsible if it is proven that they contributed in some way to the non-payment of RETT."

EXEMPTIONS AND REFUNDS

"Another interesting point to note is that when it comes to RETT, refunds are available for amounts that have been overpaid, paid in error, or paid for unfinalised and cancelled transactions," states Gamal. "Article 3 of Saudi Arabia Cabinet Decision No. 239/1446, provides various exemptions, each aimed at achieving different objectives. One of these objectives is supporting the functioning and development of public infrastructure and services, ensuring that necessary public projects can proceed without additional tax burdens. This category of transactions includes those with public entities or projects of public benefit, transactions conducted by public entities in their capacity as public authorities, transactions involving the expropriation of property for public interest or temporary possession, and transactions which involve foreign governments, international organisations, diplomatic or military missions, or accredited members of the diplomatic, consular, or military corps, provided there is reciprocity."

"Other exemptions aim to encourage the work of charitable organisations by reducing their financial obligations, to help them carry out their missions more effectively, or to facilitate the transfer of real

© Getty images/iStockphoto

estate within families and ensure the fulfilment of the deceased's wishes," adds Riad. "This includes transactions without consideration to public, private, or joint endowments, to or from licensed charities, or to a company or investment fund established in Saudi Arabia, where all shares, stakes, or units are directly or indirectly owned by a public, private, or joint endowment, provided ownership remains unchanged for up to five years. Saudi Arabia Cabinet Decision No. 239/1446 provides exemptions designed to encourage investment and financial market activities."

"These include transactions that constitute in-kind capital contributions to companies established the Kingdom, transactions between companies where one entity owns all shares or units of the other, or between a company and an investment fund where the company owns all shares of the fund, subject to certain conditions", Salah states. "Exemptions also apply to transactions resulting from mergers and acquisitions, or in relation to public subscription, trading of listed securities and investment fund units which should facilitate company restructuring," continues Riad. "Transactions between companies or investment funds established in Saudi Arabia where all shares, stakes, or units are directly or indirectly owned by the same person, provided ownership remains unchanged for up to five years are also exempt."

"Transactions executed under lease-to-own contracts and finance lease contracts concluded before the introduction of RETT are also exempt. This should help when the transfer facilitates property purchase financing."

Amera Gamal
Riad & Riad

RELEVANT LEGISLATION

Article 2(1) of Saudi Arabia Cabinet Decision No. 239/1446

A 5% tax will be applied to Real Estate Dispositions, regardless of the property's condition, form, or intended use.

(Source: Lexis Middle East Law)

APPEAL PROCESS

"Saudi Arabia Cabinet Decision No. 239/1446 also details how the appeal process applies to RETT", states Gamal. "Those disputing RETT amounts can appeal to ZATCA within 60 days of notification. ZATCA must decide on the appeal within 90 days. If the appeal is rejected or no decision is made within 90 days, the taxpayer can then challenge the decision before the primary and appellate objection committees within 30 days of notification or the lapse of the 90-day period. If no appeal or objection is made within these periods, a decision becomes final and cannot be contested or appealed before any other judicial body."

PENALTIES FOR NON-COMPLIANCE

"Those found guilty of RETT evasion will face fines of up to three times the value of the evaded tax," states Salah. "This penalty also applies to anyone who participated in, assisted with, or facilitated the RETT evasion. For late payment, a 2% fine is imposed for each month the tax remains unpaid, capped at 50% of the total RETT. If ZATCA adjusts the RETT, an extra 1% fine will be imposed. For other violations, the fine is the greater of the RETT amount due or 50,000 Riyals. The imposition of these penalties does not exempt the taxpayer from paying the outstanding tax."

DOWN TO BRASS TACKS ON DMTT

Following the recent regional flurry of legislation and guidance on Domestic Minimum Top Up Tax, Asrujit Mandal of BDO looks at changes across the region to support Pillar Two and how the front runner Bahrain's approach may influence approaches in other GCC countries.

"As of 1 January 2025, all GCC countries except Saudi Arabia had adopted the new Pillar Two regime," states Asrujit Mandal. "Bahrain led the way on 11 December 2024, when it enacted On the Implementation of the Tax on Multinational Enterprises Regulations (Bahrain Decision No. 172/2024). Bahrain Decision No. 172/2024 provides the procedural framework for Bahrain Decree-Law No. 11/2024 (Regarding the Implementation of Tax on Multinational Enterprises), answers a number of outstanding questions and provides further detail on how the regime will work there in practice."

"These regulations align with the OECD's Pillar Two framework and key aspects of Bahrain's regime should provide insight into the procedures other GCC states may adopt as part of their own Pillar 2 implementation," Mandal adds. "They have also introduced Bahrain's first formal Transfer Pricing framework and define the Permanent Establishment constitutions. Multinational Enterprise Groups meeting the EUR 750 million threshold in this law in two out of four previous fiscal years were required to register for the new tax by 30 January 2025, and advance tax payments of the new tax will be due quarterly, starting from 29 August 2025."

"Entities which cross this threshold later, will then be required to complete their registration within 120 days from the start of the relevant fiscal year," Mandal states. "Bahrain's National Bureau for Revenue (NBR) has also issued a Guide to the Scope of Bahrain Decree-Law No. 11/2024 and registration requirements. In addition, there is also now a dedicated email support system to facilitate smooth Top-Up Tax registrations in Bahrain."

BAHRAIN BASICS

"At present Bahrain is the regional pioneer," states Mandal. "However, they have only introduced the Domestic Minimum Top-up Tax (DMTT) and there have been no discussions on the Income Inclusion Rule or Under taxed Profits Rule."

"The DMTT which is levied at 15% on Bahrain Constituent Entities (CEs) of Multinational Enterprise Groups applies to multinational enterprises which are headquartered in Bahrain and overseas multinational enterprises (including permanent establishments) operating there," Mandal adds. "Joint ventures and

© Getty images/iStockphoto

their subsidiaries, which are accounted for under the Equity Method in the Ultimate Parent Entity's books, will also be treated as separate multinational enterprise groups for DMTT purposes if the Ultimate Parent Entity holds a direct or indirect ownership interest of at least 50%. In addition, if a joint venture is fully consolidated due to control by the Ultimate Parent Entity, it will be integrated into the broader multinational enterprise group. In this respect, the Executive Regulations under Bahrain Decision No. 172/2024 align with the Global Anti-Base Erosion rules, which means it is a Qualified Domestic Minimum Top-up Tax."

REVENUE TEST

"Key to understanding top up tax liability is whether the Multinational Group meets the EUR 750 million Revenue Test," states Mandal. "Here it has been clarified that revenue includes inflows from ordinary activities, realised and unrealised net investment gains, and extraordinary or non-recurring income."

"The Consolidated Financial Statements of the Ultimate Parent Entity must either be prepared in accordance with an Acceptable Financial Accounting Standard or under a different accounting standard provided adjustments are made to prevent any Material Competitive Distortions," Mandal adds. "The International Financial Reporting Standards (IFRS) is an Acceptable Financial Accounting Standard. However, if a multinational enterprise lacks consolidated financial statements for any of the four preceding fiscal years as a result of newly created Constituent Entities, the annual revenue for that fiscal year, is deemed to be below the threshold. Special rules also apply in computing the Revenue Test where a group merger or demerger occurs."

Asrujit Mandal
BDO

ADDITIONAL GUIDANCE

"Guidelines have been provided on substantive adjustments and the computation of Financial Accounting Net Income or Loss," states Mandal. "There is also guidance for insurance companies, and there are details on the conditions for excluding international shipping income. Although it should be noted in line

RELEVANT LEGISLATION

Article 23 of the Bahrain Decree-Law No. 11/2024
The Filing Constituent Entity may submit a request to the Bureau for a Tax Refund if it has paid an amount exceeding the Tax Due or in specified cases. The Regulations shall govern all the rules, conditions, and controls related to Tax Refunds. The Bureau will decide on the request according to these Regulations.

with the Global Anti-Base Erosion rule international airline income is not excluded, even though it is a usual exemption under double taxation agreements and domestic tax laws."

REGISTRATION AND EXEMPTIONS

"Under Bahrain Decree-Law No. 11/2024, one Entity located in Bahrain is responsible for the main compliance obligations of all Group Entities in Bahrain," Mandal adds. "This Entity, is called a 'Filing Constituent Entity'. It is responsible for filing a tax return showing the information for all the Constituent Entities located in Bahrain and for paying the DMTT due for all these Entities."

"The Filing Constituent Entity appointment is notified to the authorities by submitting a form during the registration process. They must also provide the NBR with written consent from all the relevant Entities located in Bahrain they will act for. Despite minor glitches, to date the registration process has been largely seamless. However as non-registration penalties can reach up to 100,000 Dinars it is important these steps are taken within the deadlines."

"It should also be noted that Entities seeking exemption must submit a declaration with supporting documentation," Mandal adds. "Safe Harbors (De -minimis/ transitional CBCR / initial Phase of International activities) can be claimed during registration though simplified computational safe harbor has not been defined."

TAX PAYMENT

"DMTT payments commence on a quarterly basis from 1 January 2025, and payments will be due within 60 days after the end of each quarter," states Mandal. "However, for the transition year, the first two instalments can be combined, making 29 August 2025 the final due date for multinational enterprises following the calendar year. The remaining balance must be settled within 15 months of the fiscal year-end. DMTT returns are due within 15 months of the fiscal year-end - 31 March 2027 for calendar-year multinational enterprises."

PROGRESS IN OTHER GCC COUNTRIES

"However, Bahrain is not the only GCC which has been busy issuing new Top-Up Tax legislation," states Mandal.

"Oman Sultani Decree No. 70/2024 On the Promulgation of the Law of the Top-Up Tax on Constituent Entities of Multinational Groups was also issued at the end of 2024, with effect from 1 January 2025. This law covers both the DMTT and the Income Inclusion Rule for in-scope inbound and outbound multinational enterprises."

"In Oman which already has a 15% headline rate, this tax applies to entities and permanent establishments of foreign multinational enterprises operating in Oman which have not met the minimum effective tax rate through the Income Inclusion Rule mechanism at the Ultimate Parent Entity or Intermediate Parent Entity level. It also extends to Omani-headquartered multinational enterprises with foreign entities subject to the Income Inclusion Rule at the Ultimate Parent Entity, Intermediate Parent Entity, or Partially Owned Parent Entity level. However, the relevant Executive Regulations are still to be issued."

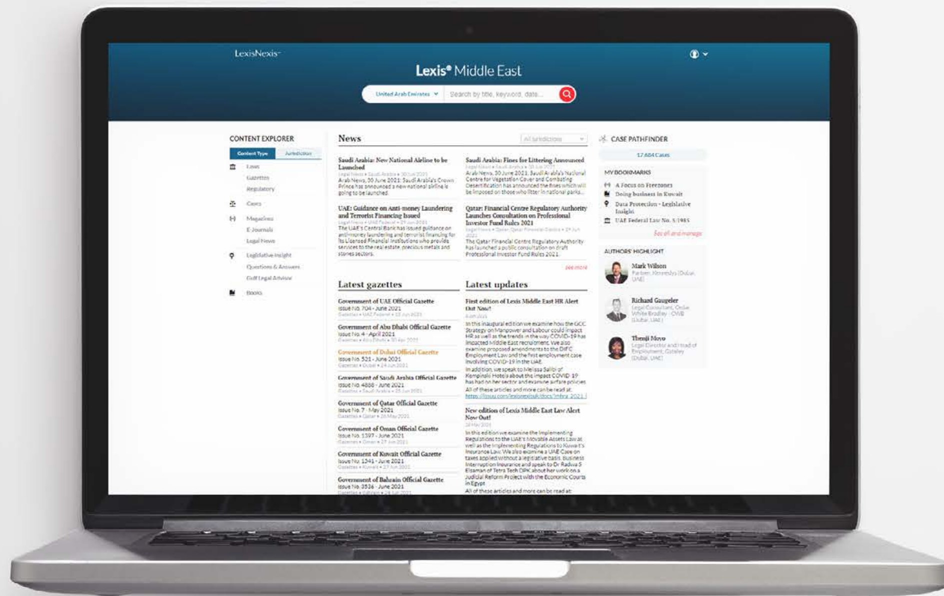
"The UAE which has an existing 9% corporate tax, introduced a Qualified Domestic Minimum Top-up Tax with Cabinet Decision No. 142/2024, On the Imposition of Top-up Tax on Multinational Enterprises which was issued on 31 December 2024," states Mandal. "This aligns the UAE with the OECD GloBE Model Rules. Entities within Multinational Enterprises (MNEs) operating in the UAE, with annual global revenues of €750 million or more, as reflected in the Consolidated Financial Statements of the Ultimate Parent Entity for at least two of the four financial years preceding the applicable financial year will be liable to pay this tax. Relief is available through a Substance-based Income Exclusion, which reduces net Pillar Two income subject to the UAE Top Up Tax. This is calculated based on payroll and the carrying value of tangible assets to determine Excess Profit for tax computation. There is also a De Minimis exclusion. The Top Up Tax will not be applied during the initial phase of a Multinational Enterprise Group's international activity, if no ownership interests in UAE entities are held by a parent entity which is subject to a Qualified Income Inclusion Rule in another jurisdiction."

"Qatar also amended its existing corporate Income tax law (which has a headline rate of 10%). On 23 December 2024 Qatar introduced the DMTT," Mandal states. "The Shura Council has approved a draft law introducing - the 15% Domestic Minimum Top-Up Tax and a General Tax Authority (GTA) statement has been made on this. The tax applies to Qatari companies with foreign branches and multinational enterprises operating in Qatar with revenues exceeding three billion Riyals (which is equivalent to EUR 750 million). Qatar's draft amendments specifically incorporate the Income Inclusion Rule (IIR) and a DMTT although the legislation is still pending."

"Finally, Kuwait also introduced DMTT under Kuwait Decree-Law No. 157/2024 on 31 December 2024, which applies to both domestic and foreign-headquartered multinational enterprises," explains Mandal. "This law's Executive Regulations are expected to be issued by 30 June 2025, and registration for in-scope multinational enterprises must be completed by 30 September 2025."

"In addition, DMTT will replace the 1% Zakat, 2.5% National Labour Support Tax, and 15% Kuwait-originated nonresident income tax."

"Finally, Saudi Arabia has been actively assessing the impact of Pillar Two rules on its corporate tax framework, and discussions are ongoing on potential amendments to align this with OECD guidelines."



Unleash your full potential with Lexis® Middle East.

The Middle East is a vibrant and rewarding business hub that legal practitioners can now fully tackle with Lexis® Middle East's straightforward access to decisive online legal content in English.

18,800+ MENA Case Summaries

10,600+ GCC Consolidated Laws (in Arabic & English)

6,200+ Practical Guidance Documents

800+ Contributing Authors & Firms

135 GCC Regulators

Essential information you can't get anywhere else
On top of fully amended and consolidated laws translated from Arabic to English by our strategic partner Sader Legal Publishing, and regulatory material for more than 100 freezones and agencies, Lexis® Middle East is the only platform that includes translations of all GCC gazette indexes and more than 18,500 case summaries.

Accomplish tasks faster with know-how from leading local practitioners
The Lexis® Middle East platform encompasses a complete up-to-date set of practical guidance tools and documents: *Questions & Answers*, *Getting the Deal Through Country Guides*, *Precedents*, *Checklists*, *Toolkits*, and more than 1,700 GCC-specific Practice Notes from *Gulf Legal Advisor (GLA)*.
GLA makes your life easier by enhancing your research and getting you up to speed quickly on new or changing topics in your practice area.

Through practical guidance provided by expert lawyers, GLA gives you the *what*, *how*, and *why* of GCC laws and allows you to confidently advise, negotiate and draft more effective documents, more efficiently.

Work at maximum efficiency with cutting-edge features
The new powerful search engine comes with numerous innovative features such as *Fast track*, *Drilldown*, *Case Pathfinder*, and dynamic tables of contents that have been designed for quick and easy access to the information that you need.

Stay on top of the latest developments
Receive exclusive online access to seven law journals and magazines such as The Oath, *The MENA Business Law*, *The International Journal of Arbitration* and more; regional office law firm newsletters from Al Tamimi & Co., Clyde & Co, Hadef & Partners... and daily news updates drawn from over 300 local, regional and international sources.
Receive alerts regarding any new content or content updates on the platform via our fully customizable alert module.

Support you can count on
With our GCC-wide team on the ground supported by our London and Paris offices, our team is on hand to assist you face-to-face or remotely to ensure that you make the best out of our solutions.

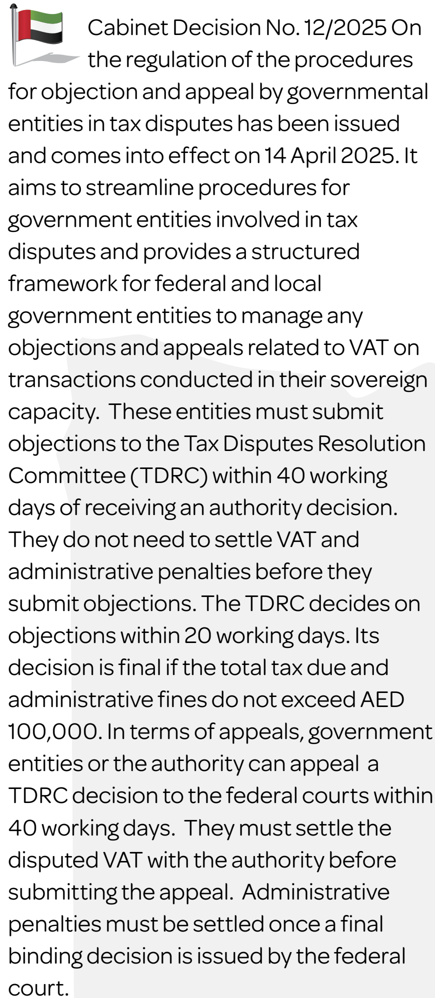
***Book a demo of Lexis® Middle East and start your free trial today:* Lexis.ae/demo**

TAX NEWS ROUND-UP

COVERING RECENT KEY DEVELOPMENTS – REGION-WIDE

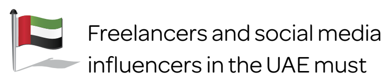
UAE

TAX DISPUTE PROCESS



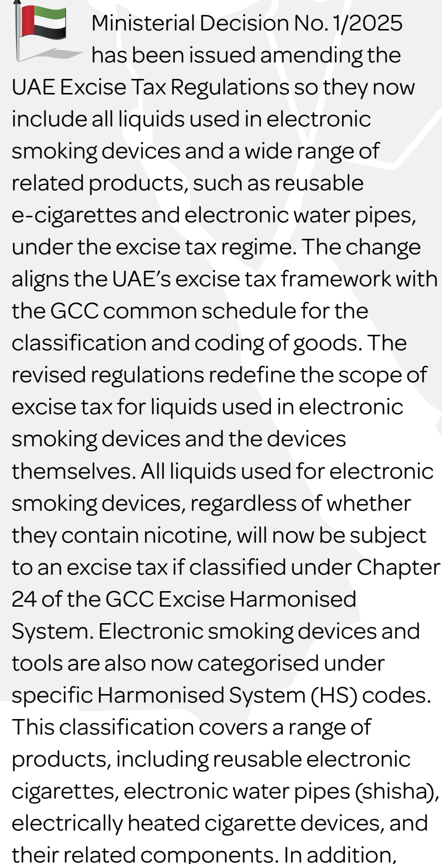
Cabinet Decision No. 12/2025 On the regulation of the procedures for objection and appeal by governmental entities in tax disputes has been issued and comes into effect on 14 April 2025. It aims to streamline procedures for government entities involved in tax disputes and provides a structured framework for federal and local government entities to manage any objections and appeals related to VAT on transactions conducted in their sovereign capacity. These entities must submit objections to the Tax Disputes Resolution Committee (TDRC) within 40 working days of receiving an authority decision. They do not need to settle VAT and administrative penalties before they submit objections. The TDRC decides on objections within 20 working days. Its decision is final if the total tax due and administrative fines do not exceed AED 100,000. In terms of appeals, government entities or the authority can appeal a TDRC decision to the federal courts within 40 working days. They must settle the disputed VAT with the authority before submitting the appeal. Administrative penalties must be settled once a final binding decision is issued by the federal court.

FREELANCERS AND INFLUENCERS



Freelancers and social media influencers in the UAE must register for corporate tax by 31 March 2025. Income from brand partnerships, sponsorships and other monetised activities is taken into account when assessing tax liability. Freelancers with revenue over 1 million AED by 31 July 2024, must register for corporate tax by 31 March 2025, and file their 2024 tax return by 30 September 2025. Freelancers with multiple licences must also combine their turnover from these various licences to assess if they are liable for tax.

EXCISE TAX ON E-SMOKING



Ministerial Decision No. 1/2025 has been issued amending the UAE Excise Tax Regulations so they now include all liquids used in electronic smoking devices and a wide range of related products, such as reusable e-cigarettes and electronic water pipes, under the excise tax regime. The change aligns the UAE's excise tax framework with the GCC common schedule for the classification and coding of goods. The revised regulations redefine the scope of excise tax for liquids used in electronic smoking devices and the devices themselves. All liquids used for electronic smoking devices, regardless of whether they contain nicotine, will now be subject to an excise tax if classified under Chapter 24 of the GCC Excise Harmonised System. Electronic smoking devices and tools are also now categorised under specific Harmonised System (HS) codes. This classification covers a range of products, including reusable electronic cigarettes, electronic water pipes (shisha), electrically heated cigarette devices, and their related components. In addition, components rexplicitly designed for these devices, such as those used in electronic shisha and heated cigarette devices (except for batteries) are also subject to excise tax framework. Excise tax now also extends to concentrates, powders, gels, and extracts which can be converted into taxable liquids by retailers. The excise price is determined on the higher of either the tax authority's listed price or the 'Designated Selling Price' declared by importers or producers.

TAX TREATY UPDATE

UAE: TheUAE Cabinet has approved a Protocol amending the Double Tax Treaty (DTT) between the UAE and Switzerland.

Oman: Bahrain and Oman have formalised a new income tax treaty.

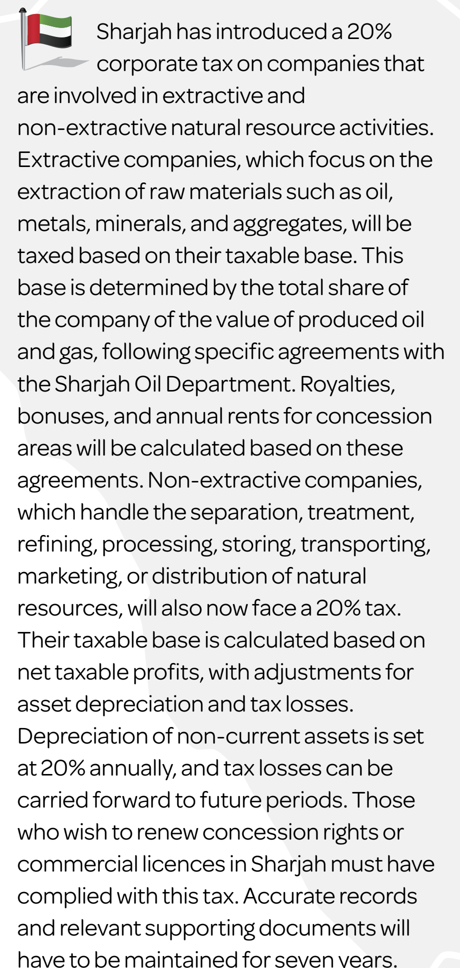
Qatar: Qatar and India have signed a revision to the India – Qatar Income Tax Treaty (1999).

Saudi Arabia: The Shura Council Majlis al-Shura has approved an income tax treaty with Iceland.

Egypt: Egypt has officially ratified the Egypt-Oman Income Tax Treaty 2023 through Egypt Presidential Decree No. 320/2024.

SHARJAH

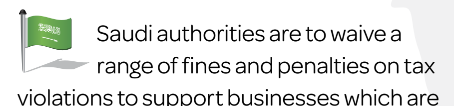
NATURAL RESOURCES TAX



Sharjah has introduced a 20% corporate tax on companies that are involved in extractive and non-extractive natural resource activities. Extractive companies, which focus on the extraction of raw materials such as oil, metals, minerals, and aggregates, will be taxed based on their taxable base. This base is determined by the total share of the company of the value of produced oil and gas, following specific agreements with the Sharjah Oil Department. Royalties, bonuses, and annual rents for concession areas will be calculated based on these agreements. Non-extractive companies, which handle the separation, treatment, refining, processing, storing, transporting, marketing, or distribution of natural resources, will also now face a 20% tax. Their taxable base is calculated based on net taxable profits, with adjustments for asset depreciation and tax losses. Depreciation of non-current assets is set at 20% annually, and tax losses can be carried forward to future periods. Those who wish to renew concession rights or commercial licences in Sharjah must have complied with this tax. Accurate records and relevant supporting documents will have to be maintained for seven years.

SAUDI ARABIA

TAX FINES WAIVED



Saudi authorities are to waive a range of fines and penalties on tax violations to support businesses which are

registered in its tax system. The cancellation of fines and penalty exemptions will be available until 30 June 2025. Waived fines include those related to late registration, payment, and filing of returns under all tax laws. Waived penalties include those for correcting VAT returns, violations of VAT field control, and non-compliance with e-invoicing and other VAT regulations. Those wishing to benefit from these waivers must be registered with the tax system, submit any previously unfiled returns to the Zakat, Tax and Customs Authority (ZATCA) and settle all outstanding principal tax debts related to those returns. There will also be an option to apply for an instalment plan if the application is made before the end of the initiative and all payments are made on time as per the approved schedule. These exemptions do not apply to penalties which relate to tax evasion or fines that were settled before the scheme began.

WITHHOLDING TAX

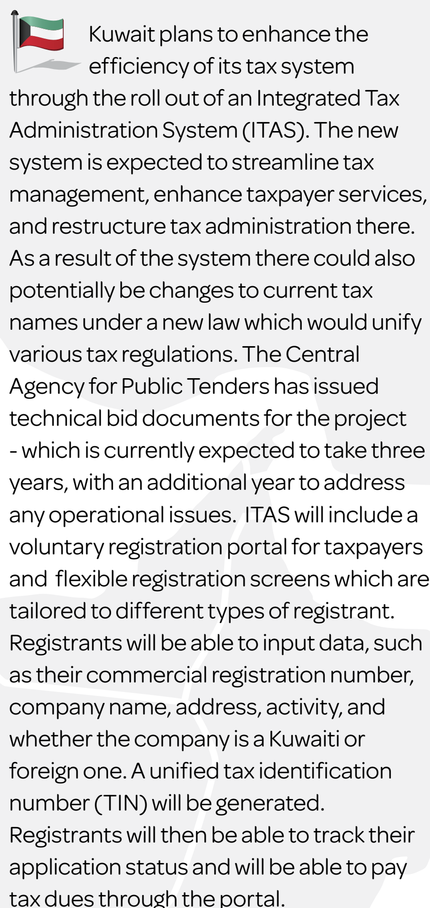
The Saudi Zakat, Tax, and Customs Authority (ZATCA) has issued new guidance clarifying the application of Withholding Tax (WHT) under both domestic regulations and Double Taxation Agreements (DTAs) signed in Saudi Arabia. In the past a lack of detailed guidance on WHT procedures in Saudi Arabia had created uncertainty and problems for businesses making cross-border payments. The new guidance aims to provide greater clarity on taxable income, applicable rates, and procedural aspects. Clarifications have been provided in particular on payments for technical and consulting services, and on taxation of independent personal services. There is also a distinction between royalties and business profits, particularly in relation to software licensing, technology transfers, and intellectual property transactions.

VEHICLE IMPORTS

Customs brokers are no longer needed when importing light vehicles into Saudi Arabia. This change came into effect on 19 December 2024. It applies exclusively to light vehicles weighing up to 3.5 tons. In order to begin importing these vehicles individuals must prove ownership and fulfil all necessary prerequisites. The procedure has also now been fully integrated into ZATCA's electronic service, allowing importers to submit required documents, pay import duties and customs fees, and receive a temporary licence plate before clearing customs at the port of entry. Once a vehicle arrives in Saudi it must have a technical inspection and compliance checks done within 15 days. The final steps then include vehicle registration and obtaining a customs certificate.

KUWAIT

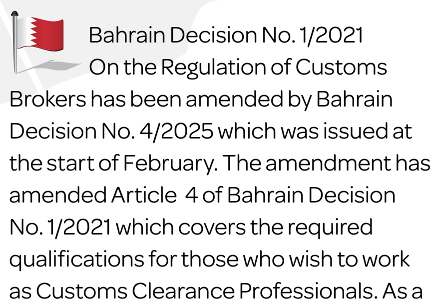
INTEGRATED TAX ADMINISTRATION SYSTEM



Kuwait plans to enhance the efficiency of its tax system through the roll out of an Integrated Tax Administration System (ITAS). The new system is expected to streamline tax management, enhance taxpayer services, and restructure tax administration there. As a result of the system there could also potentially be changes to current tax names under a new law which would unify various tax regulations. The Central Agency for Public Tenders has issued technical bid documents for the project - which is currently expected to take three years, with an additional year to address any operational issues. ITAS will include a voluntary registration portal for taxpayers and flexible registration screens which are tailored to different types of registrant. Registrants will be able to input data, such as their commercial registration number, company name, address, activity, and whether the company is a Kuwaiti or foreign one. A unified tax identification number (TIN) will be generated. Registrants will then be able to track their application status and will be able to pay tax dues through the portal.

BAHRAIN

CUSTOMS BROKERS



Bahrain Decision No. 1/2021 On the Regulation of Customs Brokers has been amended by Bahrain Decision No. 4/2025 which was issued at the start of February. The amendment has amended Article 4 of Bahrain Decision No. 1/2021 which covers the required qualifications for those who wish to work as Customs Clearance Professionals. As a result of the change Article 4(5) of Bahrain Decision No. 1/2021 now requires those working in this field to have a high school diploma or an equivalent qualification, unless they have been working as a customs clearing agent for not less than five years.

IN BRIEF

UAE: Companies that fail to pay corporate tax will face a 14% per annum penalty, calculated from the day after the payment deadline and accruing monthly...

Bahrain: A new Tax Objections Committee is to be formed...

Kuwait: Kuwait has been reported to be currently considering introducing VAT...

UAE: A grace period which has run from 1 January 2024 is due to end on 31 March 2025. During this period tax registrants can amend their information without incurring penalties...

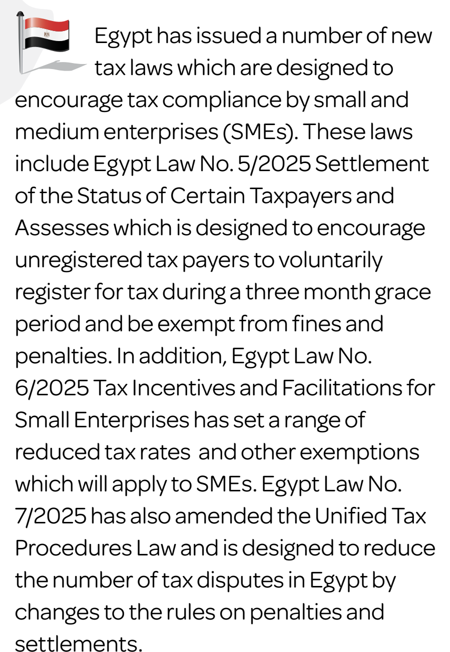
Saudi Arabia: The Zakat, Tax and Customs Authority (ZATCA) has confirmed a VAT refund service will be available for those who sponsor or contribute to public benefit projects, including mosques, health centres, educational facilities, and similar initiatives...

Kuwait: The Kuwaiti Finance Ministry is understood to be preparing a selective taxation law covering commodities which harm human health...

Kuwait: The Kuwaiti Finance Ministry has stated at present they have no plans to impose income tax on individuals...

EGYPT

SME SUPPORT



Egypt has issued a number of new tax laws which are designed to encourage tax compliance by small and medium enterprises (SMEs). These laws include Egypt Law No. 5/2025 Settlement of the Status of Certain Taxpayers and Assesses which is designed to encourage unregistered tax payers to voluntarily register for tax during a three month grace period and be exempt from fines and penalties. In addition, Egypt Law No. 6/2025 Tax Incentives and Facilitations for Small Enterprises has set a range of reduced tax rates and other exemptions which will apply to SMEs. Egypt Law No. 7/2025 has also amended the Unified Tax Procedures Law and is designed to reduce the number of tax disputes in Egypt by changes to the rules on penalties and settlements.

FOCUS ON VAT & CYPTO MINING

With Crypto-currency becoming more prominent and more acceptable worldwide, and it increasingly being used not just as an investment tool, understanding the tax considerations which apply when dealing with it has become more important. As a result, the UAE Federal Tax Authority (FTA) has recently amended Federal Decree-Law No. 8/2017 on VAT in order to make the VAT position on Crypto-currency clearer. It is important to note these amendments brought in by Federal Decree-Law No. 16/2024 have retrospective effect from 1 January 2018.

In addition, the FTA has also issued a Public Clarification VATP039 on this subject which provides detailed clarifications on the UAE VAT implications of Crypto-currency mining both when it is performed on the taxpayer's own account or on behalf of others.

WHAT IS CRYPTO-CURRENCY?

Crypto-currency is a digital or virtual asset which operates through a computer system and is not reliant on a central authority such as government or bank which are otherwise primarily responsible for issuing fiat currency.

In the case of crypto-currency every transaction is verified and recorded on a decentralised system using cryptography for secure exchanges.

All transactions are stored on a block chain, which is a public ledger that is transparent and protected. Popular examples of crypto-currencies include Bitcoin, and Ethereum, but there are also others.

CRYPTO-CURRENCY MINING

Crypto-currency mining is the process of validating transactions on a block chain and securing a network by solving complex mathematical problems using computational power. Crypto-currency miners use mining software to connect to the network, compete to solve these problems, and earn crypto-currency as a reward for adding new blocks to the block chain.

This process helps secure the network and keep it running smoothly.

© Getty images/iStockphoto

VAT ON CRYPTO MINING

The first and most important thing to understand when looking at the VAT implications of crypto-currency is the main forms of rewards miners can earn.

The most common type of reward is earned in the form of crypto-currency earned for either being the first to solve a complex problem and add a new block to the block chain or for helping to secure the network by staking their crypto-currency.

Miners can also earn transaction fees which are paid by users to process their transactions. They can join mining pools where a group of miners combine their resources to increase their chances of successfully mining a block and then share the rewards.

In VATP039, the FTA has clarified that mining crypto-currency on behalf of another person, i.e. supplying computational power, is considered to be a taxable supply of services.

Previously, there was no specific guidance on UAE VAT on Crypto-currency. However, in September 2024, the FTA amended VAT Law Implementing Regulations (Cabinet Decision No. 52/2017) when it issued Cabinet Decision No. 100/2024.

Cabinet Decision No. 100/2024 outlined the implications for Crypto-currency under Federal Decree-Law No. 8/2017. When it comes to mining for crypto-currency, the VAT treatment varies depending on whether the mining has been done for personal use or on behalf of others. Mining on your own account refers to a situation where a miner uses their own resources and equipment to mine crypto-currency.

In this situation, the miner contributes computational power to the network but does not direct this power to a specific recipient or mining pool. Where this is the case the activity is not considered to be a taxable supply, and therefore, it is outside the scope of VAT in the UAE.

Mining for others, on the other hand involves mining crypto-currency on behalf of someone else.

This typically means contributing computational power to a mining pool or a third-party network, often under a contractual arrangement in exchange for a share of the rewards.

Mining for others is treated as a taxable supply of services under UAE VAT Law. This means if the customer is in the UAE, the service is taxable at 5%. However, if the customer is non-resident, the supply may be taxable at a 0% rate, provided all conditions for zero rating are met under Article 31 of Cabinet Decision No. 52/2017. In addition, if a UAE recipient receives mining services from a non-resident, the recipient is required to account for VAT under the reverse charge mechanism if they are registered for VAT in the UAE. If the recipient is not VAT-registered, the non-resident service provider may then be required to register for VAT in the UAE. The rationale behind these different approaches to mining taxation depends on whether mining is done on your own account or on behalf of others.

When mining is conducted on your own account, it is not considered to be a taxable supply for several reasons. Firstly, there is no identifiable recipient of the services which have been performed by the miner. Furthermore, there is no direct connection between the mining activity and the reward received, such as mined tokens.

In this situation, the miner is not guaranteed a reward, as obtaining one will depend on various computational factors. As a result, the rewards earned by the miner are not considered to be consideration for taxable supply.

On the other hand, when mining is done on behalf of others, it is considered a taxable supply of services. This is because in this case there is a clearly identifiable recipient of the mining services performed by the miner. The miner receives consideration from the customer in exchange for providing them mining services, typically by sharing computational power. Therefore, the fee earned in this arrangement is treated as consideration for the services rendered to an identifiable recipient.

When a miner incurs various expenses for mining on their own account, such as hardware and software costs, space rental costs, electricity expenses, and maintenance services, the recoverability of input VAT will therefore depend on whether the mining activity is considered a taxable supply.

If mining is conducted on their own account and is considered a non-taxable supply, input VAT will not be recoverable. This is because the taxable expenses incurred are not directly related to a taxable supply. In addition, Article 54 of Federal Decree-Law No. 8/2017 requires a clear and direct link between taxable expenses and taxable supplies for input VAT recovery, which would not be satisfied in this case.

However, if mining is carried out on behalf of others and is considered a taxable supply, input VAT is recoverable. In this scenario, the expenses incurred are directly related to a taxable supply. The requirement under Article 54 of Federal Decree-Law No. 8/2017 to establish a direct nexus between taxable expenses and taxable supplies is met, allowing the miner to recover input VAT. However, it should be noted that in order to recover input VAT, other conditions must also be fulfilled, including having a compliant tax invoice and ensuring the claim is made within the prescribed time line.

The amendment to the legislation and public clarifications issued by the FTA has provided a lot of reasoning and clarity on the taxation of Crypto-currency mining, where it is performed using the proof of work mechanism.

However, as this technology is currently evolving, there may also have to be further developments in the tax law to deal with taxation in this area.

This article was written by Shailesh Kumar, Associate Partner, with contributions from Mradul Gupta, Associate Director and Megha Lohia, Assistant Manager, PKF UAE.

TAX PROFESSIONAL PROFILE

DIRECTOR – VAT

What's Next with VAT

Corporate Tax and Transfer Pricing changes may be hitting the headlines but as Harsh Bhatia, Director - VAT at Grant Thornton UAE, explains change is also afoot in the UAE with VAT too.

ABOUT YOU

I have over 14 years of specialist experience in Indirect Taxes, VAT, Excise, Customs, Goods and Services Tax (GST) in particular. I hold a degree in commerce, and later became a Chartered Accountant. In addition, I have a diploma in EU VAT from the Chartered Institute of Taxation, UK, have studied a Customs expert course with Dubai Trade, and have a Diploma in Transfer Pricing. I began my career in India, where I established my own practice and taught students. I later worked with a Big 4 Accounting firm for five years and a law firm for a year. After VAT was introduced in the Middle East, I relocated to the UAE in 2017 and now work for Grant Thornton, UAE.

ABOUT YOUR FIRM

Grant Thornton UAE is part of the global Grant Thornton network, which is made up of over 76,000 professionals in more than 150 countries. The firm has been based in the UAE for over 55 years and has offices in Dubai, Abu Dhabi, and Sharjah.

We offer Audit & Assurance, Advisory, and Tax services. Grant Thornton UAE was recently recognised as the best firm in the Grant Thornton international network and we won the Audit Service Provider of the Year award at the 2025 MENA II Awards. Our tax services cover direct and indirect taxation, including VAT, corporate tax, transfer pricing, international taxation, and customs duties.

At Grant Thornton UAE, I lead teams and have managed large-scale projects including a project on VAT implementation in the GCC. One particular achievement in connection with this project was setting up a new tax team in Oman during VAT implementation in 2021. I worked closely with the General Tax team, businesses, and the tax authority to conduct VAT impact assessments, train teams and clients, and implement processes.

I have also handled high-value litigation for multinational corporations which has helped to sharpen my strategic thinking and advocacy skills. One of the most significant projects I was involved in, in my career to date was handling multi-jurisdictional litigation for a renowned Japanese brand. This required meticulous planning and knowledge of state-level sales tax laws.

© Getty images

I worked closely with the GT team, businesses, and the tax authority to conduct VAT impact assessments, train teams and clients, and implement processes.

CHALLENGES

In addition, staying ahead in the dynamic field of tax advisory presents challenges, particularly in keeping up with regulatory changes and meeting evolving client demands.

Navigating these complexities requires staying calm under pressure, quickly analysing and resolving tax issues, and efficiently organising tasks.

To overcome these challenges, I stay updated on industry trends and regulations, leveraging technology to improve efficiency and accuracy.

Continuous professional development through conferences and training ensures I remain at the forefront of the field, allowing me to deliver exceptional value to my clients.

CHANGES AND TRENDS

The tax consultancy sector in the UAE has transformed significantly over the past seven years due to regulatory changes, including the introduction of VAT in 2018 and Corporate Tax in 2023 which have led to an increasing need for advisory services to help businesses comply. Transfer pricing is also becoming more important here as regulations develop and local businesses expand globally.

One of the changes we are seeing is the increased integration of advanced technology, such as AI, in order to enhance accuracy and efficiency.

PRACTITIONER PERSPECTIVE

Dhana Pillai
Founder
DPTC

Dhana Pillai of DP Taxation Consultancy explains the UAE's tightened VAT correction rules and voluntary disclosure rules, brought in by Federal Administrative Decision No. 8/2024.

In the UAE, businesses are required to submit accurate VAT returns in compliance with the tax procedures outlined in Federal Decree-Law No. 28/2022 and its Executive Regulations under Cabinet Decision No. 74/2023 and Federal Decree-Law No. 28/2022. The VAT law, Federal Decree-Law No. 7/2017 provides detailed guidelines on addressing errors and omissions in VAT returns. A key aspect of these regulations is the Voluntary Disclosure process, which ensures businesses rectify inaccuracies in their tax filings. The recent amendment brought in by Federal Administrative Decision No. 8/2024, which came into force on 1 January 2025, has further tightened the correction mechanism by removing all thresholds for error correction. This means VAT taxpayers now have to disclose all inaccuracies, regardless of their amount. When a taxpayer identifies an error in their VAT return, they must correct it through a Voluntary Disclosure which is submitted to the Federal Tax Authority. The legal framework, outlined in Federal Law No. 7/2017 and Ministerial Decision No. 51/2021, states taxpayers must make these disclosures within 20 business days from the date they become aware of an error. Previously, the law distinguished between significant errors, where tax liability discrepancies exceeded 10,000 AED, and minor ones which could be corrected through subsequent tax returns if this was still applicable. However, with the implementation of Federal Administrative Decision No. 8/2024, all errors, regardless of their impact on tax liability, must now be disclosed using the Voluntary Disclosure process. The new correction mechanism which was introduced by Federal Administrative Decision No. 8/2024, issued on 1 November 2024, clarifies that even errors that do not alter the Due Tax must still be rectified through Voluntary Disclosure. Taxpayers must correct reporting mistakes such as misallocating standard-rated taxable supplies to the wrong Emirate, misstating zero-rated taxable supplies, or inaccurately reporting exempt supplies. While these types of errors do not affect the total VAT due, they must still be disclosed under the amended regulations. In order to comply with the Voluntary Disclosure requirements, businesses must submit a formal declaration within 20 business days of identifying an error. This submission should include a comprehensive explanation of the mistake, specify the affected tax period, the nature of the error, and any necessary adjustments. The disclosure must also be made using the prescribed FTA form, ensuring all relevant details are included. Under the new rules, businesses can no longer correct errors in a subsequent tax return; every modification must go through the Voluntary Disclosure process, which automatically incurs an administrative penalty. Failure to comply with the Voluntary Disclosure obligations can lead to significant penalties. If a business does not disclose errors within the prescribed timeframe, penalties may be imposed, particularly if an underpayment of VAT results from non-compliance. The severity of these penalties will depend on the nature of the violation, whether it is an unintentional mistake or a deliberate act of fraud. With these stricter enforcement measures now in place under the amended framework, businesses must be vigilant and ensure their VAT returns are totally accurate in order to avoid financial penalties and regulatory scrutiny. Beyond the financial impact, failure to comply with VAT regulations can damage a company's reputation and hinder its ability to conduct business effectively in the UAE. Regulatory non-compliance can also lead to increased scrutiny from the authorities, making it crucial for businesses to have robust internal tax governance processes in place.

We are also developing more specialised services which are tailored to industry-specific needs.

The UAE's implementation of the OECD's Pillar 2 rules, and the introduction of a global minimum tax rate of 15% for multinational enterprises with revenues exceeding EUR 750 million, is also causing changes. We expect to see a reduction in profit shifting to low-tax jurisdictions as a result of these changes.

RECENT OR PENDING LAWS

VAT, has been in place in UAE since 2018, and we now have a fairly developed framework in this area as a result.

Whereas corporate tax and transfer pricing are relatively new areas which are developing and changing more quickly.

At present businesses in the UAE are preparing for their first compliance cycle in 2025, and having to navigate the complexities in integrating these regulations.

However, e-invoicing is an area which will significantly impact the way of doing business in UAE and VAT reporting.

E-invoicing already exists in Saudi Arabia. However, the new system in the UAE which is expected to take a different approach is to be implemented in phases, starting in July 2026. It should enhance transparency and help streamline compliance.

The UAE's new e-invoicing system will be mandatory for all B2B and B2G transactions.

It aims to standardise invoicing, automate tax reporting, and will also ensure real-time data exchange with the UAE Federal Tax Authority (FTA).

ANY QUESTIONS?

Is tax automation required in the UAE?

Dhana Pillai of DP Taxation Consultancy looks at requirements, help and plans which are increasing the uptake of tax automation software in the UAE.

© Getty images/iStockphoto

EmaraTax which was developed by the UAE Federal Tax Authority (FTA) is a sophisticated platform that enables businesses to manage VAT and Corporate Tax returns, payments, and filings seamlessly. It is found at https://eservices.tax.gov.ae/ Mobile versions of the App can also be downloaded from the Apple Store and Google Play. It facilitates periodic filings and Tax Certificates can be viewed and downloaded from it. It has also been integrated with the UAE Pass (Maskan App), which is a national digital identity app (available on the Apple Store and Google Play) which enables users to identify themselves to service providers through smart phone based authentication. Its integration into EmaraTax has expanded the platform's functionality and ease of use.

Businesses in the UAE are currently being encouraged to use tax automation software to ensure accurate tax calculations, automate filing, and to help manage their returns. This type of software can be used to reduce errors and speed tax compliance. It can automatically generate compliant invoices, self-billing invoices and credit/debit notices. However, any tax software solutions used must be purchased from Authorised Service Providers (ASPs) which meet FTA specifications, ensuring compliance with tax regulations. There is a searchable list of these Authorised Tax Accounting Software Providers at https://tax.gov.ae/en/tax.support/tax.accounting.software.vendors/accredited.tax.accounting.software.vendors.aspx. Systems which are used must be able to generate automatic tax invoices, maintain comprehensive audit trails, create non-editable tax return files, and produce Federal Tax Authority (FTA) Audit Files (FAF files), which provide robust audit trails and internal controls, promote transparency, and help ensure taxpayers are always audit ready. These systems can also have self-testing mechanisms embedded in them so taxpayers can verify compliance in real time. It is possible for returns to be submitted on the EmaraTax platform by either the Taxable Person themselves or by someone they have authorised such as a Tax Agent or Legal Representative. With mandatory EmaraTax applications in place many smaller entities are starting to consider whether using tax automation software could help them become more efficient although this can be costly. As a result, the FTA has introduced the Muwafaq package to help SMEs with this transition. The package can be accessed through the EmaraTax portal, and includes special rates on tax accounting software, appointments with tax specialists, exclusive packages from Tax Agents, priority in using services, and educational workshops on tax procedures tailored specifically for SMEs.

E-INVOICING

Federal Decree-Law No. 17/2024 gave the UAE Minister of Finance the authority to implement an e-invoicing system and defines e-Invoicing. A public consultation has been issued on this project which is also called the 'E-billing system'. Legislation is expected to be issued later this year with the Phase 1 Go Live for Business to Business (B2B) and Business to Government (B2G) transaction e-invoicing expected in 2026. The consultation suggests but it has not been confirmed yet that the UAE e-invoicing model will include a decentralised Continuous Transaction Control (CTC) model based on Peppol (the Pan-European Public Procurement On-Line). This framework for the secure cross-border exchange of electronic business documents, is currently being considered but has not yet come into force. It is also known as the Peppol 5-corner model and includes the invoice issuer, invoice receiver, and the central tax platform. In the UAE, UAE Peppol PINT, may be used and both the sender and receiver would need certified Peppol Access Points, which could validate the information and send it to the recipient. The issuer's Peppol Access Point would manage the transmission of an invoice to the tax authority. The AE PINT Data Dictionary would be introduced. This Data Dictionary was published as part of the UAE E-Invoicing Consultation Document, and detailed a structured framework for key data elements (fields) and their attributes, It clarified the approach for the UAE's most commonly used invoice types. Federal Decree-Law No. 16/2024 has expanded the definitions of 'tax invoice' and 'tax credit note' to include electronic versions, further formalising the shift toward digital invoicing. Taxpayers subject to this new system will have to issue invoices and credit notes electronically and maintain proper records. EmaraTax, as a central hub for tax-related tasks, will continue to play an integral role in managing these processes. With this change taxpayers in the UAE will increasingly have to use tax automation software so they can issue compliant invoices and integrate with FTA and ASPs.

Dhana Pillai
Founder
DP Taxation Consultancy

DLA Piper in the Middle East

150+

Lawyers

32

Partners

10

Ranked capabilities in *The Legal 500 EMEA 2024*

14

Ranked capabilities in *Chambers Global 2024*

8

Practice Groups

7

Middle East Offices
(5 Countries, 7 Cities)

For more information, visit dlapiper.com

DLA PIPER

AL SULAITI LAW FIRM

السليطي للمحاماة والإستشارات القانونية

DELIVERING RESULTS THAT EXCEED EXPECTATIONS

A Qatari law firm with a regional reach and a global outlook.

Al Sulaiti Law Firm provides a full range of cutting-edge legal services to both local and international clients. An experienced team of diverse, multilingual professionals bridging cultural and linguistic barriers by offering legal services in Arabic, French, English and Italian.

lLitigation & Dispute Resolutionl Corporatel Real Estate & Constructionl Taxl Banking & Financel Energyl IT & Telecommunicationsl Intellectual Propertyl

ITALY | EGYPT | TÜRKIYE | QATAR | KUWAIT | UK

www.alsulaitilawfirm.com