



**THE INSTITUTE OF CHARTERED ACCOUNTANTS OF INDIA
DUBAI CHAPTER NPIO**



FILING WITHOUT FUSS: SIMPLIFYING CT RETURNS!!!

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Is the taxpayer incorporated, established, or otherwise registered in a Free Zone?

☒ Yes ☐ No

Taxation of Corporations and Businesses
Federal Decree-Law No. 47 of 2022

Guide - Explanatory Guide On DL. 47 of 2022 on the Taxation of Corporations and
Businesses - May 2023

Article 1 – Definitions

Free Zone	A designated and defined geographic area within the State that is specified in a decision issued by the Cabinet at the suggestion of the Minister.
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“Free Zone Person”

The term “Free Zone Person” refers to a juridical person that is incorporated, established or otherwise registered in a Free Zone. This includes:

- a) branch of a UAE mainland or foreign juridical person that is registered in a Free Zone.
- b) a foreign juridical person that transfers its place of incorporation to a Free Zone
- c) A foreign juridical person that is a Resident Person under Article 11(3)(b) by virtue of being effectively managed and controlled in the UAE shall not be considered a Free Zone Person solely on the basis of the place of effective management and control of that juridical person being situated in a Free Zone.

Is the Taxable Person making an election to be subject to Corporate Tax under the standard Corporate Tax regime?



☐ Yes ☒ No

Taxation of Corporations and Businesses Federal Decree-Law No. 47 of 2022

Article 18 – Qualifying Free Zone Person

1. A Qualifying Free Zone Person is a Free Zone Person that meets all of the following conditions:
 - c. Has not elected to be subject to Corporate Tax under Article 19 of this Decree-Law.

Article 19 – Election to be Subject to Corporate Tax

1. A Qualifying Free Zone Person can make an election to be subject to Corporate Tax at the rates specified under Clause 1 of Article 3 of this Decree-Law.
2. The election under Clause 1 of this Article shall be effective from either of:
 - a. The commencement of the Tax Period in which the election is made.
 - b. The commencement of the Tax Period following the Tax Period in which the election was made.

Article 3 – Corporate Tax Rate

1. Corporate Tax shall be imposed on the Taxable Income at the following rates:
 - a. 0% (zero percent) on the portion of the Taxable Income not exceeding the amount specified in a decision issued by the Cabinet at the suggestion of the Minister.
 - b. 9% (nine percent) on Taxable Income that exceeds the amount specified in a decision issued by the Cabinet at the suggestion of the Minister (Cabinet Decision No. 116 of 2022, defines AED 375,000).

Ministerial Decision No. (265) of 2023

Article (5) - Other Conditions

2. A Qualifying Free Zone Person that at any particular time during a Tax Period fails to meet any of the conditions set out in Clause (1) of Article (18) of the Corporate Tax Law and this Decision and any other conditions prescribed by the Minister shall cease to be a Qualifying Free Zone Person from the beginning of the relevant Tax Period and for the subsequent (4) four Tax Periods.

Does the Taxable Person meet the requirements to be considered a Qualifying Free Zone Person?

☒ Yes ☐ No

Taxation of Corporations and Businesses
Federal Decree-Law No. 47 of 2022

Ministerial Decision No. (265) of 2023

Article 18 – Qualifying Free Zone Person

1. A Qualifying Free Zone Person is a Free Zone Person that meets all of the following conditions:
 - a. Maintains adequate substance in the State.
 - b. Derives Qualifying Income as specified in a decision issued by the Cabinet at the suggestion of the Minister.
 - c. Has not elected to be subject to Corporate Tax under Article 19 of this Decree- Law.
 - d. Complies with Articles 34 and 55 of this Decree-Law.
 - e. Meets any other conditions as may be prescribed by the Minister.

Article (5) - Other Conditions

1. In addition to the conditions set out in Clause (1) of Article (18) of the Corporate Tax Law, a Qualifying Free Zone Person must meet the following two conditions:
 - a. Its non-qualifying Revenue does not exceed the de minimis requirements set out in Article (3) of this Decision.
 - b. It prepares audited financial statements in accordance with any decision issued by the Minister on the requirements to prepare and maintain audited financial statements for the purposes of the Corporate Tax Law.

Total Revenue per Financial Statements (AED)

5000,000

Does the Free Zone Person have a Domestic or Foreign Permanent Establishment?



Yes



No

Total Revenue attributable to a Domestic or Foreign Permanent Establishment (AED)

2,000

Cabinet Decision No. 100 of 2023 on Determining Qualifying Income for the Qualifying Free Zone Person

Article (4) - De minimis Requirements

3. The following Revenue shall **not be included** in the calculation of non-qualifying Revenue and total Revenue:

- a. a. Revenue derived from the following transactions in relation to immovable property located in a Free Zone:
 - (1) Transactions with Non-Free Zone Persons in respect of Commercial Property.
 - (2) Transactions with any Person in respect of immovable property that is not Commercial Property.
- b. b. Revenue attributable to a **Domestic Permanent Establishment** or a **Foreign Permanent Establishment** of the Qualifying Free Zone Person.
- c. c. Revenue derived from the ownership or exploitation of intellectual property, except for the Revenue related to the Qualifying Income referred to in Clause (1) of Article (7) of this Decision.

Cabinet Decision No. 100 of 2023 on Determining Qualifying Income for the Qualifying Free Zone Person

Domestic Permanent Establishment

A place of Business or other form of presence of a Qualifying Free Zone Person outside the Free Zone in the State.

Article (3) Qualifying Income

4. For the purposes of determining whether a Qualifying Free Zone Person has a Domestic Permanent Establishment, the provisions of Article (14) of the Corporate Tax Law shall apply and the expression “Qualifying Free Zone Person” shall be used instead of the expression “Non-Resident Person”, and the expression “geographical areas outside the Free Zones in the State” shall be used instead of the word “State”, wherever used in that Article.

Taxation of Corporations and Businesses Federal Decree-Law No. 47 of 2022

Article 24 – Foreign Permanent Establishment Exemption

1. A Resident Person can make an election to not take into account the income, and associated expenditure, of its Foreign Permanent Establishments in determining its Taxable Income.
7. The exemption under Clause 1 of this Article shall only apply to a Foreign Permanent Establishment that is subject to Corporate Tax or a tax of a similar character under the applicable legislation of the relevant foreign jurisdiction at a rate not less than the rate specified in paragraph (b) of Clause 1 of Article 3 of this Decree-Law (i.e. 9%).

Cabinet Decision No. 100 of 2023 on Determining Qualifying Income for the Qualifying Free Zone Person

Non-Free Zone Person	Any Person who is not a Free Zone Person.
Commercial Property	Immovable property or part thereof: (a) used exclusively for a Business or Business Activity; and (b) not used as a place of residence or accommodation including hotels, motels, bed and breakfast establishments, serviced apartments and the like.

Does the Free Zone Person derive Revenue from transactions with Non-Free Zone Persons in respect of Commercial Property located in a Free Zone?



Yes



No

Total Revenue derived from transactions with Non-Free Zone Persons in respect of Commercial Property located in a Free Zone (AED)

1,000

Cabinet Decision No. 100 of 2023 on Determining Qualifying Income for the Qualifying Free Zone Person

Article (4) - De minimis Requirements

3. The following Revenue shall **not be included** in the calculation of non-qualifying Revenue and total Revenue:

a. a. Revenue derived from the following transactions in relation to **immovable property located in a Free Zone**:

(1) Transactions with **Non-Free Zone Persons** in respect of **Commercial Property**.

(2) Transactions with any Person in respect of immovable property that is not Commercial Property.

b. b. Revenue attributable to a Domestic Permanent Establishment or a Foreign Permanent Establishment of the Qualifying Free Zone Person.

c. c. Revenue derived from the ownership or exploitation of intellectual property, except for the Revenue related to the Qualifying Income referred to in Clause (1) of Article (7) of this Decision.

Does the Free Zone Person derive Revenue from immovable property located in a Free Zone that is not Commercial Property?



Yes



No

Total Revenue from immovable property located in a Free Zone that is not Commercial Property (AED)



3,000

Cabinet Decision No. 100 of 2023 on Determining Qualifying Income for the Qualifying Free Zone Person

Article (4) - De minimis Requirements

3. The following Revenue shall **not be included** in the calculation of non-qualifying Revenue and total Revenue:

a. a. Revenue derived from the following transactions in relation to **immovable property located in a Free Zone**:

(1) Transactions with Non-Free Zone Persons in respect of Commercial Property.

(2) Transactions with **any Person** in respect of immovable property that is **not Commercial Property**.

b. b. Revenue attributable to a Domestic Permanent Establishment or a Foreign Permanent Establishment of the Qualifying Free Zone Person.

c. c. Revenue derived from the ownership or exploitation of intellectual property, except for the Revenue related to the Qualifying Income referred to in Clause (1) of Article (7) of this Decision.

Does the Free Zone Person derive Revenue from the ownership or exploitation of intellectual property?



Yes



No

Intellectual Property Schedule

Cabinet Decision No. 100 of 2023 on Determining Qualifying Income for the Qualifying Free Zone Person

Article (4) - De minimis Requirements

3. The following Revenue shall **not be included** in the calculation of non-qualifying Revenue and total Revenue:

- a. a. Revenue derived from the following transactions in relation to immovable property located in a Free Zone:
 - (1) Transactions with Non-Free Zone Persons in respect of Commercial Property.
 - (2) Transactions with any Person in respect of immovable property that is not Commercial Property.
- b. b. Revenue attributable to a Domestic Permanent Establishment or a Foreign Permanent Establishment of the Qualifying Free Zone Person.
- c. c. Revenue derived from the **ownership or exploitation of intellectual property**, except for the Revenue related to the Qualifying Income referred to in **Clause (1) of Article (7)** of this Decision.

Description of the Qualifying Intellectual Property

Royalty

Overall Income derived from the Qualifying Intellectual Property (AED)



100,000

Overall Expenditure relating to the Qualifying Intellectual Property (AED)



50,000

Qualifying Expenditure relating to the Qualifying Intellectual Property (AED)



10,000

Uplift Expenditure relating to the Qualifying Intellectual Property (AED)

3,000

Revenue attributable to Qualifying Income in respect of the Qualifying Intellectual Property (AED)

26,000

Income in excess of Qualifying Income (AED)

74,000

Cabinet Decision No. 100 of 2023 on Determining Qualifying Income for the Qualifying Free Zone Person

Article (7) - Income Derived from Qualifying Intellectual Property

1. Qualifying Income derived from the ownership or exploitation of Qualifying Intellectual Property shall be calculated in accordance with a decision issued by the Minister.

Ministerial Decision No. (265) of 2023

Article (4) - Income Derived from Qualifying Intellectual Property

1. For the purposes of Clause (1) of Article (7) of Cabinet Decision No. 100 of 2023 referred to above, subject to the application of Clause (3) of this Article, the Qualifying Income shall be determined as follows:

$$\text{Qualifying Income} = \frac{\text{Qualifying Expenditure} + \text{Uplift Expenditure}}{\text{Overall Expenditure}} \times \text{Overall Income}$$

$$= \frac{10,000 + 3,000}{50,000} \times 100,000$$

‘Uplift Expenditures’ means the Qualifying Expenditure increased by 30% (thirty percent), subject to the application of Clause (3) of this Article.

3. The Up-lift Expenditures shall be applicable only to the extent that Qualifying Expenditures, after being up-lifted is less than or equal to Overall Expenditures.

2. For the purpose of Clause (1) of this Article the following provisions shall apply:
- a. **“Qualifying Expenditures”** means expenditures incurred to fund research and development activities, conducted either by the Qualifying Free Zone Person or outsourced to any Person in the State or any Person outside the State that is not a Related Party, directly connected with the creation, invention or significant development of the Qualifying Intellectual Property.
 - b. **‘Overall Expenditures’** means total expenditures incurred to fund research and development activities, conducted either by the Qualifying Free Zone Person or outsourced to any Person, directly connected with the creation, invention or significant development of the Qualifying Intellectual Property, including acquisition costs of the Qualifying Intellectual Property.
 - c. **‘Overall Income’** means royalties or any other income derived from Qualifying Intellectual Property as determined according to the provisions of the Corporate Tax Law, including embedded intellectual property income derived from the sale of products and the use of processes directly related to the Qualifying Intellectual Property as determined in accordance with the arm’s length principle under Article (34) of the Corporate Tax Law.
 - d. **‘Uplift Expenditures’** means the Qualifying Expenditure increased by 30% (thirty percent), subject to the application of Clause (3) of this Article.
3. The Up-lift Expenditures shall be applicable only to the extent that Qualifying Expenditures, after being up-lifted is less than or equal to Overall Expenditures.)

Non-Qualifying Revenue

Revenue derived from Excluded Activities (AED)	100,000	Revenue derived from activities that are not Qualifying Activities where the other party to the transaction is a Non-Free Zone Person (AED)	146,000
Revenue derived from transactions with Free Zone Persons that are not the Beneficial Recipient of the relevant services or goods (AED)	0	Total non-qualifying Revenue (AED)	246,000

De Minimis Calculation

Is the de minimis requirement met?

☒ Yes ☐ No

Revenue delivered from transactions with Free Zone Persons that are not the Beneficial Recipients of the relevant services or goods.

Cabinet Decision No. 100 of 2023 on Determining Qualifying Income for the Qualifying Free Zone Person

Article (3) Qualifying Income

1. For the purposes of application of Article (18)) of the Corporate Tax Law, Qualifying Income of the Qualifying Free Zone Person shall include the below categories of income, provided that such income is not attributable to a Domestic Permanent Establishment or a Foreign Permanent Establishment in accordance with Article (5) of this Decision or derived from the ownership or exploitation of immovable property in accordance with Article (6) of this Decision , or considered Taxable Income under Clause (2) of Article (7) of this Decision:
 - a. Income derived from transactions with a **Free Zone Person**, **except** for income derived from **Excluded Activities**.
 - b) Income derived from transactions with a **Non-Free Zone Person**, but only in respect of **Qualifying Activities** that are not **Excluded Activities**.
 - d) Income derived from the ownership or exploitation of Qualifying Intellectual Property under Clause (1) of Article (7) of this Decision.
 - e) Any other income provided that the Qualifying Free Zone Person satisfies the de minimis requirements under Article (4) of this Decision

Revenue from Excluded Activities

Non-Qualifying Revenue

Revenue derived from Excluded Activities (AED)	100,000	Revenue derived from activities that are not Qualifying Activities where the other party to the transaction is a Non-Free Zone Person (AED)	146,000
Revenue derived from transactions with Free Zone Persons that are not the Beneficial Recipient of the relevant services or goods (AED)	0	Total non-qualifying Revenue (AED)	246,000

De Minimis Calculation

Is the de minimis requirement met?

☒ Yes ☐ No

Ministerial Decision No. (265) of 2023

Article (2) Qualifying Activities

2. For the purposes of Cabinet Decision No. 100 of 2023 referred to above, the following activities shall be considered Excluded Activities:

- a. Any transactions with natural persons, except transactions in relation to the Qualifying Activities specified under paragraphs (e), (g), (h) and (k) of Clause (1) of this Article.
- b. Banking activities.
- c. Insurance activities, without prejudice to the Qualifying Activities specified under paragraphs (f) and (i) of Clause (1) of this Article.
- d. Finance and leasing activities without prejudice to the Qualifying Activities specified in paragraphs (e), (j) and (k) of Clause (1) of this Article.
- e. Ownership or exploitation of immovable property, other than Commercial Property located in a Free Zone where the transaction in respect of such Commercial Property is conducted with a Free Zone Person.
- f. Any activities that are ancillary to the Excluded Activities specified in paragraphs (a) to (e) of this Clause.

a	(e) Ownership, management and operation of Ships.
	(g) Fund management services.
	(h) Wealth and investment management services.
c	(k) Financing and leasing of Aircrafts.
	(f) Reinsurance services.
	(i) Headquarter services to Related Parties.
d	(e) Ownership, management and operation of Ships.
	(j) Treasury and financing services to Related Parties.
	(k) Financing and leasing of Aircrafts.

For the purposes of paragraph (f) of Clause (2) of this Article, an activity shall be considered ancillary where it is necessary for the performance of the main activity or where it makes a minor contribution to it and is so closely related to the main activity that it should not be regarded as a separate activity.

Revenue delivered from activities that are not Qualifying Activities where the other party to the transaction is a Non-Free Zone person

Non-Qualifying Revenue

Revenue derived from Excluded Activities (AED)	100,000	Revenue derived from activities that are not Qualifying Activities where the other party to the transaction is a Non-Free Zone Person (AED)	146,000
Revenue derived from transactions with Free Zone Persons that are not the Beneficial Recipient of the relevant services or goods (AED)	0	Total non-qualifying Revenue (AED)	246,000

De Minimis Calculation

Is the de minimis requirement met?

☒ Yes ☐ No

Article (2) Qualifying Activities

1. For the purposes of Cabinet Decision No. 100 of 2023 referred to above, and subject to Clauses (2) and (3) of this Article, the following activities conducted by a Qualifying Free Zone Person shall be considered **Qualifying Activities**:

(a) Manufacturing of goods or materials.	(b) Processing of goods or materials.
(c) Trading of Qualifying Commodities.	(d) Holding of shares and other securities for investment purposes.
(e) Ownership, management and operation of Ships.	(f) Reinsurance services.
(g) Fund management services.	(h) Wealth and investment management services.
(i) Headquarter services to Related Parties.	(j) Treasury and financing services to Related Parties.
(k) Financing and leasing of Aircrafts.	(l) Distribution of goods or materials in or from a Designated Zone.
(m) Logistics services.	(n) Any activities that are ancillary to the Qualifying Activities specified in paragraphs (a) to (m) of this Clause.

For the purposes of paragraph (n) of Clause (1), an activity shall be considered ancillary where it is necessary for the performance of the main activity or where it makes a minor contribution to it and is so closely related to the main activity that it should not be regarded as a separate activity.

Non-Qualifying Revenue

Revenue derived from Excluded Activities (AED)

100,000

Revenue derived from activities that are not Qualifying Activities where the other party to the transaction is a Non-Free Zone Person (AED)

146,000

Revenue derived from transactions with Free Zone Persons that are not the Beneficial Recipient of the relevant services or goods (AED)

0

Total non-qualifying Revenue (AED)

246,000

De Minimis Calculation

Is the de minimis requirement met?

☒ Yes ☐ No

Revenue delivered from transactions with Free Zone Persons that are not the Beneficial Recipients of the relevant services or goods.

Cabinet Decision No. 100 of 2023 on Determining Qualifying Income for the Qualifying Free Zone Person

Article (3) Qualifying Income

1. For the purposes of application of Article (18)) of the Corporate Tax Law, Qualifying Income of the Qualifying Free Zone Person shall include the below categories of income, provided that such income is not attributable to a Domestic Permanent Establishment or a Foreign Permanent Establishment in accordance with Article (5) of this Decision or derived from the ownership or exploitation of immovable property in accordance with Article (6) of this Decision , or considered Taxable Income under Clause (2) of Article (7) of this Decision:
 - a. Income derived from transactions with a Free Zone Person, except for income derived from Excluded Activities.
2. For the purposes of paragraph (a) of Clause (1) of this Article, income will be considered as derived from transactions with a Free Zone Person where that Free Zone Person is the Beneficial Recipient of the relevant services or Goods.
3. For the purposes of this Article, the term “Beneficial Recipient” shall mean:
 - (i) a Person who has the right to use and
 - (ii) enjoy the service or the Good and does not have a contractual or legal obligation to supply such service or Good to another person and
 - (iii) the term “Good” shall mean tangible or intangible property that has economic value in dealing including moveable and immovable property.

2 Free Zone Details – De Minimis Test

Revenue Schedule

Total Revenue per Financial Statements (AED)

5,000,000

Does the Free Zone Person have a Domestic or Foreign Permanent Establishment?

☒ Yes ☐ No

Does the Free Zone Person derive Revenue from transactions with Non-Free Zone Persons in respect of Commercial Property located in a Free Zone?

☒ Yes ☐ No

Does the Free Zone Person derive Revenue from immovable property located in a Free Zone that is not Commercial Property?

☒ Yes ☐ No

Does the Free Zone Person derive Revenue from the ownership or exploitation of intellectual property?

☒ Yes ☐ No

Total Revenue derived from the ownership or exploitation of intellectual property that is not considered Qualifying Income (AED)

74,000

Total Revenue attributable to a Domestic or Foreign Permanent Establishment (AED)

2,000

Total Revenue derived from transactions with Non-Free Zone Persons in respect of Commercial Property located in a Free Zone (AED)

1,000

Total Revenue from immovable property located in a Free Zone that is not Commercial Property (AED)

3,000

Intellectual Property Schedule

Total Revenue for the de minimis requirement (AED)

4,920,000

5% of 4,920,000
246,000

Non-Qualifying Revenue

Revenue derived from Excluded Activities (AED)

100,000

Revenue derived from activities that are not Qualifying Activities where the other party to the transaction is a Non-Free Zone Person (AED)

146,000

Revenue derived from transactions with Free Zone Persons that are not the Beneficial Recipient of the relevant services or goods (AED)

0

Total non-qualifying Revenue (AED)

246,000

De Minimis Calculation

Is the de minimis requirement met?

☒ Yes ☐ No

De-minimis requirement met...

2 Free Zone Details – De Minimis Test

Revenue Schedule

Total Revenue per Financial Statements (AED)

5,000,000

Does the Free Zone Person have a Domestic or Foreign Permanent Establishment?

☒ Yes ☐ No

Does the Free Zone Person derive Revenue from transactions with Non-Free Zone Persons in respect of Commercial Property located in a Free Zone?

☒ Yes ☐ No

Does the Free Zone Person derive Revenue from immovable property located in a Free Zone that is not Commercial Property?

☒ Yes ☐ No

Does the Free Zone Person derive Revenue from the ownership or exploitation of intellectual property?

☒ Yes ☐ No

Total Revenue derived from the ownership or exploitation of intellectual property that is not considered Qualifying Income (AED)

74,000

Total Revenue attributable to a Domestic or Foreign Permanent Establishment (AED)

2,000

Total Revenue derived from transactions with Non-Free Zone Persons in respect of Commercial Property located in a Free Zone (AED)

1,000

Total Revenue from immovable property located in a Free Zone that is not Commercial Property (AED)

3,000

Intellectual Property Schedule

Total Revenue for the de minimis requirement (AED)

4,920,000

5% of 4,920,000
246,000

Non-Qualifying Revenue

Revenue derived from Excluded Activities (AED)

100,000

Revenue derived from activities that are not Qualifying Activities where the other party to the transaction is a Non-Free Zone Person (AED)

146,001

Revenue derived from transactions with Free Zone Persons that are not the Beneficial Recipient of the relevant services or goods (AED)

0

Total non-qualifying Revenue (AED)

246,001

De Minimis Calculation

Is the de minimis requirement met?

☐ Yes ☒ No

De-minimis requirement NOT met...

Qualifying Revenue

Revenue derived from Free Zone Persons (except for income derived from Excluded Activities) (AED)

3,000,000

Qualifying Activities undertaken

Distribution of goods or materials in or from a Designated Zone. ✕

Revenue derived from Non-Free Zone Persons in respect of Qualifying Activities. (AED)

1,648,000

Revenue derived from the ownership or exploitation of Qualifying Intellectual Property (AED)

26,000

Total Revenue as per financial statement		5,000,000
Total Revenue attributable to a Domestic or Foreign Permanent Establishment (AED)		2,000
Total Revenue derived from transactions with Non-Free Zone Persons in respect of Commercial Property located in a Free Zone (AED)		1,000
Total Revenue from immovable property located in a Free Zone that is not Commercial Property (AED)		3,000
Revenue from the ownership or exploitation of intellectual property?		
Description of the Qualifying Intellectual Property	Royalty	
Overall Income derived from the Qualifying Intellectual Property (AED)	100,000	100,000
Overall Expenditure relating to the Qualifying Intellectual Property (AED)	50,000	
Qualifying Expenditure relating to the Qualifying Intellectual Property (AED)	10,000	
Uplift Expenditure relating to the Qualifying Intellectual Property (AED) (30% of QE)	3,000	
Revenue attributable to Qualifying Income in respect of the Qualifying Intellectual Property (AED)	26,000	
Income in excess of Qualifying Income (AED)	74,000	
Revenue derived from Excluded Activities (AED)		100,000
Revenue derived from activities that are not Qualifying Activities where the other party to the transaction is a Non-Free Zone Person (AED)		146,000
Revenue derived from transactions with Free Zone Persons that are not the Beneficial Recipient of the relevant services or goods (AED)		-
Revenue derived from Free Zone Persons (except for income derived from Excluded Activities) (AED)		3,000,000
Revenue derived from Non-Free Zone Persons in respect of Qualifying Activities. (AED)		1,648,000

Qualifying Revenue

Revenue derived from Free Zone Persons (except for income derived from Excluded Activities)

Qualifying Activities undertaken

 Distribution of goods or materials in or from a Designated Zone. 
☐

Manufacturing of goods or materials.

☐

Processing of goods or materials.

☐

Trading of Qualifying Commodities.

☐

Holding of shares and other securities for investment purposes.

☐

Ownership, management and operation of Ships.

☐

Reinsurance services.

☐

Fund management services.

☐

Wealth and investment management services.

☐

Headquarter services to Related Parties.

☐

Treasury and financing services to Related Parties.

☐

Financing and leasing of Aircrafts.

☐

Distribution of goods or materials in or from a Designated Zone.

☐

Logistics services.

☐

Any activities that are ancillary to the Qualifying Activities specified above.

1



Substance(Free Zones)

Substance (Free Zone)

Are all employees located in a Free Zone?

☐ Yes ☐ No

Total average number of full time employees located in a Free Zone

0.0

Total operating expenditure incurred in deriving Qualifying Income (AED)

0

Total capital expenditure incurred in deriving Qualifying Income (AED)

0

Have any of the core-income generating activities been outsourced to an outsourcing provider?

☐ Yes ☒ No

Balance sheet and P&L, at Qualifying Income and Capital Expenditure level.

Free Zone Confirmations

Free Zone Confirmations

I confirm that:

- ☐ a) An adequate amount of assets were held in a Free Zone.
- ☐ b) An adequate number of qualified employees were located in a Free Zone.
- ☐ c) An adequate amount of operating expenditures were incurred in a Free Zone.
- ☐ d) Any Related Party transactions have been undertaken in accordance with Article 34.
- ☐ e) Transfer Pricing documentation has been prepared in accordance with Article 55.
- ☐ f) Audited financial statements have been prepared.

Taxation of Corporations and Businesses
Federal Decree-Law No. 47 of 2022

Article 18 – Qualifying Free Zone Person

Ministerial Decision No. (265) of 2023

Article (5) - Other Conditions

Additional Information



Provide details of EBITDA and salaries and wages attributable to each Emirate

Emirate	Earning Before Interest, Tax, Depreciation and Amortisation (EBITDA) (AED)	Salaries and Wages (AED)
Abu Dhabi	<input type="text" value="0"/>	<input type="text" value="0"/>
Ajman	<input type="text" value="0"/>	<input type="text" value="0"/>
Dubai	<input type="text" value="0"/>	<input type="text" value="0"/>
Fujairah	<input type="text" value="0"/>	<input type="text" value="0"/>
Ras Al Khaimah	<input type="text" value="0"/>	<input type="text" value="0"/>
Sharjah	<input type="text" value="0"/>	<input type="text" value="0"/>
Umm Al Quwain	<input type="text" value="0"/>	<input type="text" value="0"/>
Total	<input type="text" value="0"/>	<input type="text" value="0"/>

Additional Information (Optional)





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