



Tax Newsletter

July 2023



Landscape

In our July 2023 edition of GT's Monthly Tax Newsletter, you can read the latest news updates affecting International Tax, Transfer Pricing, and Indirect Tax in the UAE and across the GCC Region.

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Value Added Tax

The Federal Tax Authority ('FTA') amends and publishes VAT Guide, 'VATGEX1' on Administrative Exceptions

On June 2023, the FTA has amended the VAT Guide on Administrative Exceptions and published VAT GEX 1 to help taxpayers prepare and submit VAT Administrative Exception requests, which allows registrants to apply for concessions / exceptions from certain conditions set out in the Federal Decree Law and Executive Regulations.

VAT Administrative Exceptions are only available in relation to the following items:

- **Tax Invoices:** A VAT registrant may apply for VAT Administrative Exception under this category where they are unable to meet the conditions as specified in Article 59 of the Executive Regulations for tax invoices. Such VAT Administrative Exception requests will only be accepted by the FTA if the VAT registrant produces satisfactory proof to show why it would be impractical for the VAT registrant to issue a tax invoice or justify this exception by establishing the particulars of the supply or class of supplies.
- **Tax Credit Notes:** A VAT registrant may apply for VAT Administrative Exception under this category where they are unable to meet the conditions specified in Article 60 of the Executive Regulations for tax credit notes. Such VAT Administrative Exception requests will only be accepted by the FTA if the VAT registrant produces satisfactory proof to show why it would be impractical for the VAT registrant to issue a tax credit note or justify this exception by establishing the particulars of the supply or class of supplies.
- **Length of the Tax Period:** A VAT registrant may request to change the length of the tax period to half yearly (ie. 6 months). However, the VAT registrant must justify the reason for the request and the FTA will only consider such requests in the cases of:
 - **Individuals:** For instance, property owners or freelancers may make such requests, however, this will be subject to the FTA's discretion. The FTA will consider the number of invoices issued in the last 12 months by such persons, the total VAT paid by such persons in the last 12 months and also the taxable supplies of such persons in the last 12 months, before arriving at its decision.
 - **Businesses in a continuous refund position:** Those businesses which are constantly in a refundable position, must explain and confirm that their business model is unlikely to undergo changes and that they will continue to be in a refundable position and may request for administrative exceptions under such grounds.
 - **Small and medium enterprises (SME) with funding:** Only registered SMEs which receives officially approved funding by any Government entity are eligible for an exception under this category. The FTA will also evaluate the total VAT paid by such VAT registrants in the last 12 months and the taxable supplies made by such VAT registrants in the last 12 months while assessing their eligibility.

- Small and medium enterprises (SME) without funding: Only registered SMEs with taxable supplies in the last months of AED 9 million or more and which do not receive any officially approved funding by any Government entity are eligible for an exception under this category. The FTA will also evaluate the total VAT paid by such VAT registrants in the last 12 months, the taxable supplies made by such VAT registrants in the last 12 months and whether the VAT registrant has incurred any penalties in the last 12 months.
- Stagger: A VAT registrant may request for a change in its current VAT return stagger to a different stagger, this could be beneficial to bring the VAT return in line with the accounting year end but the VAT registrant must provide the reason for this exception request.
- Evidence to prove export of goods: A VAT registrant may request the FTA to permit the use of an alternative form of evidence to prove the export of goods. However, the VAT registrant must provide the actual reasons / circumstances which led to the exception request and provide the details of the alternative evidence proposed to be used.
- Time for the export of goods: A VAT registrant may apply for a time extension where it may not be possible for goods to be exported within the 90-day period from the date of supply. The FTA may allow this under any of the following circumstances:
 - Circumstances beyond the control of the supplier and the recipient of the goods have prevented or will prevent, the export of the goods within 90 days of the date of supply. or
 - Due to the nature of the supply, it is not practicable for the supplier to export the goods, or the class of goods, within 90 days of the date of supply.

However, the VAT registrant must detail the reasons or circumstances for the extension of the 90-day time period from the date of supply for physically exporting the goods outside the UAE. The FTA will consider and arrive at its decision after evaluating all the above.

The VAT Administrative Exception request can be made by the authorised signatory of the VAT registrant, the VAT registrant's tax agent, or their legal representative through such person's EmaraTax portal on the FTA's website. A VAT registrant must provide a detailed explanation for requesting the exception, a supporting letter including the reasons for being unable to meet the legal requirements and any supporting documents as proof.

The processing time for the FTA to decide on such a request may vary depending on the specific category of the exception and may range from 20 to 40 business days. The FTA may take up to 40 business days to decide on VAT Administrative Exception requests on Tax Invoices, Tax Credit Notes, Length of Tax Period, Stagger, Evidence to Prove Export of Goods etc. whilst a VAT Administrative Exception request on extending the time for the Export of Goods may take up to 20 business days from the FTA to arrive at a decision.

Businesses must thoroughly evaluate the above conditions and requirements for VAT Administrative Exceptions, before applying on any of the above-discussed circumstances. Moreover, it is essential to introspect whether there are strong grounds for such a request as this is most likely to be accepted by the FTA than requests with weaker grounds and insufficient proof.

For further information on the above-mentioned update, please click [here](#).

Should you need any further clarification and details regarding this update, please contact our VAT Directors [Harsh Bhatia](#), or [Sunny Kachalia](#) or our VAT Associate Director [Charlotte Stanley](#).

The Federal Tax Authority ('FTA') publishes 'VATGIT1', updating the Input Tax Apportionment procedures

On 19th June 2023, the FTA published an Input Tax Apportionment Guide 'VATGIT1' replacing the guide issued in March 2023. This guide serves as the updated version of all the previous Input Tax Apportionment Guides.

The FTA has updated the VAT Guide on Input Tax Apportionment Guide to reflect the current processes for submitting applications and notifications using the Emaratax portal on the FTA website in contrast to the earlier processes, which required taxpayers to submit applications through email.

For further information on the above-mentioned update, please click [here](#).

Should you need any further clarification and details regarding this update, please contact our VAT Directors [Harsh Bhatia](#), or [Sunny Kachalia](#) or our VAT Associate Director [Charlotte Stanley](#).

Recent Tax Webinars - Grant Thornton USA ('GT USA'), Grant Thornton UAE ('GT UAE') and Grant Thornton Saudi Arabia ('GT KSA) hosts Tax Webinar on latest developments 4th May 2023

The latest tax update webinar hosted by Grant Thornton included collaboration from our USA, UAE and KSA Tax experts. The topics covered were:

- Trends on completion of 5 years of VAT in the UAE and the KSA,
- Key VAT considerations for companies which are headquartered in the USA and operating in the UAE,
- Recent VAT amendments in the UAE,
- How to avail an amnesty scheme in KSA?
- E-invoicing in the UAE and the KSA,
- Key customs amendments in the UAE and Overview of proposed Corporate Tax and
- Transfer Pricing laws in the UAE

For access to the webinar. please click [here](#).

The GCC Update

Value Added Tax

Kingdom of Saudi Arabia ('KSA') – The Zakat, Tax and Customs Authority ('ZATCA') sets guidelines for selecting taxpayers in Wave 6 for implementing the Integration Phase of E-Invoicing

On 16th June 2023, the ZATCA announced its 6th wave of taxpayers for implementing the Integration Phase (Phase 2) of E-invoicing, which now includes taxpayers whose taxable revenue exceeds 70 million Saudi Riyals ('SAR') during the tax years 2021 or 2022. The taxpayers who meet the criteria should integrate their E-invoicing solutions with the FATOORA platform with effect from 1st January 2024.

The ZATCA has outlined the below additional requirements for Phase 1 & 2 of the implementation of E-invoicing, which includes:

- Integrating E-invoicing solutions with FATOORA;
- Issuing invoices in a specific format;
- Including additional fields in the invoice.

The below table provides a quick summary of the sequence of target groups and important timelines.

Target-groups	Taxable turnover in 2021	Go-live date	To be fully integrated by	Likely penalty dates for non-compliance
1 st wave	Exceeds SAR 3 Billion	1 st January 2023	30 th June 2023	1 st July 2023
2 nd wave	Exceeds SAR 500 Million	1 st July 2023	31 st December 2023	1 st January 2024
3 rd wave	Exceeds SAR 250 Million	1 st October 2023	1 st February 2024	Post 1 st February 2024
4 th wave	Exceeds SAR 150 Million	1 st November 2023	29 th February 2024	Post 1 st March 2024
5 th Wave	Exceeds SAR 100 Million	1 st December 2023	31 st March 2024	Post 1 st April 2024
6 th Wave	Exceeds SAR 70 Million	1 st January 2024	Date Awaited	Date Awaited

For further information on the above update, please click [here](#).

Should you need further clarification and details regarding this update, please contact GT KSA Head of Tax [Adel Douglas](#), or Senior Tax Manager, [Syed Abul Rahman](#) or Senior Tax Manager, [Ganesh Nair](#).

Kingdom Saudi Arabia ('KSA') – The Zakat, Tax and Customs Authority ('ZATCA') has launched a project to amend the Value Added Tax system

The ZATCA commenced an initiative to change the VAT system, proposing that under certain circumstances, taxpayers be permitted to pay sums owed in instalments when certain criteria is met.

The criteria to pay by instalments has not yet been published. This initiative will evaluate taxpayers' eligibility for the program and may potentially lead to the exemption of duties from the purview of the law already in effect.

As part of this program, ZATCA will offer thorough instructions and tax bulletins to taxpayers to assist them in meeting their obligations as Taxpayers.

Should you need further clarification and details regarding this update, please contact GT KSA Head of Tax [Adel Douglas](#), or Senior Tax Manager, [Syed Abul Rahman](#) or Senior Tax Manager, [Ganesh Nair](#).

Kingdom of Saudi Arabia ('KSA') – The Zakat, Tax and Customs Authority ('ZATCA') has published a guideline for Tax Ruling Requests

On 2nd June 2023, the ZATCA has published a detailed guideline that clarifies the process for Tax Ruling Requests in case a taxpayer seeks the ZATCA's opinion on a specific issue. This guideline is directed towards all persons, natural or legal, as well as the agents acting on their behalf who wish to submit a request for a Tax Ruling.

What is a Tax Ruling and when does ZATCA issue a Tax Ruling?

A Tax Ruling request is a medium by which a Taxpayer may seek the ZATCA's legal interpretation on a specific issue regardless of whether it is a domestic transaction or a transaction under reverse charge mechanism (RCM).

A Tax ruling cannot be provided in all instances and therefore the ZATCA, will assess for the following factors before reviewing any requests:

- Will evaluate whether a matter is complex and the extent of information available to the applicant.
- The relative importance of the transactions or activity subject to Tax Ruling request.
- Whether the facts and data provided in the application is adequate.
- The extent to which the Public Tax Ruling request would be beneficial, if applicable.
- Evaluate the availability of the required resources and information required by the ZATCA to respond.
- Whether or not the applicant has provided the ZATCA with incorrect information while applying for a Tax Ruling.

Cases in which Tax Ruling Requests are Prohibited

In the circumstances listed below, it is prohibited to request a tax ruling since the ZATCA will unavoidably deny the request:

- If the Tax Ruling Request relates to a constricted issue that the ZATCA will not review or take into account, such as:
 - Cases involving disputed tax amounts.
 - Cases involving interpretations of a foreign law.

- Cases involving the interpretations of non-tax laws, regulations, regulatory tools, rules, controls, or policies.
- If the applicant's activity or the actions anticipated are unrelated to the request for a tax ruling, including hypothetical activities or transactions.
- If the applicant's request for an interpretation differs from the original purpose of the request.
- If the ZATCA is inspecting or auditing applicant or has filed an objection or appeal that is currently being considered on matters related to the same type of tax that is the subject of the Tax Ruling request.
- If there is a legal conflict amongst the individual applying and other individuals, or if there is anything else that would cause the ZATCA to rule against such other individuals.
- If the Tax Ruling request on the matter was rejected during the prior three months, as the taxpayer failed to produce relevant documents in the time specified by the Law.
- If the ZATCA had already responded to the same or similar issue submitted by the same applicant via a Tax Ruling request.

Legal persons or natural persons may apply for Tax Ruling, irrespective of whether they are registered with the ZATCA, given that the criteria for Tax Ruling requests have been met. Non-registered ie. agents or representatives, can submit a Tax Ruling request to the ZATCA, provided that the criteria for Tax Ruling requests have been met.

How to submit a Tax Ruling?

The completed Tax Ruling request form, in addition to the relevant documents, must be submitted via the ZATCA e-portal or must be sent as an email to policy-RULING@zatca.gov.sa.

The ZATCA would accept the request, request for additional information, reject the request or accept the request only to reject it later.

The impact of the rejection of the Tax Ruling request.

The ZATCA will reason with the taxpayer on the grounds for rejecting a request for a tax ruling or for disagreeing to issue a tax ruling. Where a taxpayer's Tax Ruling request was rejected by the ZATCA on the grounds that the additionally requested information was not provided within the legally allowed timeframe, then the taxpayers will not be able to re-apply for such Tax Ruling requests within 3 months from the end of the period of submitting the information. A taxpayer may consider applying for a reconsideration in case it feels that the Tax Ruling was concluded based on misconceptions of facts or situations.

Tax Ruling Requests cannot be objected since it is an opinion and does not have any legal effect in itself. However, it is interesting to note that the guide mentions that such opinions are reliable and binding opinion of ZATCA in which the sole purpose is to inform the taxpayer on the applicable tax treatments.

For the convenience of taxpayers, the booklet also offers an example summary of the objection / appeal procedure and its timeline.

For further information on the above update, please click [here](#).

Should you need further clarification and details regarding this update, please contact GT KSA Head of Tax [Adel Douglas](#), or Senior Tax Manager, [Syed Abul Rahman](#) or Senior Tax Manager, [Ganesh Nair](#).

Kingdom of Saudi Arabia ('KSA') – The Zakat, Tax and Customs Authority ('ZATCA') has amended/added certain articles/sub-articles to the VAT Implementing Regulations

The Board of Directors (BoD) of the ZATCA has formalised amendments to the various articles of the VAT Implementing Regulations in decision number (01-04-23) dated 15th June 2023. As stated in the announcement, the effective date of the aforementioned amendments will be from the date of publication in the official gazette (i.e. 23rd June 2023).

Article references of the amendments/additions:

The highlights of the modifications are reprinted as given below. Currently, the ZATCA has only provided an Arabic version of the authorised revisions.

The following Articles have been amended: Article 8 (8), Article 9 (5), Article 9 (6), Article 29 (7), Article 34 (4), Article 40 (7)(d), Article 46, Article 63 (3), Article 70(1) and Article 70 (2).

Article 9 (7), Article 34 (9) & (10), Article 36 and Article 46 (12) are new additions and Article 75 (5) has been removed.

Below are some highlights from the above-mentioned amendments:

- Article 9 (5) – Government entities undertaking activities as a public authority shall not be considered as economic activities when certain conditions are met, this article lists the conditions.
- Article 29 (7) - The VAT treatment of payment of fees and commissions related to life insurance contracts are now considered to be exempt from VAT.
- Article 40 (7) d – The ZATCA will permit organisations, who are not legally obliged to be audited, the submission of additional supporting documentations on bad debts to validate their claims.
- Article 63 (3) - The maximum amount for rectifying errors in subsequent VAT returns has been raised from Saudi Riyals ('SAR') 10,000 to SAR 15,000.

Should you need further clarification and details regarding this update, please contact GT KSA Head of Tax [Adel Douglas](#), or Senior Tax Manager, [Syed Abul Rahman](#) or Senior Tax Manager, [Ganesh Nair](#).

Sultanate of Oman ('Oman') – The Oman Tax Authority ('OTA') issues a VAT Guide for Healthcare Services

The OTA publishes a VAT Guide on Input VAT, clarifying the key matters relating to Healthcare Services explaining the Article provisions of item (2) of Article (47) of the Law and Article (80) of the Executive Regulations. The highlights of the guide are as discussed below:

• VAT exemption of healthcare services

Health Care Services provided by Medical Professionals or Medical Institutions in accordance with the laws in force in the Sultanate of Oman are exempted from Tax Medical institutions which include public healthcare and private healthcare.

- This exemption does not include veterinary services, it only applies to human healthcare.
- If healthcare services are provided by non-licensed health providers, then a 5% standard rate of VAT is implemented. For example, a resort in Oman requested their guest to get the diagnostic test before using some of their facilities and it is being held on-site by the resort without a license, in this case, it does not qualify for exemption and is subject to VAT at 5%.

- **Cosmetic and other elective medical services**

Cosmetic and other elective medical services are exempt from VAT if it is necessary for health purposes and are prescribed by a medical professional, such as restorative or reconstructive cosmetic procedures. For example, if a person sustains burns and as a result requires plastic surgery, then this restorative treatment will be considered as a necessary part to restore the individual back to health and thus is exempted from VAT. However, elective cosmetics for aesthetic purposes, such as teeth whitening for improving their appearance, does not qualify for the VAT exemption and VAT must be charged at the standard rate for such services.

- **Goods and services related to healthcare services**

Goods and services related to healthcare services should be supplied by a medical institution to qualify for the VAT exemption. If a commercial business supplied the goods or services related to healthcare, then VAT exemption cannot be applied. For example, a commercial transportation company provides a charter helicopter to transport the patient to the hospital, this does not qualify for VAT exemption.

- **Other charges**

Private medical institutes and medical professionals that carry out services which are not related to healthcare services such as contributing to research studies in an organisation will not qualify for the VAT exemption and if they are registered for VAT, they should charge 5% on the supply of service.

For medical institutions that provide exempt and taxable healthcare services, they must attach the commercial value appropriately to the exempt and taxable components.

- **Advertising, sponsorship and donations**

If the Medical Institute enters into commercial agreements with third parties and money is provided by a donor in return to provide them advertising, naming rights or other services, then this supply of service is subjected to VAT. On the other hand, if the institute receives money from a donor and the institute provides a small public acknowledgement of gratitude, then this is not considered a supply for VAT purposes.

- **Medical insurance**

The provision of medical insurance is not considered as a supply of healthcare, thus this supply is subjected to 5% VAT.

- **Medicines and medical goods**

For commercial supplies of medicines and medical goods, which are not part of the healthcare services of the patient should be considered as zero-rated supplies throughout the supply chain, including distributors, wholesalers, pharmacies, and retailers.

If these supplies are used for the patient during the treatment, then it is part of the exempt supply of healthcare services. However, if these supplies are provided to the patient and are to be taken after the patient is discharged then this will qualify as zero-rated supplies.

- **Input VAT Deduction**

Healthcare providers, which provide only exempt supplies, are not eligible to deduct input, however, if the Healthcare providers provide both taxable and exempt supplies then they are entitled to the following deduction:

Input VAT directly and only used for the purpose of taxable supplies	Deduct in full
Input VAT directly and only used for the purpose of exempt supplies	No deduction
Input VAT that is used both in making Taxable and Exempt supplies – including overheads or costs which cannot be directly attributed	Partial exemption deduction based on apportionment calculation

For further information on the above update, please click [here](#).

Should you need further clarification and details regarding this update, please contact GT Oman Tax Partner [Nasser Al-Mughairy](#), or Tax Director, [Deepika Rajan](#).

Sultanate of Oman ('Oman') – The Oman Tax Authority ('OTA') issues a VAT Guide for Related Persons

The OTA has published the much-anticipated VAT Guide for Related Persons according to Article 39 of the Executive Regulations. The guide provides more guidance on key matters relating to Related Persons. The highlights of the guide are as discussed below:

- **Related Persons**

According to the Omani VAT law, Related Persons are defined as "two or more persons, where one has the authority to direct and oversee the others, where he has the managerial authority that enables him to influence the work of the other persons financially, economically, and organisationally, and that includes persons subject to the authority of a third person that enables him to influence the work of the other persons financially, economically, and organisationally."

Related Persons can include both natural persons and legal persons.

- Natural Persons - Husband and wife, parents and children, step-parents and step-children, grandparents and grandchildren, direct siblings, step-siblings, uncles, aunts, nephews, nieces, cousins etc. are a few examples. The spouse of any third-degree relative is also included.
- Partners in persons' companies - Partners are natural or juristic people who form a commercial company partnership (general or limited) under Oman's applicable commercial companies' law with the intention of conducting business under a certain trade name.
- Owners of the activity, employees and partners
- A natural Person - Two or more natural Persons are considered to be related to the legal Person if they directly or indirectly control more than 50% of the legal Person's capital or more than 50% of the voting rights.
- A Legal Person - Owns more than 50% of either the capital, voting rights or 50% of the value of the other legal person, directly or indirectly.
- The trustee in bankruptcy, endowment agent and any beneficiaries: It should be noted that, in addition to actual ownership, control via ownership includes the right to use and dispose of as an owner, or the ability to own the (voting rights) to a Person's income or capital with reasonable certainty.

- **Valuation of Supply of Goods and Services to Related Person**

If a transaction occurs between related persons, and the value of supply based on the consideration is less than the market value, VAT must be calculated based on the market value.

- **Valuation of Supply of Goods and Services to Employees**

Goods or services provided by an employer to employee must be subject to market value standards if the consideration for the supply is less than the market value of the supply, given that an employee does not carry on an economic activity and is not a taxable person, he or she is not eligible for any input VAT reduction.

- **Special Cases - Intercompany Charges**

- Management Services - Management services supplied between two Omani entities will be subject to VAT at the standard rate.
- Other Services within the Group - The VAT treatment of intercompany services is in principle equivalent to the VAT treatment of services rendered to entities outside the company unless the service provider and recipient are part of the same VAT group.
- Transfer Pricing Adjustments - Transfer pricing guidelines and regulations have been established at a global level, to ensure that related parties set their intercompany pricing in a similar way that independent third parties would deal with each other at an “arm’s length” price. The group companies may make transfer pricing adjustments, which adjust the consideration payable for intercompany transactions to be in accordance with rules of transfer pricing.

For further information on the above update, please click [here](#).

Should you need further clarification and details regarding this update, please contact GT Oman Tax Partner [Nasser Al-Mughairy](#), or Tax Director, [Deepika Rajan](#).

Sultanate of Oman (‘Oman’) – The Oman Tax Authority (‘OTA’) publishes a VAT Guide on Reverse Charge Mechanism (‘RCM’)

The OTA has published a VAT Guide on RCM, clarifying important matters in accordance with Articles 20 and 81 of the VAT Law. The highlights of the guide are as discussed below:

- **Applying Reverse Charge Mechanism**

The Reverse Charge Mechanism is only applicable when all of the following conditions are met, i.e.:

- A Taxable Person, being the customer, receives services from a Non- Resident Supplier;
- The supplies are taxable in nature – they are not exempted from VAT in Oman;
- The place of supply rules means the supply is subject to VAT in the Sultanate of Oman.
- The non-resident supplier is not required to register or is already registered for the Tax in the Sultanate of Oman.

RCM will also apply to intercompany charges by a non-resident of a multinational corporation to an Omani corporation in the same corporate group. As a result, the Omani Company receiving management services from a non-resident intergroup company would be compelled to self-account for VAT on the services received under RCM.

Examples of Services that fall within the scope of RCM application are legal and professional services, management services, or rights in intellectual property etc.

- **RCM is not applicable**

RCM may not be applicable for the following services:

- The receipt of exempt services;
- Payment of dividends which solely represent a return on capital; and
- VAT deduction outlined under RCM.

- **RCM treatment for Non-Taxable Persons in Oman**

Through RCM, VAT is levied on services provided in Oman to a Taxable Person, by a non-resident supplier. If a person does not have a Place of Residence in Oman, he is deemed a non-resident.

- **VAT Due Date**

In circumstances where a tax invoice is produced or payment is received before the actual date of supply, the VAT due date may be sooner than the actual date of supply.

The same rules will apply to the VAT due date for supplies made under RCM according to Articles 26 and 27 of the VAT Law.

- **Input VAT Deduction**

In order to be eligible for the deduction of Input VAT on RCM, the Omani Company should have commercial documents available to evidence the nature of the supply and the consideration payable on the supply, in addition to the corresponding calculation of tax due on the supply.

For further information on the above update, please click [here](#).

Should you need further clarification and details regarding this update, please contact GT Oman Tax Partner [Nasser Al-Mughairy](#), or Tax Director, [Deepika Rajan](#).



International Tax & Tax Treaty

GCC Tax Developments

Ministry of Finance ('MoF') Survey on Programs and Awareness Session

On 13th July 2023, the MoF opened a survey to evaluate the effectiveness of the recent Corporate Tax awareness sessions and publications on the targeted business groups. The poll created with this objective is open to entrepreneurs and the intended/targeted businesses. To access the survey link, click [here](#).

Should you need any further clarifications and details regarding this information, please contact our Corporate Tax Team – Partner [Sam Maycock](#) or Director [Emma Bird](#).

FATCA/CRS system Data Submission & Risk Assessment by Ministry of Finance ('MoF')

The UAE MoF had announced the go-live of the Data Submission and Risk Assessment functionality of the new FATCA/CRS System.

Once registration is accepted by the UAE Regulatory Authority, UAE Reporting Financial Institutions are expected to submit Annual Data / Nil reports and Risk Assessment Questionnaires for calendar year 2022 (CY2022) by the dead-line of July 31, 2023, with the MoF.

Registration on the system is needed for all UAE Reporting Financial Institutions using this [link](#).

Additionally, RFIs must submit their Annual Returns (including Nil Returns) and complete the Risk Rating Assessment by 31 July 2023.

To complete the registration process on the FATCA and CRS, please visit [\[fatcacrs.mof.gov.ae\]](https://fatcacrs.mof.gov.ae).

For more information, please visit [\[mof.gov.ae\]](https://mof.gov.ae).

Should you need any further clarifications and details regarding this information, please contact our International Team – Partner [Anuj R. Kapoor](#) or International Tax Manager [Siddharth Jain](#).

United Arab Emirates ('UAE') – Ministry of Finance ('MoF') update of FAQs on Free Zones

To complement the Cabinet Decision and ensure stakeholders have access to accurate and up-to-date information, the (MoF) has revised its FAQs on Free Zones. This serves as a reference tool for investors, businesses, and interested parties, providing answers to common queries related to Free Zone operations and regulations.

The updated FAQs address a wide array of topics on Free Zones and can be found under **Section P** of [\[mof.gov.ae\]](https://mof.gov.ae).

Should you need any further clarifications and details regarding this information, please contact our Corporate Tax Team – Partner [Sam Maycock](#) or Director [Emma Bird](#).

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