

# Tax Newsletter

June 2024





## Landscape

In our June 2024 edition of GT's regional monthly Tax Newsletter, we provide our latest Tax news updates affecting International Tax, Corporate Tax, Transfer Pricing, and Indirect Taxes in the UAE and across the Middle East region.

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# Indirect Tax Update

## Value Added Tax in UAE

The Federal Tax Authority (‘FTA’) publishes ‘VATP038’ on Manpower supply vs Visa facilitation services.

The Federal Tax Authority (‘FTA’) has issued public clarification ‘VATP038’ on Manpower supply vs Visa facilitation services, differentiating the VAT treatment between the two scenarios. The clarification provides clear guidelines on determining a supply as either a Manpower supply or Visa facilitation service along with its valuation. The following table summarises how to determine which type of supply it is and the applicable VAT treatment:

Description	VISA facilitation service	Manpower supply
Understanding	Visa facilitation services are administrative services, the aim of which is only to facilitate the employment visa process for employees hired by another entity.	A manpower supply includes identification, recruitment and hiring of candidates and making such candidates available to any customer. Example: Secondment service.
Conditions	<ul style="list-style-type: none"><li>• The facilitator and the customer should be part of the same Corporate group but does not have to be part of the same Tax /VAT group, i.e., these companies should operate within the same corporate structure / ownership.</li><li>• VISA facilitator does not have ‘manpower supplier’ listed as its business activity on the trade license / commercial license / internal documentation. We would like to highlight that the clarification does not specify the ‘internal documentation’ requirement.</li><li>• The employees should work under the supervision and control of the customer.</li><li>• The facilitator does not have an obligation towards the employee / any recurring payment to the employee (such as: salary, insurance, benefits, etc.) The facilitator is only obligated to pay for the cost incurred to obtain an employment VISA.</li></ul>	The transaction should be considered as a manpower supply if any of the conditions of VISA facilitation services are <u>not</u> met.

<b>Consideration / Valuation</b>	<p>Visa facilitation services are administrative services, the aim of which is only to facilitate the employment visa process for employees hired by another entity.</p>	<ul style="list-style-type: none"> <li>• Consideration will include employee salary, benefits and any other recharges in relation to the employee / manpower supply.</li> <li>• Consideration will be the full amount received by the supplier.</li> <li>• 5% VAT rate will be applicable to customers in the UAE.</li> </ul>
<b>Example</b>	<ul style="list-style-type: none"> <li>• 5% VAT is applicable on the amount charged for VISA facilitation services, subject to fulfilling all of the conditions.</li> <li>• As far as Valuation for Related parties is concerned, if the Supplier charges less than the market value to related parties and the customer / the related party is not entitled to recover full input VAT, then the value of supply should beat the market value, regardless of the actual amount charged for the visa facilitation services.</li> <li>• If the supplier does not charge any fees to the customer, then this is considered as a deemed supply and the general conditions of deemed supply should be analysed along with the exceptions to the deemed supply conditions.</li> <li>• If the value of the cost incurred cannot be determined, the Facilitator should use the market value.</li> </ul>	<ul style="list-style-type: none"> <li>• Employment VISA will be with Company A.</li> <li>• Employee will be working for Company B.</li> <li>• Payroll will be paid to the employee by Company A or B.</li> </ul> <p>Company A should account for output VAT on full value of supply. Consideration is total amount incurred by Company B.</p>

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

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



# Value Added Tax in Middle East Countries

**Kingdom of Saudi Arabia ('KSA') – The Zakat, Tax and Customs Authority ('ZATCA') sets guidelines for selecting Taxpayers in Wave 12 for implementing the Integration Phase of E-invoicing.**

On 24 May 2024, the ZATCA announced its 12th wave of taxpayers for implementing Integration Phase (Phase 2) of E-invoicing, which now includes taxpayers whose taxable revenue exceeds 10 million Saudi Riyals ('SAR') during the tax years 2022 or 2023. The taxpayers who meet the criteria should integrate their E-invoicing solutions with the FATOORA platform with effect from 1 December 2024.

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 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 <sup>st</sup> wave	Exceeds SAR 3 Billion	1 January 2023	30 June 2023	1 July 2023
2 <sup>nd</sup> wave	Exceeds SAR 500 Million	1 July 2023	31 December 2023	1 January 2024
3 <sup>rd</sup> wave	Exceeds SAR 250 Million	1 October 2023	1 February 2024	Post 1 February 2024
4 <sup>th</sup> wave	Exceeds SAR 150 Million	1 November 2023	29 February 2024	Post 1 March 2024
5 <sup>th</sup> Wave	Exceeds SAR 100 Million	1 December 2023	31 March 2024	Post 1 April 2024
6 <sup>th</sup> Wave	Exceeds SAR 70 Million	1 January 2024	30 April 2024	Post 1 May 2024
7 <sup>th</sup> Wave	Exceeds SAR 50 Million	1 February 2024	31 May 2024	Post 1 June 2024
8 <sup>th</sup> Wave	Exceeds SAR 40 Million	1 March 2024	30 June 2024	Post 1 July 2024
9 <sup>th</sup> Wave	Exceeds SAR 30 Million	1 June 2024	30 September 2024	Post 1 October 2024
10 <sup>th</sup> Wave	Exceeds SAR 25 Million	1 October 2024	31 December 2024	Post 1 January 2025
11 <sup>th</sup> Wave	Exceeds SAR 15 Million	1 November 2024	31 January 2025	
12 <sup>th</sup> Wave	Exceeds SAR 10 Million	1 December 2024		

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

Should you need any further clarification and details regarding this update, please contact our GT KSA Tax Team – Head of Tax [Adel Douglas](#) or Tax Director [Mohammad Huwitat](#).

## Bahrain –The National Bureau of Revenue (‘NBR’) updates the VAT treatment for the rental of retail and promotional stands

On 14 May 2024, the NBR has updated the VAT real-estate Guideline (version 1.3) which clarifies the VAT treatment for the rental of retail and promotional stands. As of 1 January 2025, space for retail or promotional stands (e.g. at a shopping mall, retail or entertainment area) will not be regarded as an exempt supply for VAT purposes, regardless of the rental period. Such a supply will be subject to VAT at 10% if the person providing the space is a taxable person.

Should you need further clarification and details regarding this update, please contact GT Bahrain Senior Tax Partner [Jatin Karia](#), or Director [Shashank Arya](#).

## Bahrain –The National Bureau of Revenue (‘NBR’) publishes version 1.10 of the VAT General Guideline

On 26 May 2024, the NBR published an updated version (version 1.10) of the VAT General Guideline. The updated version guides on how to claim the VAT charged on expenses related to mobile phones and vehicles where the NBR has included the following statement “No recovery of VAT is available for any phone related expenses where there is no bill (e.g. prepaid phone credit). VAT charged on such expenses must be disallowed in its entirety”.

In addition to that, further details on bad debt reliefs have been explained by the NBR in reference to legal proceedings that constitute lodging a claim in court for the enforcement of the debt, issuing a payment demand notification or a letter from an in-house legal team to the debtor without lodging a claim in court will not be sufficient for applying the bad debt relief for Bahrain VAT purposes. Where the supplier lodged a claim in court, he/ she must follow through with the court case. If the supplier withdraws the court case, the adjustment on bad debt must be reversed by cancelling the previously issued VAT credit note.

Should you need further clarification and details regarding this update, please contact GT Bahrain Senior Tax Partner [Jatin Karia](#), or Director [Shashank Arya](#).





# Customs and Excise Tax Update

## Customs and Excise Tax in Middle East Countries

**Kingdom of Saudi Arabia ('KSA') –  
The Zakat, Tax and Customs  
Authority ('ZATCA') sets guidelines  
on the tax refunds for non-  
consumable excise goods**

The Zakat, Tax and Customs Authority ('ZATCA') of published a guide on 26 May 2024, about tax refunds on the disposal of excise goods.

The guide provides clarification on the situations in which the ZATCA is required to reimburse a registered taxpayer for the excise tax they have paid, as outlined in paragraphs 1, 2, and 3 of Article 52 of the Implementing Regulations of the Excise Law. For excise goods that have expired or are no longer suitable for human use, taxpayers may request a refund of the excise tax paid by first filing a disposal request and then proceeding with the disposal only after obtaining the ZATCA's clearance.

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

Should you need any further clarification and details regarding this update, please contact our GT KSA Tax Team – Head of Tax [Adel Douglas](#), or Tax Director [Mohammad Huwitat](#).



## Kingdom of Saudi Arabia ('KSA') – The Zakat, Tax and Customs Authority ('ZATCA') approves the requirements for exemption from customs duties and taxes for Duty-Free markets in the arrival lounges at all customs ports

The Zakat, Tax and Customs Authority (ZATCA) has approved the requirements for exemption from customs duties and taxes for duty-free markets in the arrival lounges at all land, sea, and air customs ports. These requirements set the maximum purchase limit and allowed quantities for passengers arriving in Saudi Arabia.

ZATCA has set a maximum purchase limit ceiling for exemption requirements which is SAR 3,000 per passenger on purchase from duty-free markets in arrival lounges, provided that the purchase is for personal use and a maximum limit of 200 cigarettes per passenger on purchase from duty-free markets in arrival lounges.

ZATCA also announced that it is now receiving license applications from operators of duty-free markets in arrival lounges at customs ports, in continuation of the licenses already granted to operators in departure lounges. However, the licenses for duty free operators in arrival lounges are reliant on the completion of regulatory procedures with the relevant authorities at the ports, based on the rules and regulations governing duty-free markets.

In this context, ZATCA added that the adoption of customs duties and tax exemption forms for duty-free markets, along with the acceptance of license applications for their operation in arrival lounges at all customs ports, is part of ZATCA's efforts to enhance the logistical services provided to duty-free market operators at customs ports in both arrival and departure lounges. The ZATCA highlighted exemptions on duty-free markets aim at enhancing the experience of passengers arriving at KSA.

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

Should you need any further clarification and details regarding this update, please contact our GT KSA Tax Team – Head of Tax [Adel Douglas](#), or Tax Director [Mohammad Huwitat](#).





# Corporate Tax Update

## Corporate Tax in UAE

### FTA Issues Public Clarification on Corporate Tax ('CT') Registration Deadlines

The Federal Tax Authority (FTA) has issued Public Clarification No. CTP001 on the Registration Timelines for Taxable Persons for Corporate Tax ("CT") to further explain and clarify the specific deadlines for various types of Taxable Persons subject to CT.

The Public Clarification emphasizes the deadlines for various types of Taxable Persons for both Resident Persons and Non-Resident Persons, including juridical persons and natural persons. It also addresses the registration requirements for juridical persons seeking exempt status from the FTA under the CT Law.

The Public Clarification includes a broad analysis and examples to assist Taxable Persons understand how the timelines apply to their specific category.

#### Points to be noted:

##### Juridical Persons that is a Resident Person

- Resident juridical persons, whether incorporated or established or recognized before March 1, 2024, are required to submit their CT Registration application based on the month when their license was issued. In the case where a juridical person does not possess a license by March 1, 2024, the deadline for submitting the application is May 31, 2024.
- If such resident juridical person possesses a License that has expired by 1 March 2024, the submission reference will still be determined by the month in which the License was initially issued.
- For Resident juridical persons with multiple licenses, the deadline for submission is based on the earliest date of issuance, considering the year of license issuance.
- Juridical persons that are incorporated or established or recognized on or after March 1, 2024, are required to submit a Tax Registration application within three months from the date of incorporation, establishment, or recognition.
- Legal entities recognized under foreign legislation but managed and controlled in the UAE must submit a Tax Registration application within three months from the end of their Financial Year. For completeness, a foreign juridical person effectively managed and controlled in the UAE prior to 1 March 2024 shall obtain its CT Registration on or before 31 May 2024.

## Juridical Persons that is a Non-Resident

- Non-Resident Juridical Persons with a Permanent Establishment (“PE”) in the UAE must submit a Tax Registration application within nine months from the date the PE is recognized for UAE CT purposes. For a fixed place of business, when all requirements are fulfilled, including establishing a degree of permanence for at least six months in the UAE (longer duration under double tax treaties should prevail), starting from the implementation of the CT Law on 1 June 2023.
- Non-Resident Juridical Persons with a PE in the UAE on or after March 1, 2024, are required to submit a Tax Registration application within six months from the date of establishment of the PE.
- Non-Resident Persons with a nexus in the UAE before 1 March 2024 must submit their application by 31 May 2024.
- Juridical persons that are Non-Resident Persons with a nexus in the UAE after on or after 1 March 2024 must submit a Tax Registration application within three months from the date of establishing a nexus in the UAE.
- If the Non-Resident Persons has both a PE and a nexus in the UAE, the deadline to submit a Tax Registration application for CT to the FTA is the earliest of their respective deadlines.

## Natural Persons

- Starting from 1 January 2024, natural persons that are Resident Persons must submit a Tax Registration application for CT if their Turnover from Businesses or Business Activities in the UAE exceeds AED 1 million within a Gregorian calendar year. If this threshold is met, a Tax Registration application must be submitted by 31 March of the subsequent Gregorian calendar year.
- Natural persons that are Non-Resident Persons must submit a Tax Registration application for CT within three months of meeting the requirements of being subject to Corporate Tax. If their Turnover from Businesses or Business Activities derived via a PE in the UAE exceeds AED 1 million during a Gregorian calendar year, starting from 1 January 2024.

Resident Juridical Persons with licenses issued in the month of March or April shall submit the application for their Corporate Tax registration on or before June 30, 2024, to avoid penalty of AED 10,000/-

It is noteworthy that Public Clarification No. CTP001 was released on 4th June 2024, following the initial deadline of 31st May 2024.

Should you need any further clarifications and details regarding this information, please contact our Corporate Tax Team – Tax Partner [Anuj R. Kapoor](#) or Tax Director [Isabel Strassburger](#) or Associate Tax Directors [Tatiana Stupenkova](#) and [Amisha Anil](#).



# International Tax

## UAE Update

### MOF Portal Opens for CY2023: Mandatory Registration and Data Submission for UAE Financial Institutions

The MOF portal is now live for CY2023. All **UAE Reporting Financial Institutions** are required to register on the MOF portal and complete their submission (Data Submission and Risk Assessment Questionnaire) **using the following [link](#) for CY2023**. The entity will be required to log into the system using UAE Pass. As part of the registration, one can create Groups, add Users and multiple other actions. Additionally, one can also access/download the FATCA/CRS Excel upload templates should you wish to prepare your data offline.

If the entity is already registered, you are not required to perform a new registration. However, please ensure the below steps are taken.

The Ministry of Finance (MOF) portal for calendar year 2023 (CY2023) is now operational. All UAE Reporting Financial Institutions are required to register on the MOF portal and complete their data submission and Risk Assessment Questionnaire via the provided link. Institutions must log into the system using UAE Pass. During registration, users can create groups, add users, and perform various other actions. The portal also offers the option to access and download the FATCA/CRS Excel upload templates for offline data preparation.



Entities already registered on the portal are not required to register again but must ensure the following steps are completed:

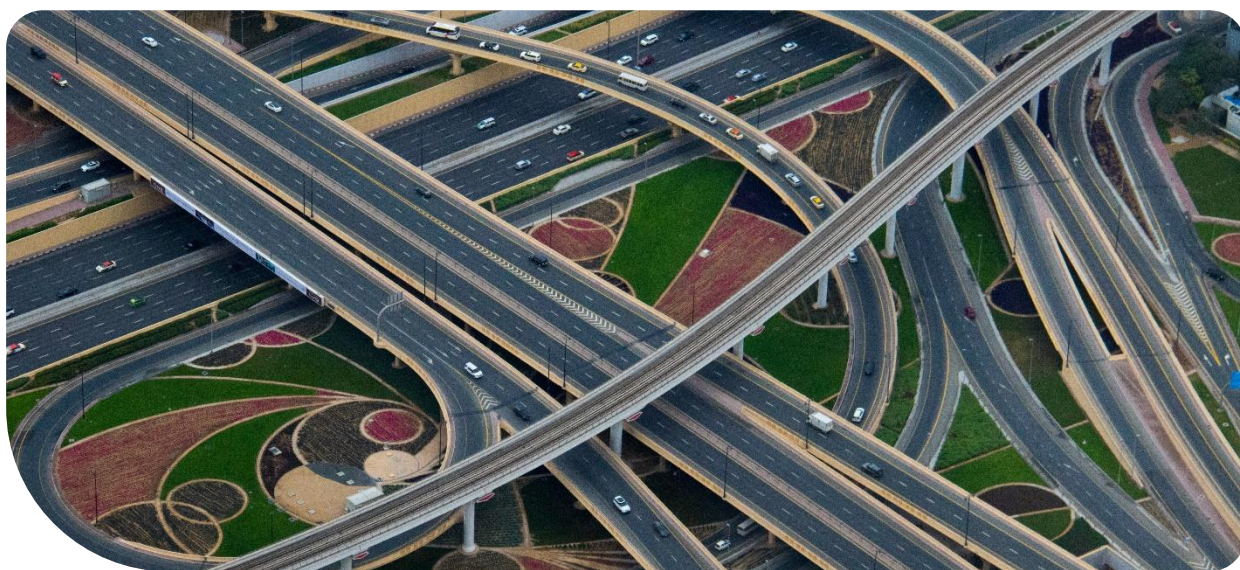
- **Registration details must be up-to-date and authorized.**
  - If the details are not up to date, please select the Entity and click “Edit Registration Details”. Upon updating the information, please submit it for your Regulatory Authority approval.
  - In case, the entity's registration is rejected, it must be re-submitted for authorization by the Regulatory Authority. Notifications regarding the registration status, whether approved or rejected, will be sent via email. Entities are also advised to periodically log into the system to check their registration status.
- **CY2023 reporting period must be assigned to the registration.**
  - To verify your entity's reporting status, click on the "Entity" section and check if "2023-12-31" is listed for CRS and/or FATCA reporting types at the bottom of the registration details.
  - If "2023-12-31" is not present, please add this reporting period to ensure compliance.

Entities must ensure the following to fulfill their reporting obligations:

- The reporting period "2023-12-31" must be assigned to their registration for CRS and/or FATCA.
- The registration must be authorized by the Regulatory Authority.

**All UAE Reporting Financial Institutions (“UAE RFIs”) are required to fulfil their CY2023 obligations for the purposes of FATCA and/or CRS no later than the stipulated deadline of 30 June 2024.**

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





# GCC Update

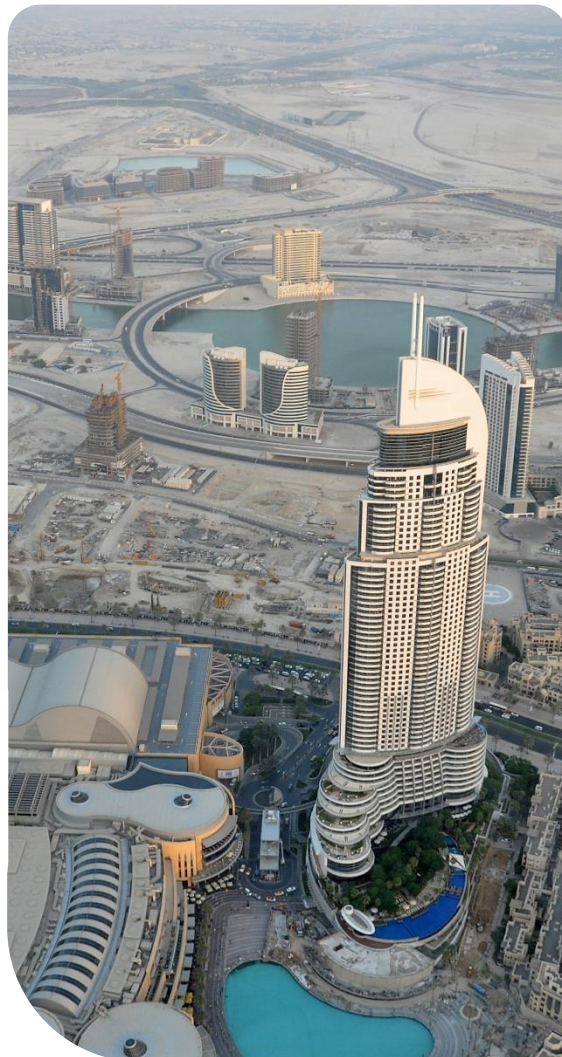
## ZATCA amends RETT Implementing Regulations

The Zakat, Tax and Customs Authority (ZATCA) has updated the Real Estate Transaction Tax Implementing Regulations. These updates introduce several exemptions, including those for individuals contributing property they own in exchange for investment units in a real estate investment fund. The regulations also address exemptions for transferring personal real estate ownership to a company in which the individual holds shares, aiming to adjust ownership, and amend the timelines for projects related to construction, ownership, operation, and transfer.

ZATCA specified that the exemptions related to ownership modification entail transferring property ownership from an individual to a company in which they currently or previously held shares, to facilitate ownership adjustment. The property must be listed as part of the company's assets before the regulations took effect, and the individual must have been a partner at the time the property was included as an asset, regardless of their partnership status at the time of modification.

ZATCA announced that the amendments broaden the scope of exemptions to include real estate transactions involving in-kind contributions to the capital of a real estate investment fund, as regulated by the Capital Market Authority. These exemptions apply to all types of real estate funds, regardless of their purpose, and are not limited to those focused on initial or construction development. The exemption also extends beyond transactions made during the initial establishment of funds, provided that the fund's units or shares related to the real estate are not disposed of until the fund's termination or liquidation, or for five years from the date of subscription or acquisition, whichever is sooner.

Additionally, ZATCA introduced a further amendment specifying that changes in ownership percentage after the exemption is applied, due to a public offering of the company's shares or fund units, do not violate the condition of retaining the shares or stocks linked to the exempted real estate. Thus, the exemption remains valid in such cases, promoting the IPO of company shares and fund units.



The amendments also revised the tax due dates for project contracts related to construction, ownership, operation, and transfer. The new deadlines are set for the date of ownership transfer or actual possession by the transferee under the existing contracts. Taxes must be paid within 30 days from the date of ownership transfer or actual possession of the property.

RETT is levied at a rate of 5% on real estate when ownership is transferred from one person to another through methods such as sale, trade-off, or assignment, with certain exceptions as outlined in the Real Estate Transaction Tax Implementing Regulations. All real estate ownership transfers must first be recorded on the RETT platform on ZATCA's website. This involves providing the property details and verifying any applicable exemptions before the transaction is finalized with the notary public or a legally authorized certification body.

For further information, please click [here](#).

Should you need any further clarification and details regarding this update, please contact our GT KSA Tax Team – Head of Tax [Adel Douglas](#), or Tax Director [Mohammad Huwitat](#).





## ZATCA Issues Comprehensive Guide to Settle Zakat and Customs Disputes

The Zakat, Tax and Customs Authority (ZATCA) of Saudi Arabia has released a new guide aimed at streamlining the resolution of disputes related to zakat and customs. This initiative reflects the Authority's commitment to enhancing transparency and efficiency within the regulatory framework.

The newly issued guide provides detailed procedures for settling disputes, ensuring that taxpayers and businesses can navigate the process with greater ease and clarity. This development is part of ZATCA's broader strategy to foster a more business-friendly environment in the Kingdom, in line with Vision 2030.

### Key Features of the Guide:

**Clear Step-by-Step Processes:** The guide outlines step-by-step instructions for lodging disputes, presenting evidence, and appealing decisions. This systematic approach is designed to minimize ambiguity and facilitate smoother interactions between the Authority and stakeholders.

**Enhanced Communication Channels:** ZATCA has emphasized the importance of open communication, providing multiple channels through which disputes can be addressed. This includes online portals, dedicated helplines, and in-person consultations.

**Timelines and Deadlines:** To ensure timely resolution, the guide specifies clear timelines for each stage of the dispute process. This includes deadlines for submission of documents, responses from ZATCA, and final resolution dates.

**User-Friendly Language:** The guide is written in straightforward language, making it accessible to a wide audience. Technical jargon is minimized to ensure that all taxpayers, regardless of their familiarity with tax and customs regulations, can understand the procedures.

**Support and Resources:** In addition to procedural guidelines, the document provides resources such as frequently asked questions (FAQs), case studies, and contact information for further assistance.



## Impact on Businesses and Taxpayers

The release of this guide is expected to have a significant positive impact on businesses operating within Saudi Arabia. By simplifying the dispute resolution process, ZATCA aims to reduce the administrative burden on companies and encourage compliance with zakat and customs regulations.

ZATCA's Governor, His Excellency Suhail Abanmi, stated, "Our goal is to create a fair and transparent system that supports economic growth and development. This guide is a testament to our ongoing efforts to enhance the efficiency and effectiveness of our services."

## Feedback and Future Improvements

ZATCA has invited feedback from the public and business community to continuously improve the guide. Stakeholders are encouraged to provide suggestions and share their experiences to help refine the dispute resolution process further.

## **Conclusion**

The issuance of the new guide marks a significant step forward in ZATCA's mission to streamline tax and customs operations in Saudi Arabia. By providing clear, accessible, and efficient dispute resolution mechanisms, the Authority aims to build trust and foster a conducive environment for economic activity.

To access the guide, please click [here](#).

Should you need any further clarification and details regarding this update, please contact our GT KSA Tax Team – Head of Tax [Adel Douglas](#), or Tax Director [Mohammad Huwitat](#).





# Tax Treaty Developments

## GCC Tax Treaty News

### Update on Tax Treaty between Estonia and Qatar

The income tax treaty between Estonia and Qatar was signed on March 7, 2024, marking the first such agreement between the two countries. This treaty includes Estonian income tax and Qatari income and corporation taxes.

#### Residence

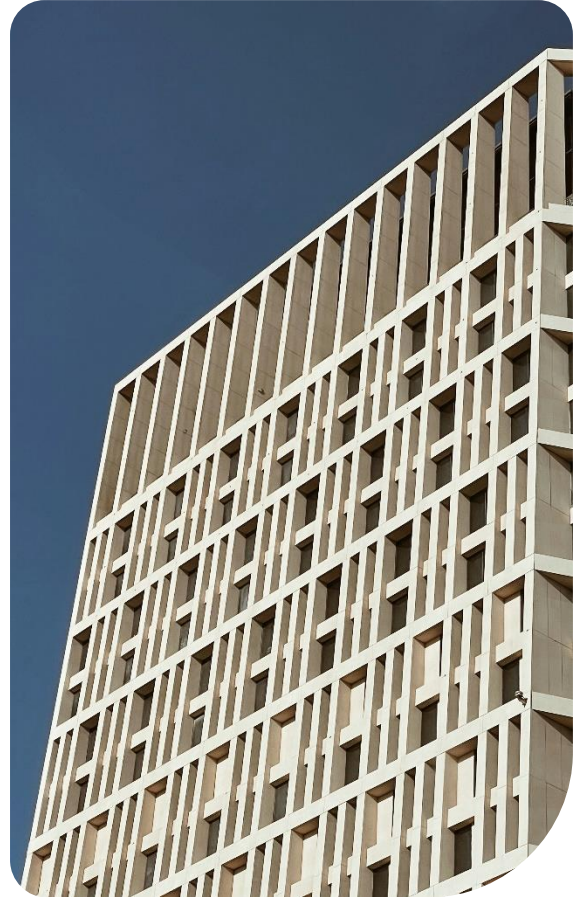
For entities that are residents of both Contracting States, the competent authorities will mutually determine the entity's residence based on factors such as place of effective management and place of incorporation. If no agreement is reached, the entity will not be considered a resident of either state for treaty benefits, except for the elimination of double taxation and the mutual agreement procedure.

#### Service Permanent Establishment (PE)

A permanent establishment is considered established when an enterprise provides services through personnel in a Contracting State for more than 183 days within a 12-month period for the same or a connected project.

#### Withholding Tax Rates

- Dividends: 0% if paid to a company or certain government entities; otherwise, 5%.
- Interest: 0% if paid to a company or certain government entities; otherwise, 5%.
- Royalties: 5%.



## Capital Gains

- Gains from immovable property in the other State.
- Gains from business property of a PE in the other State.
- Gains from shares deriving more than 50% of their value from immovable property in the other State during the preceding 365 days.

Other capital gains are only taxed by the resident State.

## Double Taxation Relief

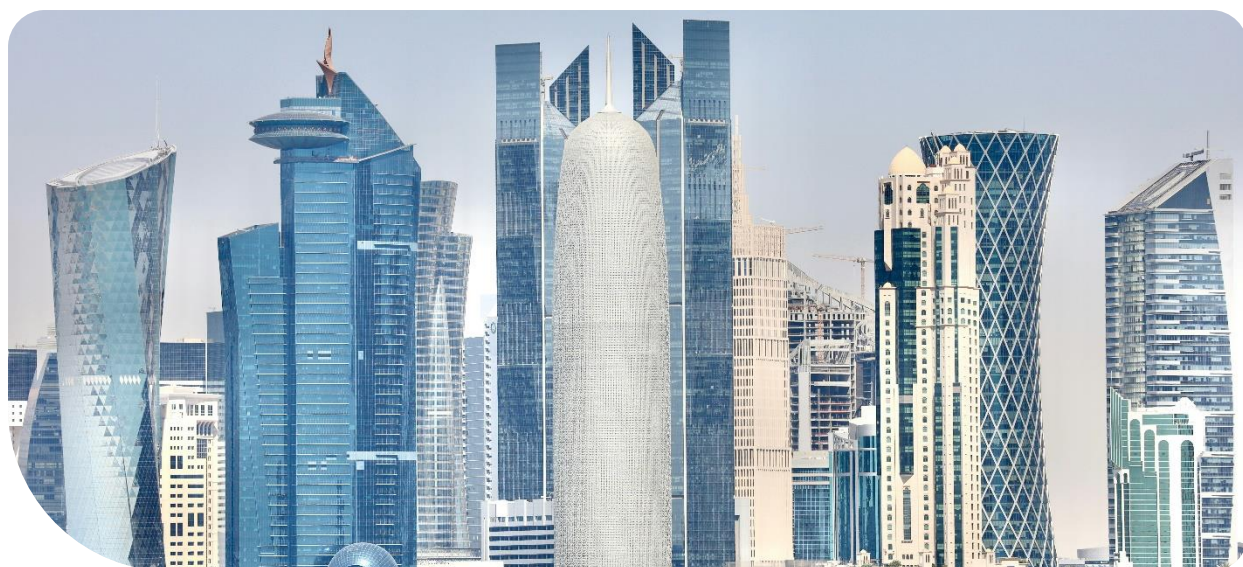
Estonia generally uses the exemption method, with the credit method for dividends, interest, royalties, and income of artistes and sportspersons. Qatar generally uses the exemption method, with the credit method for interest.

## Entitlement to Benefits

Benefits will not be granted if obtaining the benefit was a principal purpose of an arrangement, unless it aligns with the treaty's objectives.

The treaty will come into effect once ratified, applying from January 1 of the year following its entry into force.

Should you need any further clarifications and details regarding this information, please contact our International Tax Team – Partner [Anuj R. Kapoor](#) or Tax Director [Isabel Strassburger](#) or Associate Tax Directors [Tatiana Stupenkova](#) and [Amisha Anil](#).



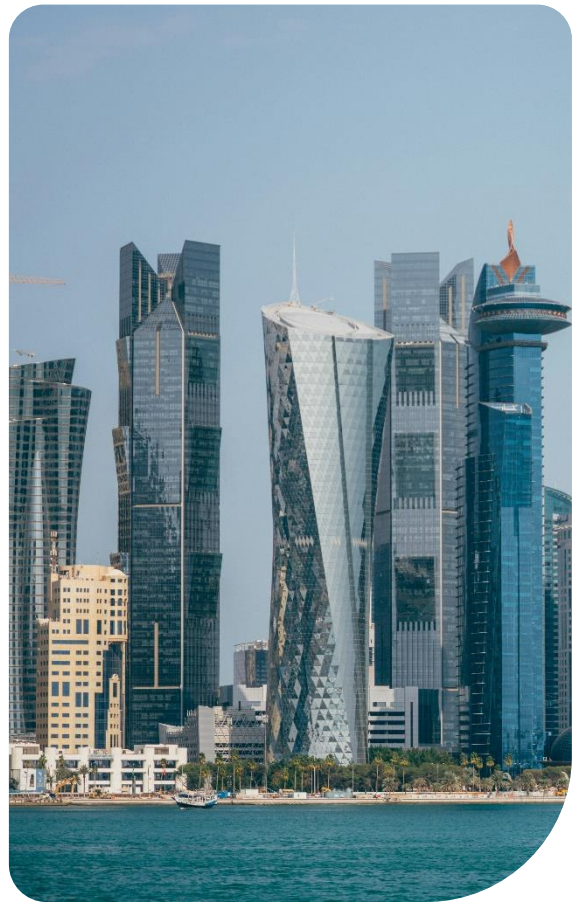


## Tax Treaty between Qatar and Saudi Arabia Signed

On May 30, 2024, officials from Qatar and Saudi Arabia signed their first-ever income tax treaty, according to a release by the Qatar News Agency. The treaty will come into effect once the ratification instruments are exchanged. Further details of the agreement will be published as they become available.

For further information, please click [here](#).

Should you need any further clarifications and details regarding this information, please contact our International Tax Team – Partner [Anuj R. Kapoor](#) or Tax Director [Isabel Strassburger](#) or Associate Tax Directors [Tatiana Stupenkova](#) and [Amisha Anil](#).



## Estonia Approves Pending Tax Treaty with Qatar

On 30 May 2024, the Estonian government approved the pending income tax treaty with Qatar. The treaty, signed on 7 March 2024, is the first of its kind between the two countries and will come into effect once the ratification instruments are exchanged.

Should you need any further clarifications and details regarding this information, please contact our International Tax Team – Partner [Anuj R. Kapoor](#) or Tax Director [Isabel Strassburger](#) or Associate Tax Directors [Tatiana Stupenkova](#) and [Amisha Anil](#).



## Tax Treaty between Qatar and the UAE Signed

According to a release by the Qatar News Agency, officials from Qatar and the United Arab Emirates signed an income tax treaty on 30 May 2024. This treaty, the first of its kind between the two countries, will come into effect once the ratification instruments are exchanged. Details of the treaty will be published when available.

For further information, please click [here](#).

Should you need any further clarifications and details regarding this information, please contact our International Tax Team – Partner [Anuj R. Kapoor](#) or Tax Director [Isabel Strassburger](#) or Associate Tax Directors [Tatiana Stupenkova](#) and [Amisha Anil](#).

## Tax Treaty between Ireland and Oman Signed

According to a release by the Oman News Agency, officials from Ireland and Oman signed an income tax treaty on 30 May 2024. This treaty, the first of its kind between the two countries, will come into effect once the ratification instruments are exchanged. Details of the treaty will be published when available.

For further information, please click [here](#).

Should you need any further clarifications and details regarding this information, please contact our International Tax Team – Partner [Anuj R. Kapoor](#) or Tax Director [Isabel Strassburger](#) or Associate Tax Directors [Tatiana Stupenkova](#) and [Amisha Anil](#).





## Ivory Coast Approves Pending Tax Treaty with Qatar

On 22 May 2024, the Ivory Coast Council of Ministers approved the ratification of the pending income tax treaty with Qatar. This treaty, signed on 7 December 2022, is the first between the two nations and will come into effect once the ratification instruments are exchanged.

Should you need any further clarifications and details regarding this information, please contact our International Tax Team – Partner [Anuj R. Kapoor](#) or Tax Director [Isabel Strassburger](#) or Associate Tax Directors [Tatiana Stupenkova](#) and [Amisha Anil](#).

## Croatia and Saudi Arabia Conclude Tax Treaty Negotiations

Officials from Croatia and Saudi Arabia reportedly concluded negotiations for an income tax treaty on 15 May 2024. The treaty will be the first of its kind between the two countries and must be signed and ratified before entering into force.

Should you need any further clarifications and details regarding this information, please contact our International Tax Team – Partner [Anuj R. Kapoor](#) or Tax Director [Isabel Strassburger](#) or Associate Tax Directors [Tatiana Stupenkova](#) and [Amisha Anil](#).

## Papua New Guinea Looking to Negotiate Tax Treaty with the UAE

According to a recent release from the International Trade and Investment Ministry of Papua New Guinea, officials from Papua New Guinea and the United Arab Emirates met on the margins of the Annual Investment Meeting (AIM) Congress, which was held from 7 to 9 May 2024. During the meeting, the two sides discussed the strengthening of trade and economic relations including Papua New Guinea's interest in the negotiation of an income tax treaty. Any resulting treaty would be the first of its kind between the two countries and must be finalized, signed, and ratified before entering into force.

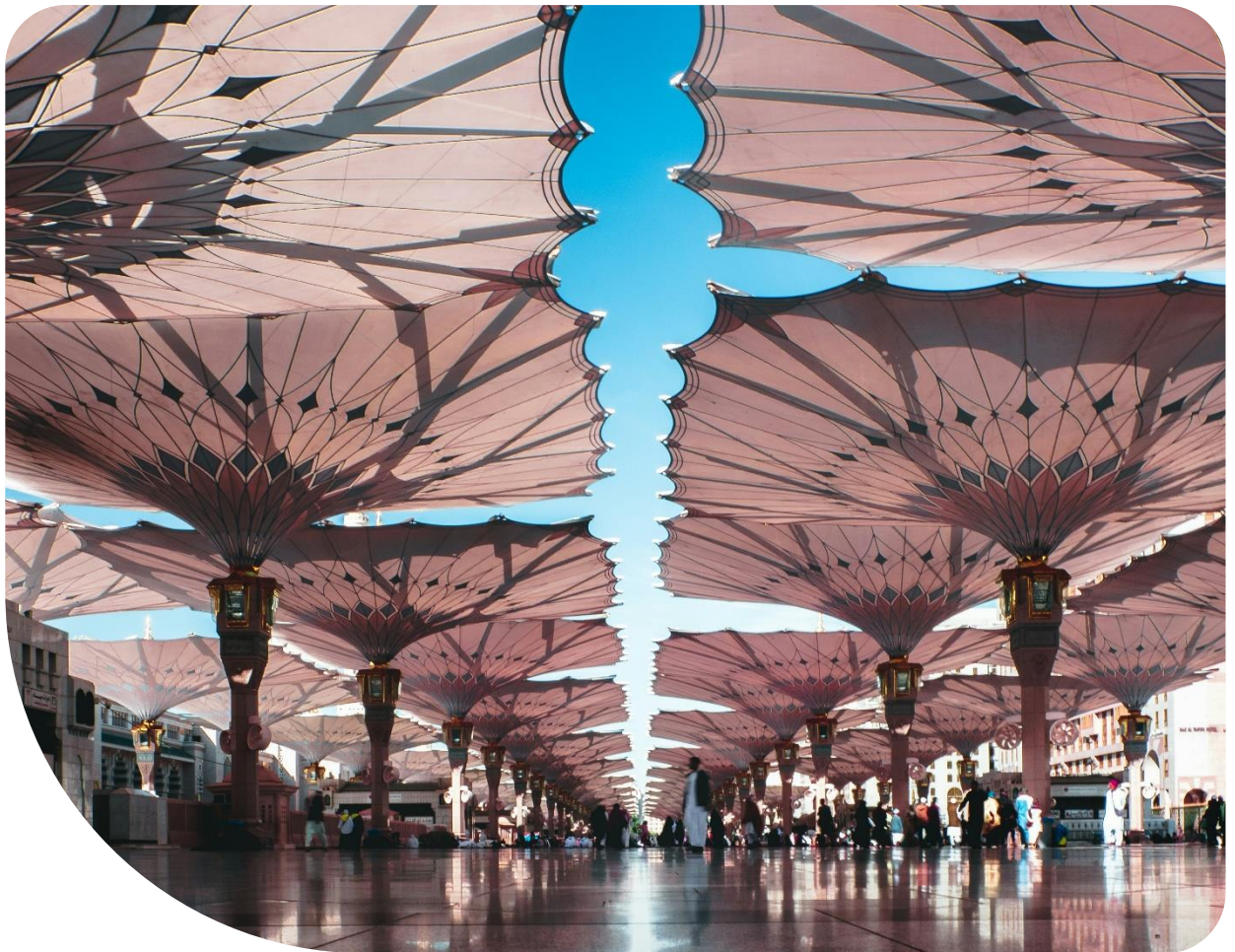
For further information, please click [here](#).

Should you need any further clarifications and details regarding this information, please contact our International Tax Team – Partner [Anuj R. Kapoor](#) or Tax Director [Isabel Strassburger](#) or Associate Tax Directors [Tatiana Stupenkova](#) and [Amisha Anil](#).

## Saudi Cabinet Approves Pending Tax Treaty with Slovak Republic

On 14 May 2024, the Saudi Cabinet approved the ratification of the pending income tax treaty with the Slovak Republic. The treaty, signed 13 November 2023, is the first of its kind between the two countries and will enter into force after the ratification instruments are exchanged. It will enter into force on the first day of the third month after the ratification instruments are exchanged and will apply from 1 January of the year following its entry into force.

Should you need any further clarifications and details regarding this information, please contact our International Tax Team – Partner [Anuj R. Kapoor](#) or Tax Director [Isabel Strassburger](#) or Associate Tax Directors [Tatiana Stupenkova](#) and [Amisha Anil](#).





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