



This is not an official translation:

Determining the Tax Compliance Requirements for Unincorporated Partnerships, Foreign Partnerships and Family Foundations for the purposes of Federal Decree-Law No. 47 of 2022 on the Taxation of Corporations and Businesses and its amendments

Federal Tax Authority Decision No. 5 of 2025 – Issued 19 May 2025 – (Effective 1 July 2025)

The Chairman of the Board of Directors of the Federal Tax Authority has decided:

- Having reviewed the Constitution,
- Federal Decree-Law No. 13 of 2016 on the Establishment of the Federal Tax Authority, and its amendments,
- Federal Decree-Law No. 28 of 2022 on Tax Procedures, and its amendments,
- Federal Decree-Law No. 47 of 2022 on the Taxation of Corporations and Businesses, and its amendments,
- Cabinet Decision No. 74 of 2023 on the Executive Regulation of Federal Decree-Law No. 28 of 2022 on Tax Procedures,
- Decision of the Chairman of the Board of Directors No. 9 of 2021 on the Delegation to the Vice Chairman of the Board of Directors of the Federal Tax Authority,
- Ministerial Decision No. 261 of 2024 on Unincorporated Partnership, Foreign Partnership and Family Foundation for the Purposes of Federal Decree-Law No. 47 of 2022 on the Taxation of Corporations and Businesses,
- FTA Decision No. 16 of 2023 on Determining the Requirements for the Registration of the Unincorporated Partnership and Determining the Distributive Shares of Partners in an



Unincorporated Partnership for the purposes of Federal Decree Law No. 47 of 2022 on the Taxation of Corporations and Businesses, and its amendments, and

- Pursuant to the approval of the Board of Directors of the Federal Tax Authority on amending the Policy for Determining the Requirements for the Registration of the Unincorporated Partnership and Determining the Distributive Shares of Partners in an Unincorporated Partnership at its 38th meeting held on 29 April 2025.

Article 1 – Definitions

Words and expressions in this Decision shall have the same meanings specified in the Federal-Decree Law No. 47 of 2022 referred to above (“Corporate Tax Law”), unless the context otherwise requires.

Article 2 – Requirements for the Registration of the Unincorporated Partnership

1. For the purposes of Clause 2 of Article 51 of the Corporate Tax Law, the partners in an Unincorporated Partnership that is not treated as a Taxable Person in its own right must appoint one of the partners to be the authorised partner to act on behalf of all the partners in relation to registration for Corporate Tax purposes.
2. The authorised partner shall be required to submit an application to the Authority to register the Unincorporated Partnership for purposes of Corporate Tax according to the forms specified by the Authority in order to obtain a Tax Registration Number, in accordance with the following:
 - a. For an Unincorporated Partnership whose first Financial Year ended prior to the effective date of this Decision, such Unincorporated Partnership shall submit the Tax Registration application on or before 31 August 2025.
 - b. For an Unincorporated Partnership whose first Financial Year did not end prior to the effective date of this Decision, such Unincorporated Partnership shall submit the Tax Registration application within a period not exceeding (3) three months from the end of



the first Financial Year of the Unincorporated Partnership.

Article 3 – The Annual Declaration of the Unincorporated Partnership

1. For the purposes of Clause 6 of Article 53 of the Corporate Tax Law, the authorised partner of an Unincorporated Partnership that is not treated as a Taxable Person in its own right is required to submit an annual declaration on behalf of all the partners in the Unincorporated Partnership within a period not exceeding (9) nine months from the end of the relevant Financial Year of the Unincorporated Partnership or part thereof, taking the following into account:
 - a. The Financial Year of an Unincorporated Partnership shall be the Gregorian calendar year or the (12) twelve-month period for which the Unincorporated Partnership prepares financial statements.
 - b. The annual declaration shall include all the information necessary to determine the Taxable Income of the partners in the Unincorporated Partnership during the relevant Financial Year.
2. Notwithstanding Clause 1 of this Article, for any Financial Year that ended on or before 31 March 2025, the deadline to file the annual declaration shall be 31 December 2025.

Article 4 – Determining the Distributive Shares of Partners in the Unincorporated Partnership

For the purposes of Clause 3 of Article 16 of the Corporate Tax Law, where the distributive share of the partners cannot be identified, the assets, liabilities, income and expenditure of the Unincorporated Partnership shall be allocated equally to each partner in the Unincorporated Partnership.



Article 5 – Timeline to Apply for Tax Deregistration

For the purposes of Clause 1 of Article 52 of the Corporate Tax Law, the authorised partner of an Unincorporated Partnership that is not a Taxable Person shall file a Tax Deregistration application within a period not exceeding (3) three months from the date of cessation of the Business or Business Activity, whether such cessation was due to dissolution or termination of the Unincorporated Partnership or due to any other reason.

Article 6 – Application for an Unincorporated Partnership to be a Taxable Person

1. For the purposes of Clause 8 of Article 16 of the Corporate Tax Law, where the partners in an Unincorporated Partnership submit an application, they must make it before the end of the relevant Financial Year of the Unincorporated Partnership. If the Authority approves the application, the Unincorporated Partnership shall be treated as a Taxable Person effective from the commencement of the Tax Period in which the application is made, or from the commencement of the next Tax Period as specified in the application.
2. As an exception to the provisions of Clause 1 of this Article, where an application is made by the partners in an Unincorporated Partnership on or before 31 December 2025, the Authority may approve to treat the Unincorporated Partnership as a Taxable Person effective from the commencement of any Tax Period ending on or before 31 December 2025 as specified in the application.

Article 7 – Deadlines to File the Tax Return and Settle the Corporate Tax Payable for an Unincorporated Partnership that is a Taxable Person

1. For the purposes of Clause 1 of Article 53 of the Corporate Tax Law, the deadline to file the Tax Return to the Authority by an Unincorporated Partnership that is a Taxable Person in its own right shall be 31 December 2025 for any Tax Period that ended on or before 31 March 2025.



2. For the purposes of Article 48 of the Corporate Tax Law, the deadline to settle the Corporate Tax Payable by an Unincorporated Partnership that is a Taxable Person in its own right shall be 31 December 2025 for any Tax Period that ended on or before 31 March 2025.

Article 8 – A Foreign Partnership that is treated as an Unincorporated Partnership

For the purposes of Clause 3 of Article 4 of Ministerial Decision No. 261 of 2024, a Taxable Person that is a partner in a Foreign Partnership is required to submit an annual declaration on behalf of the Foreign Partnership when filing the Tax Return of that partner as per Article 53 of the Corporate Tax Law.

Article 9 – Submitting an Application for a Family Foundation to be treated as an Unincorporated Partnership

1. For the purposes of Clause 2 of Article 17 of the Corporate Tax Law, a Family Foundation or a juridical person wholly owned and controlled by a Family Foundation must make an application before the end of the relevant Tax Period. If the application is approved, the Family Foundation or the juridical person wholly owned and controlled by a Family Foundation shall be treated as an Unincorporated Partnership effective from the commencement of the Tax Period in which the application is made, or from the commencement of the next Tax Period as specified in the approval of the Application.
2. As an exception to the provisions of Clause 1 of this Article, where an application is made by a Family Foundation or a juridical person wholly owned and controlled by a Family Foundation on or before 31 December 2025, the Authority may approve to treat the Family Foundation as an Unincorporated Partnership effective from the commencement of any Tax Period ending on or before 31 December 2025 as specified in the application.



Article 10 – The Annual Confirmation of a Family Foundation

1. For the purposes of Clause 3 of Article 17 of the Corporate Tax Law, a Family Foundation or a juridical person that is wholly owned and controlled by a Family Foundation, that has had an application under Clause 1 of Article 17 of the Corporate Tax Law approved, is required, within a period not exceeding (9) nine months from the end of the relevant Tax Period, to submit an annual confirmation that the conditions stipulated in Clause 1 of Article 17 of the Corporate Tax Law have been met for the relevant Tax Period.
2. As an exception to the provisions of Clause 1 of this Article, the deadline to file the annual confirmation shall be 31 December 2025 for any Tax Period that ended on or before 31 March 2025.

Article 11 – Repeals

Federal Tax Authority Decision No. 16 of 2023 referred to above as well as any text or provision contrary to or inconsistent with the provisions of this Decision shall be repealed.

Article 12 – Implementation of the Decision

This Decision shall be published in the Official Gazette and shall come into effect from 1 July 2025.