



This is not an official Translation:

Exempting Certain Persons from Corporate Tax for the Purposes of Federal Decree-Law No. 47 of 2022 on the Taxation of Corporations and Businesses

Cabinet Decision No. 55 of 2025 – Issued 2 May 2025 (Effective from 1 Jun 2023)

The Cabinet has decided

- Having reviewed the Constitution,
- Federal Decree-Law No. 47 of 2022 on the Taxation of Corporations and Businesses, and its amendments,
- Pursuant to what was presented by the Minister of Finance and upon the approval of the Cabinet.

Article 1 – Definitions

Definitions in Federal Decree-Law No. 47 of 2022 referred to above shall apply to this Decision.

Article 2 – Exemption from Corporate Tax

For the purposes of paragraph (i) of Clause 1 of Article 4 of Federal Decree-Law No. 47 of 2022 referred to above, a Taxable Person incorporated or established under the applicable legislation of a foreign jurisdiction that is wholly owned and controlled by an Exempt Person specified in paragraphs (a), (b), (f) and (g) of Clause 1 of Article 4 of Federal Decree-Law No. 47 of 2022 referred to above shall be exempt from Corporate Tax, provided it conducts any of the following:

1. Only undertakes part or whole of the activity of the Exempt Person.
2. Is engaged exclusively in holding assets or investing funds for the benefit of the Exempt Person.
3. Only carries out activities that are ancillary to those carried out by the Exempt Person.



Article 3 – Publication and Application of the Decision

This Decision shall be published in the Official Gazette and shall be effective from 1 June 2023.