Cabinet Resolution No. (209) of 2025
Regarding Exchange of Information Upon Request for Tax Purposes

The Cabinet:

- Having reviewed the Constitution;
- Federal Law No. (1) of 1972 Regarding the Competences of Ministries and the Powers of Ministers, as amended;
- Federal Decree by Law No. (47) of 2022 Regarding Taxation of Corporations and Businesses, as amended;
- Federal Decree by Law No. (10) of 2025 Regarding Anti-Money Laundering and Combating the Financing of Terrorism and the Proliferation Financing;
- Cabinet Resolution No. (17) of 2012 Regarding the Collection and Exchange of Information for the Purposes of Implementing International Tax Agreements;
- Cabinet Resolution No. (109) of 2023 Regarding the Regulation of Beneficial Ownership Procedures; and
- Upon the proposal of the Minister of Finance, and the approval of the Cabinet,

Hereby resolves as follows:

Article (1)
Definitions

For the purposes of the provisions of this Resolution, the following terms and expressions shall have the meanings assigned to each of them, unless the context requires otherwise:

State	:	The United Arab Emirates.
Minister	:	The Minister of Finance.
Ministry	:	The Ministry of Finance.
Government Entity	:	All federal and local government entities in the State, including Free Zones, and includes ministries, authorities, agencies, departments, institutions, public authorities, courts, and police authorities.

Regulatory Authority	:	All federal and local authorities, including Free Zone authorities, that are responsible for the licensing or supervision of Persons, Permanent Establishments, Legal Arrangements, and persons subject to the provisions of this Resolution.
Person	:	A natural person or a legal person.
Free Zones	:	The financial and non-financial Free Zones established in the State.
Beneficial Owner	:	Shall have the meaning assigned thereto in Federal Decree by Law No. (10) of 2025 Regarding Anti-Money Laundering and Combating the Financing of Terrorism and the Proliferation Financing and its Executive Regulation, and any legislation superseding either thereof.
Legal Arrangement	:	A relationship established pursuant to a contract between two or more parties, including, without limitation, a trust, joint venture, consortium, and other similar arrangements, which are subject to disclosure requirements in accordance with the provisions of this Resolution.
Licensed Natural Person	:	Any natural person who owns a sole proprietorship or is licensed or authorized to conduct any commercial business in their own name and for their own account in the State, including the Free Zones.
International Treaties and Agreements	:	Any bilateral or multilateral international treaty or agreement to which the State is a party, and which requires the exchange of information for tax purposes.
Information	:	Ownership and identity information, banking information, accounting records, Information on Net Assets, and any other information specified by the Minister.

Ownership and Identity Information	:	Information and documents establishing the identity of a natural person, as well as information and documents establishing the identity of legal owners, Beneficial Owners, and persons appearing in the ownership chain in respect of legal persons and Legal Arrangements.
Banking Information	:	Includes records relating to the holder of a bank account, such as legal owners and Beneficial Owners, together with details of all financial information pertaining to the account, including information relating to transactions conducted through the account.
Accounting Records	:	All accounting records, invoices, contracts, correspondence, books, journal entries, and other relevant documents that correctly reflect, at all times, all financial transactions and enable the accurate determination of the financial position of a legal person, the business of a Licensed Natural Person, a Permanent Establishment, or a Legal Arrangement, and permit the preparation of financial statements.
Information on Net Assets	:	Information relating to the financial position of Persons, Permanent Establishments, and Legal Arrangements, including details of movable and immovable property, other assets held, liabilities incurred, revenues, income, and returns.
Permanent Establishment	:	Shall have the meaning assigned thereto in Federal Decree by Law No. (47) of 2022 Regarding Taxation of Corporations and Businesses or in the relevant international treaty or agreement.

Article (2)

Scope of Application

The provisions of this Resolution shall apply to the following categories:

1. Natural Persons.
2. Legal persons incorporated, registered, or licensed to operate in the State, including the Free Zones.
3. Legal Arrangements registered, licensed, or managed in the State, including the Free Zones.
4. Any Person having a Permanent Establishment in the State, including the Free Zones.

Article (3)

Collection and Exchange of Information

1. For the purposes of compliance with International Treaties and Agreements, the Ministry shall request and collect Information and documents relating to any of the categories referred to in Article (2) of this Resolution, whether directly or indirectly through any Government Entity or Regulatory Authority, in the manner and within the period specified by the Ministry. Such Information shall be exchanged with the competent foreign authorities upon their request and within the limits provided for under the International Treaties and Agreements concerning such requests.
2. The foreign authorities referred to in Clause (1) of this Article shall mean the foreign authorities designated pursuant to the International Treaties and Agreements concerning the request for such Information.
3. The Ministry shall not exchange Information in the following cases:
   a. Where the exchange of Information would be contrary to public order, including by compromising the security of the State or the security of any of the member Emirates.
   b. Where any circumstance exists under the relevant International Treaties and Agreements that permits the State not to exchange Information.

Article (4)

Cooperation

Government Entities, Regulatory Authorities, Persons, and Legal Arrangements shall comply with the following:

1. Provide the Ministry, upon its request and within the period specified thereby, with the Information and documents relating to the categories referred to in Article (2) of this Resolution.
2. Cooperate with the Ministry for the purposes of implementing the provisions of this Resolution.

Article (5)

Functions of the Regulatory Authorities

1. The Regulatory Authority shall, each within the scope of its competence, undertake the following functions:
    a. Requesting and collecting Information and documents from the categories referred to in Article (2) of this Resolution and verifying that such Information is accurate, complete, and up to date.
    b. Notifying the Ministry, within the period specified thereby, of the measures taken to obtain Information, including compliance and enforcement measures.
    c. Requesting assistance from any authority, Person, or Legal Arrangement to obtain the Information relating to any other Person or Legal Arrangement.
    d. Imposing and collecting the administrative penalties prescribed in Article (7) of this Resolution.
    e. In the event of suspicion that any of the administrative violations prescribed in this Resolution has been committed, the Regulatory Authorities shall have the authority to enter the premises of the Person or Legal Arrangement for the purpose of inspecting, examining, and auditing Information, documents, records, and original documentation related to the suspected administrative violation, and obtaining copies thereof, subject to the legislation in force in the State.

   f. Taking such actions and performing such functions as may be necessary to ensure compliance with and implementation of the provisions of this Resolution and any implementing decisions issued by the Minister.
   g. Issuing guidance or decisions necessary for the implementation of the provisions of this Resolution, in coordination with the Ministry.
2. The Regulatory Authorities shall provide the Ministry with any Information and documents in their possession relating to the categories referred to in Article (2) of this Resolution, or which have been collected pursuant to this Resolution, in the manner and within the period specified by the Ministry.
3. The Regulatory Authority, or any person delegated thereby, shall notify the Person or Legal Arrangement whose Information is to be collected and exchanged prior to such exchange, where practicable, unless such notification would result in obstructing, delaying, or preventing the effective exchange of Information or would impede the procedures for which the Information has been requested, in accordance with the requirements specified by the Ministry in the request for Information.

Article (6)

Record-Keeping and Disclosure Obligations

1. The categories referred to in Clauses (2) to (4) of Article (2) of this Resolution shall retain and periodically update the following data and records:
   a. Ownership and Identity Information.
   b. Accounting Records.
   c. Information on Net Assets.
   d. Any other Information specified by the Minister.
2. Banks licensed in the State, including the Free Zones, shall retain and periodically update Banking Information and Ownership and Identity Information relating to their account holders.
3. Licensed Natural Persons shall retain and periodically update the following data and records:
   a. Accounting Records.

   b. Information on Net Assets relating to their business.
   c. Any other Information specified by the Minister.
4. The Information referred to in Clauses (1), (2), and (3) of this Article shall be retained for a period of not less than five (5) years from the end of the fiscal year or Gregorian year to which such Information relates, as the case may be.
5. Information relating to a legal person, Permanent Establishment, or Legal Arrangement shall be retained for a period of not less than five (5) years from the date on which it ceases to exist or its deregistration from the companies register, as the case may be.
6. For the purposes of Clause (5) of this Article, the obligation to retain the Information shall rest with each of the following:
   a. The person responsible for managing the affairs of the legal person or Permanent Establishment, the liquidator, or any person authorized to dissolve or liquidate the legal person or Permanent Establishment, as the case may be.
   b. The trustee, controller, or any other person authorized to dissolve or terminate the Legal Arrangement.
7. Any Person or Legal Arrangement required to retain Information shall be prohibited from concealing, destroying, or tampering with such Information or the related records.
8. The categories referred to in Clauses (2) to (4) of Article (2) of this Resolution, Clause (6) of this Article, and Licensed Natural Persons shall retain the Information within the State or ensure that it is accessible within the State and shall provide it to the requesting Regulatory Authority in the manner and within the period specified by the Ministry.
9. For the purposes of this Resolution, Accounting Records shall include:
   a. All amounts received or paid and the matters in respect of which such amounts were received or paid.
   b. All sales, purchases, and other transactions.
   c. Assets and liabilities.
10. The disclosure requirements set out in this Resolution shall not apply to confidential information provided by clients to their lawyers or legal representatives, where such information is provided for the purpose of assessing the legal position of the client, defending or representing the client before courts, arbitration, or mediation proceedings,

or providing legal advice in relation to judicial or administrative proceedings, including advice concerning the initiation or avoidance of such proceedings, whether the information was obtained before, during, or after such proceedings.

11. The obligations and penalties provided for in this Resolution in relation to a Legal Arrangement shall apply to the trustee, controller, or person responsible for the management of the Legal Arrangement.

Article (7)

Administrative Violations and Penalties

1. Without prejudice to any more severe penalty prescribed under any other applicable legislation, the Regulatory Authority shall impose the following administrative fines on any Person or Legal Arrangement that violates the provisions of this Resolution:

No.	Violation	Fine Amount (AED)
1.	Failure to retain Information or documents.	(20,000)
2.	Failure to provide Information or documents within the specified period.	(20,000)
3.	Providing incorrect or inaccurate Information.	(60,000)
4.	Concealing, destroying, or tampering with Information.	(100,000)

2. The fine prescribed in Clause (1) of this Article shall be doubled in the event of repetition of the same violation within twelve (12) months from the date of imposition of the previous fine.
3. The proceeds of the fines imposed pursuant to this Resolution shall accrue to the Regulatory Authority imposing and collecting them.
4. In addition to the fines prescribed in Clause (1) of this Article, the Regulatory Authorities may, each within the scope of its competence, impose any of the following supplementary administrative penalties upon the violator:
   a. Suspension of the license, registration, or permit for a period not exceeding six (6) months.
   b. Non-renewal of the license, registration, or permit.

c. Revocation of the license, registration, or permit.

Article (8)
Grievances

1. Any interested person may submit a grievance to the concerned Regulatory Authority against any administrative penalty imposed thereupon pursuant to the provisions of this Resolution within thirty (30) working days from the date of notification of the contested penalty.
2. The grievance referred to in Clause (1) of this Article shall be determined within thirty (30) working days from the date of its submission. The failure to respond to the grievance within such period shall be deemed a rejection thereof.
3. The decision issued in respect of the grievance shall be final. This shall not preclude challenging such decision before the competent court within sixty (60) days from the date of publication of the decision, notification thereof to the grievant, the grievant's actual and certain knowledge thereof, or from the day following the expiry of the period prescribed for determining the grievance without a response.

Article (9)
Confidentiality

The Information and documents collected or provided to the Ministry or any entity related therewith pursuant to the provisions of this Resolution shall be confidential and may not be disclosed except in accordance with the provisions of the International Treaties and Agreements and the legislation in force in the State.

Article (10)
Executive Resolutions

The Minister may issue the resolutions necessary for the implementation of the provisions of this Resolution.

Article (11)

Publication and Entry into Force

This Resolution shall be published in the Official Gazette and shall enter into force thirty (30) days after the date of its publication.

Mohammed bin Rashid Al Maktoum

Prime Minister

Issued by Us:

On: 2 Rajab 1447 A.H.

Corresponding to: 22 December 2025 A.D.