

Cabinet of Ministers Resolution No. (55) of 2025

**Regarding the Exemption of Certain Persons from Corporate
Tax for the Purposes of Federal Decree-Law
No. (47) of 2022 on the Taxation of Corporations and
Businesses**

The Cabinet of Ministers:

- Having reviewed the Constitution,
- And Federal Decree-Law No. (47) of 2022 on the Taxation of Corporations and Businesses, and its amendments,
- And based on the proposal of the Minister of Finance and the approval of the Cabinet of Ministers,

Has decided:

Article (1)

Definitions

The definitions contained in the aforementioned Federal Decree-Law No. (47) of 2022 shall apply to this Resolution.

Article (2)

Exemption from Corporate Tax

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

1. Exclusively undertaking part or all of the activity of the Exempt Person.

2. Exclusively holding assets or investing funds for the benefit of the Exempt Person.
3. Exclusively carrying out activities that are ancillary to the activities performed by the Exempt Person.

Article (3)

Publication and Entry into Force

This Resolution shall be published in the Official Gazette and shall come into effect from 1 June 2023.

Issued by us:

On: 4 / Dhu al-Qi'dah / 1446 H

Corresponding to: 2 / May / 2025 G

Mohammed bin Rashid Al Maktoum

Prime Minister