



Cabinet Resolution No. (209) of 2025 on Exchange of Information upon Request for Tax Purposes

On 31 December 2025, the UAE issued Cabinet Resolution No. (209) of 2025, establishing an enhanced framework for the collection and exchange of information upon request for tax purposes.

The Resolution implements the UAE's obligations under international tax treaties and Exchange of Information (EOI) standards and replaces Cabinet Resolution No. (17) of 2012, significantly strengthening compliance and enforcement.

It enters into force 30 days after publication in the Official Gazette (from 30 January 2026), with further implementation guidance expected through ministerial decisions.

Scope of Application

The Resolution applies broadly to almost all economic actors connected to the UAE, including:

- Natural persons;
- Legal entities established, registered, or licensed in the UAE (including free zones);
- Legal arrangements (such as trusts, joint ventures, consortia);
- Persons with a permanent establishment in the UAE.

Information Covered and Exchange Mechanism

"Information" is defined broadly and includes ownership and beneficial ownership details, banking (including transaction history) and accounting records, net asset information, and any additional information specified by the Minister.

Confidential client information provided to lawyers or legal representatives is exempt from disclosure only where it relates to legal advice, representation before courts, arbitration, or mediation, judicial or administrative proceedings.

The Ministry of Finance (MoF) is the central competent authority responsible for:

- requesting and collecting information;
- coordinating with government entities and regulatory authorities;
- exchanging information with foreign tax authorities under applicable treaties (exchange may only be refused in limited cases, such as where public order, national security, or treaty-based exceptions apply).

Regulatory authorities (including free zone authorities and licensing bodies) play a key operational role by collecting, verifying, and enforcing compliance. They must cooperate fully with MoF and provide requested information within the prescribed timeframe. Failure to do so constitutes an administrative violation

Regulatory authorities are empowered to:

- collect and verify information;
- request assistance from third parties;
- notify the Ministry of enforcement actions;
- impose administrative penalties;
- enter business premises to inspect documents and records where violations are suspected.

Where possible, affected persons must be notified before their information is exchanged, unless notification would undermine the effectiveness of the request.

Record-Keeping and Retention Obligations

Entities, permanent establishments, legal arrangements, banks, and licensed natural persons must:

- maintain accurate, up-to-date records on ownership, accounting, and net assets;
- retain records for at least five (5) years, including after dissolution or deregistration;
- ensure records are kept in or accessible from the UAE.

Destruction, concealment, or tampering with records is strictly prohibited.

Administrative Violations and Penalties

Administrative fines for non-compliance are substantial and include:

Violation	Fine (AED)
Failure to retain records	20,000
Failure to provide information on time	20,000
Providing incorrect information	60,000
Concealing or tampering with information	100,000

Fines are doubled if repeated within 12 months. Additional sanctions may include license suspension, non-renewal, or cancellation.

A grievance procedure is established, whereby affected parties may appeal penalties within 30 working days (decision should be issued within 30 working days, if no decision is issued – rejection of the appeal). Subsequent appeal before the competent court should be within 60 days.

Why This Matters for You

The Resolution significantly strengthens tax transparency in the UAE, expanding the scope of information that may be collected and exchanged with foreign tax authorities under the international treaties.

Stricter record-keeping requirements and substantial penalties increase compliance and enforcement risk, including potential license suspension or cancellation.

We recommend you to review your internal compliance and record-keeping procedures to ensure readiness for this enhanced regulatory framework.



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