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COUNTRY & INVESTMENT GUIDE 2026/2027

United Arab Emirates

Business · Investment · Taxation · Residence

A strategic platform between Europe, Asia and Africa

A practical introduction for entrepreneurs, international families, investors and advisers considering the UAE for business, investment, holding structures or residence.

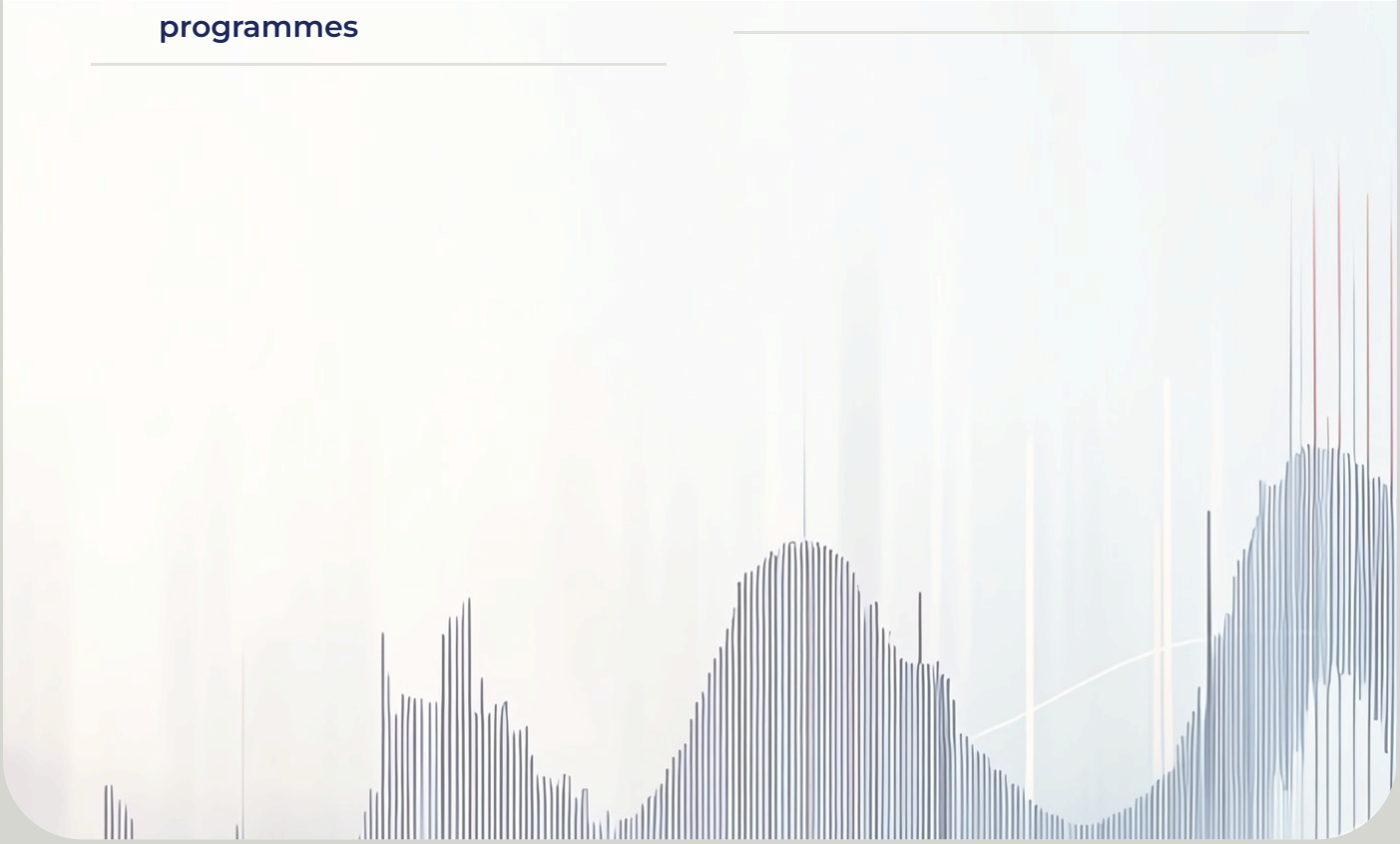
Prepared by Brookfort Group

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Dubai · United Arab Emirates



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01 COUNTRY GUIDE

UAE at a glance

A diversified federation with global reach

The United Arab Emirates is a federation of seven emirates on the Arabian Gulf and Gulf of Oman. Its commercial model combines a globally connected trading economy, major sovereign investment capacity, modern infrastructure, a large expatriate workforce and an increasingly developed tax and regulatory framework.

11.5m
Population (2025, World Bank)

6.2%
Real GDP growth 2025

9%
Corporate tax (above AED 375,000)

0%
General personal income tax

INDICATOR	CURRENT SNAPSHOT
Real GDP	AED 1.9 trillion in 2025
Non-oil GDP	AED 1.5 trillion; +6.8% in 2025
Currency	UAE dirham (AED); USD peg at AED 3.6725 per USD
Corporate tax	0% up to AED 375,000 taxable income; 9% above
VAT	5% standard rate
Capital controls	No general exchange controls on repatriation
Time zone	GMT+4

2025 growth was broad-based

Official statistics reported real GDP growth of 6.2% in 2025, with non-oil GDP growing 6.8%. This supports the UAE's long-term shift toward trade, finance, manufacturing, construction, real estate, tourism and technology alongside hydrocarbons.

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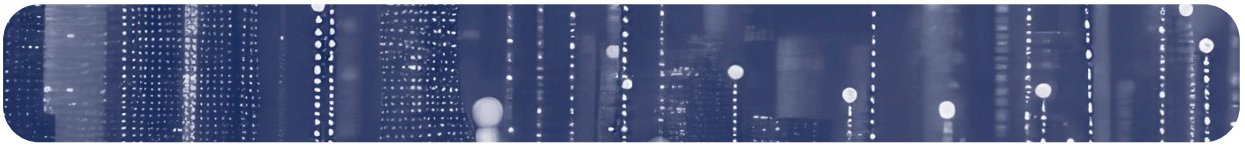
Why the UAE

Commercial reach, capital mobility and residence options

- A strategic location between Europe, Asia and Africa, with strong same-day business overlap across multiple time zones.
- World-scale aviation and maritime infrastructure, including Dubai International Airport, Jebel Ali Port, Khalifa Port in Abu Dhabi, and Fujairah Port.
- 100% foreign ownership permitted for most mainland commercial activities, alongside numerous specialised free zones.
- AED pegged to the US dollar, reducing currency volatility for USD-based trade and investment.
- No general personal income tax and no general wealth or inheritance tax at federal level.
- Competitive 9% federal corporate tax, with a 0% regime for qualifying free-zone income subject to detailed conditions.
- Long-term residence routes for investors, entrepreneurs, skilled professionals, retirees and remote workers.
- Established financial centres in DIFC and ADGM with independent common-law based legal frameworks and courts.

A mature low-tax jurisdiction — not a "tax-free shell" environment

Corporate tax, VAT, transfer pricing, beneficial ownership, AML/CFT and international information-exchange requirements now form part of the UAE compliance landscape. The Economic Substance Regulations no longer apply to financial years ending after 31 December 2022. Substance, local decision-making and physical presence are now assessed under Corporate Tax, Qualifying Free Zone Person and tax-residence rules, and should be designed into a structure from the outset.



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Economy & investment climate

Diversification is now central to the growth story

The UAE economy reached approximately AED 1.9 trillion in real GDP in 2025. Non-oil GDP reached approximately AED 1.5 trillion and expanded faster than the overall economy. The largest non-oil pillars include wholesale and retail, manufacturing, financial services, construction, real estate, logistics, tourism and professional services.

SECTOR / THEME	INVESTMENT RELEVANCE
Trade & logistics	Regional distribution, re-export, warehousing, aviation and maritime services.
Financial services	Banks, asset managers, funds, fintech, family offices and private wealth.
Manufacturing	Industrial zones, advanced manufacturing, food, metals and energy-linked industry.
Technology & AI	Digital government, data centres, fintech, AI investment and start-up ecosystems.
Tourism & hospitality	Dubai recorded 19.59m international overnight visitors in 2025; hotel occupancy averaged 80.7%.
Real estate	Large residential, hospitality and commercial markets with significant foreign participation.
Energy	Hydrocarbons remain important, while renewable energy and energy-transition investment are expanding.

Government strategies such as “We the UAE 2031” and Dubai's D33 agenda target further expansion of non-oil trade, digital activity, advanced industry and international investment. For investors, the key feature is the combination of growth policy with infrastructure and access to regional markets.



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The seven emirates

Different commercial profiles within one federation

EMIRATE	COMMERCIAL PROFILE
Abu Dhabi	Federal capital; hydrocarbons; sovereign wealth; ADGM; industrial and logistics development through KEZAD; culture and tourism.
Dubai	International trade, aviation, logistics, finance, technology, tourism and real estate; DIFC, DMCC, JAFZA and many specialist zones.
Sharjah	Manufacturing, education, culture and lower-cost industrial/trading platforms including SAIF Zone and Hamriyah.
Ras Al Khaimah	RAKEZ, manufacturing, tourism, real estate and RAK ICC corporate registry.
Ajman	Smaller and generally lower-cost base for SMEs, trading and services.
Fujairah	Indian Ocean access outside the Strait of Hormuz; port, bunkering, storage and logistics.
Umm Al Quwain	Smaller-scale industry, marine activities and cost-sensitive free-zone solutions.

Dubai or Abu Dhabi?

Dubai generally offers the deepest international commercial ecosystem. Abu Dhabi can be particularly compelling for institutional capital, financial services, energy, industrial investment and structures using ADGM. The appropriate emirate should follow the activity, client base, regulatory needs, substance and residence plan — not simply the cheapest licence.

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Business structures

Mainland, free zone and holding vehicles

Mainland

BEST SUITED TO

Businesses serving the UAE domestic market; operating companies; government-facing activity.

KEY CONSIDERATIONS

Most activities allow 100% foreign ownership. Office, licensing and regulatory requirements depend on activity and emirate.

Free zone

BEST SUITED TO

International services, trading, logistics, sector-specific businesses and regional headquarters.

KEY CONSIDERATIONS

100% foreign ownership and streamlined licensing; tax treatment depends on QFZP conditions and qualifying income.

Financial centre

BEST SUITED TO

Holding, investment, funds, family offices, finance and sophisticated governance.

KEY CONSIDERATIONS

DIFC and ADGM offer distinct regulatory frameworks and common-law based courts.

Offshore / registry vehicle

BEST SUITED TO

Certain international holding and asset-owning uses.

KEY CONSIDERATIONS

No UAE operating presence or residence visas through a conventional offshore company; banking, tax and substance need careful planning.

Since reforms effective from 2021, most mainland commercial activities can be wholly foreign owned. However, regulated or strategically sensitive activities can remain subject to additional requirements. A licence is activity-specific; the legal vehicle, licensing authority, premises, visa quota and tax profile should therefore be designed together.

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Free zones

A specialised ecosystem rather than a single regime

ZONE	EMIRATE	TYPICAL POSITIONING
DIFC	**Dubai**	Financial services, funds, family offices, professional services; independent courts.
DMCC	**Dubai**	Commodities, trading, precious metals, diamonds, coffee/tea and broad commercial services.
JAFZA	**Dubai**	Port-linked logistics, trading, distribution and industry.
Dubai South	**Dubai**	Aviation, logistics, e-commerce and businesses around Al Maktoum International Airport.
IFZA / Meydan	**Dubai**	SMEs, consulting, services and relatively flexible licence packages.
ADGM	**Abu Dhabi**	Financial services, holding structures, asset management, funds and family offices.
KEZAD	**Abu Dhabi**	Industry, manufacturing and logistics.
RAKEZ	**Ras Al Khaimah**	SMEs, manufacturing, industrial and cost-sensitive operations.
SAIF / Hamriyah	**Sharjah**	Trading, logistics and industrial activity.

Free-zone tax is conditional

A free-zone licence does not automatically mean 0% corporate tax. A Qualifying Free Zone Person must meet statutory conditions, including substance and income requirements. Qualifying income can be taxed at 0%; non-qualifying taxable income is generally subject to 9%.

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Corporate taxation

A competitive rate with increasingly sophisticated rules

TOPIC	POSITION
Standard corporate tax	0% on taxable income up to AED 375,000; 9% on taxable income above AED 375,000.
Qualifying Free Zone Person	0% on Qualifying Income; 9% on taxable income that is not Qualifying Income.
Withholding tax	Current UAE corporate tax withholding rate is 0%.
VAT	5% standard rate; mandatory registration threshold for UAE-resident businesses is AED 375,000 of taxable supplies/imports.
Small Business Relief	Subject to eligibility conditions, available to eligible UAE Resident Persons with revenue of AED 3 million or less in the relevant and all previous tax periods, for tax periods ending on or before 31 December 2029.
Pillar Two / DMTT	Applies from financial years beginning on or after 1 January 2025 to in-scope MNE groups meeting the EUR 750m revenue test.
Transfer pricing	Arm's-length principle and documentation rules can apply to related-party and connected-person transactions.

The corporate tax regime is federal and applies to UAE companies, including free-zone entities. Free-zone entities remain taxable persons and generally have registration and filing obligations even where they expect to benefit from a 0% rate on qualifying income.

Planning point

For holding, financing, intellectual property, distribution or service structures, the commercial flow and counterparty profile should be tested against corporate-tax, transfer-pricing, permanent-establishment and free-zone rules before implementation.

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International tax & compliance

Treaty access requires more than incorporation

The UAE has built an extensive network of tax and investment agreements. According to the Ministry of Finance, its Double Taxation Agreements and Bilateral Investment Treaties total 193, of which more than 140 are bilateral double-tax agreements.

193

DTAs and BITs

- Treaty entitlement depends on the wording of the relevant treaty and the facts of the taxpayer, including residence and beneficial ownership requirements.
- Tax Residency Certificates are issued by the Federal Tax Authority through EmaraTax. Treaty-purpose requirements are not identical to domestic tax-residence tests.
- The UAE participates in international tax transparency frameworks, including exchange of information and the Common Reporting Standard.
- Companies should maintain adequate accounting records, beneficial ownership information and corporate governance documentation.
- AML/CFT and sanctions screening are material considerations for financial institutions, corporate service providers and designated non-financial businesses and professions.

Treaty residence for individuals

For an individual seeking a Tax Residency Certificate for tax-treaty purposes, current FTA guidance generally requires at least 183 days of UAE residence in the relevant financial year. Domestic UAE tax residence can arise under broader tests, including certain 90-day and centre-of-interests circumstances.

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Residence & visa programmes

Multiple routes for business owners, investors and internationally mobile families

ROUTE	INDICATIVE VALIDITY	CORE FEATURE
Employment residence	**Typically linked to employment**	Employer-sponsored residence and work authorisation.
Investor / partner	**Varies by authority / structure**	Residence linked to qualifying ownership or business participation.
Green Visa	**5 years**	Self-sponsored route for qualifying skilled workers, freelancers/self-employed and investors/business partners.
Golden Visa – public investment	**10 years**	Long-term self-sponsored residence; qualifying investment criteria apply.
Golden Visa – real estate	**10 years**	Current official guidance refers to qualifying real-estate investment from AED 2 million.
Virtual work	**1 year**	Self-sponsored residence while working for an employer outside the UAE; official guidance includes minimum USD 3,500 monthly salary evidence.
Retirement	**5 years**	For eligible retirees aged 55+ meeting work-history and financial/property criteria.

Golden Visa holders can generally remain outside the UAE for longer than the usual six-month period without invalidating residence and may sponsor qualifying family members. Requirements vary by category and may be implemented through ICP or, in Dubai, GDRFA.

Residence is not the same as tax residence

A residence visa permits immigration residence. It does not by itself establish tax residence for every domestic or treaty purpose, nor does it automatically terminate tax residence in another country.

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Personal tax residence

Domestic rules, treaty residence and former-country exposure

The UAE does not impose a general personal income tax on salaries or most personal investment income. However, internationally mobile individuals should distinguish UAE immigration residence, UAE domestic tax residence and treaty residence.

Domestic UAE tests

Usual residence / centre of interests

The UAE is the individual's usual place of residence and centre of financial and personal interests.

183-day test

Physical presence in the UAE for at least 183 days in a relevant consecutive 12-month period.

90-day test

At least 90 days in a relevant 12-month period, plus UAE nationality or valid residence permit and a permanent home, employment or business in the UAE, subject to the statutory conditions.

Part-days generally count as full days for the physical-presence tests. Evidence can include immigration movement records, residence documentation, tenancy/title evidence, utility records, employment or business evidence and banking records.

Cross-border warning

Moving to the UAE does not automatically end tax residence elsewhere. Departure rules, tie-breaker provisions, domicile concepts, exit taxes and continuing source-country taxation should be reviewed in the individual's former and continuing jurisdictions.

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Banking & financial services

A deep regional financial system with rigorous onboarding

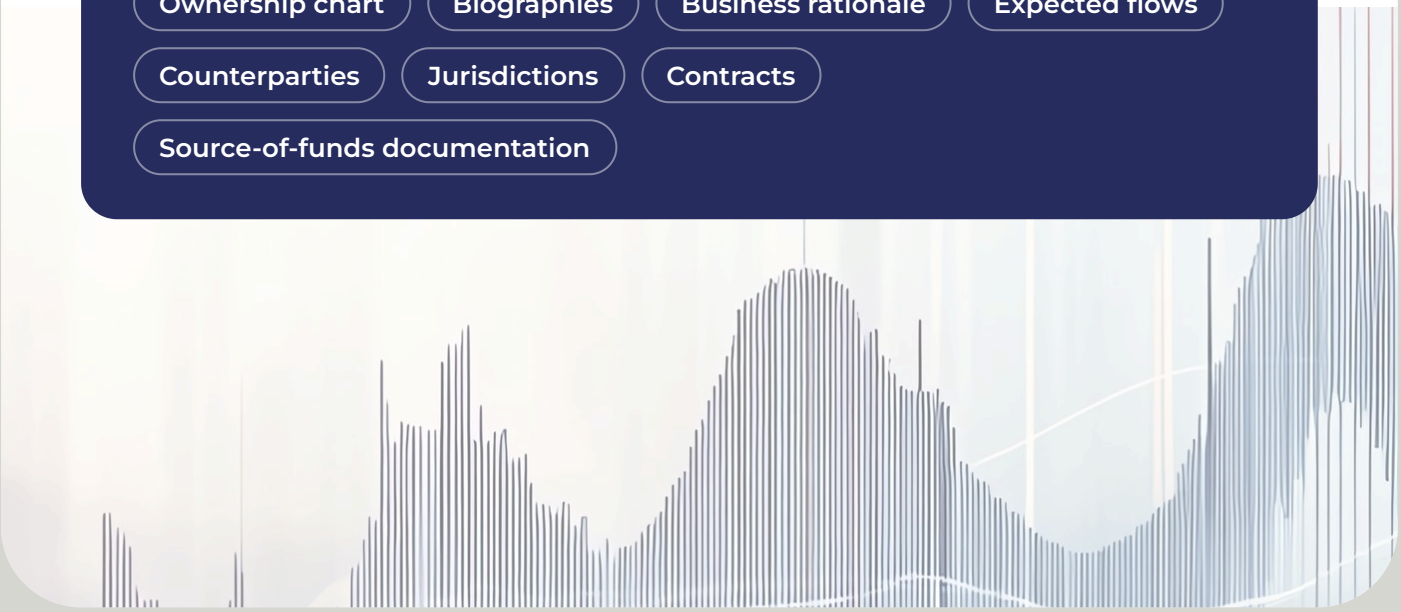
The UAE hosts domestic banks, international banking groups, private banks, asset managers, insurers, exchanges and two major international financial centres. DIFC and ADGM are particularly relevant for investment management, funds, family offices, private wealth and holding structures.

- Corporate account opening is fact-driven and can take several weeks or longer, particularly for newly incorporated entities or complex cross-border ownership.
- Banks commonly request detailed source-of-wealth and source-of-funds evidence, business plans, contracts/invoices, ownership charts and proof of operating substance.
- An incorporation licence does not guarantee bank-account approval; banking strategy should be considered before selecting the jurisdiction and entity type.
- Personal banking generally becomes easier once the individual holds UAE residence, Emirates ID and satisfactory address/income evidence.

Practical approach

For internationally owned companies, prepare the banking file alongside incorporation:

Ownership chart | Biographies | Business rationale | Expected flows | Counterparties | Jurisdictions | Contracts | Source-of-funds documentation



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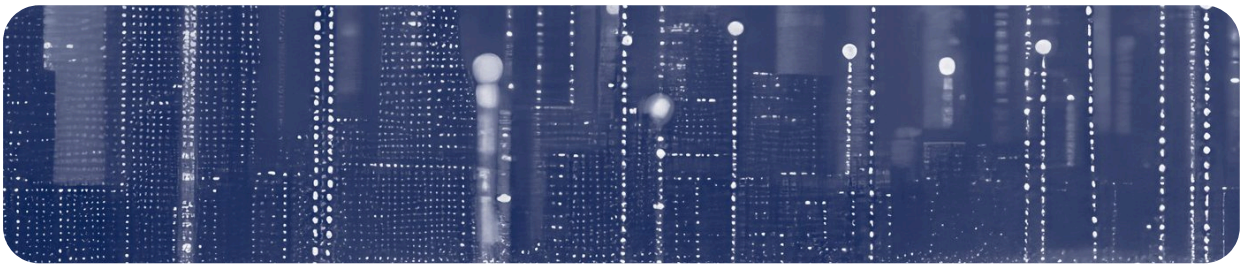
Real estate & investment

A major asset class and a potential residence pathway

Dubai and Abu Dhabi have large international property markets, while Ras Al Khaimah, Sharjah and Ajman provide different price points and development profiles. Foreign ownership is permitted in designated freehold areas, subject to local emirate rules.

THEME	PRACTICAL POINT
Dubai transaction cost	Dubai Land Department transfer fee is commonly 4%, with additional registration, agent, mortgage and service costs where applicable.
Rental economics	Gross yields vary significantly by location, property type, service charges and market cycle; net returns should be modelled after all costs.
Golden Visa	Current official guidance provides a 10-year Golden Visa for qualifying real-estate investment from AED 2 million.
Off-plan	Escrow and project-registration rules provide protections, but developer quality, completion risk and contract terms remain important.
Tax	Individuals generally do not face UAE personal capital-gains or annual net-wealth tax, but business and home-country tax consequences can still arise.

Dubai's tourism and population growth support demand, but investors should remain sensitive to supply pipelines and the cyclical nature of residential and hospitality markets. A property purchase should be analysed separately from the decision to become UAE resident.

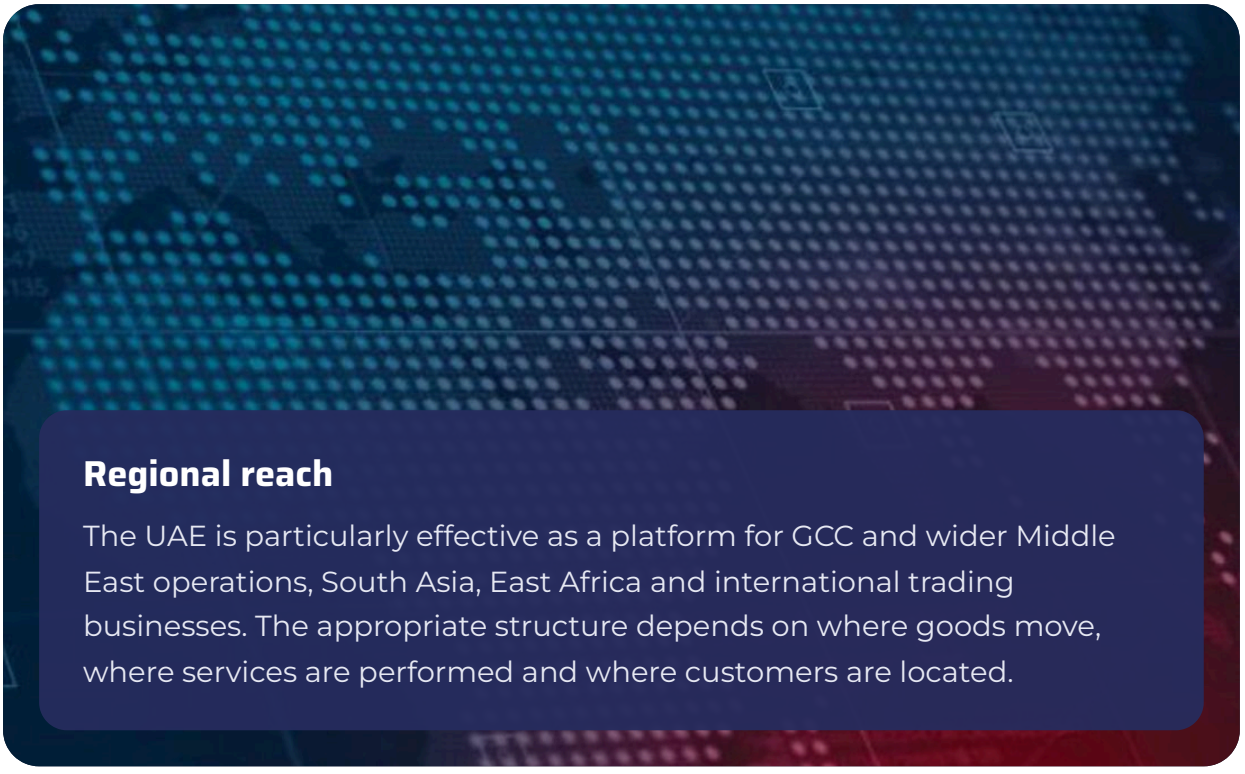


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Trade, logistics & connectivity

A regional headquarters and distribution platform

- Dubai International is one of the world's busiest airports for international passengers, while Abu Dhabi is served by Etihad and a growing airport network.
- Jebel Ali is a major global container port and anchors a large logistics and industrial ecosystem. Khalifa Port, Fujairah and Khor Fakkan add strategic capacity.
- Fujairah provides Indian Ocean access outside the Strait of Hormuz, important for energy logistics and maritime trade.
- Etihad Rail is creating an integrated national freight and passenger network with planned wider GCC connectivity.
- The UAE has pursued Comprehensive Economic Partnership Agreements with major trading partners to improve market access and reduce trade barriers.
- GMT+4 allows a UAE-based team to interact with Asian markets during the morning and European markets later in the working day.



Regional reach

The UAE is particularly effective as a platform for GCC and wider Middle East operations, South Asia, East Africa and international trading businesses. The appropriate structure depends on where goods move, where services are performed and where customers are located.

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Living in the UAE

High-quality infrastructure with meaningful cost differences by emirate

Housing

Dubai and Abu Dhabi can be expensive in prime areas; Sharjah, Ajman and RAK may offer lower-cost alternatives.

Education

Broad choice of international schools and universities; fees can be a major family cost.

Healthcare

Modern private and public healthcare; health insurance is generally integral to residence arrangements.

Safety

Low reported violent-crime levels and a highly regulated public environment.

Climate

Very hot summers; the cooler months are a major lifestyle and tourism advantage.

Language

Arabic is official; English is widely used in business and daily commercial life.

Transport

Strong road and aviation infrastructure; Dubai has an extensive metro/tram network, with continued public-transport investment.

Budget the whole household

The UAE is highly expatriate-oriented, but the practical cost of residence should be assessed holistically: housing, schooling, health insurance, transport, visa renewals, domestic support and travel can materially affect the household budget.



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Structuring use cases

Illustrative applications for international clients

International entrepreneur / regional operating company

Individual / family → UAE operating company →

Regional clients and employees

A mainland or suitable free-zone company may be appropriate depending on customer location, regulated activity, premises, visas and tax treatment.

International investment holding

Family or investment vehicle → UAE holding company →

Subsidiaries / portfolio assets

DIFC, ADGM or other UAE vehicles can be considered where governance, treaty access, banking and substance support the commercial rationale.

Family office / private wealth platform

Family → Family governance / holding structure →

Portfolio, operating companies, succession vehicles

DIFC and ADGM have developed family-office ecosystems, but the legal, regulatory and tax design must reflect the family's home-country rules and asset locations.

Trading / distribution hub

Foreign group → UAE trading company → GCC / Africa / Asia customers

Customs, VAT, transfer pricing, free-zone status, logistics and permanent-establishment exposure should be modelled as one operating chain.

Illustrative only

The examples above are conceptual and are not recommendations. The correct vehicle depends on ownership, residence, source jurisdictions, business activity, counterparties, banking, regulatory status, substance and succession objectives.

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Key risks & practical considerations

The UAE rewards proper implementation

01 Regional geopolitical developments and oil-price cycles can affect markets and sentiment even as the economy diversifies.

02 Free-zone tax benefits are conditional; non-qualifying activities or insufficient compliance can materially change the tax result.

03 Banking and KYC can be more demanding than incorporation. Complex ownership, high-risk jurisdictions and unexplained flows can delay onboarding.

04 Real-estate supply is significant in some markets; projected yields should be stress-tested for service charges, vacancies and price cycles.

05 International individuals must coordinate UAE residence with their former-country tax, succession, matrimonial-property and reporting rules.

06 Licensing, visa and office requirements vary by emirate, free zone and activity and can change frequently.

07 Corporate governance, accounting, beneficial ownership, AML/CFT and tax filing should be treated as ongoing obligations rather than post-incorporation administration.

Implementation principle

Choose the structure for the commercial objective first, then optimise tax, residence and administration around that objective. The lowest-cost licence is rarely the best decision criterion for a serious international structure.

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How Brookfort can assist

Global solutions. Boutique precision. Emerging market focus.

Brookfort Group is a boutique provider of corporate, fiduciary and fund services. We support international businesses, investment funds, family offices and private clients with cross-border structuring, governance, compliance and administration.

Structuring

Jurisdiction and vehicle comparison; holding and operating structures; coordination with legal and tax advisers.

Corporate services

Incorporation, registered-office coordination, governance, company secretarial and ongoing administration.

Private wealth

Trust and foundation structures, succession planning coordination and family governance support.

Accounting & tax compliance

Bookkeeping, financial reporting, tax registrations/filings and coordination of specialist tax advice.

Banking support

Preparation of corporate and KYC files; banking introductions and account-opening coordination where available.

Residence support

Coordination of company-linked residence processes and practical documentation requirements.

Cross-border administration

Ongoing multi-jurisdictional governance, compliance calendars and operational support.

Start with the facts

Before recommending a UAE structure, Brookfort would typically establish the intended activity, customer markets, ownership and residence, visa requirements, banking needs, expected transaction flows, office/substance requirements and the tax position in all relevant jurisdictions.

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Sources & disclaimer

Information current as of October 2026

Time-sensitive items were cross-checked against current official or primary sources where available.

Selected sources

- UAE Federal Tax Authority — Corporate Tax legislation, Free Zone Persons guidance, VAT registration guidance, Tax Resident and Tax Residency Certificate guidance and EmaraTax service information.
- UAE Ministry of Finance — Corporate Tax, Domestic Minimum Top-up Tax, Economic Substance Regulations (Cabinet Decision No. 98 of 2024) and international treaty information.
- Official Portal of the UAE Government (u.ae) — Golden Visa, Green Visa, virtual work and retirement residence guidance.
- Federal Competitiveness and Statistics Centre / Emirates News Agency — UAE 2025 GDP and non-oil GDP statistics.
- Dubai Department of Economy and Tourism — 2025 international visitor and hospitality statistics.
- World Bank — UAE population data.

Important disclaimer

This publication is provided for general information only and does not constitute legal, tax, accounting, regulatory, immigration, investment or financial advice. It is not an offer or recommendation to establish any entity, acquire any investment or change residence. Laws, regulations, administrative practice, visa criteria, fees, tax thresholds and market conditions may change, sometimes without notice. The application of UAE rules also depends on the facts and circumstances of each person and transaction. Independent advice should be obtained in the UAE and in every other relevant jurisdiction before implementing a structure, investment or relocation.

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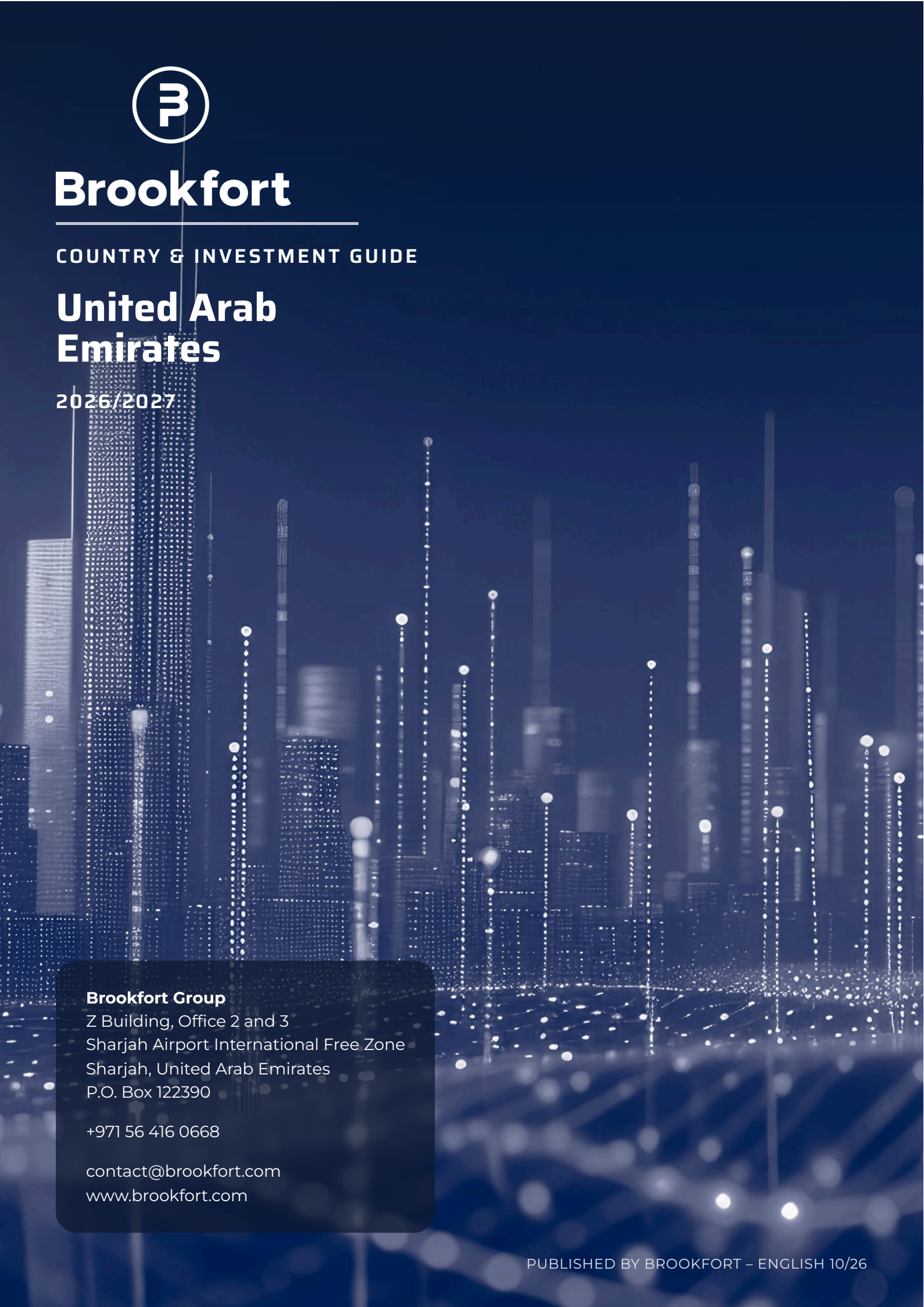
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United Arab Emirates

2026/2027



Brookfort Group
Z Building, Office 2 and 3
Sharjah Airport International Free Zone
Sharjah, United Arab Emirates
P.O. Box 122390

+971 56 416 0668

contact@brookfort.com
www.brookfort.com

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