

International Tax Alert

10 June 2019



Pursuant to signing the OECD BEPS Multilateral Convention (MLI) in 2018, UAE has deposited the ratification instrument with the OECD on 29 May 2019, making it the 26th country (to deposit), amongst 88 countries that have signed the MLI. The UAE is the first GCC country to have deposited the ratification instrument. Considering the date of deposit by the UAE, the MLI will enter into force for the UAE on 1 September 2019.

The UAE's definitive list of reservations and notifications to the MLI comprises of 114 tax treaties that it wishes to be covered by the convention. Furthermore, from the date the convention will enter into force (i.e. 1 September 2019), the UAE's treaties with Finland, France, Ireland, Japan, Jersey, Lithuania, Luxembourg, Malta, Netherlands, New Zealand, Poland, Serbia, Singapore, Slovenia and United Kingdom will be affected by the MLI. The said list would progress further once the other partner countries deposit their ratification instruments. Our previous detailed alert on the UAE and other GCC countries (i.e. Kuwait, Saudi Arabia and Qatar) position on the MLI can be accessed <u>here</u>.

Whilst this alert provides an update on the MLI status of the UAE, if you would like our assistance in understanding the specific implications of the same to your business, please feel free to get in touch with the following:

Nilesh Ashar International Tax Partner nilesh.ashar@dhruvaadvisors.com

Wasim Chunawala Manager, KSA Tax and Zakat wasim@chunawala@dhruvaadvisors.com Vartika Jain Manager, International Tax and TP vartika.jain@dhruvaadvisors.com

Zaheen Parekh Tax Assistant Manager zaheen.parekh@dhruvaadvisors.com



WTS Dhruva Consultants

Dubai

WTS Dhruva Consultants U-Bora Tower 2, 11th Floor, Office 1101 Business Bay P.O. Box 127165 Dubai, UAE Tel: + 971 56 900 5849

Bahrain

WTS Dhruva Consultants Bahrain Financial Harbour, East Tower - Floor 23, Office 2301, Building 1398, Road 4626, Block 346. Manama, Kingdom of Bahrain Tel: +973 1663 1921

Dhruva Advisors

Mumbai

1101, One IndiaBulls Centre, 11th Floor, Tower 2B, 841, Senapati Bapat Marg, Elphinstone Road (West), Mumbai 400 013 Tel:+91 22 6108 1000 / 1900

Ahmedabad

B3, 3rd Floor, Safal Profitaire, Near Auda Garden, Prahladnagar, Corporate Road, Ahmedabad - 380 015 Tel: +91-79-6134 3434

Bengaluru

Prestige Terraces, 2nd Floor Union Street, Infantry Road, Bengaluru 560 001 Tel: +91-80-4660 2500

Delhi / NCR

101 & 102, 1st Floor, Tower 4B DLF Corporate Park M G Road, Gurgaon Haryana - 122 002 Tel: +91-124-668 7000

Pune

305, Pride Gateway, Near D-Mart, Baner, Pune - 411 045 Tel: +91-20-6730 1000

Kolkata

4th Floor, Unit No 403, Camac Square, 24 Camac Street, Kolkata West Bengal – 700016 Tel: +91-33-66371000

Singapore

Dhruva Advisors (Singapore) Pte. Ltd. 20 Collyer Quay, #11-05 Singapore 049319 Tel: +65 9105 3645

New York Dhruva Advisors USA, Inc. 340 Madison Avenue, 19th Floor, New York, New York 10173 USA Tel: +1-212-220-9494

Silicon Valley, USA Dhruva Advisors USA, Inc. 5201 Great America Parkway, Santa Clara, California 95054 Tel: +1 408 930 5063

Disclaimer:

This information contained herein is in summary form and is therefore intended for general guidance only. This publication is not intended to address the circumstances of any particular individual or entity. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation. This publication is not a substitute for detailed research and opinion. Before acting on any matters contained herein, reference should be made to subject matter experts and professional judgment needs to be exercised. We cannot accept any responsibility for loss occasioned to any person acting or refraining from action as a result of any material in this publication.

KEY CONTACTS

Dinesh Kanabar

Chief Executive Officer dinesh.kanabar@dhruvaadvisors.com Phone: +91 22 6108 1010/11

Nilesh Ashar

Partner, International Tax and Transfer Pricing nilesh.ashar@dhruvaadvisors.com Phone: +971 50182 7701

Pratik Shah

Partner, Indirect Tax pratik.shah@dhruvaadvisors.com Phone: +971 55957 8232

Nimish Goel

Partner, Indirect Tax nimish.goel@dhruvaadvisors.com Phone: +971 50106 6531

Dhruva Advisors has been named "India Tax Firm of the Year" for 2017, 2018 and 2019 by International Tax Review

Dhruva Advisors has been named "India Disputes and Litigation Firm of the Year 2018" by International Tax Review

Dhruva Advisors ranked as a **Tier 1 Firm** in India in Tax and Transfer Pricing by International Tax Review.