



Saudi Arabia

Tax treaty between Kingdom of Saudi Arabia (KSA) and United Arab Emirates (UAE) has been approved by KSA's Shura Council

The income and capital tax treaty between KSA and the UAE was signed on 23 May 2018, and subsequently approved by the UAE cabinet on 13 June 2018.

On 17 December 2018, the KSA's Shura Council (Majlis Al-Shura; the Parliament) approved the said tax treaty. Following this development, it is expected that the treaty will be approved by the KSA Cabinet, in order to bring it in to force in the respective tax jurisdictions. The official text of the treaty is not yet available and is expected to be published in the Official Gazette shortly.

From a BEPS implementation perspective (both KSA and the UAE have signed the MLI), whilst KSA has included the UAE in its "covered tax agreement" list in order for the MLI to modify the said treaty, the UAE has not yet included KSA in its list. The final list of notifications should be reviewed, to understand the impact of MLI, if at all, on the KSA-UAE tax treaty.

We will keep you posted on further developments.



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