



29 December 2024

Bahrain

Domestic Minimum Top-Up Tax (DMTT) Executive Regulations released

On 15 December 2024, the Bahrain National Bureau for Revenue (NBR) published [Decision no. \(172\) of 2024 for the Issuance of the Executive Regulations for Decree-Law No. \(11\) of 2024 Regarding the Implementation of Tax on Multinational Enterprises](#) ('DMTT Regulations'). The DMTT Regulations provide much anticipated clarity on the implementation and enforcement of the Bahrain DMTT Law.

As expected, the DMTT Regulations are in line with the OECD Pillar Two Global Anti-Base Erosion Model Rules and provides references to the administrative guidance and commentary issued by the OECD.

The NBR has also published a [guide on the scope of the DMTT law and registration requirements](#) as well as a [DMTT Registration Manual](#).

In our latest [Tax Alert](#), we have discussed the key features of the DMTT Regulations.

NBR enables DMTT registration functionality on its portal

The NBR has now enabled the functionality for DMTT registration application on its portal for taxpayers that are already registered with the NBR for VAT or excise tax. The functionality can be accessed after logging into the NBR portal on the taxpayer's home page.

MNE Groups that are in-scope from 1 January 2025 should start the registration process immediately to meet the 30 January 2025 deadline.

Kingdom of Saudi Arabia (KSA)

Zakat, Tax and Customs Authority (ZATCA) extends the tax amnesty

On 29 December 2024, ZATCA announced the extension of its initiative for cancellation of fines and exemption of financial penalties. Initially scheduled to expire on 31 December 2024, the initiative has now been extended until 30 June 2025.

Click [here](#) to view ZATCA's simplified guide on this initiative.

ZATCA determines criteria for selecting taxpayers for 19th wave of e-invoicing integration

ZATCA has recently issued a circular outlining the criteria for selection of taxpayers for the 19th wave of implementation of the e-invoicing integration phase. Taxpayers with taxable revenues exceeding SAR 1.75 million during 2022 or 2023 will be covered under the 19th wave. Such taxpayers will be required to integrate their e-invoicing solutions with the FATOORA platform from 1 October 2025.

Click [here](#) to view the circular.

ZATCA conducts tax and zakat workshops

- On 29 December 2024, ZATCA will conduct a virtual workshop on the general concept of settlement of zakat and tax disputes.
- On 30 December 2024, ZATCA will conduct virtual workshops on e-commerce in KSA, and on the profit margin scheme for eligible used cars.
- On 31 December 2024, ZATCA will conduct a virtual workshop on the general concept of settlement of customs disputes.

Click [here](#) to register for upcoming virtual workshops.

United Arab Emirates (UAE)

Federal Tax Authority (FTA) publishes Arabic version of Corporate Tax (CT) guide on real estate investment for natural persons

On 27 December 2024, the FTA released the Arabic version of the CT guide on real estate investment for natural persons.

Click [here](#) to view the guide.

Ministry of Finance (MoF) announces amendments to Ministerial Decisions on CT

The UAE MoF has recently announced amendments to existing Ministerial Decisions for the purposes of Federal Decree-Law No. 47 of 2022 on the Taxation of Corporations and Businesses (CT Law) through the issuance of:

- Updated [Ministerial Decision No. \(301\)](#) of 2024 on Tax Groups; and
- Updated [Ministerial Decision No. \(302\)](#) of 2024 on the Participation Exemption and Foreign Permanent Establishment Exemption.

The amended Ministerial Decisions will come into effect from 1 January 2025.

Kuwait

Kuwaiti Cabinet approves law on imposition of 15% tax on MNEs

On 24 December 2024, the Kuwaiti Cabinet approved a draft law imposing a 15% tax on MNEs from 1 January 2025.

Qatar

Qatari Shura Council approves amendments to the Income Tax Law

On 23 December 2024, the Qatari Shura Council approved draft amendments to the Income Tax Law which pave the way for the implementation of OECD's Pillar Two Rules. The amendments include a framework for introducing the Income Inclusion Rule (IIR) and a qualifying DMTT.

For a detailed discussion on how the above updates may impact your business, [contact us](#).

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