

# **Bahrain & GCC Tax News**



## **05 January 2025**

## **Bahrain**

## Ministerial decision issued for regulating tax consulting services firms and professionals

Bahrain's Minister of Industry and Commerce has issued Decision No. (110) of 2024 dated 2 January 2025 outlining the terms and conditions for firms and professionals providing tax consulting services in Bahrain.

In line with the above development, Decision No. (40) of 2021 has also been amended to include tax consulting services to the list of permitted commercial activities for foreign capital companies.

Click here to view published decisions in the official gazette (in Arabic).

## National Bureau of Revenue (NBR) to conduct webinar on Domestic Minimum Top-Up Tax (DMTT)

The NBR has invited taxpayers to register for a webinar to be held on 13 January 2025 regarding the implementation of the Bahrain DMTT Law.

Click here to register for the workshop.

## **NBR** publishes updated VAT manuals

The NBR has recently published updated versions of the Simplified VAT Return Form, the VAT Return Filing, and the VAT Deregistration manuals.

Click here to view the Simplified VAT Return Form manual.

Click here to view the VAT Return Filing manual.

Click here to view the VAT Deregistration manual.

#### Tax treaty updates

- On 20 December 2024, Bahrain ratified the investment protection agreement with Hungary.
- On 26 December 2024, Bahrain and Korea signed an investment protection agreement.

#### **DMTT Executive Regulations released**

On 15 December 2024, the NBR published <u>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.</u>

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)

## Ministry of Industry and Mineral Resources (MIMR) updates HS tariff codes

On 22 December 2024, the KSA MIMR has upgraded the HS customs codes used in industrial licensing from a 10-digit format to a 12-digit format. This change aims to unify the customs coding system and enhance data integration for relevant entities.

#### Tax treaty update

On 30 December 2024, Ukraine published the Ukrainian synthesized text of the 'Saudi Arabia - Ukraine Income and Capital Tax Treaty' which displays the modifications made to the treaty by the Multilateral Instrument.

## **United Arab Emirates (UAE)**

## Federal Tax Authority (FTA) publishes decision on mechanism for correcting VAT return errors

The FTA has recently published Decision No. 8 of 2024 dated 1 November 2024 regarding the mechanism for correcting errors or omissions in the VAT returns submitted to the FTA.

Click here to view the published decision.

#### FTA publishes user guide on the whistle blower program for tax violations and evasion

On 31 December 2024, the FTA published a detailed user guide on Raqeeb, FTA's whistle blower program that allows individuals to report any tax violation or tax evasion incidents.

Click here to view the guide.

## Tax treaty updates

On 2 January 2025, the Emirati Cabinet approved the following:

- The Bahrain UAE Income Tax Treaty.
- The amending protocol to the Switzerland UAE Income Tax Treaty.
- The Türkiye UAE Investment Protection Agreement.

#### Qatar

# General Tax Authority (GTA) announces tax return filing due dates for tax year ended 31 December 2024

The GTA has recently announced that the tax filing period for the fiscal year ended 31 December 2024 will commence on 1 January 2025 and conclude on 30 April 2025.

Click here to view the related press release.

#### **Oman**

## **Oman introduces DMTT on MNEs**

Oman has recently released the law imposing a 15% DMTT on multinational companies operating in Oman whose annual revenues exceed OMR 300 million (EUR 750 million). The law comes into effect on 1 January 2025.

## Oman customs announces implementation of a new HS tariff codes system

Starting from 1 January 2025, a new 12-digit tariff code system has been implemented replacing the older 8-digit tariff codes used by the Oman customs.

Click here to view the new Customs Tariff details.

For a detailed discussion on how the above updates may impact your business, contact us.

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