Issue 19 | DOP 05, SEPTEMBER 2026

ELYSIAN CONSULTING GROUP

YOUR COMPLIANCE PARTNER IN THE UAE

WEEKLY NEWSLETTER



INSIGHTS

1. Four Weeks to 30 September: The CT Return Filing War-Room
2. VATP046: The Consolidated Map of Every VAT Decree-Law Amendment (30 Oct 2024 & 1 Jan 2026)
3. The September Cost Shock: Diesel Jumps 13%, Warsh Turns Hawkish, Hike Odds Hit 60%
4. Your Compliance Calendar
5. Free CT Return Readiness Review

OUR SERVICES

- CORPORATE TAX
- VAT CONSULTING
- ACCOUNTING SERVICES
- AUDITING SERVICES
- E-INVOICING IN DUBAI

info@elysianuae.com | +971 54 243 9656 | www.elysianuae.com

FOUR WEEKS TO 30 SEPTEMBER: THE CT RETURN FILING WAR-ROOM

+971 54 243 9656 WWW.ELYSIANUAE.COM INFO@ELYSIANUAE.COM

The 4-Week Sprint – Weekly Cadence

- **WEEKS 1–2· LOCK NUMBERS**
  5–18 September
  - Audited financial statements signed
  - Book-to-tax reconciliation locked
  - TP / Related-Party schedules drafted
- **WEEKS 3–4· REVIEW & FILE**
  19–30 September
  - Independent second-eyes review
  - Submit no later than Fri 25 Sep
  - Archive under 7-year retention

The Filing War-Room Checklist

- **Audited financials:** Non-negotiable for above-threshold clients and every QFZP. Chase auditors weekly; escalate sign-off blockers to the audit partner by Week 2.
- **Small Business Relief election:** For revenue ≤ AED 3M, make the SBR election IN the return. Missed elections cannot be added later. SBR now runs to 31 Dec 2029 (MD 131/2026, Issue 15) – the election matters for years.
- **QFZP substance file:** Employees, workspace, expenditure, activity mapping – documented before submission. The Private Clarifications compendium (Issue 12) confirmed the FTA reads substance strictly; "no employees" arguments are dead.

Twenty-six days. That is what stands between every 31 December 2025 year-end taxable person and the **30 September 2026 Corporate Tax return deadline** – the first mainstream CT filing wave in the UAE. The 31 July waiver window has closed. The Private Clarifications compendium and CTP011 (Issue 12), the Pillar Two package (Issue 18), and FTA Decision 13/2026 (Issue 17, effective 1 Oct) all frame the file quality the FTA will be reading. This is the **final-month war-room.**

CT RETURN DEADLINE · 31 DECEMBER 2025 YEAR-ENDS

30 SEPTEMBER 2026

Target filing: Friday 25 September · No extensions confirmed by the FTA

Five Pitfalls to Avoid This Month

- **Filing before the audit is signed:** Post-filing corrections trigger voluntary-disclosure exposure. Submit with signed audited numbers on 28 Sep, not draft numbers on 15 Sep.
- **Template-driven substance narrative:** Every QFZP client's file needs its own evidence – copy-paste substance memos are exactly what an FTA Q4 audit selection looks for.
- **Missing the SBR election:** For SME clients at or under AED 3M, the election is a return-form entry. Miss it and CT jumps from 0% to 9% for the period.
- **Ignoring Decision 13/2026 in Q4 planning:** The 1 October supplier-verification rule (Issue 17) hits the same week as the CT filing sprint. Do not let the CT deadline crowd out the supplier due-diligence policy work – the calendar has room only if planned now.
- **Skipping the post-filing archive:** The return is only half the exercise. Workpapers, benchmarking studies, substance files and correspondence must be archived under the 7-year retention rule – including under FTA Decision 4/2026's completeness/legibility standard (Issue 18).

Continue...

+971 54 243 9656 WWW.ELYSIANUAE.COM INFO@ELYSIANUAE.COM

- **TP adjustments and disclosures:** CTP011 requires disclosure of every downward TP adjustment without threshold. Related-Party and Connected-Person schedules must be complete before filing.
- **Pillar Two impact screen:** For any MNE-owned client with FY starting 1 Jan 2025 in scope, the return signing point is also when the Pillar Two registration timeline (Decision 12/2026) and Information Return filing framework (MD 133/2026, Issue 18) must be evidenced in the workpaper.
- **EmaraTax portal readiness:** User access, MFA, e-signature validity, TRN correct. Portal load spikes 28–30 Sep – a stuck login is not an excuse. Aim to file by Wed 30 Sep in the morning, ideally on Fri 25 Sep.



Four weeks and one Friday-morning submission target. The FTA will not extend the 30 September deadline. Every advisor should have a client-by-client tracker on the desk this Monday, a target filing date of Friday 25 September, and a working-papers archive plan for 1–15 October. The FTA's H1 inspection cadence (Issue 16) is the risk backdrop; file quality is the outcome-shaper.

VATP046: THE CONSOLIDATED MAP OF EVERY VAT DECREE-LAW AMENDMENT (30 OCT 2024 & 1 JAN 2026)

+971 54 243 9656 WWW.ELYSIANUAE.COM INFO@ELYSIANUAE.COM

Update 2A ·FDL 16 of 2024 – Effective 30 October 2024

NEW DEFINITIONS (ART. 1)

- Electronic Invoicing System
- Electronic Invoice + Electronic Credit Note
- Tax Invoice / Tax Credit Note amended to include their electronic counterparts

E-INVOICING OBLIGATIONS

- Art. 55(1)(c): must retain e-invoice to recover input tax
- Art. 65(5): registrants subject to EIS issue Tax Invoices as e-Invoices
- Art. 70(4): same for Tax Credit Notes

Fixed Establishment & Administrative Penalties (FDL 16/2024)

Fixed Establishment expanded: Where a foreign business's employees are regularly present at its UAE client's premises and use technology resources (mobile phone, laptop), a Fixed Establishment is created – even if the business does not own the premises. That takes the foreign business out of "non-resident" status for VAT.

The FTA has published **Public Clarification VATP046** – the definitive single-document explainer of the two VAT Decree-Law amendment waves: **Federal Decree-Law No. 16 of 2024** (effective 30 October 2024) and **Federal Decree-Law No. 16 of 2025** (effective 1 January 2026). If you have felt like every VAT working paper has needed to be re-referenced this year, this is the map you have been waiting for.

Update 2B ·FDL 16 of 2025 – Effective 1 January 2026

REVERSE CHARGE (ART. 48)

Self-invoice requirement REMOVED

For Concerned Goods AND Concerned Services imported on or after 1 Jan 2026. Output VAT still due; retain supporting documents. Pre-2026 items = VATP044 (Services) / VATP045 (Goods).

EXCESS RECOVRABLE TAX (ART. 74)

5-year refund clock introduced

Refund window = 5 years from end of Tax Period in which the excess arose. Excess not claimed or applied within 5 years is FORFEITED.

Worked Example VATP046 Gives on Article 74

A Taxable Person's Tax Return for the period ending **31 January 2026** has an excess Recoverable Tax (credit balance). That credit balance can be carried forward, used against Payable Tax or Administrative Penalties, or refunded – but only **until 31 January 2031.** After that date, any remaining unused credit **balance is forfeited.** Even where part of the credit is used within the window, the unused remainder still lapses at the end of 5 years.

Continue...

+971 54 243 9656 WWW.ELYSIANUAE.COM INFO@ELYSIANUAE.COM

- **Administrative Penalties tightened (Art. 76):** Failure to issue a Tax Invoice, Tax Credit Note or alternative document within the prescribed period is now expressly grounds for an Administrative Penalty Assessment. Under EIS, failure to issue/transmit electronically triggers a penalty layer of its own.

- **E-invoice ≠ Tax Invoice automatically:** An Electronic Invoice only qualifies as a Tax Invoice when the Article 59 / 60 Executive Regulation requirements are also met. E-invoice "generated" is not the same as Tax Invoice "valid".

What Clients Should Do This Month

- **Age your VAT credits:** Every credit balance sitting on EmaraTax needs an origin date. Build an ageing report – anything from the earliest 2021 tax periods approaches the 5-year lapse quickly. This is the most immediate action item for CFO/tax teams.
- **Refresh reverse-charge workflow:** For Concerned Goods and Services imported from 1 Jan 2026, remove the self-invoice step from AP. Retain the overseas invoice and – for Goods – the Emirate Customs declaration as the primary documentary support.
- **Reassess Fixed Establishment risk on foreign vendors:** Any foreign supplier stationing employees on client premises + tech resources now potentially has a UAE Fixed Establishment. That flips the VAT treatment; refresh the vendor risk matrix.
- **Prepare for the e-invoicing article-set:** Articles 55, 65, 70 and the amended definitions collectively make the e-invoicing regime a Decree-Law obligation, not a policy nice-to-have. ASP appointment (30 Oct 2026) and 1 Jan 2027 go-live are now anchored in primary legislation.



VATP046 is the single-document map every VAT policy manual needs to reference. Two amendments cycles, seven amended Articles, three new definitions, and – most operationally urgent – a 5-year lapse clock on excess Recoverable Tax. Age the credits, remove pre-2026 self-invoice steps, and refresh vendor / e-invoicing files this quarter.

THE SEPTEMBER COST SHOCK: DIESEL JUMPS 13%, WARSH TURNS HAWKISH, HIKE ODDS HIT 60%

+971 54 243 9656 WWW.ELYSIANUAE.COM INFO@ELYSIANUAE.COM

UAE Fuel – August vs September 2026

AUGUST 2026

- Super 98 – AED 3.60/L
- Special 95 – AED 3.49/L
- E-Plus 91 – AED 3.41/L
- Diesel – AED 3.80/L

SEPTEMBER 2026

- Super 98 – AED 3.80/L (+AED 0.20)
- Special 95 – AED 3.69/L (+AED 0.20)
- E-Plus 91 – AED 3.61/L (+AED 0.20)
- Diesel – AED 4.30/L (+AED 0.50)

Three signals into mid-September: (1) 5 September US non-farm payrolls – a soft print unwinds the Warsh-driven hike bid; (2) 11 September US August CPI – the last hard data before FOMC; (3) 16–17 September FOMC – the base-case is now a coin-flip. For UAE CFOs, this fortnight is where the September/Q4 cost trajectory gets locked in.

Two shifts landed over the weekend that reset the September cost base for every UAE business. **UAE September fuel prices** (announced 31 Aug, effective 1 Sep) rose **AED 0.20/L across petrol grades and AED 0.50/L on diesel** – a 13% diesel step-up in a single month. And at Jackson Hole, Fed Chair **Kevin Warsh** delivered an unexpectedly hawkish tone that pushed September rate-hike odds to **~60%,** with Brent trading near $95/bbl on renewed Hormuz tension.

Jackson Hole & The Fed Reset

- **Warsh's hawkish surprise:** Fed Chair Kevin Warsh warned on persistent inflation at Jackson Hole (27–29 Aug), leaning explicitly against the market's cut narrative. His speech nudged CME FedWatch odds of a September rate hike to ~60% – up from ~56% pre-speech and materially higher than the mid-August ~35%.
- **Brent snapping higher:** Brent traded near $95/bbl on 4 September, up ~8% on the week, on renewed Strait of Hormuz tension and vessel-attack headlines. August average sat at ~$87.7 vs $83.5 in July.
- **Gold turned lower on the hawkish read:** The gold rally paused after Warsh's speech – a signal that market participants took the hike-back-on-table view seriously. Dubai retail prices held around the AED 550/g range.

What This Means for UAE Clients

- **Logistics, transport, delivery operators:** Diesel up 13% in a single month reverses months of savings. Refresh unit-economics models THIS week; contractual fuel surcharges should re-price from 1 September, not from the next fuel-up.
- **Treasury & FX teams:** A Sept rate hike scenario at 60% means the strong-USD trade is back on. Non-USD payables need higher hedge ratios; dirham peg means UAE lending costs stay elevated. Test balance-sheet stress under a +25bp Sept + hold-through-year-end scenario.
- **Fleet-heavy and hospitality operators:** Employee transport, hotel shuttles, delivery fleets – all take the fuel spike on the cost line. Combined with the Salik/Parkin 5% VAT (Issue 07) and commercial-rent surge (Issue 15), Q3 opex is meaningfully higher than budgets built earlier this year.
- **Gold & jewellery businesses:** A Fed hike is gold-negative on the margin. Inventory-hedging discipline matters more this month than last; retail buyers may pause purchases waiting for a pullback.

YOUR COMPLIANCE CALENDAR

Refreshed for the next **11** months.

DATE	WHAT'S DUE / WHAT KICKS IN
28 Sep 2026 (Mon)	Quarterly VAT return for June–August 2026 due (FTA portal deadline).
30 Sep 2026 (Wed)	Corporate Tax return due (31 Dec 2025 year-end). Q3 2021 VAT credits expire.
28 Oct 2026 (Wed)	Quarterly VAT return for Jul–Sep 2026 due (FTA portal deadline).
30 Oct 2026 (Fri)	ASP appointment deadline for businesses with revenue ≥ AED 50M (extended from 31 July 2026).
30 Nov 2026 (Mon)	NEW: Pillar Two Top-Up Tax registration deadline for in-scope MNE Group entities with FY ending before 30 April 2026 (FTA Decision 12/2026).
30 Sep 2026 (Wed)	Corporate Tax return DEADLINE (31 Dec 2025 year-end). Q3 2021 VAT credits expire.
30 Nov 2026 (Mon)	NEW: Pillar Two Top-Up Tax registration deadline for in-scope MNE Group entities with FY ending before 30 April 2026 (FTA Decision 12/2026).
31 Dec 2026 (Thu)	Deadline for Top-Up Tax deregistration where entity ceased before 30 June 2026. Pre-2021 VAT credits and Pillar Two transitional-relief eligibility close.
1 Jan 2027 (Fri)	Mandatory e-Invoicing go-live for businesses ≥ AED 50M. Per-invoice penalties begin.
31 Mar 2027 (Wed)	ASP appointment deadline for businesses < AED 50M; government entities also.
1 Jul 2027 (Thu)	Mandatory e-Invoicing go-live for businesses < AED 50M.

FREE CORPORATE TAX FILING READINESS

LET'S TALK

Book a free 30-minute Corporate Tax Filing Readiness

If you have a 31 December 2025 year-end, your CT return is due 30 September 2026 – about four months away. We'll review your trial balance, transfer-pricing exposure, QFZP positioning, related-party schedules and the readiness of your working-paper file. You leave with a written gap list and a clear filing plan – no obligation

To book, write to me directly:

CA Midhun Nair

Chartered Accountant, Partner, Elysian Consulting Group

+971 54 243 9656 WWW.ELYSIANUAE.COM INFO@ELYSIANUAE.COM

