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ELYSIAN CONSULTING GROUP

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WEEKLY NEWSLETTER



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- CORPORATE TAX
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THE LAST WEEK OF OCTOBER: FOUR DEADLINES IN FOUR DAYS (28–31 OCTOBER)

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Tax Periods ended before 1 January 2026

- **VAT return (28 October):** The July–September quarter predates FTA Decisions 13/2026 and 17/2026 and Cabinet Decision 149/2026, so the old recovery rules still apply to it. Use the review to tag October costs that will need the new tests – cash-paid supplies, employee benefits and new suppliers – before the first return under the new rules.
- **ASP appointment (30 October):** A signature is the legal step, but the real work is integration and testing before 1 January. Appoint a provider that is on the Ministry of Finance accredited register – preliminary approval no longer exists (Section 02).
- **The policy-and-monitoring test for phones and internet:** A documented internal policy must set the scope of permissible use and the consequences of unauthorised use. The employer must also show reasonable monitoring mechanisms and keep records and justifications where unauthorised use occurs.
- **Decision 15/2026 exemption (31 October):** Government-owned juridical persons that met the Article 4(1)(h) conditions for Tax Periods ended before 1 January 2026 must apply by this date. Missing it leaves those periods taxable at 9%. The second window, for the CD 55/2025 and CD 34/2025 cohorts, runs to 31 December.

14 DAYS TO GO

ASP Appointment Deadline · 30 OCTOBER 2026

Every business with revenue of **AED 50 million or more** must appoint an **accredited** e-invoicing Service Provider by **Friday 30 October 2026**. The 1 January 2027 go-live has been reconfirmed and is unchanged. The Cabinet Decision 106/2025 penalty schedule (Issue 03) sets **AED 5,000 per month** for failing to appoint a provider within the required time.

October closes with the tightest cluster of UAE compliance dates since the 30 September Corporate Tax wave. Between **Wednesday 28 and Saturday 31 October**, the quarterly VAT return, the e-invoicing ASP appointment, the Corporate Tax return for **31 January 2026** year-ends and the first FTA Decision 15/2026 exemption window all fall due. With 31 October on a Saturday, the working deadline for most of this is **Friday 30 October.**

FOUR DEADLINES · ONE WEEK

28 · 30 · 31 OCT

Target: everything filed, appointed or applied for by Thursday 29 October

The Four Dates

WED 28 OCT · VAT RETURN

- Quarter July–September 2026 (and September for monthly filers)
- Return and payment both due
- Last return before the 1 October rule changes apply

FRI 30 OCT · ASP APPOINTMENT

- Businesses with revenue ≥ AED 50M
- Provider must hold full accreditation (see Section 02)
- Go-live 1 January 2027 is unchanged

Go-live 1 January 2027 is unchanged

- Return and payment due nine months after period end
- Falls on a Saturday — plan to file by Friday 30 October
- Late filing: AED 500 per month for the first 12 months

SAT 31 OCT · CT EXEMPTION WINDOW

- FTA Decision 15/2026 (Issue 20)
- Article 4(1)(h) entities wholly owned by Government / Government-Controlled Entities
- Tax Periods ended before 1 January 2026

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The last four days of October carry four separate obligations with four separate penalty regimes. None of them has an extension on the table. Treat Thursday 29 October as the deadline for all of them, and use this week to confirm which apply to each client.

What Clients Should Do This Week

- **Run a one-page deadline check for every client:** Turnover band (above or below AED 50M), financial year-end, VAT filing frequency and any exempt-entity status. That single sheet tells you which of the four dates apply.
- **Move internal target dates to Thursday 29 October:** The EmaraTax portal and ASP onboarding teams will both be busy at month-end. A one-day buffer protects against login, signatory or payment problems.
- **Confirm the ASP choice in writing this week:** Check the provider's name and accreditation status on the Ministry of Finance register, then put the accreditation in the contract (Section 02).
- **Close the January year-end CT files:** Chase signed audited financial statements now. A return filed on draft numbers and corrected later creates voluntary-disclosure exposure.



MINISTERIAL DECISION 168/2026: E-INVOICING PRE-APPROVAL IS GONE – ONLY ACCREDITED PROVIDERS COUNT

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On **9 October 2026** the Ministry of Finance announced **Ministerial Decision No. 168 of 2026** on the eligibility criteria and accreditation procedures for e-invoicing Service Providers. It took effect from **1 October 2026** and repeals Ministerial Decision 64/2025 and its amendments, including MD 56/2026. The headline change: **the separate pre-approval stage has been removed**. Providers now move straight to accreditation once they pass the Ministry's assessment and testing. In Issue 09 we explained the difference between pre-approved (Article 15) and accredited (Article 16) providers – from 1 October, only the second category exists.

Why It Matters for QFZP Distributors

- **Distribution qualifies only from a Corporate Tax Designated Zone:** "Distribution of goods or materials in or from a Designated Zone" is a Qualifying Activity under Ministerial Decision 229/2025. TAXP010 confirms the 0% rate applies only where the distribution is carried out in or from a Corporate Tax Designated Zone and every other condition is met.
- **Goods must enter through the zone:** Under Ministerial Decision 229/2025, goods entering the State must be imported through the Designated Zone and supplied to a customer who resells, processes or alters them, or to a public benefit entity.
- **The five-period consequence:** A QFZP that fails any condition at any time in a Tax Period ceases to be a QFZP **from the beginning of that Tax Period and for the following four Tax Periods**.
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TRANSITION WINDOW FOR PRE-APPROVED PROVIDERS

30 DAYS FROM 1 OCT

30 DAYS FROM 1 OCT

30 DAYS FROM 1 OCT

MD 64/2025 · TWO STAGES

- MD 168/2026 · ONE STAGE
- Full accreditation granted separately after further testing
- Businesses had to check which stage a provider had reached

Businesses had to check which stage a provider had reached

- Direct accreditation after assessment and testing
- Accredited providers published on the Ministry register
- Rules on renewal, ongoing evaluation, termination and objections



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Why It Matters Two Weeks Before 30 October

- **The provider's deadline and yours are separate:** Pre-approved providers have until roughly the end of October to complete accreditation. Your obligation is to appoint an accredited provider by 30 October. A provider that misses its window cannot carry you over the line.
- **The register is moving fast:** A firm tracking the Ministry register counted 65 accredited providers and 5 still pre-approved on 12 October. Check the live register on the day you sign, not a list saved last month.
- **Appointment is only the first step:** Integration with your ERP, master-data clean-up and end-to-end testing still have to happen before 1 January 2027. A PDF or scanned invoice is not an e-invoice – only structured data exchanged and reported through the accredited provider counts.

What the Decision Requires of Providers

- **Technical:** Active Peppol certification, OpenPeppol conformance testing, interoperability testing, end-user onboarding checks and successful tax-data reporting tests to the FTA, as reported in commentary on the Decision.
- **Security and resilience:** ISO/IEC 27001 and ISO 22301 certification, multi-factor authentication, encryption of stored and transmitted data, and regular security monitoring.
- **Financial standing:** A minimum paid-up capital and professional indemnity, crime and cyber-fraud insurance cover.
- **Validity:** Accreditation is reported to run for two years, with renewal applications due no later than 70 business days before expiry.
- **Outsourcing:** Providers may use third-party Peppol products and outsource technical components, but remain fully responsible for compliance and service delivery.
- **For end users:** A reported commitment to provide 100 free e-invoice exchange and reporting services per year to each end user – worth confirming when comparing quotes.

What Clients Should Do Before Signing

- **Verify accreditation on the Ministry register:** Record the provider's accreditation details and the date you checked. Keep a screenshot on file.
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- **Ask who runs the technology:** Where the provider outsources its Peppol access point or hosting, ask for the arrangement in writing. Responsibility stays with the provider, but your continuity depends on the subcontractor.
- **Agree an onboarding timetable:** Fix dates for mapping, testing and sign-off in November and December, with the provider's commitment to resource them.

MD 168/2026 simplifies the question businesses have to ask: is the provider accredited – yes or no? Pre-approval no longer counts, and providers still in transition must finish within the 30-day window. Check the register, put accreditation in the contract and sign by 30 October; the testing work for 1 January starts the day after.

IMF CUTS UAE 2026 GROWTH TO –3.9%, US INFLATION HITS 3.7%, BRENT HOLDS AT $105

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What It Means for UAE Clients

- **Budgets and forecasts for 2027:** The IMF's rebound case depends on Hormuz reopening from March 2027. Build a downside case where disruption lasts longer, especially for import-reliant traders and logistics businesses.
- **Treasury & FX teams:** With a December hike close to fully priced, assume EIBOR moves up again before year-end. Refresh borrowing-cost forecasts and covenant headroom now.
- **Fuel-sensitive operators:** Brent above $100 and the US diesel squeeze point to little relief in the November UAE fuel prices announced at month-end. Keep fuel surcharges in client contracts.
- **Tourism and hospitality:** The minister put hotel occupancy at about 68% at the end of August, and Lufthansa and Air France plan to resume UAE flights by the end of October. Recovery is under way but uneven – cash-flow planning still needs a cautious case.
- **Businesses on the east coast:** The shift of trade through Khor Fakkan and Fujairah is creating demand for warehousing, transport and new company set-ups. Check the VAT and Corporate Tax position of any new location – TAXP010 (Issue 21) applies to free zone moves.

The IMF's **World Economic Outlook** (13 October) now projects the UAE economy to **contract 3.9% in 2026** – a 7-point downgrade from April – before rebounding **7.7% in 2027**. The forecast assumes the Strait of Hormuz reopens gradually from March 2027. A day later, **US September CPI** came in at **3.7%,** above the 3.6% expected, pushing a December Fed hike close to fully priced. Brent ended the week near **$105/bbl** with Hormuz flows still about a third below normal.

The Numbers That Moved

IMF · WORLD ECONOMIC OUTLOOK

UAE –3.9% (2026) · +7.7% (2027)

- Saudi Arabia –3.3% in 2026; MENA –2.0%
- Global growth held at 3.1% for 2026
- Assumes Hormuz reopening from March 2027

US INFLATION SEPTEMBER

UAE –3.9% (2026) · +7.7% (2027)

- Gasoline +9.1% month on month
- Producer prices (PPI) 6.3% year on year
- December hike priced at about 92%

What Happened Under the Hood

- **The UAE downgrade is a Hormuz story:** The IMF assumes the strait returns to pre-war conditions only by October 2027. Kpler data show clearances averaged about 11.6 million barrels a day in the week to 13 October – roughly 68% of the pre-war baseline.
- **The domestic data are softer than the PMI suggested:** Economy Minister Abdulla bin Touq said real GDP grew 0.4% year on year in the first half of 2026, to AED 961.9 billion, driven by non-oil activity. The UAE's "Zero Hormuz" plan is speeding up Khor Fakkan, Fujairah and Etihad Rail links to the east coast.
- **US inflation surprised on energy:** Gasoline rose 9.1% in September and accounted for more than half of the monthly CPI increase. Producer prices rose 6.3% year on year, against 5.3% expected.
- **The Fed path firmed for December, not October:** After the PPI release, markets priced about a 26% chance of a hike at the 27–28 October meeting and about 92% for 8–9 December. Two Fed officials said an immediate hike may not be needed.
- **Oil and gold:** Brent was about $105.21 on 16 October, with WTI near $97. The IEA is speeding up about 100 million barrels of emergency releases, including more than 20 million barrels of diesel. Gold recovered to about $4,148/oz on 15 October from a weekly low of $4,073.

Three signals into November: (1) the 27–28 October FOMC – a hold is the base case, but the statement will set up December; (2) Hormuz transit data and tanker-attack headlines, which drive both Brent and the IMF's 2027 rebound case; (3) the end-October announcement of November UAE fuel prices. For UAE CFOs, plan Q4 on higher funding costs and elevated fuel, with the 2027 recovery as an upside rather than a base case.

YOUR COMPLIANCE CALENDAR

Refreshed for the next **11** months.

DATE	WHAT'S DUE / WHAT KICKS IN
28 Oct 2026 (Wed)	Quarterly VAT return for Jul–Sep 2026 due (FTA portal deadline).
30 Oct 2026 (Fri)	ASP appointment deadline for businesses ≥ AED 50M revenue – accredited providers only (MD 168/2026). Practical filing date for CT returns of 31 January 2026 year-ends.
31 Oct 2026 (Sat)	CT return and payment due for 31 January 2026 year-ends. FTA Decision 15/2026 – exemption application deadline for Article 4(1)(h) wholly-owned juridical persons of Government / Government-Controlled Entities (pre-1 Jan 2026 Tax Periods). Around this date: end of the 30-day accreditation window for pre-approved e-invoicing providers.
28 Nov 2026 (Sat)	VAT return for October 2026 (monthly filers) – the first return under FTA Decisions 13/2026 and 17/2026 and Cabinet Decision 149/2026.
30 Nov 2026 (Mon)	Pillar Two Top-Up Tax registration (Decision 12/2026) AND Pillar Two Information Return filing framework (MD 133/2026) – first cycle for FY starting 1 Jan 2025.
31 Dec 2026 (Thu)	FTA Decision 15/2026 – exemption deadline for CD 55/2025 and CD 34/2025 juridical-person cohorts. Also Top-Up Tax deregistration for entities ceased pre-30 Jun 2026.
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.
1 Oct 2027 (Fri)	Mandatory e-Invoicing go-live for government entities.
31 Dec 2029 (Mon)	Small Business Relief window closes (extended by MoF MD 131/2026 from 31 Dec 2026).

FREE ASP APPOINTMENT CHECK

LET'S TALK

Book a free 30-minute ASP Appointment Check

If your revenue is AED 50 million or more, you must appoint an accredited e-invoicing provider by 30 October 2026. Send us your shortlisted provider and draft contract. We'll confirm its status on the Ministry of Finance register, review the accreditation, exit and data-transfer terms, and outline the testing plan you need before 1 January 2027. You leave with a written checklist – no obligation.

To book, write to me directly:

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