April 2026

EmaraTax Portal Activates Advance Pricing Agreement (APA) Programme

On 31 December 2025, the UAE Federal Tax Authority (FTA) released its long-awaited Corporate Tax Guide on **Advance Pricing Agreements (APAs)**, providing a formal mechanism for businesses to agree transfer pricing treatment in advance - eliminating TP uncertainty across Corporate Tax, VAT, and Excise Tax.

What is an APA?

An Advance Pricing Agreement is a binding agreement between a taxpayer and the FTA that determines **in advance** the arm's length price for specified Controlled Transactions with Related Parties.

Key benefits:

- ✓ Eliminates transfer pricing (TP) disputes and litigation risk
- ✓ Binding on both FTA and taxpayer - covers 3–5 prospective tax years
- ✓ AED 100M minimum threshold per tax period; fee AED 30K (application), AED 15K (renewal)

Eligibility & Rollout Phases

Phase 1- LIVE

- **Domestic UAPAs** (Mainland ↔ Free Zone)
- Applications accepted from **30 December 2025**
- Now accessible via **EmaraTax → Advance Pricing Agreements**

Phases 2 & 3 - Upcoming

- **Cross-border UAPAs:** Date to be announced in 2026
- **Bilateral (BAPA):** Two-jurisdiction APAs, timeline TBA
- **Multilateral (MAPA):** Multi-jurisdiction APAs, future phase

Detailed Procedures

1 Pre-Filing Consultation

A taxpayer submits a formal request using the prescribed form to the FTA, outlining proposed Controlled Transactions, TP methodology, and key complexities for review.

The FTA evaluates suitability through meetings and documentation within 6-9 months, notifying approval or rejection based on materiality and merit.

2 APA Application Filing

Upon approval, the taxpayer files the complete APA application with detailed economic analysis, benchmarking, and AED 30,000 fee within specified timelines.

The FTA conducts in-depth review, including site visits, interviews, and information requests, culminating in a project plan for progression.

3 Evaluation and Negotiation

The FTA prepares and shares its independent transfer pricing analysis, specifying methods, criteria, and assumptions for the covered periods.

Taxpayers provide feedback within 30 business days, engaging in discussions to reach mutually agreed terms or risk application closure.

4 Conclusion and Implementation

Parties sign the binding APA agreement, effective for 3-5 prospective tax periods upon compliance with outlined conditions.

Ongoing monitoring via annual declarations ensures adherence, with mechanisms for revisions, cancellations, or renewals as circumstances evolve.

Pre-Filling Timeline

FTA Review:

- The Federal Tax Authority conducts its review within a target timeframe of 6–9 months.

Taxpayer Response Period:

- The taxpayer is required to respond to FTA queries within 40 business days.

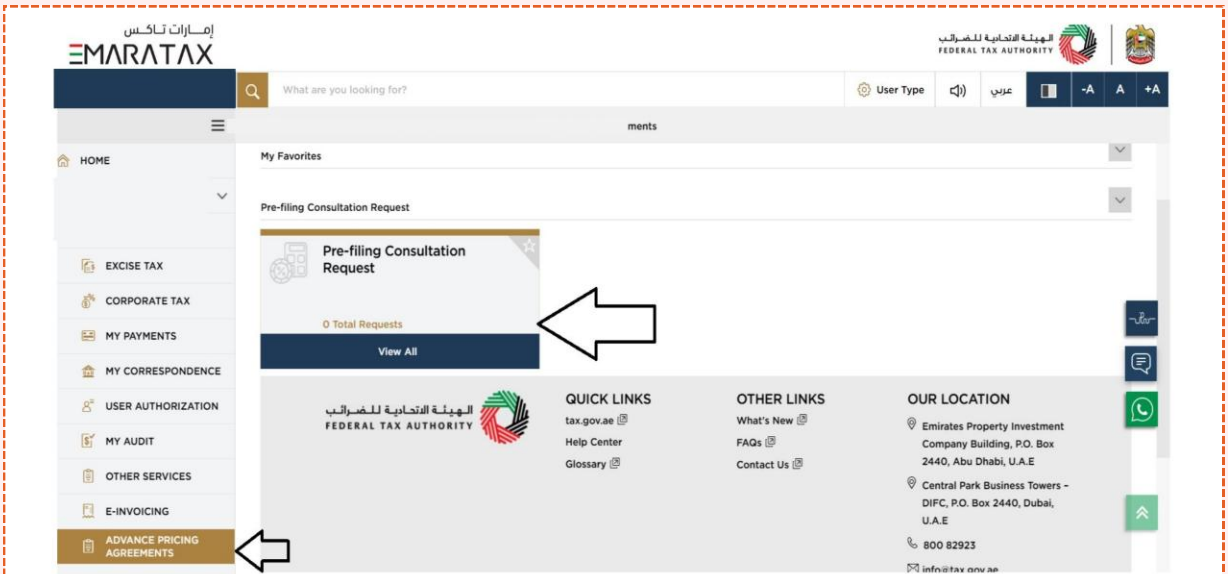
Post-Approval Requirement:

- Upon approval, the APA application must be submitted within 40 business days, or at least 12 months before the start of the first covered period, whichever is earlier.

How to Access on EmaraTax Portal

Navigation Steps

1. **Login to EmaraTax**
   via UAE Pass at eservices.tax.gov.ae
2. **Select Taxable Person**
   Choose your registered entity
3. **Click 'Advance Pricing Agreements' in the left sidebar**
4. **Pre-filing Consultation**
   Submit the pre-filing request form
5. **Track Your Request**
   Monitor status via View All



EmaraTax Portal - Advance Pricing Agreements section

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Global outlook

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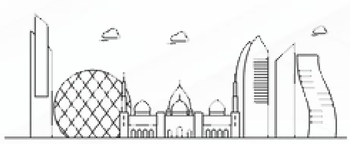

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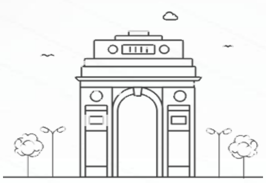

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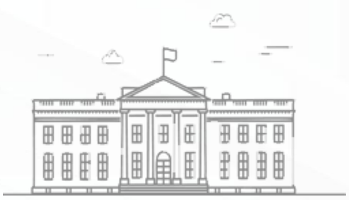

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