

SIGNED ON 17-FEBURARY-2025

**AGREEMENT
BETWEEN THE GOVERNMENT OF
THE UNITED ARAB EMIRATES
AND
THE GOVERNMENT OF THE RUSSIAN FEDERATION FOR THE
ELIMINATION OF DOUBLE
TAXATION WITH RESPECT TO TAXES ON INCOME AND ON
CAPITAL AND THE PREVENTION OF
TAX EVASION AND AVOIDANCE**

The Government of the United Arab Emirates and the Government of the Russian Federation,

Desiring to further develop their economic relationship and to enhance their cooperation in tax matters,

Intending to conclude an Agreement for the elimination of double taxation with respect to taxes on income and on capital and the prevention of tax evasion and avoidance without creating opportunities for non-taxation or reduced taxation through tax evasion or avoidance (including through treaty-shopping arrangements aimed at obtaining reliefs provided in this Agreement for the indirect benefit of residents of third jurisdictions).

Have agreed as follows:

CHAPTER I
SCOPE OF THE AGREEMENT

Article 1
PERSONS COVERED

1. This Agreement shall apply to persons who are residents of one or both of the Contracting States.
2. For the purposes of this Agreement, income derived by or through an entity or arrangement that is treated as wholly or partly fiscally transparent under the tax law of either Contracting State shall be considered to be an income of a resident of a Contracting State but only to the extent that the income is treated, for purposes of taxation by that Contracting State, as the income of a resident of that Contracting State. In no case shall the provisions of this paragraph be construed so as to affect a Contracting State's right to tax its own residents.
3. This Agreement shall not affect the taxation, by a Contracting State, of its residents except with respect to the benefits granted under paragraph 2 of Article 9, paragraph 3 of Article 16, paragraph 2 of Article 17 and Articles 18, 19, 20, 23, 24, 25 and 28 of this Agreement.

Article 2
TAXES COVERED

1. This Agreement shall apply to taxes on income and on capital imposed on behalf of a Contracting State or of its political subdivisions or local authorities, irrespective of the manner in which they are levied.
2. There shall be regarded as taxes on income and on capital all taxes imposed on total income, on total capital, or on elements of income or of capital, including taxes on gains from the alienation of movable or immovable property, taxes on the total amounts of wages or salaries paid by enterprises, as well as taxes on capital appreciation.
3. The existing taxes to which the Agreement shall apply are in particular:
 - (a) in the case of the United Arab Emirates:
 - (i) the income tax; and
 - (ii) the corporate tax
(hereinafter referred to as "United Arab Emirates tax");
 - (b) in the case of the Russian Federation:
 - (i) the tax on profits of organizations;
 - (ii) the tax on income of individuals;
 - (iii) tax on property of enterprises; and
 - (iv) tax on property of individuals
(hereinafter referred to as "Russian tax").
4. The Agreement shall also apply to any identical or substantially similar taxes that are imposed after the date of signature of the Agreement in addition to, or in place of, the existing taxes. The competent authorities of the Contracting States shall notify each other of any significant changes

that have been made in their respective taxation laws within a reasonable period of time after such changes.

CHAPTER II DEFINITIONS

Article 3

GENERAL DEFINITIONS

1. For the purposes of this Agreement, unless the context otherwise requires:
 - (a) The term "United Arab Emirates" means the territory of the United Arab Emirates and the airspace above it, as well as areas outside the territorial waters, and the submarine areas over which the United Arab Emirates exercises, in accordance with international law and the law of the United Arab Emirates, sovereign rights or jurisdiction in connection with the exploration or the exploitation of natural resources;
 - (b) the term "Russia" means the Russian Federation, when used in a geographical sense, means all the territory of the Russian Federation and also its exclusive economic zone and continental shelf, defined according to the 1982 United Nations Convention on the Law of the Sea;
 - (c) the terms "a Contracting State" and "the other Contracting State" mean the United Arab Emirates or the Russian Federation, as the context requires;
 - (d) the term "person" includes an individual, a company and any other body of persons;

- (e) the term "company" means any body corporate or any entity that is treated as a body corporate for tax purposes;
- (f) the term "enterprise" applies to the carrying on of any business;
- (g) the terms "enterprise of a Contracting State" and "enterprise of the other Contracting State" mean respectively an enterprise carried on by a resident of a Contracting State and an enterprise carried on by a resident of the other Contracting State;
- (h) the term "international traffic" means any transport by a ship or aircraft operated by an enterprise of a Contracting State, except when the ship or aircraft is operated solely between places in the other Contracting State;
- (i) the term "competent authority" means:
 - (i) in the case of the United Arab Emirates — the Ministry of Finance of the United Arab Emirates or its authorized representative;
 - (ii) in the case of the Russian Federation — the Ministry of Finance of the Russian Federation or its authorized representative;
- (j) the term "national", in relation to a Contracting State, means:
 - (i) any individual possessing the citizenship of that Contracting State; and
 - (ii) any legal person, partnership or association deriving its status as such from the laws in force in that Contracting State;
- (k) the term "business" includes the performance of professional services and other activities of an independent character;

- (l) the term "recognised pension fund" means an entity or arrangement established in that Contracting State that is treated as a separate person under the taxation laws of that Contracting State; or an arrangement which is not treated as a separate person under the taxation laws of that Contracting State but which is required to be separately identified for both regulatory and accounting purposes and:
 - (i) that is established and operated principally to administer or provide retirement benefits and ancillary or incidental benefits to individuals and that is regulated as such by that Contracting State or one of its political subdivisions or local authorities; or
 - (ii) that is established and operated principally to invest funds for the benefit of entities or arrangements referred to in subdivision (i);
- (m) the term "recognised stock exchange" means:
 - (i) any stock exchange established and regulated as such under the laws of either Contracting State; and
 - (ii) any other stock exchange agreed upon by the competent authorities of the Contracting States.

2. As regards the application of the Agreement at any time by a Contracting State, any term not defined therein shall, unless the context otherwise requires, have the meaning that it has at that time under the law of that Contracting State for the purposes of the taxes to which the Agreement applies, any meaning under the applicable tax laws of that Contracting State prevailing over a meaning given to the term under other laws of that Contracting State.

Article 4
RESIDENT

1. For the purposes of this Agreement, the term "resident of a Contracting State" means:
 - (a) in the case of the United Arab Emirates: any person who is a resident of the United Arab Emirates in accordance with the taxation laws of the United Arab Emirates by reason of that person's domicile, residence, place of incorporation, place of management or any other criterion of a similar nature;
 - (b) in the case of the Russian Federation: any person who, under the laws of the Russian Federation, is liable to tax therein by reason of his domicile, residence, place of effective management, place of the head or main office, place of registration or incorporation, or any other criterion of a similar nature, and also includes the Russian Federation, political subdivision or local authority thereof. This term, however, does not include any person who is liable to tax in the Russian Federation in respect only of income from sources in the Russian Federation.
2. Where by reason of the provisions of paragraph 1 of this Article an individual is a resident of both Contracting States, then his status shall be determined as follows:
 - (a) he shall be deemed to be a resident only of the Contracting State in which he has a permanent home available to him; if he has a permanent home available to him in both Contracting States, he shall

be deemed to be a resident only of the Contracting State with which his personal and economic relations are closer (centre of vital interests);

- (b) if the Contracting State in which he has his centre of vital interests cannot be determined, or if he has not a permanent home available to him in either Contracting State, he shall be deemed to be a resident only of the Contracting State in which he has an habitual abode;
- (c) if he has an habitual abode in both Contracting States or in neither of them, he shall be deemed to be a resident only of the Contracting State of which he is a national;
- (d) if he is a national of both Contracting States or of neither of them, the competent authorities of the Contracting States shall settle the question by mutual agreement.

3. Where by reason of the provisions of paragraph 1 of this Article, a person other than an individual is a resident of both Contracting States, the competent authorities of the Contracting States shall endeavour to determine by mutual agreement the Contracting State of which such person shall be deemed to be a resident for the purposes of this Agreement, having regard to its place of head or main office, its place of effective management, the place where it is incorporated or otherwise constituted and any other relevant factors. In the absence of such agreement, such person shall not be entitled to any relief or exemption from tax provided by this Agreement except to the extent and in such manner as may be agreed upon by the competent authorities of the Contracting States.

Article 5

PERMANENT ESTABLISHMENT

1. For the purposes of this Agreement, the term "permanent establishment" means a fixed place of business through which the business of an enterprise is wholly or partly carried on.
2. The term "permanent establishment" includes especially:
 - (a) a place of management;
 - (b) a branch;
 - (c) an office;
 - (d) a factory;
 - (e) a workshop; and
 - (f) a mine, an oil or gas well, a quarry or any other place of exploration, extraction or exploitation of natural resources or any activities related thereto including an offshore drilling site.
3. The term "permanent establishment" also encompasses:
 - (a) a building site, a construction, assembly or installation project, or supervisory activities in connection therewith, but only if such site, project or activities last more than 12 months;
 - (b) the furnishing of services, including consultancy services, by an enterprise through employees or other personnel engaged by the enterprise for such purpose, but only if activities of that nature continue (for the same or a connected project) within a Contracting State for a period or periods aggregating more than 6 months within any 12 month period.

4. Notwithstanding the preceding provisions of this Article, the term "permanent establishment" shall be deemed not to include:
 - (a) the use of facilities solely for the purpose of storage, display or delivery of goods or merchandise belonging to the enterprise;
 - (b) the maintenance of a stock of goods or merchandise belonging to the enterprise solely for the purpose of storage, display or delivery;
 - (c) the maintenance of a stock of goods or merchandise belonging to the enterprise solely for the purpose of processing by another enterprise;
 - (d) the maintenance of a fixed place of business solely for the purpose of purchasing goods or merchandise or of collecting information, for the enterprise;
 - (e) the maintenance of a fixed place of business solely for the purpose of carrying on, for the enterprise, any activity not listed in subparagraphs (a) to (d) of this paragraph, provided that this activity has a preparatory or auxiliary character;
 - (f) the maintenance of a fixed place of business solely for any combination of activities mentioned in subparagraphs (a) to (e) of this paragraph, provided that the overall activity of the fixed place of business resulting from this combination is of a preparatory or auxiliary character.
5. Paragraph 4 of this Article shall not apply to a fixed place of business that is used or maintained by an enterprise if the same enterprise or a closely related enterprise carries on business activities at the same place or at another place in the same Contracting State and:

- (a) that place or other place constitutes a permanent establishment for the enterprise or the closely related enterprise under the provisions of this Article; or
- (b) the overall activity resulting from the combination of the activities carried on by the two enterprises at the same place, or by the same enterprise or closely related enterprises at the two places, is not of a preparatory or auxiliary character,

provided that the business activities carried on by the two enterprises at the same place, or by the same enterprise or closely related enterprises at the two places, constitute complementary functions that are part of a cohesive business operation.

6. Notwithstanding the provisions of paragraphs 1 and 2 of this Article, but subject to the provisions of paragraph 8 of this Article, where a person is acting in a Contracting State on behalf of an enterprise and, in doing so, habitually concludes contracts, or habitually plays the principal role leading to the conclusion of contracts that are routinely concluded without material modification by the enterprise, and these contracts are:

- (a) in the name of the enterprise; or
- (b) for the transfer of the ownership of, or for the granting of the right to use, property owned by that enterprise or that the enterprise has the right to use; or
- (c) for the provision of services by that enterprise,

that enterprise shall be deemed to have a permanent establishment in that Contracting State in respect of any activities which that person undertakes for the enterprise, unless the activities of such person are limited to those mentioned in paragraph 4 of this Article which, if exercised through a fixed place of business,

would not make this fixed place of business a permanent establishment under the provisions of that paragraph.

7. Notwithstanding the preceding provisions of this Article but subject to the provisions of paragraph 8 of this Article, an insurance enterprise of a Contracting State shall, except in regard to re-insurance, be deemed to have a permanent establishment in the other Contracting State if it collects premiums in the territory of that other Contracting State or insures risks situated therein through a person.
8. Paragraphs 6 and 7 of this Article shall not apply where the person acting in a Contracting State on behalf of an enterprise of the other Contracting State carries on business in the first-mentioned Contracting State as an independent agent and acts for the enterprise in the ordinary course of that business. Where, however, a person acts exclusively or almost exclusively on behalf of one or more enterprises to which it is closely related, that person shall not be considered to be an independent agent within the meaning of this paragraph with respect to any such enterprise.
9. The fact that a company which is a resident of a Contracting State controls or is controlled by a company which is a resident of the other Contracting State, or which carries on business in that other Contracting State (whether through a permanent establishment or otherwise), shall not of itself constitute either company a permanent establishment of the other.
10. For the purposes of this Article, a person or enterprise is closely related to an enterprise if, based on all the relevant facts and circumstances, one has control of the other or both are under the control of the same persons or enterprises. In any case, a person or enterprise shall be considered to be closely related to an enterprise if one possesses directly or indirectly more

than 50% of the beneficial interest in the other (or, in the case of a company, more than 50% of the aggregate vote and value of the company's shares or of the beneficial equity interest in the company) or if another person or enterprise possesses directly or indirectly more than 50% of the beneficial interest (or, in the case of a company, more than 50% of the aggregate vote and value of the company's shares or of the beneficial equity interest in the company) in the person and the enterprise or in the two enterprises.

CHAPTER III TAXATION OF INCOME

Article 6

INCOME FROM IMMOVABLE PROPERTY

1. Income derived by a resident of a Contracting State from immovable property (including income from agriculture or forestry) situated in the other Contracting State may be taxed in that other Contracting State.
2. The term "immovable property" shall have the meaning which it has under the law of the Contracting State in which the property in question is situated. The term shall in any case include property accessory to immovable property, livestock and equipment used in agriculture (including the breeding and cultivation of fish) and forestry, rights to which the provisions of general law respecting landed property apply, usufruct of immovable property and rights to variable or fixed payments as consideration for the working of, or the right to work, mineral deposits, sources and other natural resources. Ships and aircraft shall not be regarded as immovable property.

3. The provisions of paragraph 1 of this Article shall apply to income derived from the direct use, letting, or use in any other form of immovable property.
4. The provisions of paragraph 1 of this Article shall also apply to the income received through a real estate investment trust, a real estate investment fund or a similar collective investment vehicle, which is organised primarily for investing in immovable property.

Article 7

BUSINESS PROFITS

1. The profits of an enterprise of a Contracting State shall be taxable only in that Contracting State unless the enterprise carries on business in the other Contracting State through a permanent establishment situated therein. If the enterprise carries on business as aforesaid, the profits of the enterprise may be taxed in that other Contracting State but only so much of them as is attributable to that permanent establishment.
2. Subject to the provisions of paragraph 3 of this Article, where an enterprise of a Contracting State carries on business in the other Contracting State through a permanent establishment situated therein, there shall in each Contracting State be attributed to that permanent establishment the profits which it might be expected to make if it were a distinct and separate enterprise engaged in the same or similar activities under the same or similar conditions and dealing wholly independently with the enterprise of which it is a permanent establishment.
3. In determining the profits of a permanent establishment, there shall be allowed as deductions expenses which are incurred for the purposes of the

business of the permanent establishment, including executive and general administrative expenses so incurred, whether in the Contracting State in which the permanent establishment is situated or elsewhere, provided such deductions are in accordance with the provisions of and subject to the limitations of the tax laws of that Contracting State.

4. Insofar as it has been customary in a Contracting State to determine the profits to be attributed to a permanent establishment on the basis of an apportionment of the total profits of the enterprise to its various parts, nothing in paragraph 2 of this Article shall preclude that Contracting State from determining the profits to be taxed by such an apportionment as may be customary. The method of apportionment adopted shall, however, be such that the result shall be in accordance with the principles contained in this Article.
5. No profits shall be attributed to a permanent establishment by reason of the mere purchase by that permanent establishment of goods or merchandise for the enterprise.
6. For the purposes of the preceding paragraphs of this Article, the profits to be attributed to the permanent establishment shall be determined by the same method year by year unless there is good and sufficient reason to the contrary.
7. Where profits include items of income which are dealt with separately in other Articles of this Agreement, then the provisions of those Articles shall not be affected by the provisions of this Article.

Article 8

SHIPPING AND AIR TRANSPORT

1. Profits of an enterprise of a Contracting State from the operation of ships or aircraft in international traffic shall be taxable only in that Contracting State.
2. The provisions of paragraph 1 of this Article shall also apply to profits derived from:
 - (a) international transport of passengers, livestock, mail, parcels, merchandise or goods by air or by sea;
 - (b) the participation in a pool, a joint business or an international operating agency;
 - (c) selling of tickets on behalf of another enterprise, provided that such income should be incidental to the operation of airlines;
 - (d) selling of technical engineering to a third party, provided that such income should be incidental to the operation of airlines;
 - (e) bank deposits, bonds, shares, stocks and other debentures, directly connected with the operation of aircraft in international traffic.
3. For purposes of this Article, profits from the operation of ships or aircraft include, but are not limited to:
 - (a) profits from the rental of ships or aircraft on a chartered fully equipped, crewed and supplied basis;
 - (b) profits from the rental on a bareboat basis of ships or aircraft,

provided that such use, maintenance, or rental is incidental to the operation of ships or aircraft in international traffic.

4. Profits of an enterprise of a Contracting State from the use, maintenance, or rental of containers (including trailers, barges, and related equipment for the transport of containers) shall be taxable only in that Contracting State, provided that such use, maintenance or rental is incidental to the operation of ships or aircraft in international traffic, except to the extent that those containers are used for transport solely between places within the other Contracting State.

Article 9

ASSOCIATED ENTERPRISES

1. Where:
 - (a) an enterprise of a Contracting State participates directly or indirectly in the management, control or capital of an enterprise of the other Contracting State; or
 - (b) the same persons participate directly or indirectly in the management, control or capital of an enterprise of a Contracting State and an enterprise of the other Contracting State,and in either case conditions are made or imposed between the two enterprises in their commercial or financial relations which differ from those which would be made between independent enterprises, then any profits which would, but for those conditions, have accrued to one of the enterprises, but, by reason of those conditions, have not so accrued, may be included in the profits of that enterprise and taxed accordingly.
2. Where a Contracting State includes, in accordance with the provisions of paragraph 1 of this Article, in the profits of an enterprise of that Contracting

State — and taxes accordingly — profits on which an enterprise of the other Contracting State has been charged to tax in that other Contracting State, the profits so included are profits which would have accrued to the enterprise of the first-mentioned Contracting State if the conditions made between the two enterprises had been those which would have been made between independent enterprises, then that other Contracting State shall make an appropriate adjustment to the amount of the tax charged therein on those profits. In determining such adjustment, due regard shall be had to the other provisions of this Agreement and the competent authorities of the Contracting States shall if necessary consult each other.

Article 10

DIVIDENDS

1. Dividends paid by a company which is a resident of a Contracting State to a resident of the other Contracting State may be taxed in that other Contracting State.

However, such dividends may also be taxed in the Contracting State of which the company paying the dividends is a resident and according to the laws of that Contracting State, but if the beneficial owner of the dividends is a resident of the other Contracting State, the tax so charged shall not exceed 10% of the gross amount of the dividends.

2. Notwithstanding the provisions of paragraph 1 of this Article, dividends arising in a Contracting State shall be exempt from tax in that Contracting State provided that they are paid to the other Contracting State or its financial and investment institutions.

3. The provisions of paragraphs 1 and 2 of this Article shall not affect the taxation of the company in respect of the profits out of which the dividends are paid.
4. The term "dividends" as used in this Article means income from shares, including distributions of additional paid-in capital and reduction of share capital or other rights, not being debt-claims, participating in profits, as well as income – even paid in the form of interest – which is subjected to the same taxation treatment as income from shares by the tax legislation of the Contracting State of which the paying company is a resident. This term also means any payments on shares of collective investment vehicles (other than real estate investment funds and similar collective investment vehicles, which are organised primarily for investing in immovable property).
5. The provisions of paragraphs 1 and 2 of this Article shall not apply if the beneficial owner of the dividends, being a resident of a Contracting State, carries on business in the other Contracting State of which the company paying the dividends is a resident through a permanent establishment situated therein, and the holding in respect of which the dividends are paid is effectively connected with such permanent establishment. In such case the provisions of Article 7 of this Agreement shall apply.
6. Where a company which is a resident of a Contracting State derives profits or income from the other Contracting State, that other Contracting State may not impose any tax on the dividends paid by the company, except insofar as such dividends are paid to a resident of that other Contracting State or insofar as the holding in respect of which the dividends are paid is effectively connected with a permanent establishment situated in that other

Contracting State, nor subject the company's undistributed profits to a tax on the company's undistributed profits, even if the dividends paid or the undistributed profits consist wholly or partly of profits or income arising in such other Contracting State.

7. The provisions of this Article shall not apply if it was the main purpose or one of the main purposes of any person concerned with the creation or assignment of the shares or other rights in respect of which the dividends are paid to take advantage of this Article by means of that creation or assignment.

Article 11

INTEREST

1. Interest arising in a Contracting State and beneficially owned by a resident of the other Contracting State may be taxed in that other Contracting State. However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that Contracting State, but if the beneficial owner of the interest is a resident of the other Contracting State, the tax so charged shall not exceed 10% of the gross amount of the interest.
2. Notwithstanding the provisions of paragraph 1 of this Article, interest arising in a Contracting State shall be exempt from tax in that Contracting State provided that it is paid to the other Contracting State or its financial and investment institutions.
3. The term "interest" as used in this Article means income from debt-claims of every kind, whether or not secured by mortgage and whether or not carrying a right to participate in the debtor's profits, and in particular,

income from government securities and income from bonds or debentures, including premiums and prizes attaching to such securities, bonds or debentures as well as other income that is subjected to the same taxation treatment as income from money lent by the laws of the Contracting State in which the income arises. Income dealt with in Article 10 of this Agreement and penalty charges for late payment shall not be regarded as interest for the purposes of this Article.

4. The provisions of paragraphs 1 and 2 of this Article shall not apply if the beneficial owner of the interest, being a resident of a Contracting State, carries on business in the other Contracting State in which the interest arises through a permanent establishment situated therein and the debt-claim in respect of which the interest is paid is effectively connected with such permanent establishment. In such case the provisions of Article 7 of this Agreement shall apply.
5. Interest shall be deemed to arise in a Contracting State when the payer is a resident of that Contracting State. Where, however, the person paying the interest, whether he is a resident of a Contracting State or not, has in a Contracting State a permanent establishment in connection with which the indebtedness on which the interest is paid was incurred, and such interest is borne by such permanent establishment, then such interest shall be deemed to arise in the Contracting State in which the permanent establishment is situated.
6. Where, by reason of a special relationship between the payer and the beneficial owner or between both of them and some other person, the amount of the interest, having regard to the debt-claim for which it is paid, exceeds the amount which would have been agreed upon by the payer and

the beneficial owner in the absence of such relationship, the provisions of this Article shall apply only to the last-mentioned amount of interest. In such case, the excess part of the payments shall remain taxable according to the laws of each Contracting State, due regard being had to the other provisions of this Agreement.

7. The provisions of this Article shall not apply if it was the main purpose or one of the main purposes of any person concerned with the creation or assignment of the debt-claim in respect of which the interest is paid to take advantage of this Article by means of that creation or assignment.

Article 12

ROYALTIES

1. Royalties arising in a Contracting State and beneficially owned by a resident of the other Contracting State may be taxed in that other Contracting State.

However, such royalties may also be taxed in the Contracting State in which they arise and according to the laws of that Contracting State, but if the beneficial owner of the royalties is a resident of the other Contracting State, the tax so charged shall not exceed 10% of the gross amount of the royalties.

2. Notwithstanding the provisions of paragraph 1 of this Article, royalties arising in a Contracting State shall be exempt from tax in that Contracting State provided that they are paid to the other Contracting State or its financial and investment institutions.

3. The term "royalties" as used in this Article means payments of any kind received as a consideration for the use of, or the right to use, any copyright of literary, artistic or scientific work including computer software, cinematograph films, or films or tapes or discs used for radio or television broadcasting, any patent, trade mark, design or model, plan, or secret formula or process, or for the use of, or the right to use, industrial, commercial or scientific equipment, or for information concerning industrial, commercial or scientific experience.
4. The provisions of paragraphs 1 and 2 of this Article shall not apply if the beneficial owner of the royalties, being a resident of a Contracting State, carries on business in the other Contracting State in which the royalties arise through a permanent establishment situated therein and the right or property in respect of which the royalties are paid is effectively connected with such permanent establishment. In such case the provisions of Article 7 of this Agreement shall apply.
5. Royalties shall be deemed to arise in a Contracting State when the payer is a resident of that Contracting State. Where, however, the person paying the royalties, whether he is a resident of a Contracting State or not, has in a Contracting State a permanent establishment in connection with which the liability to pay the royalties was incurred, and such royalties are borne by such permanent establishment, then such royalties shall be deemed to arise in the Contracting State in which the permanent establishment is situated.
6. Where, by reason of a special relationship between the payer and the beneficial owner or between both of them and some other person, the amount of the royalties, having regard to the use, right or information for which they are paid, exceeds the amount which would have been agreed

upon by the payer and the beneficial owner in the absence of such relationship, the provisions of this Article shall apply only to the last-mentioned amount of the royalties. In such case, the excess part of the payments shall remain taxable according to the laws of each Contracting State, due regard being had to the other provisions of this Agreement.

7. The provisions of this Article shall not apply if it was the main purpose or one of the main purposes of any person concerned with the creation or assignment of the rights in respect of which the royalties are paid to take advantage of this Article by means of that creation or assignment.

Article 13

CAPITAL GAINS

1. Gains derived by a resident of a Contracting State from the alienation of immovable property referred to in Article 6 of this Agreement and situated in the other Contracting State may be taxed in that other Contracting State.
2. Gains from the alienation of movable property forming part of the business property of a permanent establishment which an enterprise of a Contracting State has in the other Contracting State including such gains from the alienation of such a permanent establishment (alone or with the whole enterprise) may be taxed in that other Contracting State.
3. Gains that an enterprise of a Contracting State that operates ships or aircraft in international traffic derives from the alienation of such ships or aircraft, or movable property pertaining to the operation of such ships or aircraft, shall be taxable only in that Contracting State.

4. Gains derived by a resident of a Contracting State from the alienation of shares of a company or comparable interests, such as interests in a partnership, trust or collective investment institution, may be taxed in the other Contracting State if, at any time during the 365 days preceding the alienation, these shares or comparable interests derived at least 50% of their value directly or indirectly from immovable property, as defined in Article 6 of this Agreement, situated in that other Contracting State, unless such shares or comparable interests are traded on a recognised stock exchange and the resident own in the aggregate 5% or less of the class of such shares or comparable interests.
5. Gains from the alienation of any property, other than that referred to in paragraphs 1, 2, 3 and 4 of this Article, shall be taxable only in the Contracting State of which the alienator is a resident.

Article 14

INCOME FROM EMPLOYMENT

1. Subject to the provisions of Articles 15, 17 and 18 of this Agreement, salaries, wages and other similar remuneration derived by a resident of a Contracting State in respect of an employment shall be taxable only in that Contracting State unless the employment is exercised in the other Contracting State. If the employment is so exercised, such remuneration as is derived therefrom may be taxed in that other Contracting State.
2. Notwithstanding the provisions of paragraph 1 of this Article, remuneration derived by a resident of a Contracting State in respect of an

employment exercised in the other Contracting State shall be taxable only in the first-mentioned Contracting State if:

- (a) the recipient is present in the other Contracting State for a period or periods not exceeding in the aggregate 183 days in any 12 month period commencing or ending in the taxable year concerned; and
 - (b) the remuneration is paid by, or on behalf of, an employer who is not a resident of the other Contracting State; and
 - (c) the remuneration is not borne by a permanent establishment which the employer has in the other Contracting State.
3. Notwithstanding the preceding provisions of this Article, remuneration derived by a resident of a Contracting State in respect of an employment, as a member of the regular complement of a ship or aircraft, that is exercised aboard a ship or aircraft operated in international traffic, other than aboard a ship or aircraft operated solely within the other Contracting State, shall be taxable only in the first-mentioned Contracting State.

Article 15

DIRECTORS' FEES

Directors' fees and other similar payments derived by a resident of a Contracting State in his capacity as a member of the board of directors, or of a similar body of a company which is a resident of the other Contracting State may be taxed in that other Contracting State.

Article 16

ENTERTAINERS AND SPORTSPERSONS

1. Notwithstanding the provisions of Article 14 of this Agreement, income derived by a resident of a Contracting State as an entertainer, such as a theatre, motion picture, radio or television artiste, or a musician, or as a sportsperson, from that resident's personal activities as such exercised in the other Contracting State, may be taxed in that other Contracting State.
2. Where income in respect of personal activities exercised by an entertainer or a sportsperson acting as such accrues not to the entertainer or sportsperson but to another person, that income may, notwithstanding the provisions of Article 14 of this Agreement, be taxed in the Contracting State in which the activities of the entertainer or sportsperson are exercised.
3. Income derived by an entertainer or a sportsperson from activities exercised in a Contracting State shall be exempt from tax in that Contracting State, if the visit to that Contracting State is supported wholly or mainly by public funds of the other Contracting State.

Article 17

PENSIONS

1. Subject to the provisions of paragraph 2 of Article 18 of this Agreement, pensions and other similar remuneration paid to a resident of a Contracting State in consideration of past employment shall be taxable only in that Contracting State.
2. Notwithstanding the provisions of paragraph 1 of this Article, pensions paid and other payments made under a public scheme which is part of the

social security system of a Contracting State shall be taxable only in that Contracting State.

Article 18

GOVERNMENT SERVICE

1. (a) Salaries, wages and other similar remuneration, other than a pension, paid by a Contracting State or a political subdivision or a local authority to an individual in respect of services rendered to that Contracting State or a political subdivision or a local authority shall be taxable only in that Contracting State.
- (b) However, such salaries, wages and other similar remuneration shall be taxable only in the other Contracting State if the services are rendered in that other Contracting State and the individual is a resident of that other Contracting State who:
 - (i) is a national of that other Contracting State; or
 - (ii) did not become a resident of that other Contracting State solely for the purpose of rendering the services.
2. (a) Notwithstanding the provisions of paragraph 1 of this Article, pensions and other similar remuneration paid by, or out of funds which are created by or to which contributions are made by, a Contracting State, political subdivision or local authority to an individual in respect of services rendered to that Contracting State or political subdivision or local authority shall be taxable only in that Contracting State.

- (b) However, such pensions and other similar remuneration shall be taxable only in the other Contracting State if the individual is a resident of, and a national of, that other Contracting State.
- 3. The provisions of Articles 14, 15, 16 and 17 of this Agreement shall apply to salaries, wages, pensions, and other similar remuneration in respect of services rendered in connection with a business carried on by a Contracting State or a political subdivision or local authority.

Article 19

PROFESSORS AND RESEARCHERS

- 1. An individual who is or was a resident of a Contracting State immediately before making a visit to the other Contracting State and who, at the invitation of any university, college, school, or other similar educational institution or scientific research institution, licensed under the law of the other Contracting State visits that other Contracting State for a period not exceeding 2 years from the date of his arrival in that other Contracting State solely for the purpose of teaching or research or both at such educational or research institution, shall be exempt from tax in that other Contracting State on any remuneration derived from such teaching or research.
- 2. This Article shall not apply to income from research if such research is undertaken primarily for the private benefit of a specific person or persons.

Article 20

STUDENTS AND APPRENTICES

A student or business apprentice who is or was a resident of a Contracting State immediately before visiting the other Contracting State and who is present in that other Contracting State solely for the purpose of his education or training, shall be exempt from tax in that other Contracting State on:

- (a) payments made to him by persons residing outside that other Contracting State for the purposes of his maintenance, education or training; and
- (b) remuneration from employment in that other Contracting State, provided that such employment is directly related to his studies or is undertaken for the purpose of his maintenance, but shall not exceed 2 years.

Article 21

OTHER INCOME

Items of income of a resident of a Contracting State, which arise in the other Contracting State, not dealt with in the foregoing Articles of this Agreement may be taxed in that other Contracting State.

CHAPTER IV
TAXATION OF CAPITAL
Article 22
CAPITAL

1. Capital represented by immovable property referred to in Article 6 of this Agreement, owned by a resident of a Contracting State and situated in the other Contracting State, may be taxed in that other Contracting State.
2. Capital represented by movable property forming part of the business property of a permanent establishment which an enterprise of a Contracting State has in the other Contracting State may be taxed in that other Contracting State.
3. Capital of an enterprise of a Contracting State that operates ships or aircraft in international traffic represented by such ships or aircraft, and by movable property pertaining to the operation of such ships or aircraft, shall be taxable only in that Contracting State.
4. All other elements of capital of a resident of a Contracting State shall be taxable only in that Contracting State.

CHAPTER V
METHODS FOR THE ELIMINATION OF DOUBLE TAXATION

Article 23

ELIMINATION OF DOUBLE TAXATION

1. In the United Arab Emirates, double taxation shall be eliminated as follows:

where a resident of the United Arab Emirates derives income or owns capital which in accordance with the provisions of this Agreement may be taxed in the Russian Federation, in respect of the amount of tax on that income or capital payable in the Russian Federation, the United Arab Emirates shall allow:

- (a) as a deduction from the tax on the income of that resident, an amount equal to the income tax paid in the Russian Federation;
- (b) as a deduction from the tax on the capital of that resident, an amount equal to the capital tax paid in the Russian Federation.

Such deduction in either case shall not, however, exceed that part of the income tax or capital tax, as computed before the deduction is given, which is attributable, as the case may be, to the income or the capital, which may be taxed in the Russian Federation.

2. In the Russian Federation, double taxation shall be eliminated as follows:
where a resident of the Russian Federation derives income or owns capital which in accordance with the provisions of this Agreement may be taxed in the United Arab Emirates, the amount of tax on that income or capital payable in the United Arab Emirates shall be allowed to be credited against the Russian tax imposed on that resident. The amount of credit, however,

shall not exceed the amount of the Russian tax on that income or capital computed in accordance with the taxation laws and regulations of the Russian Federation.

CHAPTER VI
SPECIAL PROVISIONS

Article 24

NON-DISCRIMINATION

1. Nationals of a Contracting State shall not be subjected in the other Contracting State to any taxation or any requirement connected therewith, which is other or more burdensome than the taxation and connected requirements to which nationals of that other Contracting State in the same circumstances, in particular with respect to residence, are or may be subjected. The provisions of this paragraph shall, notwithstanding the provisions of Article 1 of this Agreement, also apply to persons who are not residents of one or both of the Contracting States.
2. The taxation on a permanent establishment which an enterprise of a Contracting State has in the other Contracting State shall not be less favourably levied in that other Contracting State than the taxation levied on enterprises of that other Contracting State carrying on the same activities. The provisions of this paragraph shall not be construed as obliging a Contracting State to grant to residents of the other Contracting State any personal allowances, reliefs and reductions for taxation purposes on account of civil status or family responsibilities which it grants to its own residents.

3. Except where the provisions of paragraph 1 of Article 9, paragraph 6 of Article 11, or paragraph 6 of Article 12 of this Agreement apply, interest, royalties, and other disbursements paid by an enterprise of a Contracting State to a resident of the other Contracting State shall, for the purpose of determining the taxable profits of such enterprise, be deductible under the same conditions as if they had been paid to a resident of the first-mentioned Contracting State.
4. Enterprises of a Contracting State, the capital of which is wholly or partly owned or controlled, directly or indirectly, by one or more residents of the other Contracting State, shall not be subjected in the first-mentioned Contracting State to any taxation or any requirement connected therewith which is other or more burdensome than the taxation and connected requirements to which other similar enterprises of the first-mentioned Contracting State are or may be subjected.
5. The provisions of this Article shall, notwithstanding the provisions of Article 2 of this Agreement, apply to taxes which are subject to this Agreement imposed on behalf of a Contracting State or of its political subdivisions or local authorities.

Article 25

MUTUAL AGREEMENT PROCEDURE

1. Where a person considers that the actions of one or both of the Contracting States result or will result for him in taxation not in accordance with the provisions of this Agreement, he may, irrespective of the remedies provided by the domestic law of those Contracting States, present his case

to the competent authority of either Contracting State. The case must be presented within 3 years from the first notification of the action resulting in taxation not in accordance with the provisions of the Agreement.

2. The competent authority shall endeavour, if the objection appears to it to be justified and if it is not itself able to arrive at a satisfactory solution, to resolve the case by mutual agreement with the competent authority of the other Contracting State, with a view to the avoidance of taxation which is not in accordance with the Agreement. Any agreement reached shall be implemented notwithstanding any time limits in the domestic law of the Contracting States.
3. The competent authorities of the Contracting States shall endeavour to resolve by mutual agreement any difficulties or doubts arising as to the interpretation or application of the Agreement. They may also consult together for the elimination of double taxation in cases not provided for in the Agreement.
4. The competent authorities of the Contracting States may communicate with each other directly, including through a joint commission consisting of themselves or their representatives, for the purpose of reaching an agreement in the sense of the preceding paragraphs of this Article.

Article 26

EXCHANGE OF INFORMATION

1. The competent authorities of the Contracting States shall exchange such information as is foreseeably relevant for carrying out the provisions of this Agreement or to the administration or enforcement of the domestic laws

concerning taxes of every kind and description imposed on behalf of the Contracting States, or of their political subdivisions or local authorities, insofar as the taxation thereunder is not contrary to the Agreement. The exchange of information is not restricted by Articles 1 and 2 of this Agreement.

2. Any information received under paragraph 1 of this Article by a Contracting State shall be treated as secret in the same manner as information obtained under the domestic laws of that Contracting State and shall be disclosed only to persons or authorities (including courts and administrative bodies) concerned with the assessment or collection of, the enforcement or prosecution in respect of, the determination of appeals in relation to the taxes referred to in paragraph 1 of this Article, or the oversight of the above. Such persons or authorities shall use the information only for such purposes. They may disclose the information in public court proceedings or in judicial decisions. Notwithstanding the foregoing, information received by a Contracting State may be used for other purposes when such information may be used for such other purposes under the laws of both Contracting States and the competent authority of the Contracting State supplying the information authorises such use.
3. In no case shall the provisions of paragraphs 1 and 2 of this Article be construed so as to impose on a Contracting State the obligation:
 - (a) to carry out administrative measures at variance with the laws and administrative practice of that or of the other Contracting State;
 - (b) to supply information which is not obtainable under the laws or in the normal course of the administration of that or of the other Contracting State;

- (c) to supply information which would disclose any trade, business, industrial, commercial or professional secret or trade process, or information, the disclosure of which would be contrary to public policy (ordre public).
4. If information is requested by a Contracting State in accordance with this Article, the other Contracting State shall use its information gathering measures to obtain the requested information, even though that other Contracting State may not need such information for its own tax purposes. The obligation contained in the preceding sentence is subject to the limitations of paragraph 3 of this Article but in no case shall such limitations be construed to permit a Contracting State to decline to supply information solely because it has no domestic interest in such information.
 5. In no case shall the provisions of paragraph 3 of this Article be construed to permit a Contracting State to decline to supply information solely because the information is held by a bank, other financial institution, nominee or person acting in an agency or a fiduciary capacity or because it relates to ownership interests in a person.

Article 27

ENTITLEMENT TO BENEFITS

Notwithstanding the other provisions of this Agreement, a benefit under this Agreement shall not be granted in respect of an item of income if it is reasonable to conclude, having regard to all relevant facts and circumstances, that obtaining that benefit was one of the principal purposes of any arrangement or transaction that resulted directly or indirectly in that benefit, unless it is established that

granting that benefit in these circumstances would be in accordance with the object and purpose of the relevant provisions of this Agreement.

Article 28

MEMBERS OF DIPLOMATIC MISSIONS AND CONSULAR POSTS

Nothing in this Agreement shall affect the fiscal privileges of members of diplomatic missions or consular posts under the general rules of international law or under the provisions of special agreements.

Article 29

PROTOCOL

The attached Protocol is an integral part of this Agreement.

Article 30

INCOME FROM HYDROCARBONS

Notwithstanding any other provision of this Agreement, nothing shall affect the right of either Contracting State or of any of their local Governments or political subdivisions or local authorities thereof to apply their domestic laws and regulations related to the taxation of income and profits derived from hydrocarbons and its associated activities situated in the territory of the respective Contracting State, as the case may be.

CHAPTER VII
FINAL PROVISIONS
Article 31
ENTRY INTO FORCE

1. Each of the Contracting States shall notify the other Contracting State in writing through diplomatic channels of the completion of the procedures required by its law for the entry into force of this Agreement. This Agreement shall enter into force on the date of the later of these notifications and shall thereupon have effect:
 - (a) in respect of taxes withheld at source, for amounts paid or credited on or after the first day of January in the calendar year next following that in which the Agreement enters into force and subsequent years; and
 - (b) in respect of other taxes on income, for taxation years beginning on or after the first day of January in the calendar year next following that in which the Agreement enters into force and subsequent years.
2. The provisions of the Agreement between the Government of the United Arab Emirates and the Government of the Russian Federation on taxation of income from investments of the Contracting States or their financial and investment institutions on 7 December 2011, shall terminate and cease to have effect from the date upon which this Agreement shall have effect in accordance with the provisions of paragraph 1 of this Article.

Article 32

TERMINATION

This Agreement shall remain in force until terminated by one of the Contracting States. Either Contracting State may terminate the Agreement, through diplomatic channels, by giving a written notice of termination at least 6 months before the end of any calendar year after the period of 5 years from the date on which the Agreement enters into force. In such event, the Agreement shall cease to have effect as follows:

- (a) in respect of taxes withheld at source: for amounts paid or credited on or after the first day of January in the calendar year next following that in which the notice of such termination is given; and
- (b) in respect of other taxes: for any tax year commencing on or after the first day of January in the calendar year next following that in which the notice of such termination is given.

In WITNESS WHEREOF, the undersigned, being duly authorised thereto, by their respective Government, have signed this Agreement.

Done at Abu Dhabi on 17th of February 2025 in two identical originals each in the Arabic, Russian and English languages, all three texts being equally authentic. In case of any divergence of interpretations, the English text shall be the operative one.

**FOR THE GOVERNMENT
OF THE UNITED ARAB
EMIRATES**

**FOR THE GOVERNMENT
OF THE RUSSIAN FEDERATION**

PROTOCOL
BETWEEN THE GOVERNMENT OF THE UNITED ARAB EMIRATES
AND THE GOVERNMENT OF THE RUSSIAN FEDERATION

At the moment of signing the Agreement between the Government of the United Arab Emirates and the Government of the Russian Federation for the Elimination of Double Taxation with respects to Taxes on Income and on Capital and the Prevention of Tax Evasion and Avoidance, the undersigned have agreed upon the following provisions which shall form an integral part of the Agreement.

1. The expression "Contracting State or its financial and investment institutions" means:

(a) in the United Arab Emirates:

- the Government of the United Arab Emirates;
- any local government of the United Arab Emirates (Abu Dhabi, Dubai, Sharjah, Ras al Khaimah, Fujairah, Umm Al Quwain and Ajman);
- the Central Bank of the United Arab Emirates;
- the Abu Dhabi Investment Authority;
- Emirates Investment Authority;
- Abu Dhabi Investment Council;
- Mubadala Investment Company;
- Abu Dhabi Developmental Holding Company (ADQ);
- Dubai World;
- Investment Corporation of Dubai;
- Abu Dhabi National Oil Company;
- Abu Dhabi Pension Fund;

- the General Pension and Social Security Authority;
- state pension fund of the United Arab Emirates;
- any financial or investment organization, institution, department, authority, agency, instrumentality or any entity established in the United Arab Emirates that is wholly owned directly or indirectly by the Government of the United Arab Emirates, a political subdivision or by any local government of the United Arab Emirates that exercise legislative, regulatory, executive, administrative and other government-related functions, or by any entity wholly owned directly or indirectly by an entity as specifically listed above; or
- any entity the capital of which is wholly owned directly or indirectly, by the United Arab Emirates, by the federal or local government, a political subdivision, or a local authority thereof, as shall be exchanged from time to time between the Contracting States through notifications by the competent authorities. The effective date of application of the benefits under paragraph 2 of Article 10, paragraph 2 of Article 11, and paragraph 2 of Article 12 of this Agreement to such entity shall be the date that the entity satisfies the ownership criteria mentioned in this subparagraph.

(b) in the Russian Federation:

- the Government of the Russian Federation;
- the government of any subject of the Russian Federation;
- the Central Bank of the Russian Federation;
- the Pension and Social Insurance fund of the Russian

- Federation;
- the Russian Direct Investment Fund;
 - State Development Corporation "VEB.RF";
 - State Corporation for Assistance to Development, Production and Export of Advanced Technology Industrial Product "Rostec";
 - JSC "RUSNANO";
 - State Atomic Energy Corporation "Rosatom";
 - State Space Corporation "Roscosmos";
 - any financial or investment organization, institution, department, authority, agency, instrumentality or any entity established in the Russian Federation that is wholly owned directly or indirectly by the Government of the Russian Federation, by the government of the subject of the Russian Federation, a political subdivision or by any local authority of the Russian Federation that exercise legislative, regulatory, executive, administrative and other government-related functions, or by any entity wholly owned directly or indirectly by an entity as specifically listed above; or
 - any entity, the capital of which is wholly owned directly or indirectly by the Russian Federation, by the Government of the Russian Federation or the government of the subject of the Russian Federation, a political subdivision or a local authority thereof, as shall be exchanged from time to time between the Contracting States through notifications by the competent authorities. The effective date of application of the benefits

under paragraph 2 of Article 10, paragraph 2 of Article 11, and paragraph 2 of Article 12 of this Agreement to such entity shall be the date that the entity satisfies the ownership criteria mentioned in this subparagraph.

2. The term "local government of the United Arab Emirates" means a government of any Emirate of the United Arab Emirates (Abu Dhabi, Dubai, Sharjah, Ras al Khaimah, Fujairah, Umm Al Quwain and Ajman).
3. With reference to Articles 6, 10 and 13 of the Agreement:
 - (a) It is understood that the term "collective investment vehicle" as used in paragraph 4 of Article 6, paragraph 4 of Article 10 and paragraph 4 of Article 13 of the Agreement includes mutual investment funds.
 - (b) It is understood that the term "dividends" as defined in paragraph 4 of Article 10 of the Agreement includes any payments on units of mutual investment funds.
 - (c) In case of the United Arab Emirates, the term "collective investment vehicle" means a qualifying investment fund within the meaning of the laws of the United Arab Emirates, as well as any other investment fund, arrangement or entity established in either Contracting State which the competent authorities of the Contracting States agree to regard as a collective investment vehicle for the purposes of this paragraph.
 - (d) In case of the Russian Federation, for the purposes of subparagraphs (a) and (b) of this paragraph, the term "mutual investment funds" means investment funds which are established under the Federal Law on Investments Funds (Law No. 156-FZ on 29 November,

2001), including such as may be amended from time to time without changing the general principle thereof.

4. It is understood for paragraph 1 of Article 14 of this Agreement that the term "employment is exercised in the Contracting State" includes:
- (a) the employment exercised remotely under the employment contract with employer or a person who is a resident of that Contracting State;
or
 - (b) the provision of services remotely by an individual under the contract with the company or a person who is a resident of that Contracting State,

notwithstanding the physical presence of the employee or individual providing the above mentioned services in the territory of that Contracting State when performing the activities or providing services for which the employment income or remuneration is paid.

5. With reference to Article 24 of the Agreement:

It is understood that nothing in Article 24 of the Agreement shall be construed as restricting the application of any of the following provisions:

- (a) in the case of the United Arab Emirates: the Corporate Tax law, as may be amended from time to time without changing the general principle thereof;
- (b) in the case of the Russian Federation:

Chapter 3.4 of the Part I of the Tax Code of the Russian Federation (Federal Law No. 146-FZ on 31 July, 1998) and Articles 269 and 309.1 of Chapter 25 of the Part II of the Tax Code of the Russian Federation (Federal Law No. 117-FZ on 5 August, 2000), including those as may be amended from time to time without changing the general principle thereof.

6. Any document received under Article 26 of the Agreement or a certificate of residence issued by the competent authority of a Contracting State shall not require legalization or apostille for the purposes of its application in the other Contracting State, including its use in administrative bodies.
7. With reference to Article 26 of the Agreement, it is understood that:
 - (a) the "other purposes" shall accord with an existing international agreement or protocol to which both Contracting States are party relating to mutual legal assistance;
 - (b) in seeking the authorisation of the competent authority of the supplying Contracting State, the requesting Contracting State shall specify the other non-tax purposes for which it wishes to use the information;
 - (c) the requesting Contracting State shall identify the legal agencies or judicial authorities with whom it will share the information; and
 - (d) it will be necessary to obtain the prior consent of the competent authority of the supplying Contracting State which signed the agreement or protocol in accordance with which the information will be used.
8. The term "political subdivisions or local authority" in the case of the Russian Federation means subjects of the Russian Federation defined as such in accordance with its legislation.

In WITNESS WHEREOF, the undersigned, being duly authorised thereto, by their respective Government, have signed this Protocol.

Done at Abu Dhabi on 17th of February 2025 in two identical originals each in the Arabic, Russian and English languages, all three texts being equally authentic. In case of any divergence of interpretations, the English text shall be used.

**FOR THE GOVERNMENT
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