



Background on the Crypto-Asset Reporting Framework

The Crypto-Asset Reporting Framework (“CARF”) is a global tax transparency standard developed by the Organisation for Economic Co-operation and Development. The CARF builds on the international automatic exchange of information architecture that underpins the Common Reporting Standard (“CRS”), establishing a standardised mechanism for the collection and cross-border exchange of tax-relevant information on crypto-asset transactions. It is designed to complement the CRS by addressing crypto-asset activities that may not be adequately captured under the existing financial account reporting framework.

UAE Commitment to Implementing the CARF

The United Arab Emirates (“UAE”) has taken concrete steps towards implementing the CARF and is among more than 70 jurisdictions that have formally committed to implementing the framework.

On 21 July 2025, the UAE Ministry of Finance (“Ministry”) signed the Multilateral Competent Authority Agreement on the Automatic Exchange of Information pursuant to the CARF (“CARF MCAA”). Following signature, the Ministry conducted a public consultation on the domestic implementation of the CARF from 15 September to 8 November 2025, inviting input from stakeholders, including advisory service providers, intermediaries, traders, custodians and exchange platforms.

On 29 March 2026, the UAE Cabinet approved the ratification of the CARF MCAA. The agreement was subsequently ratified pursuant to Federal Decree No. 60 of 2026 on 4 May 2026.

Under the current implementation timeline, the UAE is expected to require the collection of information under the CARF from 1 January 2027, with the first automatic exchange of information to take place in 2028.

Obligations of Reporting Crypto-Asset Service Providers

At a high level, Reporting Crypto-Asset Service Providers (“RCASPs”) will be subject to the following obligations:

- Registering for CARF purposes through the Ministry’s Reporting System;
- Where applicable, notifying the Ministry where the RCASP fulfils its reporting and due diligence obligations in a CARF Partner Jurisdiction in accordance with the applicable CARF nexus rules;
- Establishing documented policies, procedures, systems and controls to support ongoing CARF compliance;
- Performing due diligence on New Crypto-Asset Users and Preexisting Crypto-Asset Users, including Controlling Persons of certain Entity Crypto-Asset Users, where applicable;
- Obtaining valid self-certifications from all Crypto-Asset Users and, where applicable, the required self-certification information in respect of Controlling Persons of certain Entity Crypto-Asset Users, including Taxpayer Identification Numbers (“TINs”) where required, and confirming the reasonableness of those self-certifications;

- Identifying Relevant Crypto-Assets, Relevant Transactions, Reportable Users and, where applicable, Controlling Persons; and
- Submitting an Annual CARF Report or Nil Return, in accordance with the applicable UAE reporting requirements;

Key Milestones for the UAE

Date	Key Milestone
21 July 2025	The UAE signed the CARF MCAA.
4 May 2026	The CARF MCAA was ratified pursuant to Federal Decree No. 60 of 2026.
By 31 December 2026	RCASPs should complete their operational preparations for CARF implementation, including putting in place policies, procedures and controls required to support due diligence, self-certification and record-keeping.
1 January 2027	• Target effective date of the Cabinet Decision and Ministerial Decisions implementing CARF in the UAE. • From the effective date, RCASPs will be required to apply the prescribed CARF due diligence procedures, including obtaining a valid self-certification and confirming its reasonableness within the following timelines: - Preexisting Crypto-Asset Users: within 12 months of the effective date, i.e. 31 December 2027. - New Crypto-Asset Users: at the time of the establishment of the relationship with the User.
2027	• RCASPs to register on the Reporting System and disclose their type of nexus in the UAE. • The registration deadline will be confirmed by the Ministry. • Where applicable, RCASPs to notify the Ministry where they fulfil their reporting and due diligence obligations in a CARF Partner Jurisdiction in accordance with the applicable CARF nexus rules.
By 31 December 2027	• RCASPs will be required to have obtained a valid self-certification for each Preexisting Crypto-Asset User and confirmed its reasonableness. • RCASPs should have fully operational systems in place to compile, validate and transmit the information required to be reported under the CARF to the Ministry in the required CARF XML Schema format.
30 June 2028	RCASPs will be required to submit their first Annual CARF Report or Nil Return in respect of the 2027 Reporting Period.

Date	Key Milestone
1 September 2028	The UAE will undertake its first automatic exchange of information under the CARF on 1 September 2028.

Preparing for CARF Implementation

By 31 December 2026, individuals and entities potentially within the scope of the RCASP definition should assess their status under the CARF. Those that fall within the definition should take the following preparatory steps:

- Assess whether they have a nexus for reporting purposes in the UAE under the CARF, including through a branch in the UAE;
- Identify the Relevant Crypto-Assets and Relevant Transactions they effectuate for or on behalf of Crypto-Asset Users;
- Prepare to apply the required CARF due diligence procedures, including obtaining valid self-certifications for New Crypto-Asset Users and Preexisting Crypto-Asset Users and collecting TINs and other required information as applicable; and
- Assess whether their systems, policies, procedures, record-keeping arrangements, training and governance are sufficient to support CARF compliance.

RCASPs should also monitor further Ministry guidance on registration, reporting and technical specifications and prepare to register once the UAE registration process opens.