

The UAE Private Wealth: Structuring, Residency & Asset Protection

A Trusted Hub for Global Wealth

The United Arab Emirates has become one of the world's leading destinations for high-net-worth individuals, founders, and family offices.

Its appeal lies in a combination of economic resilience, international connectivity, sophisticated financial infrastructure, and a legal framework designed to support global business and long-term wealth preservation. The UAE offers an increasingly mature ecosystem for international families seeking stability, mobility, and efficient structuring solutions.

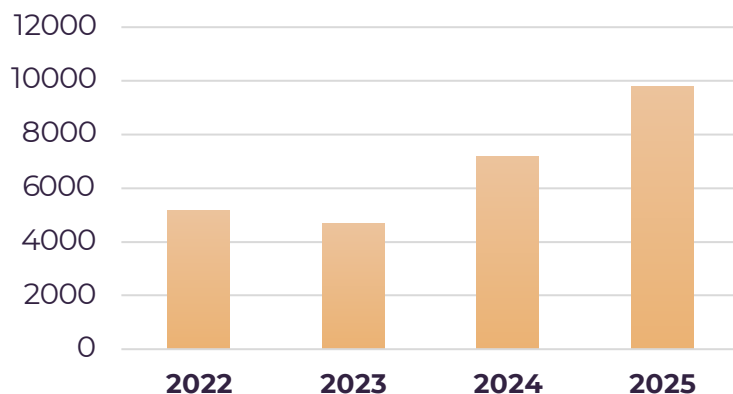
THE COUNTRY COMBINES

- no personal income tax,
- internationally recognised financial centres in the DIFC and ADGM,
- a global treaty network of more than 100 double tax agreements,
- modern residency pathways for investors, entrepreneurs and families,
- and a growing range of private wealth and succession planning tools.

As a result, the UAE continues to attract substantial global capital and private wealth. Today, the UAE is home to approximately 130,500 resident millionaires, including more than 325 centimillionaires and 28 billionaires. Dubai also recorded the largest rise among the world's Top 50 wealthiest cities, moving from 21st to 18th place globally.

THE UAE LEADS IN ATTRACTING GLOBAL WEALTH ¹

Net influx of new millionaires in the UAE



130,500+
resident millionaires ²

100+
double tax treaties ³

Top 12
global financial centre

0%
personal income tax

largest rise among the world's **Top 50** wealthiest cities in 2025 ⁴

¹ As per Knight Frank (UAE) [data](#)

² Ibid.

³ [Global Financial Centres Index 37](#)

⁴ [Henley & Partners](#), "The World's Wealthiest Cities in 2025," April 8, 2025

But establishing a meaningful presence in the UAE is rarely a simple relocation exercise. Decisions relating to tax residency, business ownership, family governance, succession, real estate holding structures and cross-border tax exposure are deeply interconnected and mistakes can create long-term legal and tax consequences across multiple jurisdictions. At Willow Tax & Legal, we advise high-net-worth individuals, founders, executives and family offices on the full lifecycle of their relationship with the UAE - from immigration and tax residency through to wealth structuring, succession planning and the protection of multi-jurisdictional assets.

What Our Clients Are Trying to Solve

International families and founders usually come to the UAE with a practical objective - relocation, asset protection, succession, consolidation of wealth or preparation for a transaction. In practice, each of these decisions has legal, tax and cross-border consequences.

Client situation

What needs to be addressed

“My family assets are held across several countries.”

Consolidation of ownership, succession planning, governance, CFC risks, reporting obligations and control mechanisms.

“I need a UAE structure that protects wealth but does not create unnecessary tax.”

Choice between foundation, holding company or other vehicle; Family Foundation status; QFZP regime; Corporate Tax exposure; substance and transparency conditions.

“I want to transfer international assets into a UAE foundation.”

ADGM/DIFC foundation structuring, asset transfer mechanics, tax treatment of dividends, capital gains and investment income, governance rights and constitutional documents.

“I need to pass assets to the next generation without losing control.”

Founder’s rights, council and guardian powers, distribution rules, succession planning, wills and long-term family governance.

“I need one adviser to coordinate the whole private wealth structure.”

Legal structuring, tax analysis, residency, banking, succession planning and coordination with local legal counsel in relevant jurisdictions..

“The FTA questioned or rejected our foundation tax position.”

Review of the structure, reassessment of tax transparency conditions, revised tax analysis, updated submission package and defence of the intended tax treatment.

Wealth Protection Instruments in the UAE

Structure	Best for	Key features / advantages	Typical tax & practical points
Foundations (ADGM / DIFC / RAK ICC)	Holding family wealth, succession planning, asset protection and long-term support for beneficiaries	Separate legal entity with no shareholders; holds assets in its own name; governed by Charter and By-laws; managed by Foundation Council; can hold shares, real estate and investment assets; provides continuity beyond founder's lifetime	By default subject to UAE Corporate Tax, but may apply for Family Foundation tax transparent status or potentially use QFZP treatment. Requires careful monitoring of transparency conditions, substance and qualifying income.
Holding Companies	Consolidating ownership of operating businesses, investment portfolios, real estate and strategic assets	Separate legal entity used to own and manage assets rather than conduct day-to-day business; centralises ownership and control; creates clearer governance for banks, regulators, counterparties and family members	May be established in mainland UAE or Free Zones. Tax treatment depends on asset type, income flows, substance, participation exemption, QFZP position and cross-border risks such as POEM / PE.
Family Offices	Centralised management, administration and oversight of family wealth	May operate as a standalone licensed company or as a coordination platform over foundations, holdings, trusts, SPVs and investment vehicles; can manage businesses, investments, real estate, yachts, aircraft, art and other strategic assets	Useful for operational control, reporting and adviser coordination, but involves licensing, staffing, governance and ongoing compliance costs.
Trusts (DIFC / ADGM / UAE Federal Trusts)	Asset protection, controlled distributions and intergenerational wealth transfer	DIFC / ADGM trusts are legal relationships between settlor, trustee and beneficiaries; trustee holds legal title and manages assets under the trust deed. UAE federal trusts may have separate legal personality and can own assets in their own name.	Common law trusts are generally fiscally transparent by default. UAE federal trusts are generally taxable persons by default but may apply for Family Foundation status to achieve tax transparency.
Wills (DIFC / ADJD / UAE Courts)	UAE succession planning and certainty over transfer of local assets	Allow individuals to determine how assets pass on death, appoint executors and guardians, and reduce uncertainty or disputes between heirs. May cover real estate, bank accounts, shares, investments and personal assets.	UAE has no inheritance tax, but registration, probate, administrative fees and asset transfer charges may apply. Wills are often used together with holding companies, foundations or family office structures.

How We Support Clients

Our Private Wealth practice is built around the practical decisions international families, founders and family offices face when establishing and managing their presence in the UAE. Rather than treating immigration, structuring, tax and succession as separate workstreams, we help clients build coordinated solutions that work across jurisdictions, generations and asset classes.

Immigration, Residency & Banking

Establishing the legal and practical foundation for living, investing and operating in the UAE.

We assist clients with:

- Golden Visa and investor residency applications;
- entrepreneur and investor immigration structures;
- family sponsorship arrangements;
- UAE tax residency positioning;
- opening and maintaining personal and corporate bank accounts;
- coordination of KYC and source-of-funds requirements.

Our work focuses not only on obtaining residency, but on aligning the immigration process with the client's wider tax, ownership and wealth structuring objectives.

Wealth Structuring & Family Office

Designing structures that protect, consolidate and govern family wealth across generations.

We advise on:

- DIFC, ADGM and RAK ICC foundations;
- holding companies, SPVs and investment structures;
- mainland and Free Zone entities;
- family office structures and corporate governance frameworks;
- private wealth holding arrangements for operating businesses, investments, real estate and strategic assets.

Our role often includes drafting constitutional documents, structuring governance rights and coordinating multi-jurisdiction ownership arrangements.

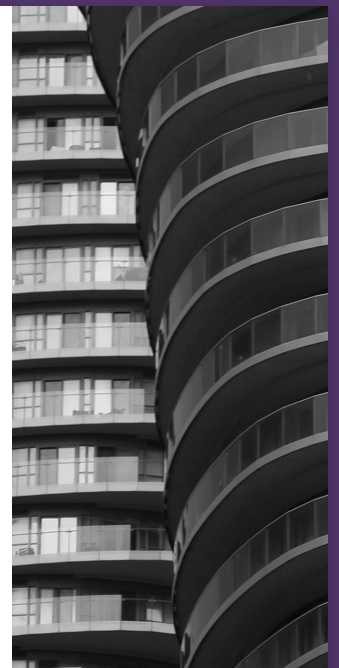
Personal & Cross-Border Tax Advisory

Helping clients establish and defend their UAE tax position while managing exposure in other jurisdictions.

Our work includes:

- UAE tax residency analysis;
- pre-relocation and exit tax planning;
- treaty positioning and tie-breaker analysis;
- review of CFC, POEM and Permanent Establishment risks;
- cross-border income and investment structuring;
- coordination with foreign tax advisers.

We regularly advise individuals relocating to the UAE before liquidity events, business exits and large-scale asset reorganisations.



Corporate & Investment Structuring

Advising on the operating and investment structures that sit beneath the family wealth structure.

We assist with:

- UAE Corporate Tax advisory and compliance;
- participation exemption analysis;
- Free Zone and QFZP positioning;
- restructuring and acquisition planning;
- transfer pricing and related-party arrangements;
- VAT and customs implications for cross-border investments and high-value assets.

This work commonly involves family-owned groups, investment platforms, real estate structures and cross-border holding arrangements.

Succession & Estate Planning

Ensuring that wealth passes to the next generation in a controlled and predictable manner.

We support clients with:

- DIFC and ADJD Wills;
- succession planning for UAE and foreign assets;
- lifetime gifting and intergenerational transfers;
- integration of succession arrangements into wider holding structures.
- Our approach focuses not only on asset transfer, but also on preserving governance, continuity and long-term family objectives.

Beyond the UAE

While the UAE remains the preferred hub for many international families, it is not always the optimal solution for every wealth, investment or succession objective.

We regularly advise clients on alternative and complementary structures across multiple jurisdictions and coordinate implementation together with our trusted international partners.

Our experience includes:

QFC Foundations (Qatar) for regional wealth holding and succession planning structures;

Oman International Financial Centre structures as emerging alternatives for selected holding and investment arrangements;

Mauritius and Singapore structures for international holding, investment and fund-related solutions;

Cyprus and European structures through our network of trusted advisers supporting European holding structures, relocation projects and succession planning involving EU assets and beneficiaries;

Coordination of multi-jurisdiction ownership, governance and tax planning involving the GCC, Europe, CIS and Asia.

Our role is not limited to selecting a structure. We help clients evaluate competing jurisdictions, understand the legal and tax implications of each option and implement a solution that works across borders and generations.

Why Willow Tax & Legal

Private wealth structuring in the UAE requires more than incorporation support or isolated tax advice. Residency, succession, governance, asset protection and cross-border taxation are closely interconnected - and effective structures must work both legally and practically across multiple jurisdictions.

Willow Tax & Legal advises high-net-worth individuals, founders and family offices on the design, implementation and ongoing support of UAE private wealth structures, combining legal and tax expertise within one integrated practice.

WHY CLIENTS WORK WITH US

- **Integrated tax and legal approach**

Immigration, structuring, tax and succession planning are handled within one coordinated team.

- **Hands-on experience with UAE wealth structures**

Practical experience with DIFC and ADGM trusts, UAE federal trusts, foundations, holding structures and family offices

- **Cross-border perspective**

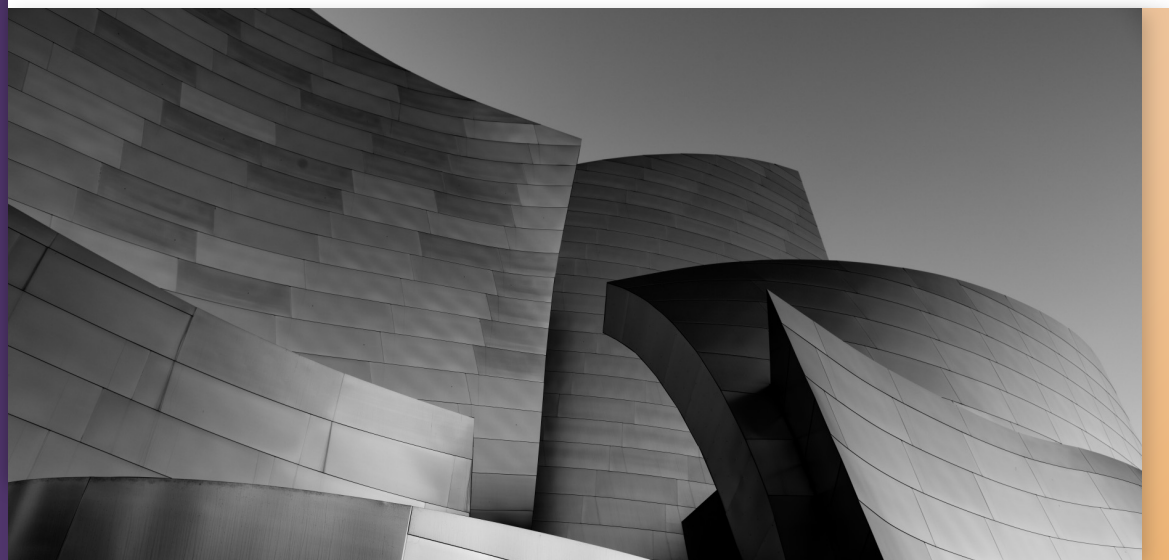
Regular coordination with advisers across the GCC, Europe, CIS and other international jurisdictions

- **Partner-led engagements**

Senior advisers remain directly involved throughout the engagement

- **Strong focus on UAE private wealth developments**

Ongoing analysis of UAE Corporate Tax, Family Foundation regimes and cross-border wealth structuring developments affecting international families and founders



Selected Experience

The following examples illustrate the types of matters on which we regularly advise private clients, founders and family offices.

ADGM Foundation for International Family Assets

We advised a UAE resident on the structuring of an ADGM Foundation to hold international family assets, including interests connected with CIS and Southeast Asian jurisdictions.

Our work included comparing available UAE foundation regimes, analysing UAE Corporate Tax implications, assessing Family Foundation and QFZP options, and designing governance mechanisms for the founder, beneficiaries, council members and guardian.

DIFC Foundation for Family Wealth, Real Estate Ownership and Succession Planning

We advised on the establishment and structuring of a DIFC Foundation to preserve and manage family wealth across multiple generations, including ownership and oversight of a portfolio of UAE residential and commercial real estate.

Our work included developing the foundation structure, analysing tax implications, preparing the Charter, By-laws and governance documents, and creating succession, investment oversight and long-term funding mechanisms. The structure was designed to preserve the client's control over key asset management and real estate decisions while ensuring tax efficiency and a sustainable framework for ownership and succession.

DIFC Wills for Cross-Border Succession Planning and UAE Assets

We advised a family on cross-border succession planning for business, personal and investment assets located in the UAE and Europe, including the preparation of DIFC Mirror Wills.

Our work included reviewing existing foreign wills and nuptial arrangements, analysing succession risks for UAE-based assets, advising on the interaction of estate planning documents across multiple jurisdictions, and developing a succession planning strategy aligned with the clients' wishes. The DIFC wills were prepared to support the family's overall succession planning framework and ensure continuity in relation to their UAE assets and investment holdings.

Selected Experience

Family Foundation Status and UAE Corporate Tax

We advised an ADGM Foundation on the UAE Corporate Tax implications of holding and selling investment assets, including the impact on its Family Foundation status.

Our work helped the client assess whether the relevant transaction could affect tax-transparent treatment and provided a reasoned position to reduce the risk of reclassification and potential 9% Corporate Tax exposure.

Pre-Relocation Planning Before a Business Exit

We advised a founder planning to relocate to the UAE before the sale of a profitable international business.

The engagement covered tax residency timing, treaty positioning, potential exit tax exposure in the outbound jurisdiction, UAE tax residency documentation and the structuring of ownership before the liquidity event.

ADGM Foundation for International Family Assets

We advised a family on the restructuring and governance review of a Liechtenstein Foundation holding diverse personal and investment assets across multiple jurisdictions, including Spain, Switzerland, Germany, the UK, Cyprus, the UAE and Estonia.

Together with local partners, we conducted a tax and legal review of the foundation structure, mapped asset types and jurisdictional exposure, assessed governance arrangements, and proposed updates to the foundation deed, control mechanisms and beneficiary rights. We also coordinated with local counsel and the Foundation Board to support implementation of the restructuring steps while preserving legal continuity, tax efficiency and banking relationships

Our team



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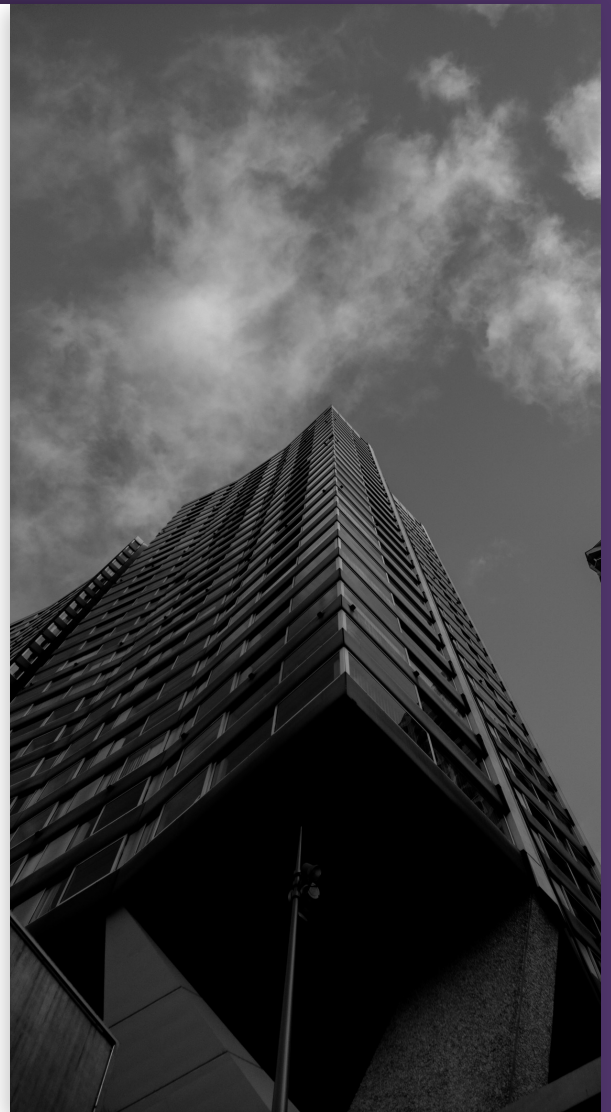
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Private Wealth Insights

[Family Foundations & Pillar Two: when transparency triggers additional tax](#)

[Significant Changes to Tax Transparency Rules for Family Foundations](#)

[Understanding Family Foundations and Similar Entities in UAE Corporate Taxation: a Multi-Part Series](#)

[LinkedIn](#)

[Telegram](#)

Discuss Your Private Wealth Structure

Whether you are relocating to the UAE, restructuring international assets or planning long-term succession arrangements, our team would be pleased to discuss how we can support you.



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