

The United Arab Emirates

Hebah Innah

BSA Law, Dubai

hebah.innah@bsalaw.com

Marina El Hachem

BSA Law, Dubai

marina.elhachem@bsalaw.com

Nadim Bardawil

BSA Law, Dubai

nadim.bardawil@bsalaw.com

1. Fintech regulatory framework: a summary of the most relevant laws and regulations concerning fintech and financial innovation.

The United Arab Emirates consists of onshore and financial free zone jurisdictions, to which different legal frameworks apply. Onshore, the UAE does not have a single regulator responsible for the supervision of fintech activities. There are currently two financial free zones in the UAE: the Dubai International Financial Centre (DIFC) and the Abu Dhabi Global Market (ADGM).

Onshore, the UAE operates a civil law system governed by a combination of federal and emirate-level legislations. The UAE established its financial free zones to attract international institutions and investors requiring a common-law framework, English-language courts, and internationally aligned regulatory standards. Entities incorporated within these zones also benefit from 100 per cent foreign ownership and unrestricted repatriation of profits.

Both DIFC and ADGM apply English common law and have developed dedicated fintech and virtual asset regimes entirely separate from the onshore framework. A fintech business must therefore determine from the outset in which jurisdiction it intends to be licensed, as the applicable rules, regulator, and governing law will differ significantly.

Regulatory authorities governing fintech in the UAE

Onshore

CENTRAL BANK OF UAE (CBUAE)

The CBUAE serves as the primary federal regulator for onshore banking, payment services, stored value facilities and financial institutions. It also oversees the licensing of financial activities, including emerging fintech services that fall within the scope of financial services definitions.

SECURITIES AND COMMODITIES AUTHORITY (SCA)

The SCA acts as the federal regulator for capital markets, securities, listed instruments and investment services. Although the SCA does not regulate payments or banking services, it plays a significant role when financial innovation involves capital markets, tokenised securities or investment-based crowdfunding.

DUBAI VIRTUAL ASSETS REGULATORY AUTHORITY (VARA)

VARA functions as the dedicated regulator for virtual asset activities conducted in or from Dubai, excluding the DIFC. It licenses and supervises a broad range of virtual asset service providers, including exchanges, brokers, custodians, token issuers, and related intermediaries.

DIFC

DUBAI FINANCIAL SERVICES AUTHORITY (DFSA)

Within the DIFC, the DFSA regulates financial and fintech activities. The DFSA supervises banks, investment firms, fintech companies and token service providers, and has developed comprehensive rulebooks governing innovative financial services. Depending on the type of financial services business that is conducted in the DIFC, financial institutions need to obtain the appropriate DFSA regulatory approval and be authorised to undertake the specified regulated activities.

ADGM

THE FINANCIAL SERVICES REGULATORY AUTHORITY (FSRA)

In ADGM, FSRA is responsible for regulating financial institutions and fintech firms operating within ADGM.

Regulatory frameworks applicable to fintech and financial innovations

Federal Decree-Law No (6) of 2025 Concerning the Central Bank, Regulation of Financial Institutions and Activities, and Insurance Business (CBUAE Financial Institutions Regulation)

The CBUAE Financial Institutions Regulation serves as the UAE's principal federal law governing fintech and financial innovation. Enacted in 2025, it repealed the 2018 Central Bank law and modernised the regulatory framework to address emerging business models. The regulation extends the CBUAE's jurisdiction beyond traditional banks to encompass technology-enabled financial services and fintech intermediaries. It also strengthens the Central Bank's supervisory and enforcement capabilities, while providing transition periods for existing market participants to achieve compliance.

Large Value Payment Systems Regulations (CBUAE Circular No 9 of 2020)

The Large Value Payment Systems Regulations, issued by the CBUAE pursuant to Circular No 9 of 2020, regulate financial market infrastructure supporting large-value and wholesale payment activities in the UAE. These regulations establish a licensing framework and set out detailed operational, governance and risk management obligations applicable to designated large-value payment systems. The regime applies to systems operated within the UAE as well as to systems that accept the clearing or settlement of transfer orders denominated in UAE currency, whether such settlement occurs within or outside the UAE. The regulations expressly exclude large-value payment systems incorporated in the DIFC or ADGM from their scope. Any entity seeking to operate a large-value payment system within the UAE mainland must obtain prior authorisation from the Central Bank.

Stored Value Facilities Regulation 2020

The Stored Value Facilities Regulation, introduced by the CBUAE in 2020, governs the issuance and operation of stored value products in the UAE, such as digital wallets, prepaid instruments and electronic money solutions. This regulatory framework is particularly significant for fintech companies providing payment and wallet-based services. It establishes a dedicated licensing regime and imposes prudential, operational and consumer protection requirements on providers, including obligations to safeguard customer funds, ensure capital adequacy, maintain operational resilience and implement risk management measures. These requirements underscore the CBUAE's commitment to reducing risks linked with non-bank payment instruments and digitally stored funds.

Retail Payment Services and Card Schemes Regulation (2021)

The Retail Payment Services and Card Schemes Regulation (2021) governs payment service providers in the UAE mainland. It covers merchant acquiring, card issuing, payment processing and card scheme operations. The regulation establishes risk-based licensing requirements tailored to the specific services offered and customer base served. Notably, it excludes stored value facilities, which fall under separate regulation. Together with the Stored Value Facilities framework, these regulations constitute the UAE's primary onshore regime for payment services and payment-focused fintech.

Guidelines for Financial Institutions Adopting Enabling Technologies

The Guidelines for Financial Institutions Adopting Enabling Technologies, jointly issued by the CBUAE, SCA, DFSA and FSRA, establish cross-sector principles and best practices for adopting and using enabling technologies in the financial services industry. These technologies include artificial intelligence, distributed ledger technology, cloud computing, application programming interfaces and biometric solutions.

These guidelines are applicable to all financial institutions regulated or supervised by any of the issuing authorities, irrespective of the specific financial activities undertaken. The primary objective is to promote responsible innovation by requiring firms to implement robust governance, risk management, cybersecurity and regulatory supervision when deploying advanced technologies in financial products and services.

2. Regulations on crypto assets: a summary of the legal framework regarding crypto assets and how they are regulated.

Regulatory authorities governing crypto assets in the UAE

Onshore

The CBUAE is the primary regulator for stablecoins and payment-related virtual asset activities in the UAE. In practice, the CBUAE's oversight is largely confined to dirham-backed stablecoins and payment services, rather than broader crypto asset investment or trading activity. The CBUAE also leads the UAE's central bank digital currency (CBDC) initiative, including the issuance and regulation of the digital dirham.

In parallel, the SCA regulates crypto assets that qualify as securities or investment products under UAE law and as stated previously, VARA regulates virtual asset service providers operating in Dubai (excluding the DIFC).

DFSA

Within the DIFC, crypto assets are regulated by the DFSA, which oversees crypto tokens and crypto-related financial services conducted in or from the DIFC. The DFSA's approach treats crypto tokens as a regulated asset class within a financial services perimeter, focusing on investor protection, market integrity and prudential supervision.

FSRA

The FSRA was the first regulator in the UAE, in 2018, to introduce a comprehensive and bespoke framework for virtual assets. The FSRA regulates a broad spectrum of virtual asset activities, including those undertaken by trading venues, brokers, custodians, asset managers and other intermediaries operating within ADGM.

Key regulatory frameworks applicable to crypto assets

CBUAE Financial Institutions Regulation

Effective from 16 September 2025, the CBUAE Financial Institutions Regulation expressly brings payment services using virtual assets within the CBUAE's regulatory perimeter, while clearly distinguishing such assets from the digital dirham, which is recognised as legal tender.

Under this framework, any entity providing, offering or facilitating licensed financial activities, including those involving virtual asset payment tokens, decentralised applications or enabling technology platforms, must obtain authorisation from the CBUAE. The law also formally embeds the digital dirham within the UAE's broader CBDC strategy.

CBUAE's Payment Token Services Regulations

The regulation establishes a licensing framework for the provision and operation of payment token services in the UAE mainland, categorising such services into three distinct activities: payment token issuance, payment token conversion, and payment token custody and transfer. The Payment Token Services Regulation applies to all entities carrying out these activities as part of a financial services offering.

Securities and Commodities Authority Framework

The SCA's crypto regulatory regime is primarily established under Decision No 23/RM of 2020 on Crypto Assets Activities Regulation, supplemented by Administrative Decision No (11) of 2021. This framework applies where crypto assets are listed on organised markets and promoted within the UAE, while expressly excluding assets that fall within the CBUAE's remit, such as fiat-backed stablecoins.

The SCA regime governs the issuance, promotion, trading, custody and settlement of crypto assets, positioning the authority as the principal federal regulator for crypto investment activity outside financial free zones.

Dubai Virtual Assets Regulatory Authority Framework

Dubai Law No (4) of 2022 on Virtual Assets provides the statutory foundation for Dubai's virtual asset regime and formally establishes VARA. Furthermore, the Virtual Assets and Related Activities Regulations 2023, introduce a tailored regulatory framework specifically designed for virtual assets.

The VARA framework regulates the full lifecycle of virtual asset activities offered to customers and investors from Dubai, and is built on principles of economic sustainability, investor protection and cross-border financial security. It clearly defines 'virtual assets' and sets out the permissible activities that may be conducted by licensed entities

ADGM FSRA Virtual Asset Framework

In 2018, the FSRA issued extensive regulations governing virtual asset activities, and the regime covers activities conducted by multilateral trading facilities, brokers, custodians, asset managers and other intermediaries, and remains one of the most mature and detailed crypto regulatory frameworks in the region.

As of June 2025, it includes specialised regulations for fiat-referenced tokens and enhanced compliance requirements, such as stringent anti-money laundering (AML) controls for transactions and a robust, secure, and transparent environment for market participants.

Dubai digital dirham

As per policy paper No 1/2025 published by CBUAE in 2025, the digital dirham is the UAE's CBDC, issued by the CBUAE as a digital form of the national currency and legal tender. It is intended primarily as a secure means of payment for retail, wholesale and cross-border transactions, using an intermediated, wallet-based distribution model through licensed financial institutions. The digital dirham will be non-interest bearing, fully fungible with cash and bank deposits, and designed to support efficient settlement and innovation through programmability and interoperability.

According to the CBUAE's policy paper No 01/2025, the digital dirham was expected to be introduced in phases following pilot programmes launched in 2023, with an initial rollout anticipated around the fourth quarter of 2025. In November 2025, the UAE Ministry of Finance and Dubai Finance executed the first government financial transaction using the digital dirham in collaboration with the CBUAE. This transaction, conducted during the pilot phase of the digital dirham project under the Financial Infrastructure Transformation (FIT) Programme, marked an important milestone toward the broader adoption of the UAE's CBDC across both government and private sector payments. As of early 2026, further developments and wider deployment is expected as the CBUAE continues to expand the programme.

Tax treatment of crypto assets

The UAE Federal Tax Authority (FTA) has issued Public Clarification VATP039 to explain the VAT treatment of cryptocurrency mining activities. Where a person mines cryptocurrency for their own account, the activity falls outside the scope of UAE VAT. This is because there is no identifiable recipient of the mining activity, and the reward (eg, newly generated tokens) is not considered consideration for a supply of goods or services.

Where a person mines cryptocurrency on behalf of another person in exchange for a fee, the activity constitutes a supply of services. In this scenario, there is a clear service relationship, with a specific recipient and consideration paid for the service (eg, payment for computational power or mining capacity). The supply of mining services is generally subject to VAT at the standard rate of five per cent if supplied to a customer in the UAE. However, the supply may qualify for zero-rating if the services are supplied to a non-resident outside the UAE, provided the conditions under Article 31 of the Executive Regulation of the UAE VAT Law are satisfied.

3. Payment service providers and digital wallets: a summary of regulations applying to payment service providers and/or digital wallets.

Payment service providers (PSPs) and digital wallets operate within a robust regulatory framework in the UAE, primarily overseen by the CBUAE for mainland activities. On the mainland, PSPs and wallet providers must navigate two key regulatory instruments: the Retail Payment Services and Card Schemes Regulation No 13/RPS/2021 and the Stored Value Facilities Regulation No 3/SVF/2020.

The Retail Payment Services Regulation governs the licensing and conduct of entities providing payment services on the mainland, including payment initiation, payment account issuance, money remittance, payment aggregation and merchant acquiring. The Stored Value Facilities Regulation applies specifically to operators of digital wallets and prepaid instruments, imposing requirements

on fund safeguarding through segregation or trust arrangements, transaction and balance caps, mandatory disclosures and redemption procedures.

What does this mean in practice? PSPs and digital wallet operators need a Central Bank licence to operate and must then maintain compliance across multiple fronts, prudential standards, governance protocols, fund safeguarding measures, AML/counter-financing of terrorism (CFT) controls, consumer protection rules, cybersecurity requirements and operational resilience. Digital wallets face particularly detailed requirements as stored value facilities, including strict rules on how customer funds must be protected (through segregation or trust arrangements), caps on transaction amounts, mandatory disclosures, and clear settlement and redemption procedures.

PSPs in the DIFC and ADGM answer to their respective regulators, the DFSA and FSRA, under distinct regulatory regimes. While these frameworks similarly demand licensing, impose conduct-of-business standards, and enforce AML/CFT, technology governance and data protection obligations, they operate independently from the Central Bank's mainland payment regulations.

Both ADGM and DIFC operate as independent common-law jurisdictions. The regulatory frameworks in these financial free zones are broadly modelled on UK and EU financial regulatory standards, generally providing greater flexibility for fintech innovation and cross-border activity. While the overarching policy objectives across the mainland UAE, DIFC and ADGM regimes are broadly aligned, the technical implementation and supervisory mechanisms differ materially.

The UAE has also made significant progress in modernising its payments infrastructure through the development of instant payment platforms, led by the CBUAE under its FIT programme. A key initiative is Aani, an instant payments platform launched by Al Etihad Payments, a CBUAE subsidiary, which enables real-time, 24/7 digital payments across individuals, businesses and government entities. Aani allows users to transfer funds using simplified identifiers such as mobile numbers and offers functionalities including request-to-pay services, bill splitting and QR code-based merchant payments.

The UAE adopts a centrally coordinated, regulator-led model, with participation limited to licensed financial institutions and regulated PSPs, ensuring interoperability and systemic stability.

4. Special support for fintechs: a description of special programmes supporting the fintech ecosystem, fintech startups (eg, regulatory sandboxes and accelerator programmes) and regulations regarding special support.

Central Bank Sandbox Conditions Regulation

The UAE Central Bank Sandbox Conditions Regulation (2023) establishes a formal regulatory sandbox framework that allows fintechs to test innovative financial products and services on a time-limited and controlled basis without holding a full licence, subject to Central Bank supervision. Participation is conditional on meeting eligibility criteria, implementing consumer protection safeguards, complying with reporting obligations, and following defined exit routes. The sandbox is designed to support innovation while safeguarding consumers and the stability of the financial system.

DIFC Innovation Testing Licence (ITL) regime

The DFSA takes a similarly forward-thinking approach through its ITL Programme, born from the DIFC's FinTech Hive accelerator. This licensed sandbox lets firms trial new financial products, services and business models in a controlled setting, but there is a process. Applicants go through a two-stage journey: an initial application review, followed by formal DFSA authorisation to operate under the ITL. The programme strikes a careful balance by encouraging innovation while upholding regulatory standards, giving the DFSA invaluable insight into emerging technologies, and opening doors for innovative market players.

ADGM RegLab and digital sandbox

The ADGM operates RegLab, a specially tailored regulatory framework that allows fintech participants to develop and test innovative solutions in a controlled and proportionate regulatory environment. RegLab is designed to foster fintech innovation for both new entrants and existing financial institutions by permitting testing without full regulatory authorisation, while maintaining appropriate safeguards. ADGM also operates a digital sandbox that supports technology development and proof-of-concept testing prior to regulatory engagement.

ADGM also hosts Hub71, a startup ecosystem and incubator platform, which provides commercial and operational support to startups (including fintechs), such as funding access, incentives, office space and investor networks.

In practice, the choice between these sandboxes largely depends on the fintech's target market and regulatory strategy. Firms seeking to offer services to customers on the UAE mainland may prefer the sandbox operated by the Central Bank of the UAE, while those targeting international markets or cross-border activities may opt to operate within DIFC or ADGM.

5. Open banking: a summary of regulations regarding open banking and direct or indirect regulations that affect open banking.

The UAE has a comprehensive regulatory framework for open banking, mandated by the UAE Central Bank Open Finance Regulation (Circular No 7 of 2023, updated by Circular No 3 of 2025, effective July 2025).

The framework requires CBUAE-licensed financial institutions to enable secure, API-based sharing of customer-permissioned financial data, supporting data access, payment initiation and broader service initiation. Unlike traditional open banking, the UAE framework covers payments, lending, insurance and investment products, and allows third-party providers to initiate financial services directly within their platforms.

Participation is mandatory for all CBUAE-licensed institutions, while third-party providers must be licensed or notified as deemed participants. The framework is structured around a centralised API Hub operated by a CBUAE subsidiary, supported by a trust framework, standardised consent management, authentication and common infrastructure services. Robust safeguards are in place, including explicit customer consent, prohibition of data scraping, restrictions on data reuse and re-sharing, and alignment with UAE data protection laws.

The regime applies exclusively to mainland UAE and does not extend to the DIFC or ADGM. Further expansion of open finance use cases is anticipated as part of the UAE Central Bank's broader fintech and digital economy strategy.

The DIFC and ADGM do not maintain standalone open banking regimes; instead, open banking activities such as account aggregation and payment initiation are permitted under existing financial services regulations, data protection laws, and regulator-administered sandbox and licensing frameworks.

6. Regulation of virtual asset service providers.

Virtual asset service providers (VASPs) are regulated in the UAE under a multi-layered framework that depends on both the place of establishment and the nature of the virtual asset activity. In Dubai (outside the DIFC), VASPs are regulated by VARA pursuant to Dubai Law No 4 of 2022 on the Regulation of Virtual Assets and VARA's implementing rulebooks. VARA requires VASPs to obtain a licence and comply with prudential, governance, custody, market conduct, technology risk and consumer protection requirements. Regulated activities include operating virtual asset exchanges, brokerage and dealer services, custody and safekeeping, transfer and settlement services, and virtual asset advisory and management services.

At the federal level, the CBUAE retains an important supervisory role, particularly where virtual asset activities intersect with payment services, stored value facilities, or fiat on- and off-ramps, and for AML/CFT compliance in line with UAE federal law and FATF standards. As a result, VASPs offering fiat-linked services may be subject to dual regulatory oversight by VARA and the CBUAE.

Within the financial free zones, VASPs are regulated under separate, self-contained regimes. In the DIFC, virtual asset activities are regulated by the DFSA under its crypto token framework and rulebooks, which apply common-law principles and impose strict requirements on token classification, custody, capital adequacy, conduct of business and AML/CFT. In the ADGM, the FSRA regulates virtual asset activities under the Financial Services and Markets Regulations and detailed guidance, covering exchanges, brokerage, custody, clearing, settlement and transfer services, with a strong emphasis on market integrity and institutional-grade controls.

UAE law recognises distinct categories of VASP activities including exchange services, custody and administration, transfer, brokerage, dealing and advisory services, all of which are regulated when carried on by way of business. Enforcement authority rests with the relevant regulator (VARA, CBUAE, DFSA or FSRA), each of which has powers to supervise, investigate, impose sanctions, and suspend or revoke licences, working in coordination with federal AML and law-enforcement authorities where necessary.

7. AML and the Travel Rule in crypto asset transactions.

Crypto asset transactions conducted by VASPs in the UAE are subject to Federal Decree-Law No (10) of 2025 on Combating Money Laundering, the Financing of Terrorism and Proliferation Financing, together with its Executive Regulations issued under Cabinet Decision No (134) of 2025, as well as applicable sector-specific regulatory frameworks.

VASPs must implement risk-based AML/CFT measures, including customer due diligence, transaction monitoring, sanctions screening, record-keeping and suspicious transaction reporting, for transactions involving virtual assets and fiat currency.

VASPs are also required to comply with the Travel Rule, in line with Financial Action Task Force (FATF) Recommendation 16 and UAE regulatory guidance. This requires the collection, verification, and secure transmission of required originator and beneficiary information for crypto asset transfers, including transfers involving other VASPs. Appropriate risk-mitigation measures must be applied to transactions involving unhosted wallets, in accordance with regulatory expectations.

8. Enforcement and cross-border recognition of tokenisation and structuring of secured transactions involving crypto assets.

In the UAE, tokenised assets may represent real-world assets (such as real estate or debt instruments), financial instruments, or purely digital contractual rights. These structures are typically implemented through regulated issuers, special purpose vehicles, or contractual and smart contract arrangements, depending on the nature of the token and the applicable regulatory regime (including mainland UAE, ADGM, or DIFC).

Collateral in crypto asset transactions commonly includes virtual assets, tokenised securities, contractual rights, receivables, bank accounts, or interests in underlying assets. Security interests are created through pledges, assignments by way of security, or control arrangements over wallets or accounts.

A pledge over crypto assets is generally created by agreement, typically by transferring the assets to a wallet controlled by the secured party or a custodian, or by restricting the pledgor's ability to deal with the assets (eg via multi-signature arrangements). An assignment by way of security involves transferring rights (such as receivables or tokenised interests) to the secured party, with perfection often requiring notice to relevant counterparties. Control arrangements are commonly used where assets are held with custodians or exchanges, with the secured party obtaining control through contractual arrangements or technical mechanisms such as private key or multi-signature access.

UAE courts generally recognise and enforce foreign governing law clauses in crypto asset-related contracts, subject to public order and mandatory UAE law considerations.

9. Litigation and jurisdiction on crypto assets: legal implications of disputes involving crypto assets.

Legal framework for crypto-related disputes

Disputes involving crypto and digital assets in the UAE are governed by general principles of civil and commercial law, as there is no standalone litigation regime dedicated exclusively to crypto assets. In the DIFC, the enactment of the Digital Assets Law (DIFC Law No 2 of 2024) introduced a statutory definition of digital assets and clarified their treatment as a form of intangible property.

This position was subsequently reinforced by the DIFC Court of Appeal, where the court affirmed that digital assets constitute property and emphasised the distinction between possession and control when determining ownership. Onshore Dubai courts have also increasingly recognised cryptocurrencies as property and retrievable assets, and recent cases indicate a growing willingness to permit enforcement of judgments against digital assets.

Role of DIFC and ADGM courts

The DIFC courts have demonstrated an active role in crypto-related disputes, including a clear appetite to grant interim relief in support of foreign proceedings, positioning themselves as a supportive jurisdiction in cross-border litigation. In addition, the DIFC has established a specialised forum for technology-related disputes through the Digital Economy Court (DEC), launched in December 2021, which handles sophisticated domestic and international disputes involving blockchain, digital assets, fintech, AI, cloud services and other emerging technologies. It complements existing specialised divisions within the DIFC courts, including the Technology and Construction Division and the Arbitration Division, and is supported by bespoke procedural rules and the appointment of judicial and technical experts. The Court is also expected to leverage advanced digital tools, including AI-driven processes and electronic case management systems, to enhance efficiency, including innovative methods of service such as through digital platforms.

In 2022, the ADGM courts introduced an innovative solution that records judgments on the blockchain, allowing enforcing commercial courts to independently and immediately verify their authenticity. This mechanism enhances enforcement in crypto asset disputes by reducing verification friction in cross-border scenarios, enabling faster recognition of judgments by courts, exchanges, and custodians dealing with digital assets. The solution allows secure, immutable judgments to be accessed via APIs, the ADGM courts platform or directly through the blockchain, significantly reducing time and costs associated with cross-border enforcement. This initiative builds on ADGM courts' earlier digitalisation efforts, including its e-Courts platform, and forms part of a broader vision to modernise judicial processes and support the development of a global network of courts utilising blockchain technology for faster and more reliable international enforcement of judgments.

Submission to foreign jurisdiction and exclusive jurisdiction clauses

Under UAE law, a party's submission to a foreign jurisdiction is legally binding and enforceable provided that the jurisdiction clause is validly agreed, does not contravene UAE public policy, and the dispute does not fall within the exclusive jurisdiction of UAE courts. Exclusive jurisdiction clauses are generally respected and enforced by UAE courts, including the DIFC and ADGM courts, in commercial matters involving digital and crypto assets. Where a foreign judgment is obtained pursuant to such a clause, enforcement in the UAE is possible subject to compliance with applicable procedural requirements, including but not limited to submission of duly authenticated copies of the foreign judgment, evidence that the judgment is final and binding, proof that the defendant was properly notified of the proceedings, and confirmation that enforcement would not conflict with UAE public order or morals. UAE courts will verify these requirements through documentary evidence and will assess whether enforcement would conflict with the applicable laws and treaties.

Enforcement considerations

Ultimately, the enforcement of judgments involving crypto assets must not conflict with the policy or procedural rules of the jurisdiction in which enforcement is sought.

In the UAE context, this often requires careful navigation between the federal onshore court system and the offshore free zone courts, particularly where digital assets or custodians are located across multiple jurisdictions.

The UAE has implemented a number of mechanisms to facilitate coordination and enforceability across its judicial and arbitral systems. Judgments and arbitral awards issued by mainland courts may be recognised and enforced in the DIFC pursuant to Dubai Law No 2 of 2025. A 2018 Memorandum of Understanding similarly provides for mutual recognition and enforcement between ADGM and mainland courts, while the DIFC and ADGM courts recognise and enforce each other's decisions. To address jurisdictional conflicts, the Conflict of Jurisdiction Tribunal (CJT), established under Dubai Decree No 29 of 2024, is tasked with determining jurisdictional disputes between the DIFC and other Dubai courts.

10. Intellectual property and crypto assets: legal protection, ownership, enforcement and monetisation of IP rights related to digital and virtual assets.

In the UAE, the protection, ownership, enforcement and monetisation of IP rights relating to digital and virtual assets are governed primarily by Federal Decree-Law No 38 of 2021 on Copyrights and Neighbouring Rights, Federal Decree-Law No 36 of 2021 on Trademarks, and Federal Decree-Law No 11 of 2021 on Industrial Property Rights.

UAE is also a party to key international treaties, including the Berne Convention, Paris Convention and the TRIPS Agreement, which facilitate recognition and protection of IP rights in foreign jurisdictions. Ownership of IP is determined by authorship, inventorship or contractual assignment of a token or digital asset.

IP rights are enforced through civil, administrative and contractual mechanisms. They may be defended against third-party claims through registered rights, contractual documentation and technical evidence.

Furthermore, IP relating to crypto assets may be lawfully monetised in the UAE through licensing, technology transfer, branding and platform-based commercial models; however, such monetisation must comply with applicable virtual asset regulations.

For example, a UAE-based developer who creates a proprietary non-fungible token (NFT) marketplace may license its branded platform and underlying smart contract code to third-party creators for a royalty fee. While this is a legitimate exercise of copyright and trademark rights under UAE IP law, the developer must simultaneously hold the appropriate licence issued by VARA or the relevant free zone authority before commercially operating or deriving revenue from such a platform, demonstrating that IP monetisation in the crypto space is subject to both IP law and virtual asset regulatory compliance.



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Chancery House
53-64 Chancery Lane
London WC2A 1QS
United Kingdom
Tel: +44 (0)20 7842 0090
Fax: +44 (0)20 7842 0091
Email: editor@int-bar.org
www.ibanet.org