

Strategic Capital Transfer & Structuring – Dutch to UAE (Box 2 & Box 3)

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Client Objective

The client's focus is on helping Dutch investors legally and efficiently transfer capital to the UAE, protect wealth, and access investment opportunities. The approach is built around setting up UAE LLCs for each client via Zaara Overseas.

Box 2 – Shareholders/Owners (5%+)

Key Insight: The most tax-efficient route is to make the Dutch BV a shareholder of the UAE LLC. This avoids dividend or capital repatriation taxes in NL and allows tax-free corporate-to-corporate transfers.

Action Plan for Client Case:

1. Transfer current UAE LLC shares from personal name to Dutch BV.
2. Amend LLC's MOA to reflect new shareholder (done in 3–5 working days).
3. Obtain notarised BV board resolution approving share acquisition.
4. Optional: Issue Power of Attorney for ease of execution.

Box 3 – Private Capital / Assets

Key Insight: Private capital can be moved to the UAE LLC via Voluntary Capital Contribution (VCC) without repayment obligations or interest. Shareholder agreement must confirm this; if not, add an addendum.

Current Status & Recommendation:

- Structure already allows VCC under current terms.
- No immediate addendum needed; can update later.
- Recent case: €1M+ transferred successfully from Dutch BV to UAE corporate account at Emirates NBD without issues.

Investment Strategy for Dutch Clients

Once capital is in the UAE, the focus is on ready, income-generating assets over off-plan developments:

- Fully rented villas/apartments (6–9% net ROI)
- Off-market properties with guaranteed tenancy
- Real estate-backed private debt opportunities
- Tokenized/fractional ownership options for liquidity

Why UAE Now

- 0% personal income & dividend tax
- Strong compliance & OECD/FATF alignment
- DIFC-based family office structures available
- Transparent, high-growth real estate market
- Residency pathways for investors

Next Step

We are planning a closed-door session with Dutch investors in September to present:

- Tax-compliant capital movement (Box 2 & Box 3)
- Live investment opportunities in Dubai
- Real case studies from existing clients

Note on VCC Implementation

The current situation is suitable for VCC without an addendum. This allows speed in execution while keeping the option open to amend the MOA later if required for long-term planning.