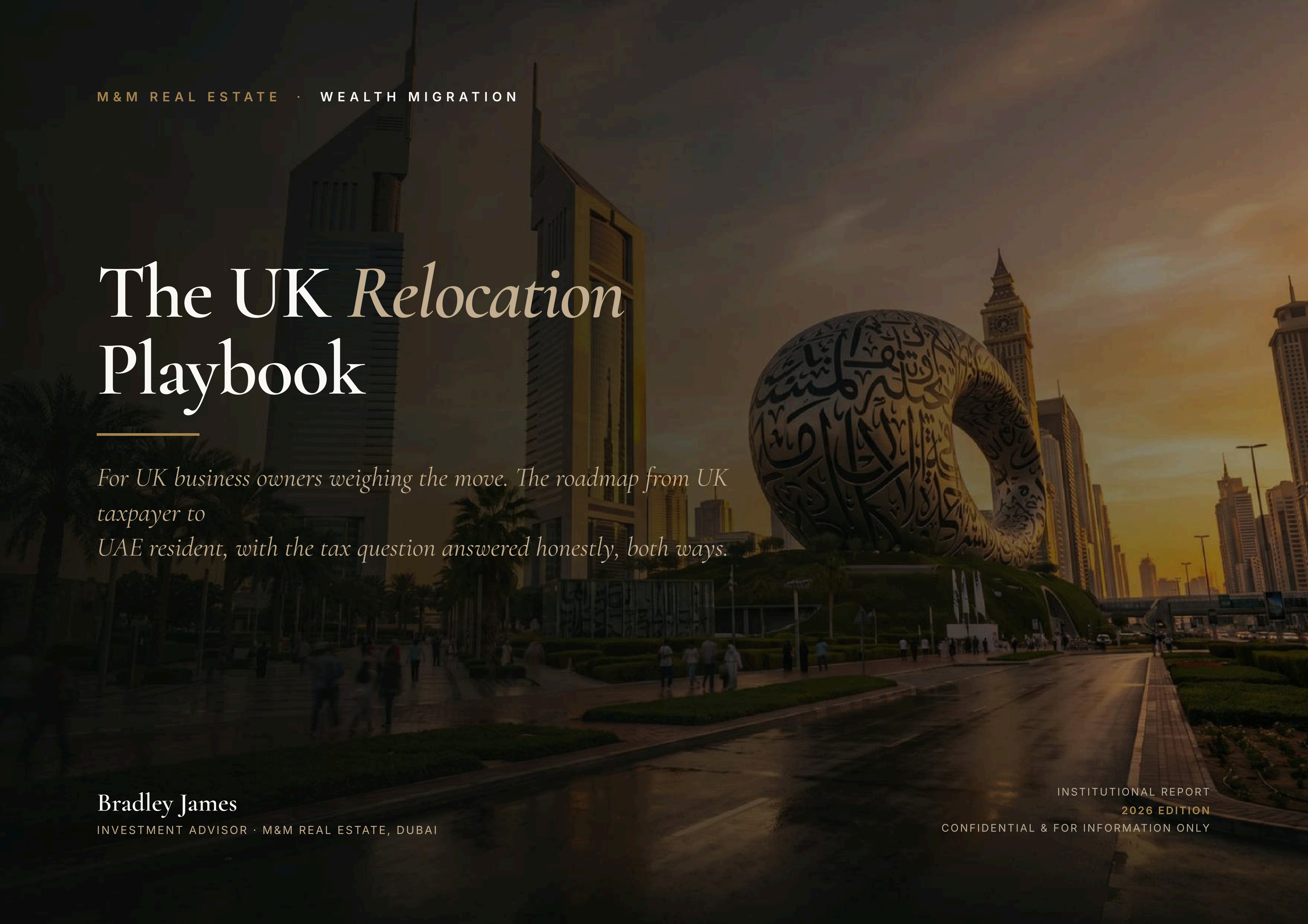

M&M REAL ESTATE · WEALTH MIGRATION

The UK *Relocation* Playbook

For UK business owners weighing the move. The roadmap from UK taxpayer to UAE resident, with the tax question answered honestly, both ways.

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CONTENTS

What This Guide Covers

01

CHAPTER ONE

Why the Maths Changed

For the first time in a generation, the case for relocation is arithmetic, not ambition.

CHAPTER 01 · THE UK CONTEXT

The UK Tax Burden Has Reached a Structural Point

For the first time in a generation, the case for a UK business owner to relocate is not about lifestyle. It is arithmetic.

The changes of the last two years were not marginal. For owners drawing meaningful income, the cumulative effect of capital gains tax, dividend tax and income tax compounds year on year, and the non-dom regime that protected many internationally mobile families was abolished on 6 April 2025. The lever of structuring alone is narrowing.

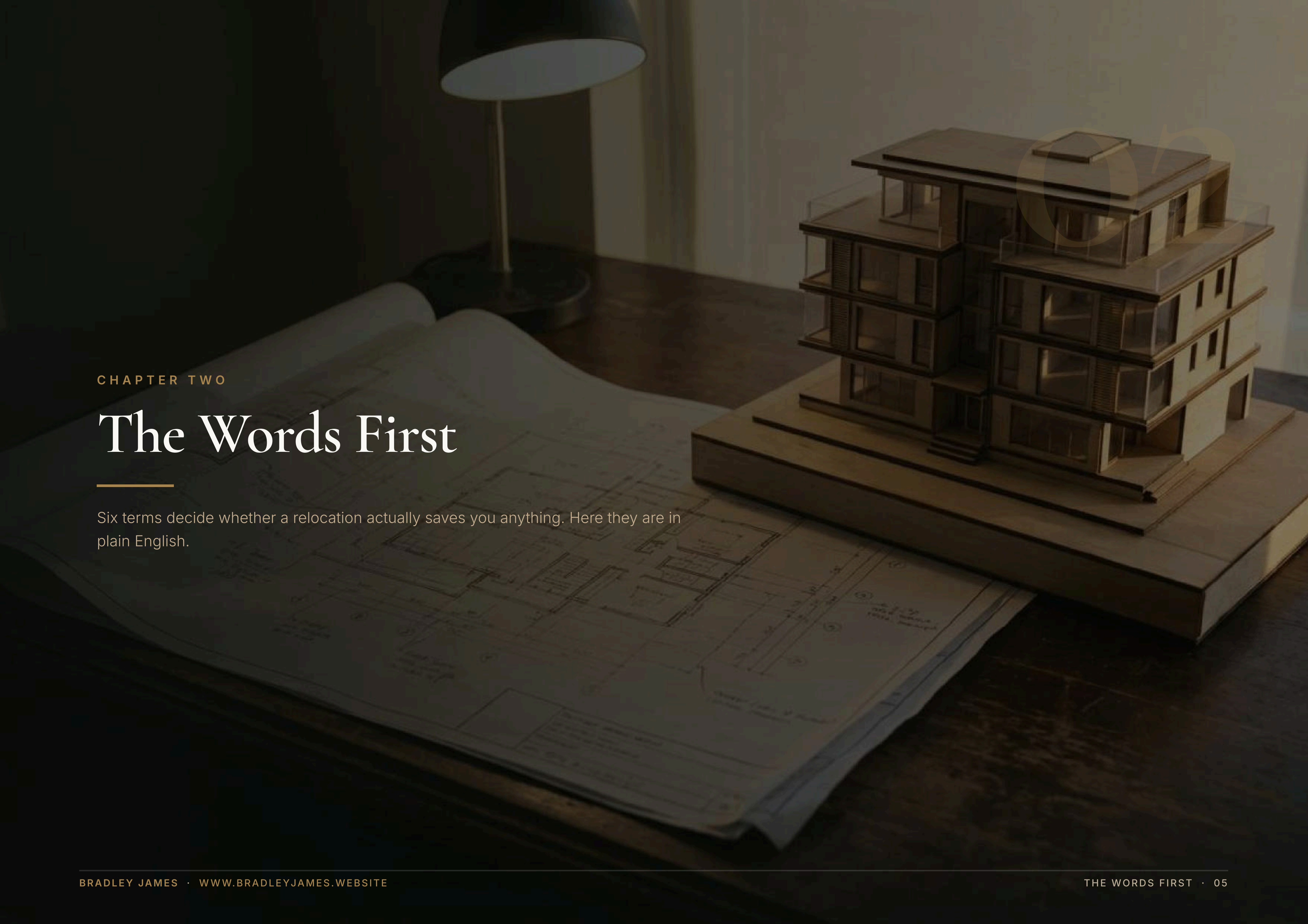
This playbook lays out the actual roadmap from UK taxpayer to UAE resident: the sequence, how you sever UK residence cleanly, what the move is genuinely worth, and, just as importantly, the caveats the sales pitches leave out. It is written to help you decide, not to talk you into anything.

◆ AT A GLANCE

- UK CGT sits at 24%, dividend tax at 39.35%, top income tax at 45%.
- The UAE levies 0% on income, gains, dividends and, for individuals, the estate.
- The non-dom regime ended on 6 April 2025, moving IHT to a residence basis.
- The saving is real only once you genuinely sever UK residence, on the rules.
- Inheritance tax still follows domicile, which a Dubai asset does not change.

◆ THE POINT

"This is a decision you can put numbers to. The job is to run them honestly for your position, with every caveat left in."



CHAPTER TWO

The Words First

Six terms decide whether a relocation actually saves you anything. Here they are in plain English.

CHAPTER 02 · PLAIN ENGLISH

The Terms That Decide the Outcome

A relocation succeeds or fails on a handful of technical terms. Get them right and the saving is real; get them wrong and it is theoretical. Here they are, plainly.

◆ THE STATUTORY RESIDENCE TEST (SRT)

HMRC's day-count and ties test that decides whether you are UK tax-resident. It does not care about intentions, only days and connections. It drives everything else.

◆ SPLIT-YEAR TREATMENT

A rule that lets a tax year be divided into a UK-resident and a non-resident part, so a clean break falls where you intend it, rather than taxing the whole year.

◆ FREEZONE COMPANY

A UAE entity that can be 100% foreign-owned, with 0% corporate tax on qualifying income. A common base for a relocating business owner, though the structuring needs advice.

◆ DOMICILE

A concept separate from residence that governs UK inheritance tax. A UK-domiciled person's worldwide estate can stay in the UK IHT net even after they leave, which is why owning in Dubai does not, by itself, remove it.

◆ TAX RESIDENCY CERTIFICATE

UAE documentation evidencing your new tax residence, used to support that you have genuinely moved, not just acquired a visa.

03

CHAPTER THREE

The Six-Step Roadmap

The process is sequential, not complicated. Each step has a timeframe, a cost and an outcome.

CHAPTER 03 · THE SEQUENCE

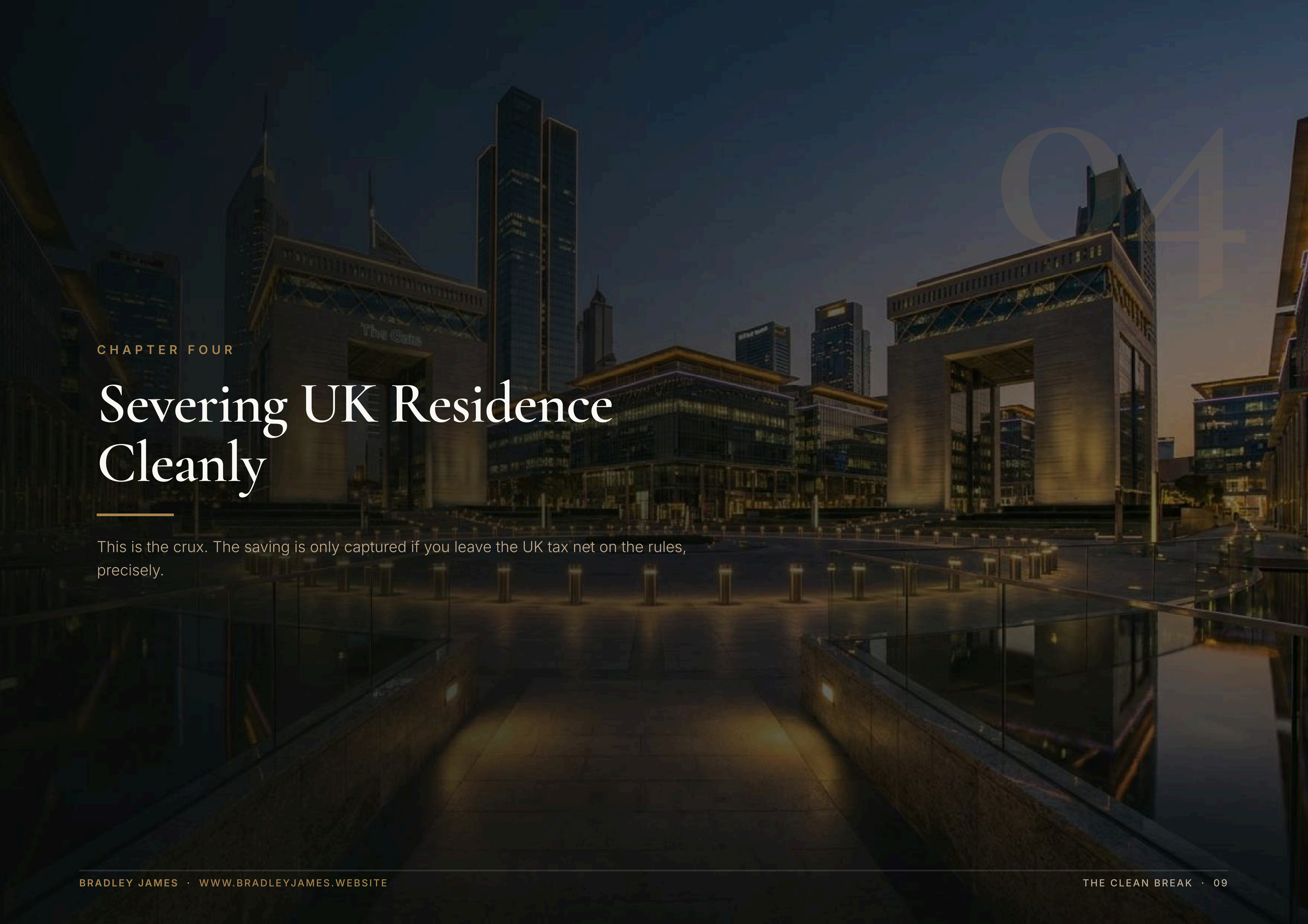
From UK Taxpayer to UAE Resident

The process is sequential but not complicated, and most business owners work through it over a matter of months rather than years. Here is the order it happens in.

1	2	3	4	5	6
Plan the tax residence	**Form the UAE company**	**Buy the Golden Visa property**	**Set up banking**	**Add the family**	**Exit UK tax cleanly**
Step 1 · The SRT day-count plus split-year treatment set the precise date UK liability is severed. Advisory-led.	Step 2 · Most establish a Freezone entity, foreign-owned, 0% on qualifying income, set up in a few weeks.	Step 3 · A qualifying AED 2 million purchase secures the ten-year visa; off-plan preserves capital while it yields.	Step 4 · UAE private banking and multi-currency accounts follow once the visa and Emirates ID are issued.	Step 5 · The visa extends to spouse and children at no additional investment, each a ten-year residency.	Step 6 · A departure return for the year of leaving, with domicile reviewed separately. Specialist counsel is essential.

◆ DO IT IN ORDER

The sequence matters. The residence planning comes first because it sets the date everything else is measured against. Buying the property or forming the company before the residence plan is settled is the most common way the saving gets diluted.



04

CHAPTER FOUR

Severing UK Residence Cleanly

This is the crux. The saving is only captured if you leave the UK tax net on the rules, precisely.

How the Saving Actually Becomes Real

Everything else is administration; this is the decision. The UAE's zero is only fully captured if you sever UK residence cleanly, on the rules, and the rules are precise. The Statutory Residence Test does not care about your intentions, only your days and your ties.

1. **Know your SRT number.**
   UK residence is decided by a day-count and ties test. Establish exactly where you stand before planning anything else.
2. **Plan the split year.**
   Leave in a way that qualifies for split-year treatment, so the clean break lands where you intend it.
3. **Sever the ties, convincingly.**
   Home, work, family and day-count ties all count. Removing them credibly is what makes non-residence hold up.
4. **Establish genuine UAE residence.**
   The Golden Visa plus real presence and a tax residency certificate evidence your new base.
5. **Mind the tail.**
   Temporary non-residence rules can claw back gains if you return too soon. Time your exit and any disposals together.

◆ COMMON MISCONCEPTION

'I have the Golden Visa, so I am now UAE tax-resident.' The visa is the right to reside; it does not by itself sever UK residence. While the SRT still makes you UK-resident, HMRC taxes your worldwide income. The visa and the tax break are two separate steps.

◆ TAKEAWAY

"Residence planning, not the property, is the real decision. It is the difference between a good outcome and a great one."

05

CHAPTER FIVE

The Financial Case

The same business owner, taxed two ways. The gap is large, and it is worth seeing in numbers.

CHAPTER 05 · ILLUSTRATIVE MODEL

The Same Owner, Taxed Two Ways

Numbers beat adjectives. Here is the same business owner, on a representative income, taxed under each regime. It is illustrative, under stated assumptions and assuming a genuine move, not a forecast or advice, but the shape of the gap is the point.

◆ STAYING IN THE UK

- **Income tax up to 45%**, dividend tax at 39.35%, CGT at 24% on disposals.
- **A six-figure annual tax bill** for an owner drawing a substantial income.
- **Non-dom protection gone** since April 2025, with IHT now on a residence basis.

◆ RELOCATING TO DUBAI

- **0% personal tax** on income, gains, dividends and, for individuals, the estate.
- **0% corporate tax** on qualifying Freezone income, structured correctly.
- **A property that yields and can appreciate**, on top of the tax saving.

◆ THE HONEST FRAME

For an owner in the higher brackets, the annual saving from a genuine move runs well into six figures, and compounds over a decade. But that figure is only real once residence is severed. Model your own numbers before you move, not after.

06

CHAPTER SIX

What to Get Right

A relocation done carelessly can undo its own benefit. These are the pieces that must be right.

CHAPTER 06 · THE CAVEATS

The Details That Decide the Outcome

A move done well is transformative; a move done carelessly can leave you exposed on both sides. These are the pieces that a serious relocation gets right, and the ones that catch people out.

AREA	THE ISSUE	WHY IT MATTERS
Inheritance tax and domicile	IHT follows domicile, not simply residence	A UK-domiciled estate, including a Dubai flat, can stay in the 40% net
Company and extraction	A Freezone base needs proper structuring advice	Getting corporate and personal extraction wrong erodes the saving
Timing the exit	Split-year and temporary-non-residence rules are strict	A mistimed departure or disposal can claw back the benefit
Genuine substance	Real presence, not just a visa, evidences the move	Residence that cannot be evidenced does not hold up

◆ RED FLAGS

- Anyone promising the tax saving without asking about your residence and domicile.
- Buying the property or forming the company before the residence plan is set.
- Treating the Golden Visa as if it, by itself, ends UK tax.
- No specialist UK/UAE cross-border tax counsel involved.

07

CHAPTER SEVEN

Straight Answers

The questions business owners actually ask about relocating, answered plainly, plus the points to keep.

CHAPTER 07 · FAQ

The Questions Business Owners Actually Ask

Q. How long does the whole relocation take?

For most business owners it is a matter of months, not years, once the residence plan is set. The company formation, the qualifying property purchase, the visa and banking each take a few weeks, but the sequencing, and getting the tax residence date right, is what determines the outcome, not the raw speed.

Q. Do I really stop paying UK tax the moment I get the visa?

No, and this is the single most important point. The Golden Visa gives you the right to reside; it does not sever UK residence. While the Statutory Residence Test still makes you UK-resident, HMRC taxes your worldwide income. The saving arrives only once you have genuinely left the UK tax net on the rules.

Q. What about inheritance tax?

Inheritance tax follows domicile, not simply where you live or where the asset sits. A UK-domiciled individual's worldwide estate, including a Dubai property, can remain within the 40% charge. Losing UK domicile is a separate, specialist exercise from becoming non-resident, and any honest adviser will treat it as one.

Q. Can my family come with me?

Yes. The Golden Visa extends to your spouse and children, each receiving a ten-year residency at no additional investment, and dependants can be added. Each gets an Emirates ID, which is what enables banking, schooling and day-to-day life in the UAE.

Q. Should I hold the business or property in a company?

Often a UAE Freezone company is part of the structure, but corporate versus personal ownership, and how profit is extracted, are exactly the questions that need specialist advice. Getting them wrong can quietly undo the saving, so this is not a decision to make on a template.

Q. Is this just tax avoidance?

No. It is relocating your life and your tax residence, on the published rules, and reporting it correctly to HMRC on departure. The difference between a clean, well-evidenced move and a sloppy one is precisely why specialist cross-border counsel matters. Done properly, it is planning, not evasion.

CHAPTER 07 · REMEMBER THIS

The Five Points to Keep

If you take nothing else from this playbook, take these five. They are the difference between a move that works and one that looks good on a brochure.

1. **The maths, not the lifestyle, is the case now.**
   UK rates versus the UAE's zero make this an arithmetic decision for higher earners.

2. **The visa is not the tax break.**
   It is the right to reside; the saving needs a genuine, rules-based severance of UK residence.

3. **Do the steps in order.**
   Residence planning first; it sets the date everything else is measured against.

4. **Inheritance tax follows domicile.**
   Owning in Dubai does not remove a UK-domiciled estate from the charge.

5. **Get specialist cross-border counsel.**
   The difference between a good and a great outcome is in the details they handle.

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The Right Guidance Changes Everything.

◆ ABOUT BRADLEY

Not a broker, an advisor. I built a business in the UK and spent more than a decade advising people from all walks of life, before moving to Dubai and joining M&M Real Estate to work at a higher strategic level than the typical transactional broker. I specialise exclusively in off-plan investment for overseas and high-net-worth clients, I put my own capital into the projects I recommend, and my business is more than 80% referral-driven, because every client came through someone who trusted me first.

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