

CONSULTATION PAPER
NO. 11 OF 2025

**PROPOSED AMENDMENTS TO THE
COMMERCIAL PERMITS FRAMEWORK
CONCERNING SALES AND PROMOTIONS,
TEMPORARY COMMERCIAL ACTIVITIES AND
EVENTS AND ENTERTAINMENT**

9 October 2025

CONTENTS

<i>Introduction</i>	3
Why are we issuing this paper?	3
Who should read this paper?	3
How to provide comments	3
What happens next?	4
<i>Scope and Approach to the Proposed Amendments</i>	5
<i>Proposed Amendments</i>	6
Current Position	6
Proposed Rules	6
<i>Proposed Amendments and Enactments</i>	11 <u>2</u>

Introduction

Why are we issuing this paper?

The Abu Dhabi Global Market (“**ADGM**”) Registration Authority (“**RA**”) has issued this Consultation Paper to invite public feedback and comments on a proposal to introduce new subordinate rules to the Commercial Permits Regulations 2024 (“**Commercial Permits Regulations**”) concerning temporary commercial permits, temporary activity permits, special sales and promotions permits and associated fees.

The proposed subordinate rules are set out in Appendices 1 to 4, respectively, to this Consultation Paper.

This Consultation Paper summarises the key proposed aspects of the temporary commercial permits, temporary activity permits and sales and promotions permits. The summaries provided within should be read as an introduction to the provisions only – the precise details and specifics are contained in the draft subordinate rules themselves.

Where terms are capitalised in this Consultation Paper, they (unless context requires otherwise) should be taken to have the definitions ascribed to such terms in the Commercial Permits Regulations.

Who should read this paper?

The proposals in this Consultation Paper would be of interest to all licensed persons in the ADGM, their directors, officers, employees and advisors who are subject to the Commercial Legislation. We also welcome feedback from other stakeholders, whether based in the ADGM or beyond.

How to provide comments

All comments should be in writing and sent to the email specified below. Please include the Consultation Paper number in the subject line. If relevant, please identify the organisation you represent when providing your comments.

The RA reserves the right to publish, including on its website, any comments you provide, unless you expressly request otherwise at the time of making any comments. Comments supported by reasoning and evidence will be given more weight.

What happens next?

The deadline for providing comments on this proposal is **30 October 2025**.

Following receipt and review of any comments, consideration will be given to whether any modifications to the proposals are required, and the ADGM Board of Directors ("**Board**") and the RA will then proceed to enact the proposals in their final form.

You should not act on these proposals until such time as the final subordinate rules, and any guidance thereon, are published by the RA.

A notice will be issued on the ADGM website upon issuance of the final subordinate rules.

Comments to be addressed to:

Consultation Paper No. 11 of 2025

Email: ra.consultation@adgm.com

Scope and Approach to the Proposed Amendments

1. This Consultation Paper aims to explain the proposed enactment of the following subordinate rules:
 - a. Commercial Permits Regulations (Temporary Commercial) Rules 2025;
 - b. Commercial Permits Regulations (Temporary Activity) Rules 2025;
 - c. Commercial Permits Regulations (Sales and Promotions) Rules 2025; and
 - d. Commercial Permits Regulations (Fees) Rules 2025,
(collectively, the “**Rules**”).
2. The proposed features include:
 - a. A requirement to obtain a temporary commercial permit and/or temporary activity permit from the RA under certain circumstances;
 - b. A requirement to obtain a sales and promotions permit from the RA in respect of carrying out specific sales and promotions related activities within ADGM by a Licensed Person or a Temporary Commercial Permitholder;
 - c. Specific conditions applicable to obtaining temporary commercial permits, temporary activity permits or sales and promotions permits;
 - d. The fees payable to the RA in connection with the issuance of temporary commercial permits, temporary activity permits or sales and promotions permits; and
 - e. Other miscellaneous requirements.
3. A draft of the Rules can be found in Appendices 1 to 4, respectively.

Proposed Amendments

Current Position

1. The RA regulates economic activity within the ADGM via a framework of licenses and permits. A key aim of the RA in issuing such licenses and permits is to strengthen consumer protection within the ADGM by ensuring that entities are correctly licensed and regulated and that temporary activities and marketing and promotional activities, i.e. (i) temporary discounts, (ii) special promotional events and prize draws are conducted transparently, fairly and responsibly.
2. The RA issues temporary commercial permits to entities looking to operate within the ADGM for up to a maximum of 12 months ("**Temporary Commercial Permit**"). After the expiry of a temporary commercial permit, permit holders must either cease operations within the ADGM or apply for a licence. Additionally, the RA issues permits for events (including trainings, seminars, etc.) and entertainment (including performances, singers, etc.) taking place within the ADGM (collectively, "**Temporary Activity Permit**") and sales and promotions activities ("**Sales and Promotions Permit**").
3. The RA has powers under Article 22 of the Founding Law, Abu Dhabi Law No. (4) of 2013 and the Commercial Permits Regulations 2024 to require a permit for any activity. Currently, there is a need for greater clarity with respect to the procedures surrounding obtaining, renewing and maintaining Temporary Commercial Permits, Temporary Activity Permits and Sales and Promotions Permits, as well as related information pertaining to oversight of such commercial permits by the RA and the associated fees for such permits. The permit system ensures that these deviations from standard business practice are carried out lawfully, transparently, and in a manner that upholds consumer rights and market integrity. It is therefore deemed appropriate to implement a formal framework for such permits.

Proposed Rules

Temporary Commercial Permit

4. The purpose of the Temporary Commercial Permit Rules is to set out the specific requirements to obtain and maintain a Temporary Commercial Permit in order to commercially operate within the ADGM for a certain amount of time. Applicants will need to:
 - a. Hold a valid commercial licence issued by the relevant onshore governmental entity or the Registrar;
 - b. Complete an application in the form prescribed by the Registrar;

- c. Provide the Registrar with a no objection letter issued by, or a lease agreement signed by, the landlord of the premises in ADGM from which the applicant will operate from;
 - d. Provide the Registrar with any additional information it may require; and
 - e. Pay any fees in connection with any application for a Temporary Commercial Permit or any extension.
- 5. A Temporary Commercial Permit holder must at all times:
 - a. Hold a valid commercial licence issued by the relevant onshore governmental entity or the Registrar; and
 - b. Comply with any conditions of the permit issued by the Registrar.
- 6. Applicants will be able to apply for Temporary Commercial Permits with the following validity periods:
 - a. Weekly, capped at 1 month;
 - b. 3 months;
 - c. 6 months; and
 - d. 12 months.
- 7. Temporary Commercial Permits are not renewable. Temporary Commercial Permit holders will need to apply for a new Temporary Commercial Permit upon expiration, subject to the Registrar's review and approval of an application.
- 8. Failing to obtain a Temporary Commercial Permit prior to temporarily conducting business in ADGM will be considered a contravention, and any such person temporarily conducting business in ADGM without a Temporary Commercial Permit may be liable to a penalty.

Q1: DO YOU HAVE ANY CONCERNS WITH, OR FEEDBACK ON, THE APPLICATION REQUIREMENTS FOR A TEMPORARY COMMERCIAL PERMIT?

Q2: DO YOU HAVE ANY CONCERNS WITH, OR FEEDBACK ON, THE VALIDITY PERIODS FOR TEMPORARY COMMERCIAL PERMITS?

Temporary Activity Permit

9. The purpose of the Temporary Activity Permit Rules is to set out the specific requirements to obtain and maintain a Temporary Activity Permit in order to conduct certain activities related to Events, Entertainment, Photography and Speakers within the ADGM for a limited time.
10. Applicants will need to:
 - a. Hold a valid commercial licence issued by the Registrar; or
 - b. Hold a valid commercial licence issued by the relevant onshore governmental entity and a Temporary Commercial Permit issued by the Registrar;
 - c. Complete an application in the form prescribed by the Registrar;
 - d. Provide the Registrar with a no objection letter issued by, or a lease agreement signed by, the landlord of the premises in ADGM from which the applicant will conduct the activity from, if applicable;
 - e. Provide the Registrar with any additional information it may require; and
 - f. Pay any fees in connection with any application for a Temporary Activity Permit or an extension.
11. A Temporary Activity Permit holder must at all times:
 - a. Hold a valid commercial license issued by the Registrar; or
 - b. Hold a valid commercial licence issued by a relevant onshore governmental entity and a Temporary Commercial Permit issued by the Registrar; and
 - c. Comply with any conditions of the permit issued by the Registrar.
12. Applicants will be able to apply for a Temporary Activity Permit with the following validity periods for each type of activity:
 - a. Temporary Activity (Events) Permit
 - 1 month, capped at 3 months
 - b. Temporary Activity (Entertainment) Permit
 - 1 month, capped at 3 months
 - c. Temporary Activity (Photography) Permit
 - 1 day, capped at 1 month

- d. Temporary Activity (Speaker) Permit
- 1 month

13. Temporary Activity Permits are not renewable. Temporary Activity Permit holders will need to apply for a new Temporary Activity Permit upon expiration, subject to the Registrar's review and approval of an application.
14. Failing to obtain a Temporary Activity Permit prior to commencing such activity in ADGM will be considered a contravention, and any such person conducting such activity in ADGM without a Temporary Activity Permit may be liable to a penalty.

Q3: DO YOU HAVE ANY CONCERNS WITH, OR FEEDBACK ON, THE APPLICATION REQUIREMENTS FOR A TEMPORARY ACTIVITY PERMIT?

Q4: DO YOU HAVE ANY CONCERNS WITH, OR FEEDBACK ON, THE VALIDITY PERIODS FOR EACH TYPE OF TEMPORARY ACTIVITY PERMIT?

Q5: DO YOU HAVE ANY CONCERNS WITH, OR FEEDBACK ON, THE PROPOSED NAMING CONVENTION OF THE TEMPORARY ACTIVITY RULES?

Sales and Promotions Permit

15. The purpose of the Sales and Promotions Rules is to clarify what constitutes a sale or promotion, and to set out the specific requirements of a Licensed Person or Temporary Commercial Permit holder to obtain and, where applicable, maintain a Sales and Promotions Permit when intended to and carrying out certain commercial activities within the ADGM for a specified and limited time. Such activities will include the following: Clearance Discounts, Temporary Sales Discounts, Instant Prizes, Prize Draws, Product Launches and Promotional Stands.
16. Applicants will need to:
- a. be a Licensed Person or a Temporary Commercial Permit holder;
 - b. Complete an application in the form prescribed by the Registrar;
 - c. Provide the Registrar with a no objection letter issued by, or a lease agreement signed by, the landlord of the premises in ADGM from which the applicant will conduct the sales and promotion activity from, if applicable;
 - d. Provide the Registrar with any additional information it may require; and
 - e. Pay any fees in connection with any application for a Sales and Promotions Permit.

17. A Sales and Promotions Permit holder must at all times:

- a. Hold a valid commercial license issued by the Registrar; or
- b. Hold a valid commercial licence issued by a relevant onshore governmental entity and a Temporary Commercial Permit issued by the Registrar; and
- c. Comply with any conditions of the permit issued by the Registrar.

18. Applicants will be able to apply for one or more of the following type of sales and promotions activity:

- a. Clearance Discount (Sales) Permit
 - 1 month, capped at 3 months
- b. Temporary Sales Discount (Sales) Permit
 - 1 month, capped at 3 months
- c. Instant Prizes (Promotions) Permit
 - 1 month, capped at 3 months
- d. Prize Draws (Promotions) Permit
 - 1 month, capped at 3 months
- e. Product Launches (Promotions) Permit
 - 1 month
- f. Promotional Stands (Promotions) Permit
 - 1 month, capped at 12 months

19. Sales and Promotions Permits are not renewable. Sales and Promotions Permit holders will need to apply for a new Sales and Promotions Permit upon expiration, subject to the Registrar's review and approval of an application.

20. Failing to obtain a Sales and Promotions Permit prior to commencing a Sales and Promotions Activity in ADGM will be considered a contravention, and any such person conducting such activity in ADGM without a Sales and Promotions Permit may be liable to a financial penalty.

Q6: DO YOU HAVE ANY CONCERNS WITH, OR FEEDBACK ON, THE APPLICATION REQUIREMENTS FOR A TEMPORARY ACTIVITY PERMIT?

Q7: DO YOU HAVE ANY CONCERNS WITH, OR FEEDBACK ON, THE VALIDITY PERIODS FOR EACH TYPE OF TEMPORARY ACTIVITY PERMIT?

Fees

21. The Commercial Permits Regulations (Fees) Rules 2024 will be updated to provide the structure of fees associated with obtaining Temporary Commercial Permits, Temporary Activity Permits and Sales and Promotions Permits.

22. The proposed fees for Temporary Commercial Permits will be as follows:

- a. Weekly: 250 AED
- b. 3 months: 3,000 AED
- c. 6 months: 6,000 AED
- d. 12 months: 12,000 AED

23. The proposed fees for a Temporary Activity Permits will be as follows:

- a. Temporary Activity (Events) Permit: 500 AED
- b. Temporary Activity (Entertainment) Permit: 1,500 AED
- c. Temporary Activity (Photography) Permit: 500 AED
- d. Temporary Activity (Speaker) Permit: 1,500 AED

24. The proposed fees for Sales and Promotions Permits will be as follows:

- a. Sales and Promotions Permit - Clearance Discount: 1000 AED
- b. Sales and Promotions Permit - Temporary Sales Discount: 1000 AED
- c. Sales and Promotions Permit - Instant Prizes: 1000 AED
- d. Sales and Promotions Permit – Prize Draws: 1000 AED
- e. Sales and Promotions Permit - Product Launches – sampling campaigns and distribution of promotional items: 1000 AED
- f. Sales and Promotions Permit - Product Launches – special events, presentations, exhibitions and interactive demonstrations: 1000 AED
- g. Sales and Promotions Permit - Promotional Stands 1000 AED

Q8: DO YOU HAVE ANY BROADER FEEDBACK ON THE PROPOSED AMENDMENTS THAT IS NOT COVERED BY THE QUESTIONS SET OUT ABOVE?

Proposed Amendments and Enactments

Rules

Appendix 1 Proposed Commercial Permits Regulations (Temporary Commercial) Rules 2025

Appendix 2 Proposed Commercial Permits Regulations (Temporary Activity) Rules 2025

Appendix 3 Proposed Commercial Permits Regulations (Sales and Promotions) Rules 2025

Appendix 4 Proposed Commercial Permits Regulations (Fees) Rules 2025 (editorial blackline)