

REGISTRATION AUTHORITY – GUIDANCE

COMMERCIAL PERMITS – SALES AND PROMOTIONS

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INTRODUCTION

Introduction to ADGM

The **ADGM** is a financial district in Abu Dhabi, United Arab Emirates, under UAE Federal law. It has its own regulations and rules for business and trade, based on English law. ADGM provides a clear and trusted system for companies and businesses from the UAE and around the world to do business.

The ADGM Registration Authority (**RA**) is responsible for the registration and licensing of all commercial businesses seeking to conduct commercial business within and from ADGM. The RA is also responsible for ensuring that any such business complies with ADGM's regulations and rules.

Note: Unless exempt under the Commercial Licensing Regulations (Exemptions) Order 2025, all businesses located in ADGM (Al Maryah and Al Reem Islands) are licensed by the RA, not the Abu Dhabi Department of Economic Development.

Guidance overview and application

This guidance is issued under the Commercial Permit Regulations 2024 ("**Regulations**") to assist businesses in understanding and complying with the Commercial Permits Regulations (Sales and Promotions) Rules 2025 ("**Rules**"). It gives a short and clear summary of the main requirements that businesses should know about with respect to sales and promotional activities.

The Rules establish a framework for the operation of certain sales and promotional activities within ADGM which require a permit to be obtained before undertaking such activities. The purpose of the Rules is to promote transparency, fairness and consumer confidence in promotional activities conducted within ADGM. This guidance explains the responsibilities of businesses that undertake the specified sales and promotional activities.

The RA ensures that these Regulations and Rules are followed by investigating complaints, checking if businesses are complying with the Regulations and Rules, and taking disciplinary action when needed.

This guidance should be read in conjunction with ADGM's Commercial Legislation, which is available at this [link](#).

Who must obtain a permit?

A sales and promotions permit is required by any person conducting, or intending to conduct, a sales and promotions activity from premises within ADGM.

A permit requirement applies irrespective of whether the activity is conducted directly by the business or through a third-party organiser, marketing agency or event contractor.

The responsibility for obtaining the permit remains with the ADGM licensed entity, or the non-ADGM licensed entity holding a temporary commercial permit issued by the RA.

UNDERSTANDING SALES AND PROMOTIONS ACTIVITIES

Overview

The Rules distinguish between two categories of activity: (1) Discounts and (2) Promotions.

Discounts include Temporary Sales Discounts and Clearance Discounts.

Promotions include Instant Prizes, Prize Draws, Product Launches, and Promotional Stands.

Each activity is explained below.

Discounts

1. Temporary Sales Discounts

A Temporary Sales Discount is a reduction in the price of goods or services for a limited duration not exceeding 30 days. This discount may apply to:

- individual products;
- groups of products;
- bundled offers; or
- services.

The discount must be temporary and clearly time bound. Permanent price reductions are not Temporary Sales Discounts.

Example 1

A retailer offers a 20% reduction on selected products for two weeks as part of a seasonal campaign.

This activity is likely to constitute a Temporary Sales Discount and require a Sales and Promotions Permit.

Example 2

A retailer permanently reduces the price of a product and updates its standard price list.

This activity is unlikely to constitute a Temporary Sales Discount because the reduction is not promotional nor temporary.

2. Clearance Discounts

A Clearance Discount relates to stock being permanently removed from inventory for final sale and liquidation purposes. Such discounts are final and cannot be combined with other promotional offers unless expressly stated.

The Registrar expects businesses conducting clearance sales to ensure that the sale genuinely relates to stock being cleared.

Example 1

A business closes a product line and conducts a six-week clearance campaign to liquidate remaining inventory.

This activity is likely to constitute a Clearance Discount and require a Sales and Promotions Permit.

Promotions

1. Instant Prizes

Instant Prizes involve rewards distributed immediately as part of a promotional activity where recipients are selected through chance or a predefined mechanism. Examples may include:

- scratch cards;
- digital prize reveals;
- sealed envelope promotions; or
- random reward mechanisms.

The Rules distinguish Instant Prizes from ordinary giveaways where every

recipient receives the same item.

Example 1

Customers spending AED 500 receive a scratch card with a chance to win prizes of varying value.

This activity is likely to constitute an Instant Prize and require a Sales and Promotions Permit.

Example 2

Every store visitor receives a complimentary branded tote bag.

This activity is unlikely to be considered an Instant Prize because there is no element of chance.

2. Prize Draws

A Prize Draw involves participants entering a random selection process to win a prize. A Prize Draw may require purchase or may be free to enter. The existence of a purchase requirement does not determine whether the activity is a Prize Draw.

The Registrar may require information regarding:

- prize descriptions;
- winner selection processes;
- draw dates; and
- participant eligibility criteria.

Example 1

A retailer offers consumers one entry into a prize draw for every AED 500 spent during a promotional campaign. At the end of the campaign period, a winner is selected at random and awarded a holiday package.

This activity is likely to constitute a Prize Draw and require a Sales and Promotions Permit.

Example 2

A retailer offers a AED 100 gift voucher to every customer who spends more than AED 1,000 during a promotional campaign.

As every qualifying customer receives the same benefit and there is no element of chance or random selection, the activity is unlikely to constitute a Prize Draw for the purposes of the Rules.

3. Product Launches

The key feature of a product launch is that the activity occurs beyond the ordinary and regular operations of the business and is conducted at premises other than the business's usual operating location. A product launch may include:

- exhibitions;
- demonstrations;
- sampling campaigns;
- promotional events; and/or
- temporary showcase events.

Product launches may introduce new products, promote existing products, or showcase product features and benefits beyond the usual activities of the business.

Example 1

A cosmetics company launches a new skincare range and establishes a temporary promotional activation in a public area within ADGM for two weeks. The activation includes product demonstrations, sampling, promotional displays and brand representatives engaging with visitors.

As the activity is being conducted from a temporary premises outside the company's ordinary place of business for promotional purposes, it is likely to constitute a Product Launch and require a Sales and Promotions Permit.

Example 2

A retailer introduces a new product range and displays the products within its existing ADGM store as part of its normal business operations. No temporary promotional structure is established and the activity remains confined to the retailer's regular premises.

The activity is unlikely to constitute a Product Launch for the purposes of the Rules solely because a new product has been introduced.

Example 3

A business announces a new product through its website and social media channels and makes the product available through its existing sales channels.

Provided no temporary promotional activity is conducted from premises within ADGM, the announcement itself is unlikely to constitute a Product Launch requiring a permit.

4. Promotional Stands

Promotional stands are generally considered to be structures located outside the business's regular operating premises. They may include temporary booths, kiosks and promotional structures established for marketing, advertising, sampling or sales activities for a limited period. Examples include:

- kiosks;
- temporary sampling stations;
- exhibition booths; and/or
- promotional display areas.

Example 1

A retail brand establishes a temporary branded kiosk in a public concourse within ADGM for a period of one week. The kiosk is used to distribute product samples, display promotional materials, and encourage visitors to sign up for a time-limited discount campaign.

The structure is not part of the business's permanent premises and is deployed solely for marketing and customer engagement purposes.

This activity is likely to constitute a Promotional Stand under the Rules and would require a Sales and Promotions Permit.

Example 2

A technology company participates in a three-day industry exhibition held within ADGM by operating a staffed promotional booth. The booth is used to demonstrate a new product, collect customer details, distribute branded materials, and promote a product launch offer.

Although conducted within an organised event, the booth is a temporary structure used for promotional purposes outside the company's ordinary place of

business.

This activity is likely to constitute a Promotional Stand under the Rules and would require a Sales and Promotions Permit.

Example 3

A professional services firm attends a conference within ADGM and uses a small table within a shared networking area to provide general information about its services and respond to enquiries. No promotional campaign, discount offer, prize draw, or sales activation is conducted, and the activity is limited to informational discussions.

As the activity is purely informational in nature and does not involve a temporary promotional structure established for marketing activation purposes, it is unlikely to constitute a Promotional Stand for the purposes of the Rules.

APPLYING FOR A PERMIT

A person intending to conduct a sales and promotions activity within ADGM must obtain a Sales and Promotions Permit before commencing the activity. Applicants should ensure that all required approvals are obtained prior to the commencement of the proposed activity.

The Registrar encourages businesses to consider permit requirements at an early stage of planning. Businesses should allow sufficient time for the preparation of supporting documentation and the assessment of the application.

The grant of a permit is not automatic, and applicants should not make commercial commitments on the assumption that a permit will be issued.

1. Who may apply?

Applications may be submitted by:

- an ADGM licensed person; or
- a non-ADGM licensed person holding a temporary commercial permit issued by the RA.

The applicant remains responsible for ensuring the accuracy and completeness

of all information submitted to the Registrar.

2. Information to be submitted

Depending on the nature of the activity, the Registrar may require information including:

- **Applicant Details:** Full name and current license information.
- **Activity Overview:** The type, description, and purpose of the proposed activity.
- **Logistics & Schedule:** Proposed location, operating hours, and exact start and end dates.
- **Promotional Details:** Information on products, services, prizes, gifts, or rewards involved in the campaign.
- **Marketing Materials:** Copies or drafts of all promotional and advertising content.
- **Event Scope:** Estimated visitor or participant numbers, along with details of any temporary structures, stands, or displays.
- **Supplemental Information:** Any additional documentation specifically requested by the Registrar.

Important Note: Applicants must ensure all submitted information is clear, accurate, and completely consistent across all supporting documents.

3. Supporting documentation

The supporting documentation required will depend on the nature of the proposed activity.

To help us process your application efficiently, please provide any relevant materials from the following categories:

- **Marketing & Visuals:** Promotional artwork, marketing materials, or photographs/renderings of proposed promotional stands.
- **Logistics & Layouts:** Floor plans, site layouts, or event schedules.
- **Compliance & Risk:** Risk assessments and health and safety documentation.
- **Terms & Permissions:** Terms and conditions of participation, prize descriptions, and written landlord or property owner approvals (such as

NOCs from mall management).

Please Note: The Registrar reserves the right to request additional information or documentation where necessary to fully assess your application.

4. Assessment of applications

In determining whether to grant a permit, the Registrar may consider matters including:

- **Location Suitability:** Whether the proposed site is appropriate and properly zoned for the requested use.
- **Public Health & Safety:** The plan for managing risks, crowds, or any hazards to the general public.
- **Nature and Scale:** The specific type of activity and its overall size, duration, or capacity.
- **Community & Business Impact:** How the activity might affect neighbouring businesses, residents, or property occupiers (e.g., noise, parking, foot traffic).
- **Operational Arrangements:** The logistics of how the activity will be run (e.g., waste management, staffing, emergency plans).
- **Cultural & Community Considerations:** Alignment with local cultural values, heritage sites, or community expectations.
- **Registrar Discretion:** Any other unique factor or specific detail the Registrar deems relevant to the application.

The Registrar may engage with applicants during the assessment process and may request clarification or supplementary information where required.

Where the Registrar is satisfied that the requirements of the Rules have been met, a permit may be issued subject to any conditions considered appropriate. Permit holders should review the permit carefully upon issuance and ensure that all conditions are understood and complied with throughout the duration of the activity.

A permit does not exempt the permit holder from obtaining any other approvals, consents or permissions that may be required under other ADGM commercial legislation.

FREQUENTLY ASKED QUESTIONS

1. What are the Commercial Permits Regulations (Sales and Promotions) Rules 2025?

The Rules establish a permit framework for certain temporary sales and promotional activities conducted within ADGM.

The framework enables the Registrar to:

- oversee temporary commercial promotions conducted within ADGM;
- ensure promotional activities are conducted from suitable premises;
- monitor compliance with permit conditions; and
- support an orderly commercial environment within ADGM.

2. Do all discounts and promotions require a permit?

Only discounts and promotions falling within the definition of a Sales and Promotions Activity require a permit under the Rules.

3. Can I conduct a promotion while my application is being reviewed?

No. The activity should not commence until the permit has been granted.

4. Do online promotions require a permit?

Online promotions will not require a Sales and Promotions Permit unless there is a corresponding activity within the business premises which falls within the definition of a Sales and Promotions Activity covered by the Rules.

5. Can a permit be amended after it is issued?

Yes. An application for variation may be made to the Registrar. Variation applications are assessed in the same manner as new applications and may be refused where the Registrar considers refusal desirable in the interests of ADGM.

A permit should not be amended where the change would materially alter the approved promotion, including, but not limited to:

- change of location;
- extension of duration;
- introduction of additional promotional activities;
- substantial amendments to the event format or promotional activity.

In such cases, the applicant may be required to submit a new permit application.

6. What happens if my permit is revoked?

The activity must stop immediately unless otherwise directed by the Registrar.

7. How do I submit an application?

Applications must be submitted through the [Access ADGM](#) Portal. The applicant should:

- Log into the ADGM Portal.
- Select “Sales and Promotions Permit”.
- Select the applicable permit type.
- Complete all mandatory fields.
- Upload supporting documents.
- Confirm campaign dates.
- Pay the fees.
- Submit the application.

Incomplete applications may be returned for clarification.

FURTHER INFORMATION

For further information, please visit www.adgm.com

DISCLAIMER

This guidance is a non-binding indicative guidance and should be read together with the relevant legislation, in particular ADGM's Commercial Permits Regulations, and any other relevant regulations and enabling rules, which may change over time without notice. Information in this guidance is not to be deemed, considered, or relied upon as legal advice and should not be treated as a substitute for specific advice concerning any individual situation. Any action taken upon the information provided in this guidance is strictly at your own risk and the RA will not be liable for any losses and damages in connection with the use of or reliance on information provided in this guidance. The RA makes no representations as to the accuracy, completeness, correctness, or suitability of any information provided in this guidance.