

#### OPINION

## TAKING THE WORLD'S MOST POPULAR HNWI RESIDENCY PROGRAM TO GREATER HEIGHTS



The UAE's ambition to become the global destination of choice for wealth management is no secret.

With an unmatched combination of business-friendly regulation and long-term residency options, the country has drawn in high-net-worth individuals ("**HNWIs**") globally. However, those leveraging the UAE's most sophisticated structuring tools, face a frustrating trade-off: structure smartly or hold property personally to access the most popular Golden Visa long-term route. Current rules do not extend this visa pathway to structured ownership.

This does not have to be the case. With practical adjustments to Golden Visa eligibility criteria, Dubai can bridge the gap between efficient wealth structuring and long-term residency access.

"Dubai can bridge the gap between efficient wealth structuring and long-term residency access"





## Background

Over the past decade, the UAE has transformed into a global hub for investment and wealth structuring. Through forward-thinking reforms, it has positioned the Dubai International Financial Centre ("**DIFC**") and Abu Dhabi Global Market ("**ADGM**") as leading international financial centres.<sup>1</sup>

In 2024, the number of foundations registered in the DIFC surged by 55%, reflecting the strong demand for regulated, succession-ready holding structures.<sup>2</sup> In fact, foundation registrations have increased tenfold in just four years, with M/HQ alone accounting for 24% of all registered foundations in the UAE.

# "Policy needs to evolve in line with how private wealth is structured today"

Launched in 2019<sup>3</sup>, the UAE's Golden Visa program has granted over 500,000<sup>4</sup> long-term residencies to HNWIs, entrepreneurs, and specialised professionals, quickly becoming the world's most attractive residency programme for HNWIs. Offering 10 year renewable residency visas supported by a stable, pro-business environment, the programme is a key driver of inward investment. Its various tracks, including real estate, entrepreneurship, employment, and special skills, provide broad-based appeal. But the AED 2 million real estate route remains the most widely used. In 2024 alone, the UAE attracted thousands of HNWIs, many of whom incorporated property purchases into their broader immigration strategies.<sup>5</sup>

However, for the UAE to go from market leader to unassailable, **policy needs to evolve in line with how private wealth is structured today.** 

migration-report-2024 - accessed on 10th March 2025.

<sup>1.</sup> The Global Financial Centres Index 37, GFCI 37 Report 2025.03.20

<sup>2.</sup> DIFC Authority, Annual Private Wealth Report 2024

Cabinet Decision Resolution (56) of 2018 regarding the regulation of residence permits for investors, entrepreneurs and those with specialized talents; Cabinet
Resolution No. (65) of 2022 Issuing the Executive Regulations of Federal Law by Decree No. (29) of 2021 Concerning the Entry and Residence of Foreigners

Estimate number is based on M/HQ's discussions with the Dubai Department of Economy and Tourism.
 The Henley Private Wealth Migration Report 2024. 18th June 2024; https://www.henleyglobal.com/newsroom/press-releases/henley-private-wealth-



#### **ASSET PROTECTION VS RESIDENCY ACCESS**

Despite the many successes, the intersection between wealth structuring and residency is misaligned.

Under the federal Golden Visa regime, the Federal Authority for Identity, Citizenship, Customs and Port Security approves residency permits. The DIFC has its own dedicated scheme via the DIFC's Government Service Office, allowing individuals holding real estate within the DIFC valued at AED 2 million (approximately USD 545,000 or EUR 500,000) or more in their own name<sup>6</sup> to apply for a 10 year visa.

## "The intersection between wealth structuring and residency is currently misaligned"

However, this regime excludes *non DIFC real estate and* real estate held through a DIFC foundation, one of the most effective structuring tools for asset protection, estate planning and intergenerational wealth transfer. These structures are not only widely accepted internationally, but are heavily used by families already relocating to the UAE seeking succession planning, asset protection, business continuity, and tax efficiency.

Investors therefore still face a dilemma: hold property in their own name to qualify for the Golden Visa, or structure it efficiently but forgo access to the DIFC's popular Golden Visa pathway.

We believe this should change.

#### **BRIDGING THE GAP**

Allowing properties held via *DIFC foundations* to qualify, even where the property is located *on the mainland*, would align Golden Visa eligibility with modern wealth structuring practices. Moreover, it would make the Golden Visa regime the most structurally flexible HNWI residency programme in the world.

"Permitting individuals to hold Dubai mainland properties through a DIFC foundation and achieve Golden Visa eligibility ... is a rare win-win-win"

SEPTEMBER 2025

<sup>6.</sup> DIFC Client Handbook. Employee Services – 2025. Government Services.



More than a mere policy adjustment, this is

#### A rare WIN-WIN-WIN:

- 1. WIN for clients, who would gain flexibility when structuring their UAE investments and encourage them to plant roots to provide for intergenerational transfers without the administrative hurdles tied to inheritance.
- **2. WIN for the DIFC,** who will see a boost in demand for DIFC foundations.
- **3. WIN for the Dubai Land Department,** who will benefit from greater transparency, professionalised ownership, and reduced fragmentation of title, not to mention additional income (collection of one-time conveyance fee; donation rate of 0.125% of the unit's market rate).
- **4. WIN for Dubai and the UAE,** cementing its status as the leading destination for wealth migration.

#### This small change would have a BIG impact.

It would open the door for investors holding properties outside the DIFC through their DIFC structures to qualify for the Golden Visa and make the Golden Visa program more accessible and attractive to a wider range of HNWI investors.

#### WHY NOW?

The numbers speak for themselves.

Today, more than 80,000 millionaires, 235 centimillionaires<sup>7</sup>, and 20 billionaires call Dubai home<sup>8</sup>, making it one of the world's top destinations for private wealth.

Dubai already hosts more than 120 families and 600 affiliated entities in the DIFC alone, collectively managing USD 1.2 trillion in assets.<sup>9</sup>

The UAE is on track to draw 9,800 of the projected 142,000 global HNWI relocations in 2025.11

With over USD 30 billion in FDI inflows in 2023, and a national target to more than double this by 2031<sup>12</sup>, the direction of travel is clear.

SEPTEMBER 2025 4

<sup>7.</sup> An individual whose wealth exceeds USD 100 million.

<sup>8.</sup> Henley & Partners, Top 50 Cities for Millionaires; https://www.henleyalobal.com/publications/wealthiest-cities-2025/top-50-cities-millionaires - accessed on 25th April 2025

<sup>9.</sup> DIFC continues to drive the future of finance with outstanding H1 2024 results. 30th July 2024; https://www.difc.com/whats-on/news/difc-continues-to-drive-the-future-of-finance-with-outstanding-h1-2024-results - accessed on 27th April 2025.

<sup>10.</sup> Hubbis. The UAE's Rising Appeal for Independent Wealth Management and Family Offices. 21st March 2025; https://hubbis.com/article/the-uae-s-rising-appeal-for-independent-wealth-management-and-family-offices\_accessed on 28th April 2025.

<sup>11.</sup> Henley & Partners. A Landmark Year for Wealth Migration; <a href="https://www.henleyglobal.com/publications/global-mobility-report/2025-january/why-2025-will-be-landmark-year-wealth-migration">https://www.henleyglobal.com/publications/global-mobility-report/2025-january/why-2025-will-be-landmark-year-wealth-migration</a> - accessed on 27th April 2025.

<sup>2.</sup> Reuters. UAE targets raising annual foreign direct investment inflows to \$65 billion in 2031. 10th March 2025; https://www.reuters.com/world/middle-east/uae-targets-raising-annual-foreign-direct-investment-inflows-65-billion-2031-2025-03-10/- accessed on 27th April 2025.



## ENHANCING THE UAE'S GLOBAL EDGE – MARGINAL POLICY SHIFT = SUBSTANTIAL BENEFITS

Permitting individuals to hold Dubai mainland properties through a DIFC foundation and achieve Golden Visa eligibility constitutes a marginal regulatory shift, **but** one which would deliver substantial benefits.

The structures are already in place.

The demand is here.

The next step is simple.

Let Dubai move from market leader to the world's gold standard.



Hermione Harrison

Director - Head of Corporate Governance

<a href="mailto:harrison@m-hq.com">harrison@m-hq.com</a>



Yann Mrazek
Managing Partner, Co-Founder
mrazek@m-hq.com

**M/HQ** is a multi-services platform catering to successful individuals and entrepreneurial families. Our one-stop-shop offering is unique in the Middle East: a holistic and cross-disciplinary combination of a market-leading corporate services firm, a private client specialist team and a regulatory & compliance services practice, all through one single platform.

We have extensive experience advising on a broad range of wealth structuring and legacy planning issues. We particularly assist in establishing and servicing **Single- and Multi- Family offices, Family- and Group- Holdings, Foundations** and other asset consolidation/protection and intergenerational wealth management structures.

Headquartered in the UAE, we are an entrepreneurial firm for entrepreneurial clients.