

[Official Translation]

MINISTERIAL DECISION NO. 215 FOR THE YEAR 2019
ON THE ISSUANCE OF DIRECTIVES FOR THE IMPLEMENTAION OF THE PROVISIONS OF THE
CABINET DECISION NO (31) OF 2019
CONCERNING ECONOMIC SUBSTANCE REQUIREMENTS

The Minister of Finance:

- After perusal of the Constitution;
- Federal Law no (1) of 1972, concerning the terms of reference of the Ministries and authorities of the Ministers, as amended;
- Federal Law no (18) of 1981, concerning the Organization of Commercial Agencies, as amended;
- Federal Law no (26) of 1981, concerning the Maritime Law, as amended;
- Federal Law no (5) of 1985, on the Issuance of the Civil Transactions Code, as amended;
- Federal Law no (3) of 1987, on the Issuance of the Penal Code, as amended;
- Federal Law no (10) of 1992, on the Issuance of the Law of Evidence in Civil and Commercial Transactions, as amended;
- Federal Law no (11) of 1992, on the Issuance of the Civil Procedures Code, as amended;
- Federal Law no (37) of 1992, concerning Trademarks, as amended;
- Federal Law no (4) of 2000, concerning the Emirates Securities and Commodities Authority and Market, as amended;
- Federal Law no (7) of 2002, concerning Copyrights and Neighbouring Rights, as amended;
- Federal Law no (17) of 2002, concerning the Organization and Protection of Industrial Property Rights for Patents and Industrial Designs, as amended;
- Federal Law no (8) of 2004, concerning Financial Free Zones, as amended;
- Federal Law no (6) of 2007, on the Establishment of the Insurance Authority and Organization of its Activities, as amended;
- Federal Decree-Law no (8) of 2011, on the Preparation of Balance Sheets and Final Accounts;
- Federal Law no (2) of 2015, concerning Commercial Companies, as amended;



- Federal Law no (8) of 2015, concerning the Federal Customs Authority;
- Federal Decree-Law no (13) of 2016, concerning the Federal Tax Authority;
- Federal Law no (14) of 2016, concerning Violations and Administrative Sanctions in the Federal Government;
- Federal Law no (19) of 2016, concerning the Anti-Commercial Fraud;
- Federal Law no (7) of 2017, concerning Tax Procedures;
- Federal Decree-Law no (8) of 2017, concerning the Value Added Tax;
- Federal Decree-Law no (14) of 2018, concerning the Central Bank and Organization of Financial Institutions and Activities;
- Federal Decree Law No (48) of 2018 Approving the Multilateral Administrative Agreement for the Automatic Exchange of Information,
- Federal Decree Law No (54) of 2018 Approving the Convention on Mutual Administrative Assistance in Tax Matters; and
- Cabinet Decision no (31) of 2019 concerning Economic Substance Requirements;

DECIDES:

ARTICLE 1: DEFINED TERMS

Unless the context otherwise requires, words or expressions defined in the Cabinet of Ministers Resolution No. 31 of 2019 Concerning Economic Substance Regulations shall have the same meaning in this Guidance.

ARTICLE 2: OVERVIEW OF GUIDANCE

2.1 Introduction

This Guidance is issued pursuant to Article 6. (6) of the Cabinet of Ministers Resolution No. 31 of 2019 Concerning Economic Substance Regulations (“**ESR**”) to provide guidance on how the economic substance test may be met for the purpose of complying with the provisions of the ESR.

The Guidance is intended to serve as a guide to entities carrying out one or more relevant activities (each a Relevant Activity as defined under the ESR) captured by the ESR and set out various guidelines on how Regulatory Authorities propose to discharge their functions and the circumstances in which monitoring and enforcement will be carried out.

It may be necessary, from time to time, to revise or expand on this Guidance.



2.2 Background

The ESR is issued pursuant to the global standard set by the OECD Forum on Harmful Tax Practices (FHTP), which requires companies to have substantial activities in a jurisdiction.

In addition to the work of the OECD, the European Union Code of Conduct Group (COCG) also adopted a resolution on a code of conduct for business taxation the aim of which is to curb harmful tax practices.

The Cabinet of Ministers of the United Arab Emirates (UAE) has enacted Resolution No. 31 of 2019 concerning the Economic Substance Regulations taking into account the global standards developed by the OECD and EU.

ARTICLE 3: LICENSEES REQUIRED TO MEET THE ECONOMIC SUBSTANCE TEST

3.1 Definition of a Licensee

Article (1) of the ESR defines a Licensee as “any natural or juridical person licensed by the competent licensing authority/(ies) in the UAE, to carry out a Relevant Activity in the UAE including a Free Zone and a Financial Free Zone”

A Licensee is considered licensed by virtue of holding a License from the relevant licensing authorities from which a licensing approval is required to carry out a Relevant Activity. A License includes a commercial license, certificate of incorporation, or other form of permit required to be procured prior to the Licensee being able to carry out a Relevant Activity.

Every Licensee that carries on a Relevant Activity and derives an income therefrom in the UAE, including a Free Zone or a Financial Free Zone must meet the Economic Substance Test.

3.2 Exempt Companies

Companies in which the Federal Government or the Government of any Emirate of the UAE or any governmental authority or body of any of them which has at least 51% direct or indirect ownership in its shareholding are not subject to the ESR.

3.3 Relevant Activity

Article 4 of the ESR identifies any of the following activities to be a Relevant Activity:

- (i) Banking Business
- (ii) Insurance Business
- (iii) Investment Fund Management Business
- (iv) Shipping Business
- (v) Lease-Finance Business
- (vi) Distribution & Service Centre Business
- (vii) Headquarters Business
- (viii) Intellectual Property Business



(ix) Holding Company Business

If a Licensee carries out a Relevant Activity, then the Licensee must review the requirements applicable to such activity under the ESR. By way of example, the ESR sets out reduced substance requirements for holding companies that do not carry out any other Relevant Activity and solely hold equity participation in other entities (see Article 5 below). Conversely, a Licensee that derives income from Intellectual Property Assets that are considered to be high risk must comply with higher reporting requirements and standards to meet the requirements of the ESR (See Article 5 below).

A Licensee that carries on more than one Relevant Activity is required to satisfy the Economic Substance Test for each Relevant Activity carried on by such Licensee.

ARTICLE 4: THE ECONOMIC SUBSTANCE TEST

4.1 Overview

All Licensees carrying out and deriving income from a Relevant Activity during a Financial Year are required to ensure that they meet the substance and reporting requirements set out under the ESR for each Relevant Activity.

4.2 The role of the Regulatory Authority in the assessment of whether a Licensee has met the Economic Substance Test.

- (a) Under Article (7) of the ESR, the Regulatory Authority is in charge of determining whether a Licensee has met the Economic Substance Test during any Financial Year of the Licensee.
- (b) In order for the Regulatory Authority to carry out this mandate, the Licensee shall provide to the Regulatory Authority the relevant information within the time determined by the Regulatory Authority as follows:
 1. Submission of Information Notification: The Licensee shall, with effect from 1 January 2020, submit to the Regulatory Authority a Notification containing the following information:
 - a. whether or not it carries out a Relevant Activity;
 - b. whether or not all or any part of the Licensee's gross income in relation to a Relevant Activity is subject to tax in a jurisdiction outside of the UAE and;
 - c. the date of the end of its Financial Year.
 2. If the Licensee, including a company in which the Federal Government or Government of any Emirate of the UAE or any governmental authority or body of any of them has less than 51% shareholding interest, is carrying out a Relevant Activity and is required to satisfy the Economic Substance Test, it shall, within twelve (12) months of the end of each Financial Year of a Licensee commencing on or after 1 January 2019, submit to the Regulatory Authority a report containing the information referred to in Article (8-4) of the ESR. If the



Relevant Activity carried out by the Licensee is a High Risk IP Business as defined in the ESR, such Licensee must include in its report the additional information determined under Article (8-4-i). If the High Risk IP Licensee fails to provide these additional information, the Regulatory Authority must determine that the Economic Substance Test has not been met during the relevant Financial Year of such Licensee.

3. The Regulatory Authority shall not be required to issue its decision in respect of whether a Licensee has met the Economic Substance Test immediately after the end of the relevant Financial Year. It shall however reach such a decision within no later than six (6) years after the end of the Financial Year subject to the evaluation. But such time bar period shall not apply if the Regulatory Authority is not able to reach a decision during this period by reason of gross negligence, fraud, or deliberate misrepresentation by the Licensee or by any other person.
4. Each Regulatory Authority shall set out the form of reports to be filed and mechanisms for submitting such forms to the Regulatory Authority.

4.3 Key Requirements of Economic Substance Test

In order for a Licensee to demonstrate that its activities in the UAE have adequate substance, it must meet the following:

- (a) The Licensee conducts State Core Income-Generating Activities in the UAE.

The ESR has identified a list of activities that are considered “Core Activities” which may be undertaken in the State in relation to each Relevant Activity and are defined as State Core Income Generating Activities (“CIGA”). (Article 5, ESR).

The list of CIGA is not exhaustive. The list of CIGA’s includes the activities listed but is not limited to them. The general principle is that the activities which form the CIGA, are regarded to be the most important activities that a Licensee carrying out a Relevant Activity is expected to be carrying on in the UAE.

- (b) The Licensee is directed and managed in the UAE in relation to that activity:

The ‘directed and managed’ test aims to ensure that there are an adequate number of board meetings held and attended in the UAE. A determination as to whether an adequate number of meetings are held and attended in the UAE will be dependent on the level of Relevant Activity being carried out by a Licensee. It is expected that it must be at least be one (1) meeting held in a Financial Year in the UAE. Consideration must also be given to meeting requirements prescribed under the applicable law regulating the Licensee or as may be stipulated in the constitutional documents of the Licensee.

The ‘directed and managed’ test further requires that; (i) meetings are recorded in written minutes and signed by attendees and that such minutes are kept in the UAE; (ii) quorum for such meetings is met and those attendees are physically present in the UAE; and (iii) directors have the necessary knowledge and expertise to discharge their duties.



The minutes of the board meetings must refer to all the relevant decisions taken and must be signed by directors physically present.

Quorum shall be determined in accordance with the law applicable to the Licensee setting out quorum requirements or as may be set out in the constitutional documents of the Licensee.

In the event that the Licensee is managed by an individual (general manager or CEO) rather than a board, the above requirements will apply to such individual.

It is imperative also to ensure that the board or manager has the necessary knowledge and expertise and is not merely giving effect to decisions being taken outside the UAE.

- (c) having regard to the level of Relevant Activity, has an adequate number of qualified full-time (or equivalent) employees in relation to that activity who are physically present in the UAE (whether or not employed by the Licensee or by another entity and whether on temporary or long-term contracts), or an adequate level of expenditure on outsourcing to third party service providers, whose activities, employees, expenditure, and premises are in the UAE; and these activities, employees, expenditures and premises are adequate for carrying out the Relevant Activity being outsourced;
- (d) Incur adequate operating expenditure by it in the UAE, or an adequate level of expenditure on outsourcing to third party service providers whose activities, employees, expenditure and premises are in the UAE; and these activities, employees, expenditures and premises are adequate for carrying out the Relevant Activity being outsourced;
- (e) has adequate physical assets in the UAE or an adequate level of expenditure on outsourcing to third party service providers in the UAE, for the activities of the Licensee; and
- (f) in the case of State Core Income-Generating Activity carried out for the relevant Licensee by another entity, if it is able to monitor and control the carrying out of that activity by the other entity.
- (g) **Meaning of “adequate” and “appropriate”**

It is acknowledged that businesses vary in size and therefore the employees, expenditures and premises which are adequate or appropriate for large or medium sized business may not be adequate or appropriate for a small business. It is not the intention of the ESR to impose requirements on businesses to engage more employees than is actually required by the business or incur expenditures beyond its needs, or beyond any existing requirements in relation to employees to which a Licensee is already subject to pursuant to any existing legislation regulating a Relevant Activity, provided that the business is engaged in genuine business activity and carrying out a CIGA in the UAE with the employees, expenditures and premises it has.

What is adequate or appropriate for each Licensee will be dependent on the nature and level of Relevant Activity being carried out by such Licensee. A Licensee will have to ensure that it maintains sufficient records to demonstrate the adequacy and appropriateness of the resources utilized and expenditures incurred. The Regulatory Authority shall review such records and



information submitted in assessing whether a Licensee has demonstrated the adequacy and appropriateness of resources utilized and expenditures incurred.

The requirement for adequate employees is aimed at ensuring that employees carrying out a Relevant Activity are suitably qualified to carry out such activity.

A Licensee may outsource the requirements under Article (6-2, paragraphs (c) (d) and (e)) to a third party provider, which may include a company related thereto, provided that any such outsourcing arrangements do not contravene any existing regulatory requirements that a Licensee may be subject to.

The requirement for adequate premises is intended to ensure that a Licensee has procured appropriate premises to carry out a Relevant Activity in the UAE. Premises can include offices or other forms of business premises depending on the nature of the Relevant Activity such as warehouses or facilities from which the Relevant Activity is being conducted.

Premises may be owned or leased by the Licensee, provided that the Licensee shall submit the relevant documentation to the Regulatory Authority evidencing the right to use the premises for the purposes of carrying out the Relevant Activity.

(h) Outsourcing

Outsourcing of State Core Income-Generating Activity

A Licensee may satisfy paragraphs (c), (d), and (e) of Article (6-2) of the ESR in relation to a Relevant Activity if part of its State Core Income-Generating Activity for that Relevant Activity is undertaken by a third party (other than the Licensee and its employees) in the UAE – referred to as 'outsourcing'.

The ability of a Licensee to satisfy the Economic Substance Test in these circumstances is subject to a number of important conditions:

1. A third party service provider to whom part of a Licensee's State Core Income-Generating Activity is outsourced must have, at all times in the UAE, levels of:
 - a. activities;
 - b. employees;
 - c. expenditures; and
 - d. premises

which are, individually and in the aggregate, adequate in relation to the State Core Income-Generating Activity being undertaken. The resources of the third party service provider in the UAE will be taken into consideration when determining the adequacy of its resources.



However, there must be no double counting if the services are provided to more than one Licensee carrying out a Relevant Activity in the UAE.

2. The Licensee must be able demonstrate its ability at all times to supervise the carrying out of the State Core Income-Generating Activity by the third party service provider.
3. All parts of the Licensee's State Core Income-Generating Activity that are outsourced must be undertaken in the UAE.
4. Where part of a State Core Income-Generating Activity is outsourced, the Licensee remains responsible for ensuring accurate information is reported to the Regulatory Authority, and this will include precise details of the level of resources employed by its service providers, for example based on the use of timesheets.

Consideration should be given to third party service provider agreements entered into for the purposes of outsourcing to ensure that such agreements meet the requirements of the ESR and mechanisms for sharing of information relating to the resources of third party service providers for the purposes of disclosure to a Regulatory Authority.

5. Outsourcing must not be used to circumvent the Economic Substance Test

A Licensee must be able to demonstrate to the Regulatory Authority that outsourcing to third party service providers is not being done with the objective of circumventing compliance with the Economic Substance Test.

4.4 Retention of Information and Records

A Regulatory Authority may determine that a Licensee has not met the Economic Substance Test, provided that such determination is made no later than six (6) years from the end of the Financial Year to which the determination relates. (Article 7(1), ESR).

The ESR provides for various powers to a Regulatory Authority to request any additional information, documents or records as they may be reasonably required to allow the Regulatory Authority to make a determination (Article 8(5), ESR).

Therefore, while the ESR does not prescribe a set period for the retention of information by a Licensee, it is advisable that a Licensee that is required to satisfy the Economic Substance Test in relation to a Relevant Activity, retain any relevant information evidencing compliance with the ESR for a period of six (6) years after the end of each Financial Year so as to allow such Licensee to address any requests for information that may be received from a Regulatory Authority during the six (6) year period granted to a Regulatory Authority to reach its determination.

Any records required to be kept and submitted to a Regulatory Authority by a Licensee pursuant to the ESR must be provided in English. In the event that such records are kept in a language other than English, the Licensee shall provide an English translation thereof (Article 8(7), ESR).



ARTICLE 5: SECTOR-SPECIFIC GUIDANCE

5.1 Holding Company Business

A Licensee whose activity is restricted to carrying out a Holding Company Business that derives its income from dividends and capital gains is subject to reduced substance requirements. Such Licensee shall only be required to meet the following requirements (Article 6 (4), ESR):

- (a) Ensure compliance with requirements to submit any documents, records or information to the relevant Regulatory Authority in accordance with the Resolution applicable to the Licensee in the UAE; and
- (b) Maintaining adequate employees and premises for holding and managing the Holding Company Business.

Therefore, for companies whose activities are limited to holding equity participation, there is no requirement that the Licensee that carries on such form of Holding Company Business carries out a CIGA in the UAE.

Holding Company Businesses that undertake a Relevant Activity and derive income from such activity (other than solely receiving income from equity interests) do not benefit from the above exemption and are required to meet the full substance requirements of the Economic Substance Test. The State Core Income-Generating Activities for such Licensees will be those activities associated with the Relevant Activity.

A Licensee which owns other forms of asset (e.g. bonds, government securities, interest in real property) will clearly not be a 'pure equity holding' entity (even if it also owns equity participations) and will not be treated as carrying on holding business.

Because it is possible for a Licensee to carry on more than one Relevant Activity, the fact that the Licensee is a 'pure equity holding entity' does not preclude the possibility that it may carry on one or more other relevant activities, in which case the CIGA shall be those associated with the income generated.

5.2 Headquarter Business

Whether an entity carries on headquarters business is not dependent on its position in the group structure. It is entirely dependent on the services it provides to other companies in the group, whether parents or subsidiaries.

5.3 High Risk Intellectual Property Activity

The ESR identifies certain activities in relation to Intellectual Property Business as high risk and sets out additional conditions that must be satisfied by a Licensee carrying out any of such activities.



Income derived from intellectual property assets activity poses a greater risk of artificial profit shifting as opposed to income derived from non-IP related activity. In anticipation of this higher risk, the ESR presumes that a Licensee who carries out such activity is not complying with the Economic Substance Test.

A Licensee shall be considered a High Risk IP Licensee if such Licensee carries on an Intellectual Property Business and in respect of which any of the two conditions set out in Article (1) of the ESR applies.

The Regulatory Authority shall presume that a High Risk IP Licensee has not met the Economic Substance Test during a Financial Year. Such an assumption can be rebutted by a Licensee provided that the Licensee submits, inter alia, sufficient information demonstrating that the Licensee does and historically has exercised a high degree of control over the development, exploitation, maintenance, enhancement and protection of the Intellectual Property Asset by an adequate number of full-time employees, with the necessary qualifications, who permanently reside and perform their activities in the UAE.

A High Risk IP Licensee must further show sufficient evidence that decision making is taking place within the UAE by meeting the following criteria:

- (a) taking strategic decisions and managing (as well as bearing) the principal risks related to development and subsequent exploitation of the intangible asset generating income.
- (b) taking the strategic decisions and managing (as well as bearing) the principal risks relating to acquisition by third parties and subsequent exploitation and protection of the intangible asset.
- (c) carrying on the ancillary trading activities through which the intangible assets are exploited leading to the generation of income from third parties.

Periodic decisions by non-resident directors or board members would not be sufficient to satisfy the Economic Substance Test in respect of a High Risk IP Licensee.

ARTICLE 6: REGULATORY AUTHORITY FUNCTIONS

The ESR set out various functions that must be carried out by each Regulatory Authority and prescribes various powers to them so as to allow them to discharge such functions.

Functions of Regulatory Authorities under the ESR include:

6.1 Obtaining Licensee Records, Documentation and Information

The Regulatory Authority shall receive, review, hold, store and disseminate as required all documentation, records and information that any Licensee is required to submit to the Regulatory Authority from time to time under the ESR.



The Regulatory Authority shall ensure that the submission of required documentation, records and information by any Licensee under the jurisdiction of the Regulatory Authority is timely and complete, and shall promptly follow-up with any Licensee in the event of any delay or failure in the submission of required documentation, records and information, and/or in the event that documentation, records and information are discovered to be incorrect or incomplete. For these purposes the Regulatory Authority may:

- (a) serve a notice on a Licensee requiring further documentation or information; and/or
- (b) enter a Licensee's premises in order to obtain necessary documentation or information; and/or
- (c) impose on a Licensee an administrative penalty not exceeding fifty thousand Dirhams (AED 50,000).

The Regulatory Authority shall collect all information required from a Licensee so as to carry out its functions pursuant to the ESR.

6.2 Determination of whether Economic Substance Test is Met

The Regulatory Authority shall, in accordance with the ESR and this Guidance, make a determination under Article 7 of the ESR as to whether a Licensee meets the Economic Substance Test for any Financial Year in respect of each Relevant Activity carried out in the UAE by the Licensee.

The Regulatory Authority will consider the information submitted by a Licensee under the ESR to determine whether or not a Licensee has met the Economic Substance Test with respect to each Relevant Activity in the UAE.

In carrying out such functions, each Regulatory Authority shall adopt a strict yet pragmatic approach to the construction and application of the ESR to satisfy its objectives.

For the purpose of its determination of whether a Licensee has met the Economic Substance Test, the Regulatory Authority may consider various factors, including the following:

- (a) State Core Income-Generating Activity is being carried out.
- (b) State Core Income-Generating Activity for any particular Licensee may fluctuate during the course of a Financial Year and from one Financial Year to the next, with the result that what is an adequate level of employees and other resources may not be constant.
- (c) The Regulatory Authority may consider timesheets or other evidence of relevance when assessing whether a Licensee has an adequate number of full-time employees or other personnel with appropriate qualifications in the UAE, and may consider the hours spent by different employees and other personnel with appropriate qualifications to conduct State Core



Income-Generating Activity and relevant comparable statistics for the business sector, such as the average revenue per employee.

- (d) The directors of a Licensee may sometimes perform State Core Income-Generating Activity in addition to performing their fiduciary duties as directors of the Licensee, and thereby reduce or even eliminate the Licensee's need for full-time employees or an outsourcing arrangement. In these cases, the Regulatory Authority may consider evidence of the State Core Income-Generating Activity performed by the directors in the UAE. The Regulatory Authority will take this type of activity into account in making its determination whether a Licensee meets the Economic Substance Test.
- (e) The Regulatory Authority will take outsourcing activity into account in making its determination whether a Licensee meets the Economic Substance Test.

6.3 Action in the Event of Failure to Meet the Economic Substance Test

If the Regulatory Authority determines that a Licensee has failed to meet the Economic Substance Test in relation to a Relevant Activity for a Financial Year, the Regulatory Authority shall issue a notice to the Licensee notifying the Licensee of such determination, giving the reasons for the determination, containing details of any administrative penalty, directing any action to be taken to satisfy the Economic Substance Test and advising the Licensee of its right to appeal.

The Regulatory Authority shall impose an administrative penalty not exceeding fifty thousand Dirhams (AED 50,000) on a Licensee for failing to meet the Economic Substance Test, or an administrative penalty not exceeding three hundred thousand Dirhams (AED 300,000) if a Licensee fails to meet the Economic Substance Test in respect of the subsequent Financial Year after the initial notice of failure.

The Regulatory Authority may also impose additional penalties on a Licensee that fails to meet the Economic Substance Test. Such penalties may include suspension, revocation or non-renewal of a Licensee's Licence.

A Licensee may appeal a decision of the Regulatory Authority on the following grounds:

- (i) Liability does not arise;
- (ii) Appeal against the amount if fine imposed.

There is, in general, a six-year limitation period which applies to administrative penalties.

6.4 Sharing of Information and Reporting Requirements

The collection and submission of information that will enable the Regulatory Authority to monitor whether an entity is carrying on a Relevant Activity and whether it is complying with the ESR is an integral aspect to the monitoring and enforcement of the provisions of the ESR.



Information is generally collected from a Licensee in two ways, as follows:

- (1) By way of self-reporting and information submitted by a Licensee; and
- (2) Pursuant to specific information requests made by the Regulatory Authority

Each Regulatory Authority shall supply copies of all reports and information provided to it under the ESR to the Ministry of Finance, as Competent Authority under the ESR.

The Regulatory Authority will notify the Competent Authority of each Licensee that fails to satisfy the Economic Substance Test in relation to any Relevant Activity. In the case of a High Risk IP Licensee, the Regulatory Authority is required to submit all information obtained in relation to such Licensee to the Competent Authority irrespective of whether the Regulatory Authority has made a determination as to whether such High Risk IP Licensee has met the Economic Substance Test or not.

6.5 The Competent authority's Obligations to Disclose Information to Overseas Authorities

The Competent Authority shall provide the information submitted to it under Clause 6.4 of this Guidance to the Foreign Competent Authority in the event of:

- (a) a Licensee fails to meet the requirements under the ESR for a specific Financial Year; or
- (b) the Licensee carries out a High Risk IP business.

Obaid Humaid Al Tayer

Minister of State for Financial Affairs

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