

Translation of

Law No. 159 of 2023 on the
Abolition of Tax and Fee
Exemptions for State Entities
Engaged in Economic and
Investment Activities

ترجمة القانون رقم ١٥٩ لسنة ٢٠٢٣
بشأن إلغاء الإعفاءات الضريبية والرسوم
المقررة لجهات الدولة التي تمارس
أنشطة استثمارية واقتصادية

15 October 2026



ANDERSEN

Law No. 159 of 2023, Concerning the Abolition of Tax and Fee Exemptions Granted to State Entities Engaging in Investment and Economic Activities

In the name of the people: President of the republic

The House of Representatives has enacted the following law, which we hereby promulgate:

Preamble

In the Name of the People

The President of the Republic,

The House of Representatives has enacted the following Law, which we hereby promulgate:

Article (1):

Without prejudice to the international agreements in force in the Arab Republic of Egypt, the exemptions prescribed for military operations and duties, the requirements of national defense and the protection of national security, as well as the exemptions prescribed for activities involving the provision of essential public utility services, the exemptions from taxes and fees granted pursuant to the provisions of laws, regulations and decrees issued in favor of State entities, including units of the State Administrative Apparatus, local administration units, public authorities, bodies with independent budgets, and entities and companies wholly or partially owned by the State, shall be abolished insofar as such exemptions relate to the economic or investment activities undertaken by those entities, which shall be subject to the laws governing such activities.



Article (2):

Contracts concluded prior to the entry into force of this Law shall remain subject to the laws, regulations and decrees in force at the time of their conclusion until their execution has been fully completed.

Article (3):

Any provision that contradicts the provisions of this Law shall be repealed.

Article (4):

This Law shall be published in the Official Gazette and shall enter into force on the day following the date of its publication.

This Law shall bear the Seal of the State and shall be enforced as one of its laws.



Translation of

the Executive Regulations
of Law No. 159 of 2023 on the
Abolition of Tax and Fee
Exemptions for State Entities
Engaged in Economic and
Investment Activities

ترجمة اللائحة التنفيذية للقانون
رقم ١٥٩ لسنة ٢٠٢٣ بشأن إلغاء الإعفاءات
الضريبية والرسوم المقررة لجهات الدولة التي
تمارس أنشطة استثمارية واقتصادية

15 October 2026

Prime Ministerial Decree No. 242 of 2024 Concerning the Executive Regulations of Law No. 159 of 2023 on the Abolition of Tax and Fee Exemptions Granted to State Entities Engaging in Investment and Economic Activities.

Preamble

Having reviewed the Constitution;

Law No. 90 of 1944 concerning Judicial Fees and Notarization Fees in Civil Matters;

The Stamp Tax Law promulgated by Law No. 111 of 1980;

Law No. 147 of 1984 imposing a State Financial Resources Development Fee;

The Income Tax Law promulgated by Law No. 91 of 2005;

The Real Estate Tax Law promulgated by Law No. 196 of 2008;

The Value Added Tax Law promulgated by Law No. 67 of 2016;

The Unified Tax Procedures Law promulgated by Law No. 206 of 2020;

The Customs Law promulgated by Law No. 207 of 2020;

Law No. 159 of 2023 concerning the Abolition of Tax and Fee Exemptions Granted to State Entities Engaging in Investment and Economic Activities;

Having considered the proposal submitted by the Minister of Finance;

And following the approval of the Council of Ministers;

Hereby decrees as follows:



Article (1):

For the purposes of applying the provisions of this Decree, the following words and expressions shall have the meanings assigned to each of them below:

- Law: Law No. 159 of 2023 concerning the Abolition of Tax and Fee Exemptions Granted to State Entities Engaging in Investment and Economic Activities.
- Taxes and Fees: All types of taxes and fees prescribed under the provisions of laws, regulations and decrees, particularly Stamp Tax, Income Tax, Value Added Tax, Real Estate Tax, Customs Duties, and the State Financial Resources Development Fee.

State Entities:

- Units of the State Administrative Apparatus, including sovereign authorities, local administration units, national, service and economic public authorities, and bodies with independent budgets.
- Entities and companies owned by any of the authorities referred to in the preceding paragraph, whether directly or indirectly, regardless of their legal form, as well as entities and companies in which any of those authorities hold an ownership interest, whether directly or indirectly, regardless of the percentage of such ownership interest, the nature of the activities carried out by the authority, entity or company holding an ownership interest in the relevant entity or company, or the manner in which the funds generated from the investment or economic activity are utilized.

Article (2):

The abolition of tax and fee exemptions prescribed under Article (1) of the Law shall not apply to the following:

- Exemptions granted pursuant to international agreements in force in the Arab Republic of Egypt, for as long as the provisions establishing such exemptions under those agreements remain in force.
- Exemptions granted for military operations and duties, the requirements of national defense, and the protection of national security.



- Exemptions granted for activities involving the provision of essential public utility services. The services referred to herein shall be identified and specified by a decree issued by the Council of Ministers upon a proposal submitted by the Minister of Finance.

Article (3):

The abolition of tax and fee exemptions prescribed under Article (1) of the Law shall apply to all investment or economic activities undertaken by State Entities, with the aim of eliminating preferential treatment granted to such entities, thereby ensuring equality and strengthening the principles of fair competition between these entities and other parties. Such activities shall be subject to the laws governing them.

For the purposes of the first paragraph of this Article, investment or economic activities shall include the production or sale of goods, the provision of services of any kind, or the granting of exploitation rights, where such activities are ordinarily carried out by the private sector or by investors, whether natural or legal persons.

Article (4):

Where State Entities undertake activities benefiting from any of the exemptions stipulated in the provisions of Article (2) of this Decree, in addition to undertaking investment or economic activities subject to Article (3) hereof, such entities shall be required to maintain separate accounts for each category of activities and to pay the taxes and fees due in accordance with the applicable governing law.

Article (5):

State Entities shall be required to provide the Ministry of Finance with a comprehensive inventory of the legislation granting them exemptions from taxes and fees, together with a statement specifying the nature of the activities they undertake (investment, economic, or service activities).



Article (6):

The abolition of tax and fee exemptions prescribed under Article (1) of the Law shall apply to new contracts relating to investment or economic activities concluded by State Entities as of the date on which the Law entered into force.

For the purposes of applying the first paragraph of this Article, any renewal of a contract existing on the date of entry into force of the Law, or any increase in the scope of works exceeding the percentage stipulated in the contract, shall be deemed a new contract.

Article (7):

The Ministry of Finance shall prepare an annual statement of the revenues generated from the implementation of the abolition of tax and fee exemptions prescribed under Article (1) of the Law, which shall be submitted to the Supreme Committee for Supporting Competition Policies and Competitive Neutrality.

Article (8):

This Decree shall be published in the Official Gazette and shall enter into force on the day following the date of its publication.

