

RULE NO. 3 OF 2025

Violations and Penalties Schedule for Clinical and Commercial Activities

Effective: 2 May 2025

RUL-DHCA-03

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Failure to adhere to the provisions set forth herein may result in regulatory action, penalties, or other enforcement measures as determined by DHCA and in accordance with applicable laws and regulations.

In the event of any inconsistency between this version and the officially signed or published version, the officially signed version shall prevail.

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1. PREAMBLE

This Rule is issued by Dubai Healthcare City Authority (DHCA) in accordance with its powers set forth under Law No. (16) of 2024 Concerning Dubai Healthcare City, which grants DHCA legal, financial, and administrative autonomy including the right to issue regulatory instruments, implement compliance frameworks, and impose administrative penalties.

Rule No. 3 governs the enforcement of violations within Dubai Healthcare City (DHCC) across clinical, commercial, administrative, and compliance domains, subject to coordination where necessary with competent authorities, including the Dubai Health Authority (DHA) pursuant to Law No. (6) of 2018 as amended by Law No. (14) of 2021.

Additionally, DHCA enforces compliance with national regulations regarding the Ultimate Beneficial Owner (UBO) regime in accordance with Cabinet Resolution No. (132) of 2023 Concerning Penalties Relating to UBO, Cabinet Resolution No. (109) of 2023 Concerning UBO regulation, and related Ministerial Resolution No. (186) of 2024 Regarding Grievance Procedures.

2. PURPOSE AND SCOPE

2.1 This Rule is issued to establish a comprehensive legal framework for the regulation and enforcement of violations arising from clinical, commercial, administrative, and compliance-related activities conducted within the jurisdiction of

Dubai Healthcare City (DHCC).

2.2 All Licensees, Contractors, Owners, and Operators engaged in any activity within DHCC shall be subject to, and must ensure strict compliance with, the following legal instruments and regulatory frameworks:

- Law No. (16) of 2024 concerning Dubai Healthcare City (DHCC);
- Governing Regulation No. 1 of 2013;
- All DHCA-issued Healthcare and Commercial Regulations applicable within DHCC;
- Relevant Federal laws including Federal Decree-Law No. (20) of 2018 on Anti-Money Laundering and Financing of Terrorism;
- Cabinet Resolution No. (109) of 2023 concerning UBO regulation;
- Cabinet Resolution No. (132) of 2023 concerning penalties related to UBO non-compliance;
- Ministerial Resolution No. (186) of 2024 regarding grievance procedures;
- DHCA Standard for Violations Management – Enforcement;

- i) DHCA Policy and Procedure for Violations Management – Inspection; and
- j) DHCA Rule No. 2 of 2025 – Violations Schedule Related to Hygiene and Maintenance Standards for Properties and Public Areas.

2.3 A claim of ignorance or lack of knowledge of the aforementioned laws, rules, and regulations shall not constitute a defense or excuse for non-compliance. All regulated parties are deemed to have constructive notice of their obligations under the applicable legal and regulatory framework.

2.4 This Rule shall be read in conjunction with the full suite of DHCA Regulations, which provide the governance framework under which clinical, commercial, educational, and research activities in DHCC are licensed and monitored.

DHCA Regulations are as promulgated and as may be amended from time to time:

- a) Governing Regulation No. 1 of 2013;
- b) Healthcare Professionals Regulation No. 2 of 2013;
- c) Complementary and Alternative Medicine Professionals Regulation No. 3 of 2013;
- d) Healthcare Operators Regulation No. 4 of 2013;
- e) Education Regulation No. 5 of 2013;
- f) Research Regulation No. 6 of 2013;
- g) Health Data Protection Regulation No. 7 of 2013;
- h) Company Regulation No. 8 of 2013; and
- i) Commercial Services Licensing Regulation No. 9 of 2013.

These Regulations shall continue to govern the conduct of all relevant activities within DHCC until such time as they may be amended, supplemented, or superseded by subsequent instruments issued by the Authority in accordance with its legislative and regulatory mandate.

ARTICLE (1)

Definitions and Interpretations

1.1 Capitalized and abbreviated words in this Rule shall have the meaning indicated below:

Activity	means a business activity permitted to operate in DHCC.
Authority	means Dubai Healthcare City Authority (DHCA), as the public authority.
DHCC	Dubai Healthcare City, a Free Zone under Law no. 16 of 2024.
DHCA	Dubai Healthcare City Authority
Inspector	means an official of DHCA who is appointed by the Minister of Justice to act as a judicial officer or who is authorized by DHCA as an inspector.
Healthcare Operator (HCO)	means a hospital, clinic, laboratory, pharmacy or other Entity providing Healthcare Services in DHCC, holding a Clinical Operating Permit duly issued by the Registry of Companies in accordance with the Healthcare Operators Regulation and the applicable Rules, Standards and Policies.
Healthcare Professional (HCP)	means a Licensed Healthcare Professional, Licensed Complementary and Alternative Medicine Professional, a Licensed Healthcare Operator, an Approved Education Operator, an Approved Research Operator, a Licensed Commercial Company, or a Non-Clinical Operating Permit Holder.
License	means Healthcare Professional, Complementary and Alternative Medicine Professional, Healthcare Operator, Approved Education Operator, Approved Research Operator, Commercial Company licensed in DHCA or a Non-Clinical Operating Permit Holder.
Licensing Regulations	means Dubai Healthcare City Commercial Services Licensing Regulations No. 9 of 2013.
Licensee	means the holder of a company registered and licensed under Dubai Healthcare City Authority.
UAE	means the United Arab Emirates.
Property	means facilities, buildings, structures or plots within the boundaries of the DHCC owned by investors or forming part of the DHCC master community
Public Areas	means areas, facilities or amenities beyond the boundaries of privately owned plots and areas that are open and accessible to people.
Rule	This rule No. 3 of 2025.
UBO (Ultimate Beneficial Owner)	A natural person as defined under Article (5) of Cabinet Resolution No. (109) of 2023 who exercises ultimate control over a legal person, either directly or indirectly.
Registrar	The Competent Authority under Cabinet Resolution No. (109) of 2023 and (132) of 2023 for enforcing UBO compliance.
Violation	Any act, omission, or failure by a DHCC establishment that breaches the applicable laws, rules, or regulatory instructions.

- 1.2 This Rule shall take effect on the date of its issuance.
- 1.3 Wherever in this Rule an obligation or duty is placed on a Licensee, a Licensee is authorized to do any act to meet that obligation or duty, unless otherwise provided. Such obligations, duty or act may be carried out by the Directors, Owners or Operators.
- 1.4 Reference in this Rule to time periods are to be construed in accordance with the Gregorian calendar. Whenever in this Rule references a period of time, such period will include every calendar day, except that:
- a) When the last day of the period falls on a Saturday or a Sunday, the period will end instead on the following Monday; and
 - b) When the last day of the period falls on a UAE or Dubai public holiday the period will end instead on the next working day.
- 1.5 Unless the context otherwise requires, any reference in this Rule to a “person” includes a reference to a natural person, to a corporate body, limited liability company, association or partnership and to the legal or personal representatives, legal successors and lawful assigns of any such person.
- 1.6 In the event of any inconsistency or conflict between the provisions of this Rule and any other applicable law, regulation, or directive—whether issued by the Authority or another competent body—the interpretation determined by the Authority, in alignment with prevailing UAE Federal and the Emirate of Dubai legislations, shall prevail and be binding on all Licensees.
- 1.7 Any word(s) used in this Rule, however not defined in the Definition, shall have the meaning as contemplated under the respective applicable Rules or Regulations.

ARTICLE (2)

Compliance Obligation

2.1 General Obligation of Compliance

All natural and legal persons, including but not limited to owners, contractors, licensees, and operators, who reside, work, or conduct activities within the boundaries of the Dubai Healthcare City (DHCC), shall comply fully with all applicable laws, rules, regulations, directives, and policies issued by the Dubai Healthcare City Authority (DHCA), as amended from time to time.

2.2 Irrelevance of Individual Notice

This general duty of compliance applies regardless of whether the individual or entity received express notice or publication of the applicable provision. Lack of knowledge, awareness, or failure to receive individual notification of applicable obligations shall not be considered a valid justification or defense for non-compliance.

2.3 Specific Compliance with UBO Regulations

In particular, all DHCC establishments shall comply with the Ultimate Beneficial Owner (UBO) regulations in accordance with Cabinet Resolution No. (109) of 2023 and Cabinet Resolution No. (132) of 2023, which include but are not limited to the following duties:

- Create and maintain a UBO Register within 60 days of incorporation and ensure updates within 15 days of any change.
- Maintain accurate Register of Partners or Shareholders and ensure data completeness.
- Designate a local authorized person to provide full UBO data to the Registrar upon request.
- Disclose issuance of shares or changes in ownership within 15 days.
- Submit UBO and Partners/Shareholders Registers to Registrar and protect records from damage.
- Update all changes within the legally prescribed period.
- Disclose complex structures or nominee board memberships if applicable.

ARTICLE (3)

Inspection

3.1 Right of Access and Inspection by DHCA

DHCA requires inspection of the Properties within DHCC from time to time to ensure compliance with DHCC Rules, Regulations, guidelines, requirements and relevant Federal Laws. DHCA reserves the right to enter the Property at any time without prior notice.

3.2 Enforcement Measures for Serious or Repeated Violations

In case of serious violations or repeated incidents which may place people at risk or harm, the Authority may order the Property to be closed and or the License suspended or fully revoked, and all work or operations associated with such risk shall be stopped immediately until the corrective action is completed by the parties concerned.

ARTICLE (4)

Violations

4.1 General Liability for Non-Compliance

All entities or persons (including but not limited to owners, contractors, and operators) residing, working, or operating within DHCC in violation of DHCC rules and regulations shall be guilty of an offence which, if not remedied to the satisfaction of the Authority, shall render such entities or persons liable to sanctions as provided in this section, or to such other sanctions as the Authority may consider necessary from time to time.

4.2 Sanctions for Repeated Violations

Repeated violations will result in the imposition of additional fines or freezing of services to the Licensee as deemed appropriate by the Authority.

4.3 Mandatory Incident Reporting

All incidents and accidents occurring at a Licensee's premises, which result in a person requiring medical attention, must be reported to the Authority within 24 hours of the date of the incident/accident.

4.4 Enforcement of Court Instructions

Specific instructions received from Dubai Courts pertaining to sponsored employees shall be executed by the Authority.

4.5 Visa-Related Violations

Visa-related violations shall be addressed in accordance with the DHCA Visa Policy.

4.6 Discretionary Blacklisting or Banning

Blacklisting, banning, or suspension of the entry of a sponsored employee within DHCC or the UAE is at the sole discretion of the Authority.

4.7 Penalties Imposed by Other Authorities

Certain violations may be subject to additional penalties imposed by other relevant authorities in accordance with applicable laws.

Appendix 1: Violations Schedule – General

Sr. No	Violations	Applicability	1st Warning	Fine 1 (D)	Fine 2 (D)
1	Display products for sale by way of calling on the roads without a permit	Licensee	N/A	500	N/A
2	Displaying goods or providing services outside of the facility	Licensee	Notice	1,000	N/A
3	Presence of men in women's salons and/or women's fitness clubs and vice versa	Licensee	N/A	5,000	N/A
4	Organize conferences or exhibitions within DHCC without approval	Licensee	N/A	5,000	N/A
5	Establish business tents without a permit	Licensee	N/A	15,000	N/A
6	ATMs placed outside the bank or Vending machines without a permit	Licensee	N/A	3,000	N/A
7	Operation of restaurants, coffee shop, canteen, or any other food entity during Ramadan's fasting period operating without a permit.	Licensee	N/A	10,000	N/A
8	Store front facade Shading by more than 50% without permission	Licensee	N/A	250	N/A
9	Storing goods inside offices	Licensee	N/A	1,000	N/A
10	Placing kiosks/counters/cabinets for commercial purposes without permission	Licensee	N/A	2,000	N/A

Sr. No	Violations	Applicability	1st Warning	Fine 1 (D)	Fine 2 (D)
11	Practicing a permitted business activity outside the registered establishment	Licensee	N/A	2,500	N/A
12	Installing lucky slot machines and other gambling games machines	Licensee	N/A	3,000	N/A
13	Organize and hold (a conference/exhibition) without a permission	Licensee	N/A	5,000	N/A
14	Sell promotional campaign tickets without permission	Licensee	N/A	5,000	N/A
15	Non-clinical facilities conducting clinical trials or research activity without valid permit from DHCA.	Licensee	N/A	5,000	N/A
16	Delayed Annual Progress Report for Research (30 days from Annual Progress Report due date)	Licensee	N/A	2,000	N/A

Appendix 2: Violations Schedule Related to Commercial License

Sr. No	Violations	Applicability	1st Warning	Fine 1 (D)	Fine 2 (D)
1	Display products for sale by way of calling on the roads without a permit	Licensee	N/A	500	N/A
2	Displaying goods or providing services outside of the facility	Licensee	Notice	1,000	N/A
3	Presence of men in women's salons and/or women's fitness clubs and vice versa	Licensee	N/A	5,000	N/A
4	Organize conferences or exhibitions within DHCC without approval	Licensee	N/A	5,000	N/A
5	Establish business tents without a permit	Licensee	N/A	15,000	N/A
6	ATMs placed outside the bank or Vending machines without a permit	Licensee	N/A	3,000	N/A
7	Operation of restaurants, coffee shop, canteen, or any other food entity during Ramadan's fasting period operating without a permit.	Licensee	N/A	10,000	N/A
8	Store front facade Shading by more than 50% without permission	Licensee	N/A	250	N/A
9	Storing goods inside offices	Licensee	N/A	1,000	N/A
10	Placing kiosks/counters/cabinets for commercial purposes without permission	Licensee	N/A	2,000	N/A
11	Practicing a permitted business activity outside the registered establishment	Licensee	N/A	2,500	N/A

Sr. No	Violations	Applicability	1st Warning	Fine 1 (D)	Fine 2 (D)
12	Installing lucky slot machines and other gambling games machines	Licensee	N/A	3,000	N/A
13	Organize and hold (a conference/exhibition) without a permission	Licensee	N/A	5,000	N/A
14	Sell promotional campaign tickets without permission	Licensee	N/A	5,000	N/A
15	Non-clinical facilities conducting clinical trials or research activity without valid permit from DHCA.	Licensee	N/A	5,000	N/A
16	Delayed Annual Progress Report for Research (30 days from Annual Progress Report due date)	Licensee	N/A	2,000	N/A

Appendix 3: Violations Schedule Related to Clinical Facilities and Healthcare Professional in Dubai Healthcare City

Sr. No	Violations	Applicability	1st Warning	Fine 1 (D)	Fine 2 (D)
1	Failure to display patient's rights and responsibilities document clearly in the facility	HCO	Notice	1,000	2,000
2	Failure to prominently display a copy of the facility Operating Permit	HCO	Notice	1,000	2,000
3	Failure of the Healthcare Operator to assign a suitably qualified Clinical/Medical director in the event of a vacancy of more than two months	HCO	Notice	2,000	5,000
4	Failure to notify DHCA prior to the temporary closure of the facility	HCO	N/A	5,000	N/A
5	Failure to notify DHCA prior to discontinuation of any clinical specialty/service	HCO	Notice	1000	2,000
6	Provision of unauthorized overnight patient stay in an outpatient facility	HCO	N/A	5,000	10,000
8	Non-compliance with DHCC Health Data Protection Regulation	HCO/HCP	N/A	5,000	N/A
9	Non-compliance with DHCA Advertising Policy requirements	HCO/HCP	N/A	2,000	4,000
10	Falsification of information on a Clinical Operating Permit/Healthcare Professional License	HCO/HCP	N/A	10,000	20,000
11	Failure to comply with the Policy for additional employment for HCP	HCO/HCP	N/A	2,000	4,000

Sr. No	Violations	Applicability	1st Warning	Fine 1 (D)	Fine 2 (D)
12	Allowing a Physician/ Complementary and Alternative Medicine (CAM) Physician/Dentist to practice without license issued by DHCA/ DHA.	HCO	N/A	15,000	30,000
13	Allowing Nursing or Allied healthcare professionals to practice without license issued by DHCA/ DHA.	HCO	N/A	5,000	10,000

Sr. No	Violations	Applicability	1st Warning	Fine 1 (D)	Fine 2 (D)
14	Allowing healthcare professionals to practice with expired/inactive license	HCO	N/A	2,000	4,000
15	*Late Renewal Fee of HCP license per month up to a maximum of six months (All categories)	HCP	N/A	500	N/A
16	Physician/ Complementary and Alternative Medicine (CAM) Physician/Dentist providing service(s) which is not within his/her license specialty or scope of practice	HCO/HCP	N/A	15,000	30,000
17	Failure to comply with DHCA Pharmacy Standards	HCO	N/A	5,000	10,000
18	Promote medicine(s) or medical products in a clinical facility	HCO	N/A	2,000	4,000
19	Unauthorized storage of narcotic drugs in the facility without approval from DHCA and Ministry of Health and Prevention (MOHAP).	HCO	N/A	20,000	40,000

Sr. No	Violations	Applicability	1st Warning	Fine 1 (D)	Fine 2 (D)
20	Failure to adhere to decisions issued by DHCA.	HCO/HCP	N/A	5,000	10,000
21	Conduct research / clinical trials without a valid Research permit.	HCO	N/A	5,000	10,000
22	Conduct educational activity without a valid Education permit	HCO	N/A	5,000	10,000
23	Conduct training courses and/or hands-on training on human subjects/volunteers prior to obtaining approval/accreditation from DHCA/DHA/KHDA.	HCO	N/A	2,000	4,000
24	Allowing trainees to participate in a program without a valid license.	HCO	N/A	2,000	4,000
25	Failure to notify DHCA of a Sentinel Event within the required timeframe.	HCO	N/A	2,000	4,000
26	Using unregistered/unapproved U.S. Food and Drug Administration (FDA), International Electrotechnical Commission (IEC) or Conformité Européenne (CE) Medical Equipment	HCO	N/A	5,000	N/A

* System generated

Appendix 4: Violations Schedule Related to Visas

Sr. No	Violations	Applicability	1st Warning	Fine 1 (D)	Fine 2 (D)
1	Illegally employing personnel from other Licensees (per employee)	Licensee	N/A	5,000	N/A
2	Illegally employing persons who are not sponsored or approved by DHCA	Licensee	N/A	50,000	N/A
3	Supplying sponsored employees to work for third parties without approval	Licensee	N/A	5,000	N/A
4	Failure to apply abscond declaration for absence (in the country) exceeding 14 continuous days	Licensee	N/A	1,000	N/A

Appendix 5: UBO Violations – Cabinet Resolution No. 132 of 2023

No.	Violation	Legal Reference	First Offense	Second Offense (D)	Third Offense (D)
1	Failure to correctly register the Real Beneficiary details	Article (6) and (7)	Written notice (15 days)	20,000 + notice (15 days)	40,000 + notice
2	Failure to include data under Clause (2) of Article (8) in the Real Beneficiary Register	Article (8)	Written notice (15 days)	20,000 + notice (15 days)	40,000 + notice
3	Failure to create or maintain the Real Beneficiary Register	Article (8/1)	Written notice (30 days)	50,000 + notice (30 days)	100,000 + notice
4	Failure to update the Real Beneficiary Register	Article (8/1)	Written notice (15 days)	15,000 + notice (15 days)	30,000 + notice
5	Failure to provide Director or Board Nominee data as required by law	Article (10)	Written notice (30 days)	40,000 + notice (15 days)	80,000 + notice
6	Failure to create Partners or Shareholders Register	Article (10)	—	50,000 + notice (30 days)	100,000 + notice
7	Failure to update the Partners/Shareholders Register within 15 days of change or awareness	Article (10)	Written notice (30 days)	15,000 + notice (15 days)	30,000 + notice
8	Failure to maintain or include data of each partner/shareholder under Clause (1), Article (10)	Article (10)	Written notice (30 days)	30,000 + notice (15 days)	60,000 + notice
9	Failure to provide or preserve UBO/Shareholder Registers to the Registrar	Article (11/1)	Written notice (30 days)	15,000 + notice (15 days)	30,000 + notice
10	Failure to provide additional data requested by the Registrar within 14 days	Article (11/2)	Written notice (30 days)	15,000 + notice (15 days)	30,000 + notice
11	Failure to disclose classes of Real Beneficiaries in Complex Structures	Article (15)	Written notice (30 days)	50,000 + notice (30 days)	100,000 + notice

No.	Violation	Legal Reference	First Offense	Second Offense (D)	Third Offense (D)
12	Failure to provide name of UAE-resident natural person authorized to disclose UBO data	Article (11/4)	Written notice (30 days)	10,000 + notice (15 days)	20,000 + notice
13	Failure to disclose names when issuing shares or stakes to management or individuals	Article (11/6)	Written notice (30 days)	15,000 + notice (15 days)	30,000 + notice
14	Failure to hand over UBO and Shareholder Registers to the Liquidator within 30 days of appointment	Article (11/7)	Written notice (30 days)	5,000 + notice (15 days)	10,000 + notice
15	Liquidator fails to maintain records and data for five years from date of dissolution or cancellation	Article (11/8)	—	100,000	—