

Italian and Russian wealth

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The flow of Italian wealth to Dubai consists mainly of entrepreneurs, professionals, athletes and younger heirs who move their residence and often their trading or holding companies. It is not documented by official statistics, and Italian law places obstacles in its way. The United Arab Emirates have long been on the Italian list of 4 May 1999, so that an Italian citizen who moves to Dubai is presumed under Art. 2(2-bis) TUIR to remain resident in Italy unless he or she proves the contrary.¹ Since 2024 the Italian definition of residence also turns on the place where the person's personal and family relationships principally develop, which makes a partial move risky.² A Swiss residence, by contrast, no longer carries the presumption. For Italian families who want to leave Italy but keep their children in European schools and their companies within reach, Ticino retains clear advantages over Dubai in legal certainty and proximity.

The second flow concerns Russian wealth after February 2022. The United Arab Emirates did not adopt the sanctions of the European Union, the United States and the United Kingdom against Russia. Dubai therefore became a destination for Russian individuals, traders and companies. Some commodity trading firms with Russian connections moved staff and functions from Geneva, Zug and Lugano to Dubai.³ This flow has made Dubai a competitor of the Swiss trading hubs described in Part F. It has also become a jurisdiction in which Swiss banks and traders must apply heightened sanctions diligence, as Chapter G.II has explained. The Italian press observed in 2026 that political instability in the Middle East had affected the attraction of centres such as Dubai and contributed to the growth of Italy's own flat tax regime.⁴

1 Competitor and platform for Swiss institutions

For Lugano, Dubai is both a competitor and a platform. It competes for residents, above all younger Italian entrepreneurs who are less attached to

Switzerland than their parents, and for commodity trading functions that do not require a presence in Europe. It is also a market in which Swiss banks have built a substantial presence. Many Swiss private banks, among them groups with offices in Lugano, operate DIFC branches or subsidiaries regulated by the Dubai Financial Services Authority and serve clients from the Gulf, South Asia and Africa from there.⁵ The double taxation convention between Switzerland and the United Arab Emirates of 2011 and the exchange of financial account information since 2018 provide the treaty framework.⁶

Two conclusions follow for the Ticino financial centre. The first is that Dubai's growth reflects a shift of the centre of gravity of global private wealth towards the Middle East and Asia, in which Switzerland as a whole has gained assets from the Gulf while Lugano, with its Italian focus, has benefited little. The second is that Dubai's offer is weakest where Lugano's is strongest: in legal certainty for Italian residents, in the stability of the currency and in proximity to the European family. A Lugano strategy towards Dubai should therefore aim primarily at cooperation, for example by booking in Lugano part of the liquid assets of Italian or Swiss clients who live in the Gulf.

In figures. Dubai ranked seventh and Abu Dhabi twenty-first in the GFCI of March 2026.⁷ The DIFC counted 8,844 active companies, 50,200 employees, more than 500 wealth and asset management entities, 1,289 family-related entities and 1,115 family foundations at the end of 2025.⁸ The United Arab Emirates were on the FATF grey list from 4 March 2022 to 23 February 2024 and were removed from the EU high-risk list with effect from 5 August 2025.⁹ Henley & Partners estimated a net inflow of 9,800 millionaires to the Emirates in 2025.¹⁰

2 Notes

1. Decreto ministeriale 4 maggio 1999 (above); the inclusion of the United Arab Emirates is reported by Wikipedia, "Paradiso fiscale" (above). On the presumption see Art. 2(2-bis) TUIR (above). ↩
2. Art. 2(2) TUIR as amended by Legislative Decree No. 209 of 27 December 2023 with effect from 1 January 2024, text at Brocardi (above). See Chapters E.V and H.II. ↩
3. See Chapter G.II. Reported in the Swiss and international financial press from 2022 onwards; no individual firm is named here. ↩
4. Milano Finanza (above). ↩

5. Register of the Dubai Financial Services Authority, for individual groups. ↩
6. Double taxation convention between Switzerland and the United Arab Emirates of 6 October 2011; AEOI from 2018 data. ↩
7. GFCI 39 (above). ↩
8. Dubai Media Office (above). ↩
9. Norton Rose Fulbright (above); Stibbe (above). ↩
10. Henley & Partners (above). ↩

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