The Gulf Doesn't Need Another Common Law Court. The Indian Ocean Does.

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February 2026

In January 2026, Oman established the International Financial Centre of Oman by Royal Decree.[1] The reaction was predictable: polite interest, a handful of law firm briefings, and the unspoken question that hovered over all of it — does the Gulf really need a fourth common law financial centre?[2]

The answer is no. It does not. But that is the wrong question. The right question is whether the Gulf's common law courts have reached the point where they need to stop being generalists and start being specialists. We think they have. And we think IFC Oman's arrival is the moment that forces the conversation.

We practise in all three of the existing centres — the DIFC, the QFC, and ADGM. We appear before their courts regularly. This article draws on that experience to make an argument that, so far as we are aware, nobody else is making: that the GCC's common law courts are entering an era of necessary specialisation, and that the centres which identify their niche earliest will be the ones that thrive.

The Generalist Court and Its Limits

The major international dispute resolution centres found their identities over time. London is the global centre for commercial litigation — not because of any marketing campaign, but because the Commercial Court and the English common law tradition made it so. Paris became the home of international arbitration, anchored by the ICC and a judiciary that understood the supervisory role without overreaching. Singapore positioned itself as the neutral seat for Asia-Pacific disputes. Each found its identity. The market is better for it. Nobody drafts a Paris arbitration clause for a shipping dispute, and nobody specifies Singapore for a European insurance claim. Specialisation creates clarity, and clarity creates confidence.

The Gulf's common law courts have not yet completed this process. For the first decade of the DIFC's existence, there was no need — it was the only game in town,

[1] Royal Decree No. 8/2026 Establishing the International Financial Centre of Oman and Issuing Its Law, effective 13 January 2026.

[2] Dubai International Financial Centre (DIFC), established 2004; Abu Dhabi Global Market (ADGM), established 2013; Qatar Financial Centre (QFC), established 2005.

and every common law dispute in the region gravitated towards it by default. But with four centres now operating and a fifth in Oman, that era is ending. Those that continue to pitch themselves as all-purpose common law courts will find themselves competing on price, convenience, and marketing. Those that carve out a genuine specialism will compete on expertise — and that is a better competition for everyone.

The Jurisdictional Foundation

Before examining how specialisation might develop, one structural point needs to be understood, because it determines how much room each court has to specialise.
At their foundation, each of the GCC's common law courts exists to resolve disputes arising from its own free zone. DIFC Courts have jurisdiction over DIFC entities. ADGM Courts have jurisdiction over ADGM entities. The QICDRC has jurisdiction over QFC-connected matters. IFC Oman's court will have jurisdiction over IFC Oman entities. That is the baseline, and it is the same for every court — just as the Commercial Court in London has jurisdiction over claims brought in England, or the Singapore International Commercial Court over cases admitted under its framework.

The question that determines each court's strategic reach is what happens beyond that baseline. Modern commerce is mobile. Companies can establish themselves in whichever free zone suits their purposes. More importantly, dispute resolution clauses can specify any forum the parties consider best suited to their transaction. A hydrogen joint venture between a European energy major and a Gulf sovereign wealth fund does not have to resolve its disputes in the court of whichever free zone one of the parties happens to be registered in. The parties can choose.

Three of the four existing centres allow this kind of opt-in jurisdiction. The DIFC permits parties to submit to its courts by written agreement, even where neither party is a DIFC entity. ADGM takes the same approach. IFC Oman's Royal Decree expressly provides for jurisdiction over any civil or commercial dispute where the parties have conferred jurisdiction in writing. These courts are, in effect, competing for business beyond their captive free zone populations.

The outlier is Qatar. The QFC Court has been disciplined about declining jurisdiction where there is no QFC connection. In *University of Cambridge v The Holding WLL*, the Appellate Division — Lord Thomas, Sir William Blair, and Dr Hassan Al Sayed — confirmed that the QICDRC does not have jurisdiction based solely on a contractual submission clause where there is no underlying QFC nexus.[3] Qatar's strength lies elsewhere: in the arbitration supervisory jurisdiction confirmed in *L v M*, where Justice Fritz Brand held that non-QFC parties may designate the QICDRC as the supervisory court for arbitration proceedings seated in Qatar.[4] Qatar has opted, whether by design

[3] *University of Cambridge v The Holding WLL* [2025] QIC (A) 6 (Appellate Division, Lord Thomas, Sir William Blair, Dr Hassan Al Sayed). The Appellate Division confirmed that the QICDRC does not have jurisdiction based solely on a contractual submission clause where there is no QFC connection.
[4] *L v M* [2025] QIC (F) 67 (Justice Fritz Brand), confirming that non-QFC parties may designate the QICDRC as the competent court to supervise arbitration proceedings seated in Qatar under the Qatar Arbitration Law (Law No. 2 of 2017).

or judicial temperament, not to compete for opt-in litigation but to build the most integrated arbitration supervision model in the region. It is a distinctive and defensible position.

The practical consequence is this: for the three centres that do accept opt-in jurisdiction, specialisation is not just possible — it is the logical next step. If parties can choose their forum, they will choose the forum that understands their disputes. A court that develops genuine expertise in energy and infrastructure will attract energy and infrastructure clauses, regardless of where the parties are registered. The mechanism is the same one that made London the maritime disputes capital and Paris the arbitration capital. Only the geography has changed.

There is a further economic point, and it goes to the heart of why specialisation matters. A financial centre's value proposition is the integrated package it offers: a regulatory environment, fiscal incentives, and a court system, all in one jurisdiction. But that package only works if the court's expertise matches the centre's economic purpose. A hydrogen developer choosing where to establish is not just comparing tax rates and licensing fees. It is asking: if my joint venture partner defaults on a performance guarantee, will the court that hears my claim understand the economics of a green ammonia offtake agreement? Will the procedural timetable reflect the commercial urgency of an infrastructure project that is burning cash daily? And if I win, can I enforce the judgment where it matters? If the answer is no, the entity registers for the licence and the tax treatment, but the dispute-resolution clause points elsewhere — London, Singapore, or ICC arbitration. The centre becomes a regulatory shell rather than an ecosystem.

Where the court's expertise does match the centre's economy, the opposite dynamic takes hold. Entities register not just for the fiscal package but because they know the court behind it understands their business. The right entities generate the right disputes, which build the court's expertise, which attracts more of the same. That is how London's maritime ecosystem developed: the Baltic Exchange, the P&I clubs, the maritime arbitrators, and the Admiralty Court all reinforce each other. It is specialisation compounding over time.

For IFC Oman, this means that the centre's commercial success and the court's identity are not separate questions. They are the same question. If IFC Oman attracts energy and infrastructure companies but staffs its court with banking judges, those companies will register in Muscat and arbitrate in London. The centre will collect the licence fees. It will lose the ecosystem.

The Emerging Map

With this jurisdictional framework in mind, the outlines of specialisation are already visible — even if the centres themselves have not always articulated it.

The DIFC is the most established and the most expansive court in the region — a position built on twenty years of precedent, geographic centrality as Dubai's court, and the simple advantage of being first. Its courts handle the broadest range of commercial disputes, from banking and finance to construction and employment. But the DIFC's most distinctive feature is not its breadth — it is its willingness to act as an enforcement conduit.[5] The DIFC Courts have allowed parties to enforce foreign judgments and arbitral awards through the centre, even where the underlying dispute has no DIFC connection. The practical effect is that the DIFC serves as a gateway for enforcement into Dubai and the wider UAE. That is bold, commercially valuable, and a role neither ADGM nor the QFC has embraced. If the DIFC is developing a specialism, it is this: the court that is most willing to be used instrumentally by international parties, including for purposes that go well beyond its free zone's own disputes.

ADGM's orientation is towards sovereign and institutional capital.[6] Anchored by the proximity of Mubadala and the Abu Dhabi Investment Authority, its regulatory framework and judicial expertise are tuned to fund structuring, asset management, and the disputes that arise when sovereign wealth is deployed at scale. It is a smaller court than the DIFC, but it serves a deep and well-defined market.

As noted, Qatar has taken a different path. The QFC Court's refusal to become an opt-in litigation forum has, paradoxically, strengthened its position in arbitration. The combination of commercial litigation jurisdiction for QFC-connected disputes and arbitration supervision for all seated in Qatar is the most integrated dispute-resolution model in the Gulf. That joined-up thinking is Qatar's competitive advantage.

Bahrain remains the regulatory home of Islamic insurance and AAOIFI, though its common law court infrastructure is thinner than its neighbours'. Saudi Arabia is building a formidable commercial judiciary, but it is being built for the Saudi domestic market and Vision 2030 projects, not as an international neutral forum.

That leaves an obvious gap. None of the existing centres was designed for the disputes arising from the physical economy — infrastructure, energy, logistics, maritime operations, and industrial supply chains. Those disputes are growing faster than any other category in the region. They are currently dispersed across local courts, ad hoc arbitration, London, and Singapore. No GCC common law court has claimed this ground.

What Oman Says — and What It Should Say

The official messaging from Muscat does not yet reflect this opportunity. The Royal

[5] The DIFC Courts' "conduit jurisdiction" allows parties to enforce foreign judgments and arbitral awards through the DIFC, even where the underlying dispute has no connection to the centre. The practical effect is that the DIFC serves as a gateway for enforcement into Dubai and the wider UAE. See, e.g., *DNB Bank ASA v Gulf Eyadah Corporation* [2015] DIFC CA 007. Neither ADGM nor the QFC has embraced this role to the same extent.

[6] ADGM's ecosystem is anchored by the presence of Mubadala Investment Company and the Abu Dhabi Investment Authority. Its regulatory framework is heavily oriented towards asset management, fund structuring, and wealth management.

Decree aligns IFC Oman with "the Sultanate's strategic directions aimed at diversifying the national economy, strengthening Oman's position as a global hub for financial services, attracting capital, and supporting innovation." H.E. Mahmood Abdullah AlAweini described the centre as offering "competitive costs, high responsiveness and regulatory agility."[7]

Replace "Oman" with "Dubai" and date these statements 2004: nobody would notice. Diversify the economy, attract capital, and become a global hub—it is the standard GCC financial centre script. It tells the market that IFC Oman exists. It does not tell the market why IFC Oman is different. And in a region that now has four common law centres, "different" is the only thing that matters.

The more compelling case is one Oman has not yet made for itself. It starts with geography, and it leads to a conclusion that has nothing to do with financial services.

<u>The Case for the Indian Ocean Court</u>

Open a map. The DIFC, ADGM, and the QFC are all inside the Persian Gulf, behind the Strait of Hormuz. Oman is the only GCC state with deep-water ports directly on the Indian Ocean, outside the Strait. Sohar in the north, Duqm on the central coast, Salalah in the south — three ports on the primary Asia–Africa–Europe shipping lanes, handling 137 million tonnes of cargo in 2024.[8] Duqm's volumes rose 152 per cent in a single year. Salalah ranks among the world's most efficient transhipment hubs.

This is not an abstraction. When Red Sea disruptions forced commercial rerouting in 2024, Salalah launched a multimodal service to Jeddah in four to five days. India has made Duqm a regular anchor for its western Indian Ocean naval operations, precisely because it sits outside the Strait, outside sanctions regimes, and outside the chokepoint politics of the Gulf.[9] Oman's diplomatic neutrality — maintaining constructive relations with Iran, Saudi Arabia, the UAE, India, and China simultaneously — is itself a commercial asset. Capital follows stability, and Oman offers structural rather than circumstantial stability.

Then there is the economy behind the ports. Oman has earmarked 50,000 square kilometres for green hydrogen production, aiming to reach 1 million tonnes per annum by 2030. The ACME project at Duqm passed 50 per cent completion in late 2025, with first-phase output committed to Europe under a 15-year offtake with Yara. BP bought into HyPort Duqm. Jindal Steel's green steel plant is over 30 per cent

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[7] Press release issued by IFC Oman via Business Wire, 12 January 2026. Statements by H.E. Abdulsalam Mohammed al Murshidi, President of Oman Investment Authority, and H.E. Mahmood Abdullah AlAweini, Chairman of the Executive Committee of IFC Oman.

[8] Total cargo volumes across Oman's ports reached 137 million tonnes in 2024, up 15 per cent year-on-year. Duqm Port volumes rose 152 per cent. Combined container volumes at Salalah and Sohar exceeded 4.2 million TEUs. See The Business Year, 'Oman's Ports in 2025' (September 2025).

[9] The National Interest, 'The Quiet Omani Port Reshaping India's Regional Strategy' (24 December 2025). See also Med-Or, 'Oman's Connectivity Strategy Maximizes Multi-Alignment' (March 2025): 'Oman is the only GCC state with direct access to the Indian Ocean.'

complete.[10] Investment in the economic free zones rose 17 per cent last year to USD 3.6 billion. Industrial FDI hit USD 9 billion. Non-oil exports topped USD 16 billion.[11] A USD 3 billion railway linking Sohar to Abu Dhabi is due in 2027.[12]

These projects will generate disputes. Construction delays on hydrogen facilities. Performance guarantees on infrastructure concessions. Force majeure claims in cross-border supply chains. Joint venture deadlocks between sovereign wealth funds and international energy companies. Maritime and logistics claims arising from one of the world's fastest-growing port systems. A common law court built for this economy — with opt-in jurisdiction available to parties who are not IFC Oman entities — is not a fourth DIFC. It is the court that the region does not yet have.

The Admiralty Gap

The argument so far has been about geography and economics. But there is a harder jurisdictional point that goes to the architecture of the court itself, one that none of the existing GCC common law centres has addressed.

No GCC common law court has admiralty jurisdiction. None can hear an action *in rem* against a vessel. None can arrest a ship. None has a maritime lien framework, a procedure for judicial sale, or an urgent duty judge mechanism for applications that cannot wait until the next business day. The DIFC, ADGM, and the QFC are *in personam* commercial courts. If a charter party dispute involves a DIFC entity, the DIFC Courts can hear the contractual claim — but they cannot arrest the vessel berthed at Port Rashid. For that, the claimant must go to the onshore UAE courts, instruct local counsel, file in Arabic, and navigate a procedural system built for general civil litigation rather than the specific demands of maritime commerce.[13]

This matters because the core remedy in maritime disputes is not a judgment for damages. It is the arrest of the vessel — the mechanism by which a claimant obtains security before the ship sails beyond the jurisdiction. In the English Admiralty Court

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[10] Hydrogen Development Oman (Hydrom) has earmarked approximately 50,000 km² for green hydrogen production, targeting 1 million tonnes per annum by 2030 and up to 8.5 million tonnes by 2050. ACME Group's Phase I at Duqm passed 50 per cent completion in December 2025, with 100,000 tpa of green ammonia committed to Europe under a 15-year offtake with Yara. BP acquired a 49 per cent stake in HyPort Duqm in July 2025. See Zawya, 'Oman: Hydrogen project set for commissioning by Q4 2026' (16 December 2025); Green Hydrogen Organisation, 'Oman' (2025).

[11] Investment in Oman's economic free zones rose 17 per cent in 2025 to USD 3.6 billion. Total committed capital across zones managed by OPAZ reached OMR 22.4 billion. FDI in the industrial sector reached approximately USD 9 billion in 2025, up 24.6 per cent. Non-oil industrial exports hit USD 16.1 billion in 2024. See AGBI, 'Oman economic zones raised $3.6bn investment in 2025' (16 February 2026); GCC Business News, 'Oman Industry Day 2026' (February 2026).

[12] Hafeet Rail: a USD 3 billion joint venture between Oman Rail, Etihad Rail, and Mubadala to construct a 238 km railway linking Abu Dhabi and Sohar Port. Completion expected end of 2027.

[13] There is no equivalent in the UAE to the English Admiralty Court: Al Hawamdeh & Idais, 'United Arab Emirates' in Chamberlain, Colaço & Neylon (eds), The Shipping Law Review (10th edn, Law Business Research, 2023), 564. Ship arrest is governed by the onshore civil courts applying Federal Decree-Law No. 43 of 2023 (replacing the Maritime Code, Federal Law No. 26 of 1981). Proceedings are conducted in Arabic and require instruction of UAE-qualified counsel. See Watson Farley & Williams, 'New UAE Maritime Law — What You Need to Know' (August 2025); Al Tamimi & Company, 'Can I Arrest a Ship in the UAE as Security for Foreign Substantive Proceedings?' (June 2020).

and the Singapore High Court, an action *in rem* treats the vessel itself as the defendant.[14] Service is effected on the ship, not on the owner, in whichever flag state the vessel happens to be registered. The court assumes jurisdiction by virtue of the vessel's physical presence within its territorial waters, regardless of flag, registration, or the domicile of the owner.[15] The question of service in a foreign jurisdiction, and of judgment recognition in the flag state, largely falls away. The asset is already there.

In the majority of cases, an arrest never reaches judgment. The shipowner's Protection and Indemnity club posts a Letter of Undertaking to release the vessel, the ship sails, and the substantive dispute proceeds — usually through London arbitration under LMAA terms. The arrest's practical function is to compel the provision of security. For the residual cases that do proceed to judicial sale, the court sells the vessel, extinguishes all prior claims, and transfers a clean title to the purchaser. That outcome has historically been recognised internationally as a matter of comity, and is now underpinned by the Beijing Convention on the Judicial Sale of Ships, which entered into force on 17 February 2026 with thirty-three signatories — including Singapore, the other major common law admiralty court on the Indian Ocean rim.[16]

Oman's onshore legal system already has the substantive building blocks. The Maritime Law, enacted by Royal Decree No. 19/2023, is a comprehensive statute of 387 articles. Title 3 — expressly headed "Rights in Rem against the Ship" — creates a framework of privileged debts (maritime liens) for crew wages, salvage, general average, collision, and passenger claims, with detailed provisions for ship mortgages, lien priority, precautionary arrest, and enforcement by judicial sale.[17] But those proceedings are conducted in Arabic, through the general civil courts applying the Civil and Commercial Procedure Law, with the Coast Guard executing the arrest.[18] The claimant must furnish evidence that the vessel is likely to abscond — a higher threshold than the English standard — and there is no equivalent of the duty judge mechanism that allows the English Admiralty Court or the Singapore High Court to

[14] Senior Courts Act 1981 (UK), s 21; CPR Part 61 (Admiralty Claims). In Singapore, the High Court (Admiralty Jurisdiction) Act (Cap 123) confers equivalent in rem jurisdiction.
[15] This principle is well established in international admiralty law. See generally The Bold Buccleugh (1851) 7 Moo PC 267, establishing that a maritime lien travels with the vessel regardless of changes of ownership.
[16] On the international recognition of judicial sales, see The Acrux [1962] 1 Lloyd's Rep 405. The position is now supplemented by the United Nations Convention on the International Effects of Judicial Sales of Ships (the 'Beijing Convention on the Judicial Sale of Ships'), adopted by the UN General Assembly on 7 December 2022 (GA Res 77/100) and entering into force on 17 February 2026 following ratification by El Salvador, Barbados, and Spain. Thirty-three states have signed, including Singapore and Saudi Arabia. See generally Fenech, 'UN Convention on the International Effects of Judicial Sales of Ships' (2022) 28 JIML 363; Shao, Harmonisation in the Rules Governing the Recognition of Foreign Judicial Sales of Ships (PhD thesis, World Maritime University, 2023).
[17] Royal Decree No. 19/2023, Title 3 ('Rights in Rem against the Ship'). See Addleshaw Goddard, 'New Maritime Law in Oman' (June 2023); Al Tamimi & Company, 'Oman Introduces New Maritime Law: A Comprehensive Overview and Key Updates' (May 2023).
[18] Chambers and Partners, 'Ship Arrestment under Omani Maritime Law' (2024): arrest procedures 'follow the guidelines mentioned in Civil and Commercial Procedure Law No. 29 of 2002 in the absence of specific directives in maritime law.'

grant arrest orders within hours.[19]

If IFC Oman's founding regulations were to confer admiralty jurisdiction on its court — with *in rem* powers, ship arrest capability at Sohar, Duqm, and Salalah, and a lien framework modelled on English admiralty law — it would offer the same substantive remedies that already exist in Omani law, but in English, under common law procedure, with the urgency that international shipping demands. The common law character of the court is not incidental to this proposition. The global maritime ecosystem operates overwhelmingly under English law: charter parties, bills of lading, P&I insurance, and LMAA arbitration.[20] The major admiralty courts — London, Singapore, Hong Kong, and the Federal Court of Australia — are all common law courts. An English-language common law judgment is more readily recognised in those jurisdictions through principles of comity than an Arabic-language civil court judgment would be, even without bilateral enforcement treaties. Add Oman's existing status as a New York Convention signatory, and arbitral awards supervised by IFC Oman's court would be enforceable in 172 contracting states.

The essential features of a functioning admiralty court, drawing on the English and Singaporean models, are well understood. The court would need *in rem* jurisdiction — the power to treat the vessel itself as defendant — modelled on section 21 of the Senior Courts Act 1981 and CPR Part 61. It would need an urgent duty judge mechanism capable of granting arrest orders within hours of an application, because a vessel in port today may be in international waters tomorrow. It would need a judicial sale procedure that confers a clean title recognised under the Beijing Convention. And it would need an Admiralty Marshal — or an equivalent enforcement officer — with authority to execute arrest warrants at Sohar, Duqm, and Salalah, because an arrest order is only as effective as the mechanism for serving it on the vessel's gangway.

No GCC common law court has claimed this ground. The opportunity is not merely to build a court that understands energy and infrastructure disputes. It is to build the first international common law admiralty court between Suez and Singapore — sitting directly on the ports that handle those disputes, with jurisdiction over the vessels that generate them.

The Advantage of Arriving Last

Oman has watched the other centres operate for twenty years, and the lessons are visible in its founding legislation. The jurisdictional boundary problem is the most obvious. Every GCC common law enclave has had to manage the interface between

[19] Under English practice, admiralty arrest applications may be made to a duty judge on an urgent ex parte basis: CPR Part 61, PD 61. The Singapore High Court operates an equivalent mechanism under the Supreme Court of Judicature Act and the Rules of Court.

[20] The London Maritime Arbitrators Association (LMAA) handles approximately 1,500–2,000 maritime arbitration references per year, making London the dominant global seat for maritime dispute resolution. The standard LMAA terms provide for English law and London arbitration.

its courts and the host state's domestic judiciary. The DIFC's Joint Judicial Committee took over a decade to establish and generated its own satellite litigation.[21] IFC Oman's founding legislation addresses enforcement directly: Article 48 creates a mutual enforcement mechanism between IFC Oman and the Omani courts from the outset.[22] Oman is a New York Convention signatory.[23] Whether this works smoothly in practice remains to be seen. But the fact that the drafters addressed it in the founding decree, rather than leaving it to be improvised, suggests they were paying attention.

The regulatory architecture reflects similar learning. IFC Oman separates policy (the Board), operations (the Authority), and regulation (the Regulatory Authority) from day one.[24] Licensed establishments can conduct certain activities outside IFC Oman that are deemed in law to have occurred within it[25] — a feature that gives international firms the ability to anchor cross-border transactions in the centre. The fiscal package — 50-year exemptions from income tax, withholding tax, and certain VAT obligations[26] — is the longest of its kind in the region.

Oman also built a specialist onshore commercial court simultaneously. The Court of Investment and Commerce, operational since October 2025, is an Arabic-language, digital-first court with mandatory electronic filing and a 90-day decision timetable.[27] Practitioners advising on Omani transactions now have a genuine choice between an onshore specialist court and an offshore common law court. That choice, and the drafting considerations it creates, is new for Oman and richer than the menu most GCC states offer.

What Will Determine Success

The bench has not been announced. That is not a minor detail.[28]

The judicial appointments will be the first signal. If IFC Oman appoints judges with expertise in energy, infrastructure, maritime, and commercial arbitration — and if it confers admiralty jurisdiction on the court, with *in rem* powers and ship arrest capability at its three Indian Ocean ports — rather than exclusively banking and financial services — it will show that it has understood the opportunity we have described. If it appoints a bench that looks like every other GCC common law court, it will have missed the point. The same logic applies to the Dispute Resolution

[21] See the establishment of the Joint Judicial Committee by Dubai Decree No. 19 of 2016, created to resolve jurisdictional conflicts between the DIFC Courts and the Dubai courts.
[22] Royal Decree No. 8/2026, Article 48.
[23] Oman acceded to the Convention on the Recognition and Enforcement of Foreign Arbitral Awards (New York, 1958) on 25 February 1999.
[24] Royal Decree No. 8/2026, Article 7. See also Trowers & Hamlins, 'International Financial Centre Oman: can a new financial regime turn ambition into capital?' (29 January 2026).
[25] Royal Decree No. 8/2026, Article 8. See Al Tamimi & Company, 'Oman's New Financial Frontier' (February 2026).
[26] EY Tax Alert, 'Oman establishes International Financial Centre' (28 January 2026). Exemptions for up to 50 years include income tax, non-resident withholding tax, and VAT benefits for qualifying activities.
[27] Royal Decree No. 35/2025 Establishing the Court of Investment and Commerce, issued 23 March 2025, effective 1 October 2025.
[28] Pinsent Masons, 'Oman establishes IFC to become alternative financial hub in the Middle East' (12 February 2026); MEED, 'International Financial Centre Oman will have to differentiate' (2026).

Tribunal. A well-run arbitral seat on the Indian Ocean, with competitive costs and a common law supervisory court, could attract the energy and infrastructure arbitrations that are currently dispersed across London, Singapore, Paris, and ad hoc proceedings. But the procedural rules and institutional support must match the ambition.

None of this is inevitable. The framework is in place, but frameworks are only as good as the decisions behind them. Oman could appoint a generalist bench, build a weak arbitration infrastructure, and continue pitching itself as another global financial hub. If that happens, IFC Oman becomes a fourth DIFC — without the DIFC's case law, its incumbency, or its location in the region's commercial capital.

Above all, the positioning must change. If IFC Oman continues to describe itself as a "global hub for financial services," it will be measured against the DIFC and found wanting. If it describes itself as the common law court for the Indian Ocean's industrial economy — the forum of choice for disputes arising from the fastest-growing trade corridor on earth — it occupies ground that nobody else has claimed. The difference between those two pitches is the difference between a centre that struggles for relevance and one that defines a new category.

The Practitioner's Calculation

The GCC's common law courts are maturing. The era in which each centre could be all things to all disputes is giving way to one in which specialisation will determine relevance. The DIFC is the most expansive court, with a unique role as an enforcement conduit — a position built on twenty years of precedent, geographic centrality, and the simple advantage of being first. ADGM serves sovereign and institutional capital. Qatar has built the most integrated arbitration model. Oman has the geography, the real economy, and the late-mover advantage to claim the Indian Ocean's physical economy — energy, infrastructure, logistics, maritime, and admiralty. Whether it does so will depend on choices yet to be made: the composition of the bench, the design of the arbitration framework, and the willingness to tell the market something more distinctive than "global financial hub."

For practitioners, the calculation is more immediate. There is a new common law court with opt-in jurisdiction, sitting behind the Indian Ocean's fastest-growing trade corridor. It does not yet have a track record. That is the risk. But the lawyers who engage now — who draft the first jurisdiction clauses, who appear in the first hearings, who test the enforcement machinery before anyone else — will shape how this court develops. In the DIFC, the practitioners who showed up in 2006 built practices that their competitors spent the next decade trying to replicate. IFC Oman presents the same window.

About Us

33 Chancery Lane is a specialist set of barristers with a leading reputation in financial wrongdoing, asset recovery, and commercial disputes. Members are called to the

QFC, the DIFC, and ADGM, and appear regularly before the courts in all three centres. The set's international arbitration experience covers the ICC, LCIA, HKIAC, ICSID, and UNCITRAL, across seats including the Middle East.

The disputes that the Gulf's maturing common law ecosystem will generate fall within the set's core practice areas: banking and finance litigation, civil fraud and asset recovery, multi-jurisdictional enforcement, and complex regulatory work. Members have particular expertise in energy, commodities, and cross-border infrastructure disputes. The set operates across criminal, civil, and international law—a combination that reflects the reality of commercial disputes in the Gulf, where regulatory enforcement, commercial claims, and cross-border asset recovery frequently arise from the same underlying facts.

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