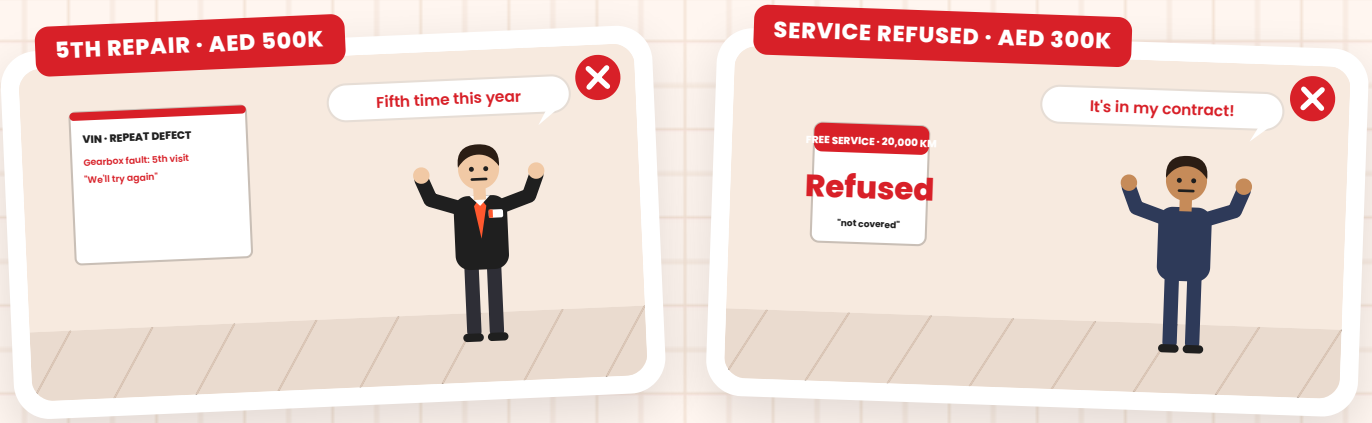
• UP TO AED 1,000,000 PER VIOLATION Sales, aftersales, parts & recalls

# Consumer Protection Compliance Guidebook for Automotive Companies

Warranties, maintenance, repeat defects, prices and recalls: what the Ministry of Economy and DEDs check, **and why one refused warranty repair can cost AED 500,000.**




**AED 1M**
maximum consumer protection fine per violation.

**×2**
every fine is **doubled** for a repeat.

**8,168**
Ministry inspection visits in under 3 weeks (Mar 2026).

5 standards · 15 checkpoints · Federal Law 15/2020 · CD 66/2023 · Right way / wrong way · Ideal fix time

**2023** Penalty schedule issued → **Mar 2026** 8,168 inspections → **2026** Thousands of recalls → **After-sales is where fines start.**

WHY THIS GUIDEBOOK EXISTS

# In the UAE, the warranty is where the fines are.

The Consumer Protection Law and its 2023 penalty schedule list **46 violations** with fines of **AED 100,000 to AED 1,000,000**, doubled for a repeat. Many of the highest fines are about after-sales: warranty documents, maintenance, repeat defects and replacements.

This guidebook covers the 5 consumer standards most relevant to UAE dealers.

WHERE CONSUMER RISK SITS

**Warranty**
Document for every buyer
CP-01

**Maintenance**
Service plans honoured
CP-02

**Defects**
Replace or refund
CP-03

**Pricing**
Displayed and invoiced in Arabic
CP-04

**Recalls**
Contacted and completed
CP-05

**Complaints**
MoET and DED channels
All

WHO ENFORCES IT

**MoET**
**Ministry of Economy & Tourism**
Federal consumer protection, recalls

**DED / DET**
**Emirate economic departments**
Inspections and complaints

**Courts**
**Civil courts**
Customer claims

**Agents**
**Brand distributors**
Warranty terms and recalls

WHO IT'S FOR

**Dealer principals & GMs**
Understand fines per violation, doubled on repeat.

**Sales & aftersales managers**
Know what every customer must receive.

**Auditors**
Check deal files, service plans and recalls.

SET PER VIOLATION, DOUBLED ON REPEAT

# One repeat defect ignored. AED 500,000.

Consumer fines in the UAE are set per violation. Failing to replace or refund a car with a recurring defect is **AED 500,000**, and **AED 1,000,000** the second time.

## THE PENALTY LADDER

LEVEL 1
**AED 100K**
Missing warranty document.

LEVEL 2
**AED 300K**
Periodic maintenance not provided.

LEVEL 3
**AED 500K**
No replacement or refund for repeat defects.

LEVEL 4
**AED 1M**
Maximum fine; any fine doubled on repeat.

## REAL CASES FROM US AUTOMOTIVE BUSINESSES

| WHO | RESULT | WHAT HAPPENED |
|---|---|---|
| **MoET market inspections**<br>Feb–Mar 2026 | **8,168 visits**<br>216 penalties | 729 warnings; fines AED 2,000–200,000; missing price labels among findings. |
| **Lexus LX recall**<br>UAE · 2026 | **~7,000**<br>vehicles | Engine software and transmission issues. |
| **Jeep Wrangler / Gladiator recall**<br>UAE | **5,612**<br>vehicles | Steering fault and fire risk. |

ONE REPEAT DEFECT
**AED 500K**
No replacement or refund offered.

SECOND TIME
**AED 1M**
The same violation, doubled.

AND THEN
**Refund**
The customer still gets **the car replaced or refunded**.

HOW TO USE THIS GUIDE

# One page per standard. Honour the warranty.

1. **Header**: code, area, owner and the maximum penalty
2. **The law**: which regulator and which regulation
3. **The cost**: fine, what else can happen and a real case
4. **Right / wrong**: illustrated pass and fail, plus how to audit

## THE 5 STANDARDS

| | | | | | | |
|---|---|---|---|---|---|---|
| CP-01 | Warranty Document Given | CD 66/2023 | SEVERE | AED 100K | 7 days | 5 |
| CP-02 | Scheduled Maintenance Delivered | CD 66/2023 | SEVERE | AED 300K | 72 hours | 6 |
| CP-03 | Replacement or Refund for Repeat Defects | CD 66/2023 | CRITICAL | AED 500K | 72 hours | 7 |
| CP-04 | Clear Prices & Arabic Invoices | CPL | CRITICAL | AED 100K–1M | 24 hours | 8 |
| CP-05 | Recalls Actioned | CPL · MoET recall | CRITICAL | AED 100K–1M | Immediate | 9 |

## IDEAL FIX TIME · COUNTED FROM AUDIT SUBMISSION

| | | |
|---|---|---|
| Immediate | Stop now · serious harm or clear breach | 1 standard |
| 24 hours | Fix within 1 working day | 1 standard |
| 72 hours | Fix within 3 working days | 2 standards |
| 7 days | Fix within 1 week · records, notices, training | 1 standard |

## SCORING EACH CHECKPOINT

**PASS**

Every criterion met at the time of audit, with evidence captured.

**FAIL**

Any criterion not met at the time of audit. Record what you saw and who owns the fix.

**N/A**

Only where "Applies when" rules it out. Record why.

**Note.** Fine amounts come from Cabinet Decision 66/2023. Emirate economic departments may also apply local procedures.

CP-01 CONSUMER PROTECTION · MOET · STANDARD 01 OF 05

# Warranty Document Given

Area **Sales** | Person in charge **Sales Manager** | Regulator **MoET · DED**

**MAXIMUM PENALTY**

**AED 100,000**

per violation · missing warranty document

Repeat: **AED 200,000**

**• SEVERE**

**THE LAW**

**CPL**

**Federal Law No. 15 of 2020** on Consumer Protection · **Cabinet Decision No. 66 of 2023** (Executive Regulation, penalty schedule) · Consumer Protection Law warranty obligations · penalty schedule item: failure to provide the warranty document

## WHAT WE CHECK

Every buyer gets a written warranty document in Arabic (and English where used) stating what is covered, for how long, and how to claim.

## CHECKPOINTS IN THE AUDIT

- **Q1** Does every new and used car sale include a written warranty document?
- **Q2** Does it state coverage, duration and how to claim, in Arabic?
- **Q3** Is a signed copy kept on the deal file?

## WHAT NON-COMPLIANCE COSTS YOU

### THE FINE

Cabinet Decision 66/2023 sets fines from **AED 100,000 to AED 1,000,000** across 46 violation types, and fines are **doubled** for a repeat.

### BEYOND THE FINE

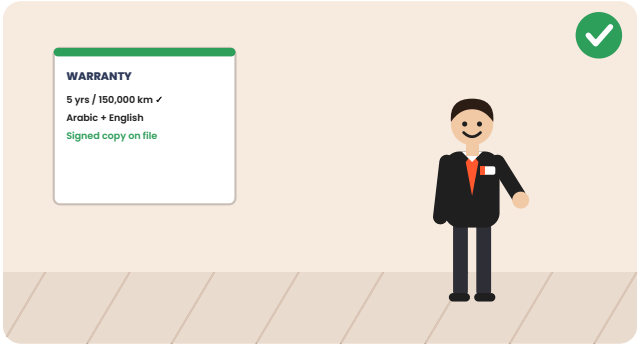
The Ministry and emirate economic departments can also order **refunds or replacements**, suspend activity and publish violations. Consumers complain directly through MoET and DED channels.

### REAL ENFORCEMENT

**46**

violation types in the consumer protection penalty schedule, each fined between **AED 100,000 and AED 1,000,000**, and doubled if repeated.

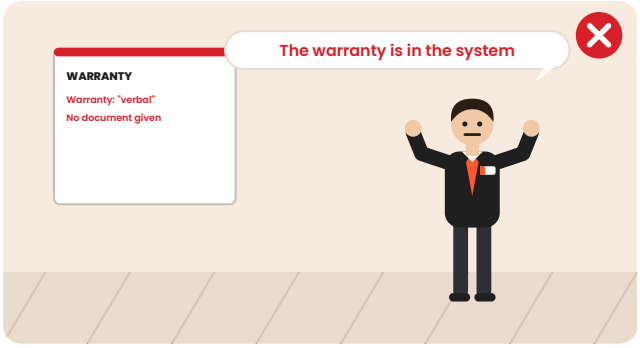
## ✔ RIGHT WAY




Written, bilingual warranty handed over and signed.

## ✖ WRONG WAY

AED 100K




"Verbal" warranty with no document.

### PURPOSE

The warranty document is the customer's proof. Without it, disputes go straight to the Ministry.

### FIX IT WITHIN

◷ 7 days

### AUDIT CRITERIA · PASS WHEN

- Document for every sale
- Arabic language
- Coverage and duration clear
- Copy on file

### IDEAL WAY OF AUDITING

1. Sample 10 deal files
2. Check the template
3. Ask a salesperson what's handed over

**Evidence:** Deal files + template.

**WORST CASE** **AED 100,000** for a missing warranty document, doubled to **AED 200,000** if it happens again.

CP-02 CONSUMER PROTECTION · MOET · STANDARD 02 OF 05

# Scheduled Maintenance Delivered

Area **Aftersales** | Person in charge **Aftersales Manager** | Regulator **MoET · DED**

**MAXIMUM PENALTY**

**AED 300,000**

per violation · periodic maintenance not provided

Repeat: **AED 600,000**

• SEVERE

**THE LAW**

**CPL**

**Federal Law No. 15 of 2020** on Consumer Protection · **Cabinet Decision No. 66 of 2023** (Executive Regulation, penalty schedule) · Penalty schedule item: failure to provide periodic maintenance on warranted goods

## WHAT WE CHECK

Free or included service plans are honoured on time, service bookings are available within a reasonable period, and warranty work is never refused without a documented reason.

## CHECKPOINTS IN THE AUDIT

- **Q1** Are service plan and warranty maintenance visits honoured as promised?
- **Q2** Can customers get a booking within a reasonable time?
- **Q3** Are refusals of warranty work documented with a reason?

## WHAT NON-COMPLIANCE COSTS YOU

### THE FINE

Cabinet Decision 66/2023 sets fines from **AED 100,000 to AED 1,000,000** across 46 violation types, and fines are **doubled** for a repeat.

### BEYOND THE FINE

The Ministry and emirate economic departments can also order **refunds or replacements**, suspend activity and publish violations. Consumers complain directly through MoET and DED channels.

### REAL ENFORCEMENT

**46**

violation types in the consumer protection penalty schedule, each fined between **AED 100,000 and AED 1,000,000**, and doubled if repeated.

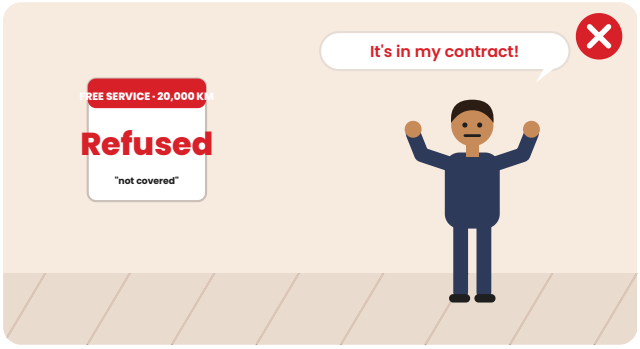
## ✔ RIGHT WAY




Warranty service booked within 3 days.

## ✖ WRONG WAY

AED 300K




Included service refused.

### PURPOSE

After-sales promises are where most car complaints to the Ministry start.

### FIX IT WITHIN

72 hours

### AUDIT CRITERIA · PASS WHEN

- Plans honoured
- Reasonable booking time
- Refusals documented

### IDEAL WAY OF AUDITING

1. Check service plan redemptions
2. Check booking lead times
3. Review refusals

**Evidence:** DMS reports.

**WORST CASE** Failing to provide the maintenance is **AED 300,000** per violation, **AED 600,000** on repeat.

CP-03 CONSUMER PROTECTION · MOET · STANDARD 03 OF 05

# Replacement or Refund for Repeat Defects

Area **Aftersales** | Person in charge **Aftersales Manager · Customer Relations** | Regulator **MoET · DED**

**MAXIMUM PENALTY**

**AED 500,000**

per violation · no replacement or refund

Repeat: **AED 1,000,000**

**• CRITICAL**

**THE LAW**

**CPL**

**Federal Law No. 15 of 2020** on Consumer Protection · **Cabinet Decision No. 66 of 2023** (Executive Regulation, penalty schedule) · Penalty schedule items: failure to replace a defective product; failure to replace or refund when defects recur during warranty

## WHAT WE CHECK

If the same defect keeps coming back during warranty, or the supplier is responsible for the defect, the customer is offered a replacement or refund as the law requires. Replacement cars are provided where the warranty says so.

## CHECKPOINTS IN THE AUDIT

- Q1 Are repeat defects tracked per vehicle (VIN)?
- Q2 Is replacement or refund offered when a defect recurs during warranty?
- Q3 Are courtesy or replacement cars provided when the warranty promises them?

## WHAT NON-COMPLIANCE COSTS YOU

### THE FINE

Cabinet Decision 66/2023 sets fines from **AED 100,000 to AED 1,000,000** across 46 violation types, and fines are **doubled** for a repeat.

### BEYOND THE FINE

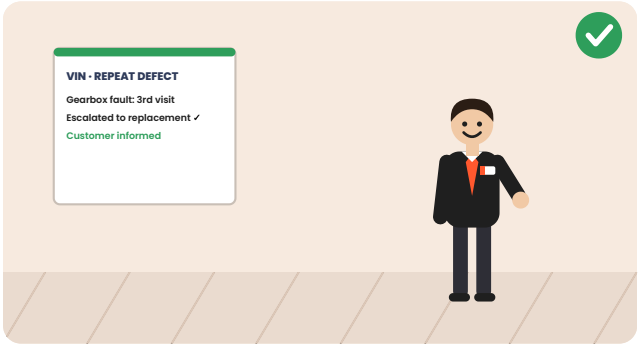
The Ministry and emirate economic departments can also order **refunds or replacements**, suspend activity and publish violations. Consumers complain directly through MoET and DED channels.

### REAL ENFORCEMENT

**46**

violation types in the consumer protection penalty schedule, each fined between **AED 100,000 and AED 1,000,000**, and doubled if repeated.

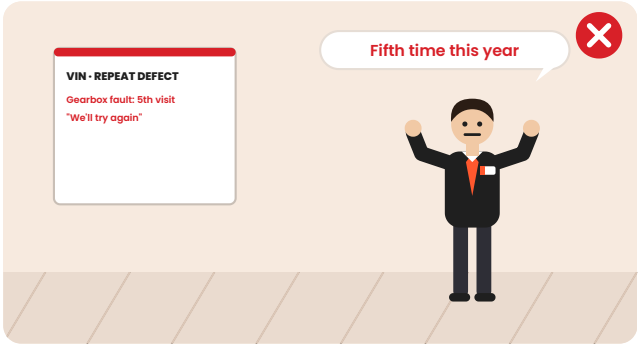
## ✔ RIGHT WAY




Third repeat escalated to replacement.

## ✖ WRONG WAY

AED 500K




Fifth repair attempt, no remedy offered.

### PURPOSE

Repeat-defect cases are the most expensive consumer violations for dealers.

### FIX IT WITHIN

◷ 72 hours

### AUDIT CRITERIA · PASS WHEN

- Repeat defects tracked
- Escalation rule
- Replacement or refund offered
- Courtesy car where promised

### IDEAL WAY OF AUDITING

1. Run a repeat-repair report by VIN
2. Review escalations
3. Check courtesy car records

**Evidence:** DMS repeat report.

**WORST CASE** **AED 500,000** per case, and **AED 1,000,000** if repeated.

CP-04 CONSUMER PROTECTION · MOET · STANDARD 04 OF 05

# Clear Prices & Arabic Invoices

Area **Showroom · Parts · Service**

Person in charge **Sales Manager · Parts Manager**

Regulator **MoET · DED**

**MAXIMUM PENALTY**

**AED 1,000,000**

maximum per violation · 46 violation types

Fines range **AED 100,000–1,000,000** · **doubled** on repeat

**• CRITICAL**

**THE LAW**

**CPL**

**Federal Law No. 15 of 2020** on Consumer Protection · **Cabinet Decision No. 66 of 2023** (Executive Regulation, penalty schedule) · Consumer Protection Law: price display, invoices and information in Arabic

## WHAT WE CHECK

Prices for cars, parts and labour are clearly displayed, and every invoice is in Arabic (other languages allowed alongside) with the date, item details, price and VAT.

## CHECKPOINTS IN THE AUDIT

- **Q1** Are prices displayed on cars, parts and service menus?
- **Q2** Are invoices issued in Arabic with full details and VAT?
- **Q3** Do quoted and invoiced prices match?

## WHAT NON-COMPLIANCE COSTS YOU

### THE FINE

Cabinet Decision 66/2023 sets fines from **AED 100,000 to AED 1,000,000** across 46 violation types, and fines are **doubled** for a repeat.

### BEYOND THE FINE

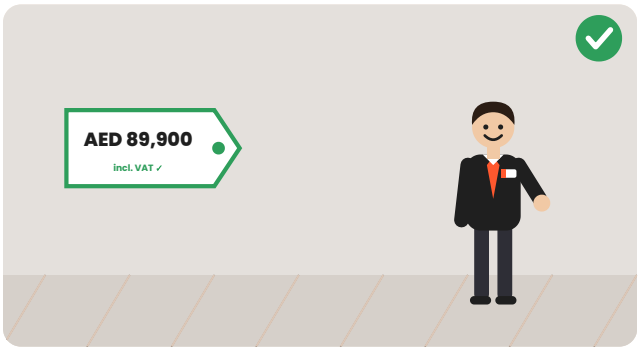
The Ministry and emirate economic departments can also order **refunds or replacements**, suspend activity and publish violations. Consumers complain directly through MoET and DED channels.

### REAL ENFORCEMENT

**8,168**

Ministry inspection visits in under 3 weeks (Mar 2026): **729 warnings and 216 penalties** of AED 2,000–200,000.

## ✔ RIGHT WAY




Price with VAT displayed.

## ✖ WRONG WAY

**UP TO AED 1M**




"Ask for price" on the car.

### PURPOSE

Missing price labels were among the top findings in the Ministry's 2026 inspection campaign.

### FIX IT WITHIN

**24 hours**

### AUDIT CRITERIA · PASS WHEN

- Prices displayed
- Arabic invoices
- VAT shown
- Quote = invoice

### IDEAL WAY OF AUDITING

1. Walk the showroom and parts counter
2. Sample 10 invoices
3. Compare quotes to invoices

**Evidence:** Photos + invoices.

**WORST CASE** Price and invoice failures are fined under the consumer schedule, from **AED 100,000** per violation.

CP-05 CONSUMER PROTECTION · MOET · STANDARD 05 OF 05

# Recalls Actioned

Area **Aftersales · Used cars** | Person in charge **Aftersales Manager** | Regulator **MoET · DED**

**MAXIMUM PENALTY**

**AED 1,000,000**

maximum per violation · 46 violation types

Fines range **AED 100,000–1,000,000** · **doubled** on repeat

**• CRITICAL**

**THE LAW**

**CPL**

**Federal Law No. 15 of 2020** on Consumer Protection · **Cabinet Decision No. 66 of 2023** (Executive Regulation, penalty schedule) · Consumer Protection Law recall obligations · MoET product recall announcements

## WHAT WE CHECK

When the Ministry or manufacturer announces a recall, affected customers are contacted, vehicles in stock are fixed before sale, and completion is tracked.

## CHECKPOINTS IN THE AUDIT

- Q1 Are recall notices received and assigned promptly?
- Q2 Are affected customers contacted and completion tracked?
- Q3 Are recalled vehicles in stock fixed before sale?

## WHAT NON-COMPLIANCE COSTS YOU

### THE FINE

Cabinet Decision 66/2023 sets fines from **AED 100,000 to AED 1,000,000** across 46 violation types, and fines are **doubled** for a repeat.

### BEYOND THE FINE

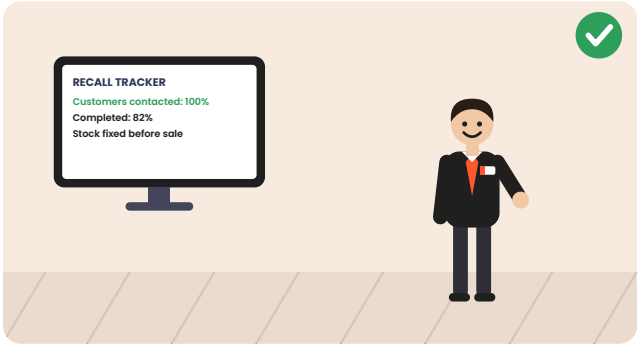
The Ministry and emirate economic departments can also order **refunds or replacements**, suspend activity and publish violations. Consumers complain directly through MoET and DED channels.

### REAL ENFORCEMENT

**~7,000**

Lexus LX vehicles recalled in the UAE over engine software and transmission issues. Recalls must be **actioned by the agent and dealers**.

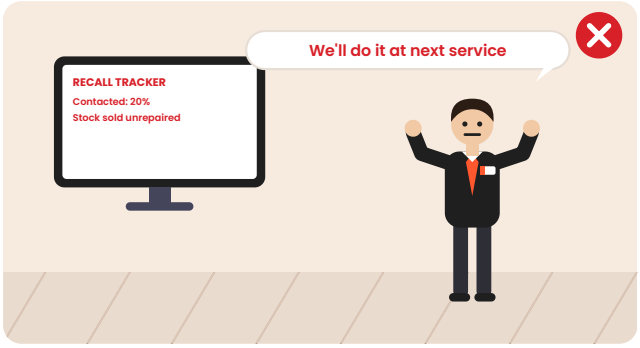
## ✔ RIGHT WAY




All customers contacted, stock fixed.

## ✖ WRONG WAY

**UP TO AED 1M**




Recalled cars sold unrepaired.

## PURPOSE

The UAE announces thousands of vehicle recalls a year, and dealers carry them out.

### FIX IT WITHIN

**Immediate**

## AUDIT CRITERIA · PASS WHEN

- Owner contact
- Completion tracked
- Stock fixed first
- Reported to agent / Ministry

## IDEAL WAY OF AUDITING

1. Check open recalls against stock
2. Check contact logs
3. Check completion rates

**Evidence:** Recall tracker.

**WORST CASE** Selling a recalled car unrepaired risks a **replacement or refund order** and the highest consumer fines.

FIX IT BEFORE THE CUSTOMER COMPLAINS

# Your 30-day consumer action plan.

## Today

- [ ] **CP-05** Recalls Actioned
  Immediate
- [ ] **CP-04** Clear Prices & Arabic Invoices
  24 hours

## This week

- [ ] **CP-02** Scheduled Maintenance Delivered
  72 hours
- [ ] **CP-03** Replacement or Refund for Repeat Defects
  72 hours
- [ ] **CP-01** Warranty Document Given
  7 days

## This month

Re-audit the site in 30 days.

**?/5** Count your passes. Each fail is **AED 100,000–1,000,000**, doubled if it happens again.

SOURCES

- Chambers and Partners: UAE issued new penalties under the Consumer Protection Law · chambers.com
- Eye of Riyadh / Business News MEA: MoET 8,168 inspection visits, 216 penalties (Mar 2026) · eyeofriyadh.com
- Gulf News: Lexus and Jeep vehicle recalls in the UAE · gulfnews.com
- Federal Law No. 15 of 2020; Cabinet Decision No. 66 of 2023 · uaelegislation.gov.ae

**Disclaimer.** For compliance-audit guidance only; not legal advice. Check the current penalty schedule with MoET or your emirate's economic department.

AUDIT SIGN-OFF

| DEALERSHIP / SITE | AUDITOR | DATE | SCORE __ / 5 |
|---|---|---|---|
| | | | |

BRANCH / DEALER PRINCIPAL SIGNATURE

COMPLIANCE LEAD SIGNATURE