ADGM

FSRA
Annual Report
2025

ADGM

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Our Leadership

Foreword by

the Chairman of ADGM H.E. Ahmed Jasim Al Zaabi

> "The FSRA's independent, risk-based and internationally aligned approach continues to support market confidence and enable responsible innovation."

Over the past decade, Abu Dhabi has established itself as one of the world's most dynamic centres for finance, investment and innovation. As global capital increasingly seeks stability, certainty and long-term opportunity, the Emirate has emerged as a trusted platform connecting international capital, businesses and talent with opportunities across the region and markets.

This evolution brings both opportunity and responsibility. As ADGM continues to grow in scale and international reach, maintaining confidence in the financial system becomes paramount. Sustainable growth depends not only on attracting capital and fostering innovation, but also on the strength and resilience of the institutions and regulatory frameworks that underpin them.

As ADGM enters its next decade, it does so from a position of strength. Today, it stands among the world's leading international financial centres, supported by a globally recognised legal framework, a thriving ecosystem, and a reputation for innovation and regulatory excellence. This progress reflects Abu Dhabi's broader economic ambition to build a globally competitive economy that enables capital, enterprise and talent to thrive. It also reinforces the Emirate's standing as the Capital of Capital.

Through its progressive regulatory and supervisory frameworks, the Financial Services Regulatory Authority (FSRA) continues to support the sustainable development of financial services within ADGM, ensuring that innovation and growth are consistently matched by trust and stability. In an increasingly complex global environment, regulatory excellence is not simply a safeguard, it is a competitive advantage that strengthens market confidence and enables responsible growth.

Looking ahead, Abu Dhabi's continued success will be shaped by its ability to remain diversified, innovative and globally competitive. As the UAE's Falcon Economy evolves, ADGM remains committed to fostering an environment defined by regulatory excellence and sustainable growth. By maintaining the highest standards of governance, market integrity and innovation, ADGM will continue to support Abu Dhabi's role in shaping the future of global finance and strengthening its position among the world's leading financial centres.

Statement by

the Chief Executive Officer of the Financial Services Regulatory Authority of ADGM – Emmanuel Givanakis

"Our focus was on delivering effective regulation in practice-ensuring our framework, supervision and enforcement operated cohesively and proportionately."

In 2025, we continued to evolve in response to the increasing scale, complexity and international integration of activity within ADGM. Our focus throughout the year was on engaging with our community, delivering effective regulation in practice, ensuring that our legislative framework, supervisory approach and enforcement tools operated cohesively and proportionately.

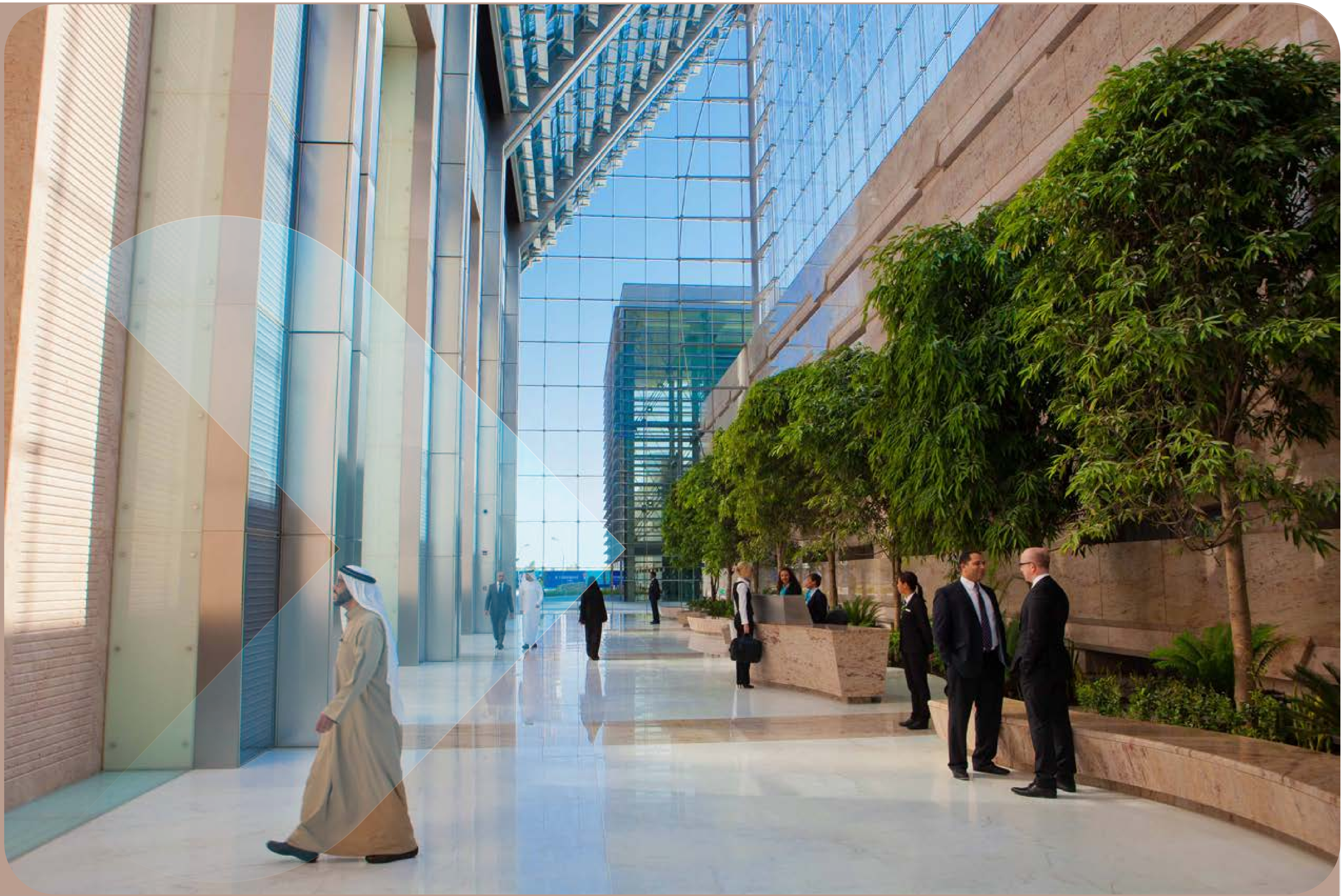
As ADGM continues to attract a growing number of sophisticated firms and financial activities, we have strengthened our risk-based approach across authorisation, supervision and enforcement. This enabled us to prioritise those areas of greatest impact, intervene early where risks emerged, and take decisive action when standards were not met.

During the year, the FSRA continued to support ADGM's strong growth with a total of 95 Financial Services Permissions (FSPs) and 120 In-Principle Approvals, representing an increase of 22% and 32%, respectively, compared to 2024. The FSRA also signed 5 new MoUs to further strengthen international cooperation. The scale of activity across ADGM continued to accelerate during 2025, with total assets increasing by 36% over the year,

Innovation remained a priority in 2025, although the focus increasingly shifted towards supervising more mature and higher-impact activity. We continued to support further technological advancement in financial services while enhancing our own regulatory capabilities through the development and deployment of various SupTech and RegTech tools.

Alongside this, we continued to invest in our people, systems and international relationships, recognising that regulatory effectiveness depends on institutional resilience and skilled judgement. These efforts also ensured that we remain well-positioned to meet our international obligations and contribute meaningfully to national and global regulatory initiatives.

Looking ahead, the FSRA enters the next phase of its development with strong foundations in place. All that was achieved in 2025 positions us to continue successfully executing our 2025–26 Business Plan with confidence, supporting sustainable growth while safeguarding the integrity of ADGM's financial services sector.



Executive Summary

Executive Summary

Overview of 2025 Delivery and Outcomes

As ADGM continued to grow in scale, complexity and international reach, the FSRA has entered an important new phase. Its focus is not only to build and enhance an internationally credible regulatory framework but also to deliver it effectively at scale. This is executed while ensuring its relevance to the characteristics and complexity of the financial services sector in ADGM remains intact, as it tailors it to the rapidly evolving landscape.

During 2025, the FSRA enhanced its risk-based approach across authorisation, supervision and enforcement, with greater attention on complex firms, emerging risks and activities with the greatest potential impact on market integrity and confidence. This notably included a continued focus on financial crime, cyber risk, FinTech and Virtual Assets, and increasingly interconnected business models.

The FSRA also advanced important policy and regulatory initiatives, strengthened its use of technology and data, and deepened engagement with domestic and international partners and stakeholders. At the same time, it continued to invest in its people, systems and governance, recognising that effective regulation and supervision depends on strong internal capability as well as a robust external framework.

ADGM entered its next decade of growth with clearer rules, stronger oversight and in the FSRA, a regulator better equipped to respond to a more complex and rapidly developing financial services sector.

About the FSRA

About the FSRA

The FSRA of ADGM

The Financial Services Regulatory Authority (FSRA) is the independent regulator of financial services carried on in or from ADGM. Our role is to maintain a fair, orderly and transparent financial services sector, protect and enhance the reputation of ADGM, and support confidence in Abu Dhabi as an international financial centre.

It oversees a broad range of regulatory functions, including authorisation, supervision, market oversight, enforcement, policy development, international relationships and financial crime prevention. In carrying out these responsibilities, we apply a risk-based and outcomes-focused approach designed to uphold market integrity while supporting sustainable growth.

The FSRA works closely with other ADGM authorities, domestic stakeholders and international peers to ensure that our regulatory framework remains proportionate, credible and aligned with global standards. This helps provide firms and market participants with a clear and predictable regulatory environment in which to operate.

Our Vision, Strategic Objectives and Regulatory Priorities

VISION

Be a progressive and globally recognised regulator, that contributes to ADGM as a leading and dynamic IFC, through engagement, innovation and fostering sustainable growth

STRATEGIC OBJECTIVES

- Innovation
- Efficient and Safe Markets
- Growth through Sound Regulation and Cooperation
- Building the Future

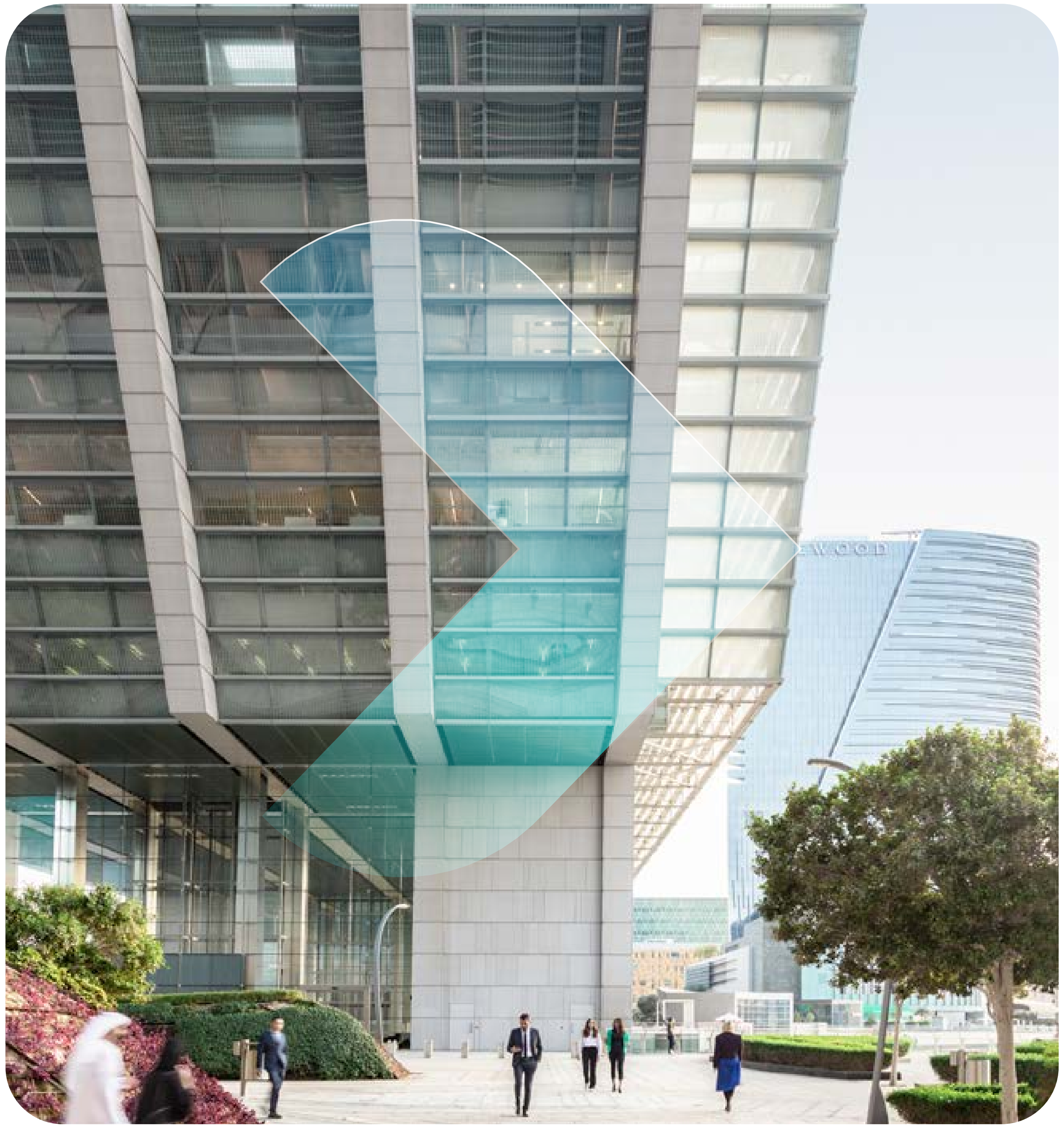
REGULATORY PRIORITIES

- Strengthen FSRA's international standing and alignment with global standards
- Preventing and Reducing Financial Crime
- Enhancing Operational Resilience of Market Participants
- Strengthening Conduct, Market Integrity and Professional Standards
- Fostering Technological Innovation in Financial Services and Regulation
- Investment in and development of Staff

International Engagement and Alignment with Standards

We are committed to delivering a progressive and effective regulatory framework, aligned with international standards and best practices. Our legislative and regulatory approach is based on globally recognised standards, including those developed by the Basel Committee on Banking Supervision (BCBS), the International Organisation of Securities Commissions (IOSCO), the International Association of Insurance Supervisors (IAIS), and the Financial Action Task Force (FATF).

We continue to engage actively with international organisations and standard setters, contributing to the development of global regulatory thinking across market integrity, innovation, and sustainable finance. This ensures our framework remains relevant, proportionate, and responsive to evolving market dynamics, while supporting ADGM's position as a leading international financial centre.



ADGM Structure and Leadership

ADGM was established under Abu Dhabi Law No. (4) of 2013 to position Abu Dhabi as a leading international financial centre (IFC), supporting economic diversification, and creating a robust and attractive environment for financial services in the Emirate and the wider UAE.

Since becoming operational in October 2015, ADGM has continued to grow as a dynamic and internationally connected financial centre. It plays a key role in linking Abu Dhabi to global markets and contributes to the Emirate's long-term economic development.

ADGM comprises three independent authorities that work together to maintain a transparent, well-regulated, and business-friendly environment. Alongside the FSRA, these comprise the Registration Authority (RA) and ADGM Courts, together with the ADGM Authority, which all work in tandem to deliver the statutory objectives enshrined in Abu Dhabi Law No. 4 of 2013.

ADGM

ADGM Board

CHAIRMAN
H.E. Ahmed Jasim Al Zaabi

VICE CHAIRMAN
H.E. Mohamed Ali Al Shorafa

MEMBERS

- H.E. Hisham Khalid Malak
- Khaled Abdulla Al Qubaisi
- Dhaen Mohamed Al Hameli
- Mansour Mohamed Al Mulla
- Kaj-Erik Relander

The FSRA, through its Chief Executive Officer, is accountable to the ADGM Board for the effective discharge of its responsibilities in accordance with the relevant statutory and legislative framework.

The FSRA operates with a clear organisational structure designed to support effective supervision, policy development and regulatory delivery.

FSRA Organisational Structure and Leadership Team

ADGM BOARD OF DIRECTORS

ADGM CHAIRMAN

Emmanuel Givanakis
FSRA - Chief Executive Officer

Office of CEO
Risk & Strategy

Wai Lum Kwok
Authorisation & FinTech

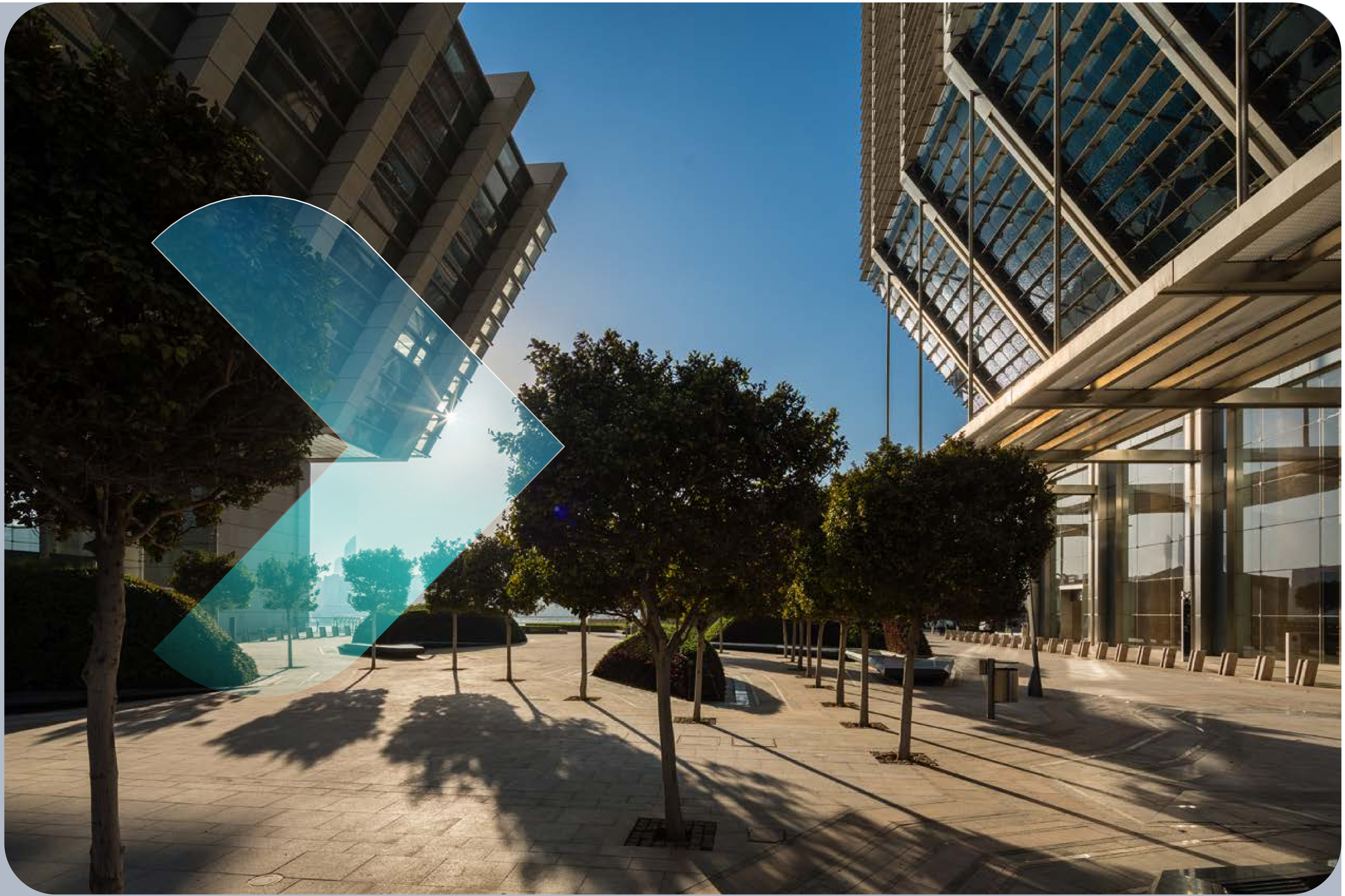
Marianne Scicluna
Supervision & Markets

Lawrence Paramasivam
Policy & Legal

Adrian Bock
Enforcement

Noura Al Salami
Financial & Cyber Crime Prevention

Philippe Richard
International Affairs



Governance, Values and Ethical Standards

Governance, Values and Ethical Standards

FSRA Governance Framework

FSRA Advisory Committees and Decision-Making Panels

Authorisation Committee

During 2025, the Authorisation Committee considered a growing number of complex applications across banking, asset management, virtual assets, market infrastructure, recognised bodies and investment funds. As business models became increasingly innovative and interconnected, the Committee applied a proportionate, risk-based approach to decision-making, ensuring that firms capable of contributing positively to ADGM's ecosystem could progress efficiently while maintaining high regulatory standards.

Policy, Waivers and Modifications Committee

The Policy, Waivers and Modifications Committee oversaw significant policy proposals, legislative enhancements and requests for regulatory waivers and modifications. Its work supported the continued evolution of the FSRA's regulatory framework, ensuring that policy developments remained internationally aligned, responsive to market innovation and consistent with the FSRA's statutory objectives.

Disciplinary Committee

The Disciplinary Committee supported the CEO in considering significant enforcement matters arising from potential breaches of FSRA-administered legislation. Throughout 2025, it provided oversight of complex investigations and enforcement cases, ensuring that regulatory actions were proportionate, evidence-based and procedurally fair, reinforcing confidence in the integrity of ADGM's regulatory framework.

IT Advisory Committee

The IT Advisory Committee (ITAC) supports the Chief Executive Officer by providing strategic oversight of the FSRA's technology, digital transformation and data priorities. It ensures that technology investment, digital initiatives and IT-related risks are aligned with the FSRA's regulatory objectives and operational priorities.

During 2025, the Committee oversaw key technology initiatives, including the continued enhancement of FSRA Connect, the deployment of RegTech and SupTech capabilities, improvements to data management and analytics, and the implementation of AI governance and cybersecurity initiatives. Through its oversight, the Committee helped strengthen the FSRA's digital capability, operational resilience and ability to regulate an increasingly technology-enabled financial sector.

Appeals Panel

The ADGM Board of Directors established the Appeals Panel in accordance with ADGM Financial Services and Markets Regulations 2015 (FSMR) to provide an independent review of a wide range of administrative decisions made by the FSRA. In addition to listening to appeals against administrative decisions, the Appeals Panel also has a first instance decision-making function to consider and determine executive decisions referred to it by the FSRA. To preserve its objectivity and impartiality, the Appeals Panel has full independence and authority for determining regulatory appeals and is independent of the RA.

Mr. Michael Brindle KC
President

Ms. Jane Diplock AO
Deputy President

Ms. Rachel Eng
Member

Ms. Patricia Robertson KC
Member

Mr. Andrew Whittaker
Member

Mr. Michael Brindle KC President Ms. Jane Diplock AO Deputy President Ms. Rachel Eng Member Ms. Patricia Robertson KC Member Mr. Andrew Whittaker Member The Panel is led by Mr. Michael Brindle KC as the President, with Ms. Jane Diplock AO as Deputy President, and with Ms. Rachel Eng, Ms. Patricia Robertson KC, and Mr. Andrew Whittaker as members.

Values and Ethical Standards

The FSRA's values reflect the core principles of ADGM, i.e. integrity, transparency, accountability, and impartiality. These principles underpin our approach to regulation and supervision and are embedded across our policies, processes, and day-to-day operations.

Our Code of Ethics, which applies to all FSRA employees, sets clear expectations in the following areas.

- **Integrity and Accountability** - acting with honesty and professionalism, and taking responsibility for decisions and actions
- **Conflicts of Interest** - identifying, disclosing, and managing actual or potential conflicts
- **Confidentiality and Information Security** protecting sensitive and confidential regulatory information and maintaining strong data security practices
- **Gifts, Hospitality and Benefits** - ensuring transparency and appropriateness in all interactions
- **Anti-Corruption and Compliance** - maintaining zero tolerance for corruption and adhering to applicable laws, sanctions, and ethical standards

Together, these standards support a strong culture of integrity and accountability across the FSRA, reinforcing our commitment to high-quality regulation and trusted engagement with all stakeholders.

2025 at a Glance

2025 at a Glance

Operational and Regulatory Performance Snapshot

Continued growth and the delivery of appropriate outcomes characterised 2025. As activity within ADGM became larger, more complex and more international, we strengthened our oversight, modernised our framework and focused resources where we could have the greatest impact.

Authorisation

95
FSP granted
up 22% on 2024

120
IPA issued
up 32% on 2024

11
FSP variations
approved

346
FSP holders
as of the end of 2025

Markets infrastructure firms

5
IPA granted

1
New Recognised Clearing House

1
Recognised Body authorised

14
Remote Bodies

44
Remote Members admitted

Supervision

230
Risk assessments completed

29%
of firms subject to supervisory visits

877
Approved Person applications completed

2
Thematic reviews undertaken

Enforcement

423
Complaints received and assessed

38
Regulatory actions finalised

- 9* regulatory actions under Financial Services and Markets Regulations **(FSMR)**; and
- 29 taxation reporting (Common Reporting Standard **(CRS)** and Foreign Account Tax Compliance Act **(FATCA)**) penalty actions

37
Financial penalties imposed totalling
USD 9.24M
(AED 33.95 million)

8
Investigations commenced

4
Investigations concluded

1
Cancellation of an FSP;

1
Prohibition Order of an Individual;

1
Withdrawal of Designated Non-Financial Business or Profession (DNFBP) registration.

Policy and Legal Development

9
consultation papers published

37
rulebook amendments made

8
legislative initiatives progressed

8
supplementary guidance documents issued

International Cooperation

5
MoUs signed with international regulators

AMERC
meeting and Global Financial Regulators Summit hosted in ADGM

46
requests for information made

77
received from peer regulators

Financial and Cyber Crime Prevention

609
FATCA / CRS requests for information processed

203
financial crime and cyber notices issued

11
AML, sanctions, tax and cyber guidance documents published

2
financial crime outreach sessions delivered

7
new financial crime-specific Memoranda of Understanding signed to support information sharing and cooperation

5
Cyber Threat Intelligence newsletters issued

2025 at a Glance

Highlights and Key Outcomes

In 2025, we continued to deliver against our strategic objectives by strengthening oversight, supporting growth and building the capabilities needed for the next phase of ADGM's development.

Innovation

- Enhanced the acceptance framework on the use of Fiat-Referenced Tokens in payment services and on virtual assets that regulated entities can deal in.
- Progressed work on staking and other emerging digital asset activities
- Launched and expanded the use of RegTech and SupTech tools to support faster, more consistent regulatory assessments and decisions
- Continued to digitalise and automate key regulatory processes through FSRA Connect

Efficient and Safe Markets

- Applied a more targeted and risk-based approach across authorisation, supervision and enforcement
- Increased supervisory focus on financial crime, cyber risk, outsourcing and complex business models
- Granted IPA to systemically important virtual asset market infrastructure
- Strengthened market surveillance
- Concluded significant enforcement action

Growth Through Sound Regulation and Cooperation

- Delivered a broad programme of legislative and policy enhancements aligned with international standards
- Published consultation papers and guidance across priority areas, including virtual assets, cyber risk and transition planning
- Strengthened cooperation with domestic and international regulators, including signing five new MoUs and chairing the UAE Sustainable Finance Working Group
- Continued to play a leading role in national and international regulatory initiatives

Building the Future

- Invested in talent, leadership and specialist capability across the FSRA
- Strengthened internal risk management, governance and operational resilience
- Expanded industry engagement and outreach to improve understanding of regulatory expectations
- Continued to build a stronger pipeline of future leaders and specialist expertise

Outcomes

- More effective regulation across a larger and more complex sector
- Greater confidence among firms, investors and international partners
- Earlier identification of emerging risks and more targeted regulatory responses
- A stronger platform for the next phase of growth in ADGM

Strategic Delivery in 2025

Innovation

At a Glance

- Supported the growth of innovative business models across ADGM
- Continued to refine the digital assets and Fiat-Referenced Tokens framework as the market matured
- Encompassed innovation in emerging activities such as staking and smart-contract-enabled services
- Strengthened regulatory capabilities through the wider use of RegTech and SupTech
- Increased focus on operational dependencies, outsourcing and customer protection as firms became more interconnected

Our approach to innovation has evolved alongside the market, as much of the previous focus was on creating the right conditions for new products, technologies and business models to emerge within ADGM. By 2025, the market had become more established and interconnected, and firms are increasingly building on existing infrastructure, using shared platforms and developing more sophisticated products and services.

Our focus, therefore, shifted from not only enabling innovation to ensuring that it could develop safely, at scale and in a way that supports confidence in the wider financial system in ADGM.

Innovative Business Models

We continued to support the development of innovative business models across ADGM, particularly in areas where firms were using existing market infrastructure to deliver new products and services more efficiently.

As the ecosystem matured, firms increasingly relied on specialist providers for functions such as custody, payments, trading infrastructure and technology services. This reduced duplication, supported more scalable operating models and encouraged the development of complementary products and services.

During the year, we worked with firms and advisers to ensure that new business models remained within a clear and proportionate regulatory perimeter. Particular attention was paid to how firms managed operational dependencies, outsourcing, governance and customer protection as business models became more interconnected.

This supported innovation in ADGM within a more mature and resilient ecosystem, where firms can deliver new services while maintaining appropriate safeguards and standards.

ADGM

Advancing the Framework for Digital Assets

In 2025, we continued to evolve our digital assets regime in response to increasingly sophisticated business models and the growing integration of digital assets with traditional financial markets. During the year, we continued to refine our regulatory and supervisory frameworks for virtual assets and Fiat-Referenced Tokens, progressed work on emerging activities such as staking and smart-contract-enabled services, and strengthened our own regulatory capability through greater use of RegTech and SupTech.

Building on the FSRA's digital asset framework, which we introduced in 2018, an enhanced notification process for new virtual assets offered for trading by regulated entities in ADGM was introduced, and updated guidance was published to provide greater clarity to firms. We also implemented enhancements to the framework to support broader access to and adoption of Fiat-Referenced Tokens following consultation in late 2024.

Emerging Activities

These developments supported the emergence of new business development opportunities, including staking and smart-contract-enabled financial services such as digital asset lending platforms and collateralised liquidity arrangements. By bringing these activities within a well-defined and risk-sensitive regulatory perimeter, the FSRA supported innovation while maintaining appropriate safeguards for investor protection and financial stability.

RegTech and SupTech – Strengthening Regulatory Capability

We continued to invest in technology and digitalisation to improve both the experience of firms interacting with the regulator and our own supervisory capabilities. We also applied advanced analytics and specialist AI tools to support supervision, including in areas such as financial crime, technology risk and supervisory prioritisation.

Alongside this, we continued to enhance FSRA Connect, which automates key regulatory processes, including applications, variations and withdrawals. Improvements to data capture, workflow automation and digital interaction increased efficiency and strengthened the role of FSRA Connect as the primary interface between the regulator and firms.

In 2025, we progressed the development and pilot deployment of RegTech and SupTech solutions designed to improve the clarity of regulatory requirements, enhance the accessibility of processes for firms, and strengthen compliance outcomes. This included the rollout of the internally developed RiskAnalyser tool, which uses Artificial Intelligence (AI) to support the initial assessment of authorisation applications. By analysing large volumes of application data, the tool enhances risk-based decision-making by the teams responsible for those assessments.

The FSRA also continued to collaborate with academic and research institutions, including Mohamed bin Zayed University of AI, to explore the responsible use of emerging technologies in regulatory contexts and support the future development of AI-enabled regulation.

In 2025, we continued to focus our resources where they could have the greatest impact. As firms, products and market infrastructure became more complex and interconnected, we strengthened coordination across our authorisation, supervision, financial crime and enforcement teams.

This more integrated approach enabled us to identify risks earlier, respond more quickly, and apply more proportionate and consistent regulatory actions. At the same time, continued investment in technology, data and internal coordination enhanced our ability to supervise a growing and increasingly sophisticated financial centre.

Efficient and Safe Markets

At a Glance

- Applied a more integrated and risk-based approach across authorisation, supervision, financial crime and enforcement
- Focused regulatory attention on higher-risk firms, emerging risks and more complex market activity
- Strengthened oversight through greater use of data, technology
- Continued to support growth in ADGM while maintaining high standards of market integrity and investor confidence

Risk-Based Authorisation

During 2025, the FSRA continued to support the entry into ADGM of high-quality firms that would make a positive contribution to the financial services ecosystem. Building on process and system enhancements implemented in 2024, authorisation activity focused on delivering efficient, consistent and proportionate outcomes, while maintaining high regulatory standards through a robust, risk-based authorisation framework.

Authorisation: Instant Insights

Strongest Sector Growth

What the Data Indicates

- Growth was concentrated in advisory and wealth management activity, indicating that ADGM's market is continuing to diversify, deepen and mature.
- Technology-enabled and advisory-led business models featured prominently across new authorisations.
- A growing proportion of applications involved more complex group, ownership and cross-border structures.
- The authorisation pipeline remained strong, with applications continuing to outpace previous years.

As demand to establish a presence within ADGM remained strong, we prioritised applications with the potential to advance the objectives of ADGM while contributing to those of the FSRA, including promoting market integrity, investor confidence and financial stability. Accordingly, emphasis continued to be placed on applicants demonstrating effective governance, sound risk management and having suitably qualified and experienced senior management, backed by fit and proper owners and controllers.

Ongoing enhancements to internal processes and digital tools, including greater automation and more risk-sensitive assessment methodologies, supported improved turnaround times and greater transparency across the authorisation lifecycle. Proactive engagement with applicants and professional service providers explained and reinforced regulatory expectations, addressed common gaps and contributed to improved application quality.

In 2025, the FSRA granted 95 FSPs, an increase of 22% on 2024, and issued 120 IPAs, up 32% on the same period. We also approved 11 licence variations for firms, reflecting continued demand to expand and diversify regulated businesses within ADGM.

This enabled well-prepared firms to move through the authorisation process more efficiently, while greater scrutiny was applied where ownership structures, activities or business models presented higher risk. This supported growth in ADGM without lowering the standards that underpin market confidence.

Supervision: Instant Insights

What the Data Indicates

- Supervisory activity remained strongly risk-based, with higher-risk firms receiving more intensive engagement.
- Resources were focussed on identifying and responding to emerging risks, significant firm events and more complex business models.
- Supervision increasingly combined inspections, thematic reviews and targeted engagement to identify issues earlier and intervene more proportionately.
- Supervisory effort continued to focus on changes in control and Approved Person assessments and approvals as the population of authorised firms grows.

Supervision

Supervision activity in 2025 reflected the FSRA's continued shift towards a data-driven, risk-based supervisory model, focused on those areas of greatest potential impact on market integrity and the resilience of firms. The supervisory priorities communicated in 2024, including financial crime, conduct of business, outsourcing, governance, financial soundness, and cyber risk, continued to underpin supervisory planning and engagement throughout the year.

Priorities were based on firm impact, inherent risk and emerging thematic concerns, and delivered through a combination of firm visits, focused inspections, thematic reviews and ongoing engagement. This approach enabled earlier identification of potential weaknesses and supported more proportionate, targeted supervisory responses across the regulated population.

We strengthened supervisory effectiveness through enhanced engagement and process improvements. This included holding the Annual Supervision Outreach Session to communicate supervisory expectations and priorities to industry, focusing supervisory efforts on Private Financing Platforms as an evolving business model, which highlighted the need for strengthened AML standards in prospective client onboarding, and publishing supervisory FAQs to provide greater clarity to authorised firms, professional advisers and other stakeholders. In addition, we issued various Dear SEO letters throughout the year communicating findings and expectations.

In parallel, we progressed the digitisation of our supervisory processes, including the automation of applications for Approved Persons, Changes in Control and the withdrawal of FSPs, alongside testing of the Variation of Permission application.

Focused Visits and Thematic Reviews

We carried out several focused visits at firms depending on their risk profile and in line with our supervisory review methodology. We continued to use thematic reviews as a key supervisory tool to assess risks and practices across groups of firms and business models, supporting a consistent and outcomes-focused approach to supervision.

In 2025, we conducted an AML Thematic Review, examining firms' frameworks, controls and governance arrangements in relation to financial crime risk. The review identified areas of good practice as well as common gaps, informing supervisory engagement and reinforcing expectations around customer due diligence, risk assessment and ongoing monitoring.

We also undertook a thematic review on outsourcing practices, reflecting the increasing reliance on third-party service providers and technology solutions. The review focused on governance, risk management and oversight of outsourced arrangements, including accountability, data protection and operational resilience. Findings supported targeted supervisory follow-up and contributed to broader efforts to strengthen firms' resilience and control environments.

The use of more data-led and thematic reviews enabled us to identify issues earlier in areas of particular interest and vulnerability and so engage with firms before concerns became more serious.

Markets: Instant Insights

Market Connectivity 2025

14 Remote Bodies admitted

44 Remote Members admitted

6 Firms under ongoing supervision

Recognition and Authorisation Activity 2025

5 IPAs issued across trading, clearing, settlement and custody firms

1 New trading/ clearing/ settlement/ custody firms launched

4 Remote Member Recognition Orders issued

What the Data Indicates

- ADGM's markets continued to become more internationally connected, with 14 remote bodies and 44 remote members participating in the market.
- Demand remained strongest in trading, clearing, settlement and custody activity, with five new IPAs issued during the year.
- One new Recognised Clearing House was launched, reflecting continued development of ADGM's market infrastructure.
- Interest in digital settlement, post-trade infrastructure and other innovative market models continued to increase.
- Supervisory focus evolved during the year in response to growing operational, technological and systemic risks as market infrastructure became larger, more sophisticated and more closely linked across markets and services.

Markets

In 2025, the FSRA continued to oversee the development and operation of ADGM's market ecosystem amid increasing levels of activity, complexity and innovation across trading, clearing, settlement, custody and surveillance. Authorisation and supervisory efforts focused on ensuring that markets firms operated in line with both ADGM's and international standards, while supporting the orderly growth of ADGM's markets.

As the pipeline of market products and activities evolved, we prioritised the effective authorisation and oversight of markets firms with the potential to contribute significantly to the markets in ADGM.

We also strengthened our role as Listing Authority through enhancements to the listing framework. The publication of the Guidance Note on Listing Applications and Eligibility in April 2025 provided greater clarity on regulatory expectations and supported a consistent, efficient and internationally aligned approach to listing assessments.

Market surveillance capabilities were further enhanced through the launch of a new surveillance system, significantly strengthening our ability to receive, analyse and act on market data. These enhancements improved monitoring of trading activity, supported earlier detection of potential market risks and reinforced confidence in the integrity and resilience of ADGM's markets.

The authorisation of more sophisticated market infrastructure firms, together with stronger market surveillance, marked an important step in the continued evolution of ADGM's markets.

Financial and Cyber Crime Prevention: Instant Insights

Key Activity 2025

2 Outreach sessions completed

609 FATCA / CRS requests for information processed

203 Notices issued

5 Cybercrime guidance publications issued

10 National regulatory reports submitted

6 AML / TFS guidance publications issued

TYPE OF NOTICE

162 Requests for Information

23 AML / CFT Notices

14 Sanctions Notices

5 Cybercrime Notices

203 Total Notices Issued

NATIONAL REGULATORY REPORTING

4 Quarterly AML / CFT supervisory reports to AMLCFT GS and SSC

4 Quarterly National Action Plan progress reports to AMLCFT GS

2 Semi-annual TFS supervisory reports

What the Data Indicates

- The FSRA strengthened national and international cooperation through five new Memoranda of Understanding, including a domestic agreement with the Executive Office for Control and Non-Proliferation.
- High volumes of FATCA / CRS requests for information and supervisory notices reflected increasingly proactive supervision and stronger information-sharing arrangements.
- Regulatory reporting remained a significant focus, with 10 reports submitted in support of national AML, CFT and TFS priorities.
- Continued publication by the FSRA of AML, TFS and cybercrime guidance, together with regular Cyber Threat Intelligence newsletters, helped provide firms with clearer expectations in a more complex and fast-moving risk environment.

Financial and Cyber Crime Prevention (FCCP)

In 2025, the FSRA continued to prioritise the prevention of financial and cybercrime as a key focus of our supervisory mandate. The Financial & Cyber Crime Prevention (FCCP) Department played a central role in contributing towards advancing the UAE's national strategy to combat money laundering, terrorist financing, cyber threats, and other illicit financial activity, alongside a key role in overseeing and strengthening firms' compliance with international tax transparency requirements.

Supporting National Efforts

Following the UAE's removal from FATF's list of jurisdictions under increased monitoring in February 2024, we maintained active engagement throughout 2025 to support national AML/CFT outcomes and readiness for the upcoming Mutual Evaluation scheduled for June 2026. During this period, ADGM contributed substantively to the implementation of the UAE AML/CFT National Strategy (2024–2027), as well as to broader technical compliance and effectiveness efforts, through sustained support to nationallevel FATF preparations and the provision of regulatory and supervisory insights that reinforced ADGM's positioning within the consolidated UAE submission. These coordinated efforts reflect ADGM's continued focus on alignment with FATF Recommendations and Immediate Outcomes, in support of national onsite readiness.

This work was informed by ongoing sectoral and firm-level risk assessments, including updates of free zone-specific risk ratings and substantial progress in revising the ADGM ML/TF Sectoral Risk Assessment. The FSRA also strengthened financial crime supervision through enhancements to risk assessment methodologies, an enhanced AML Return Template, updated dashboards and improved reporting requirements, helping to identify vulnerabilities and respond more effectively.

Outreach and Digitalisation

We continued to support firms through targeted outreach and guidance. During 2025, we delivered two outreach sessions focused on AML / TFS and FATCA / CRS requirements and published 11 Financial Crime specific guidance documents covering AML, targeted financial sanctions (TFS), tax transparency and cybercrime prevention. These activities were designed to improve understanding of regulatory expectations and support stronger compliance across the regulated population.

We also progressed the digitalisation of FATCA and CRS self-certification, published International Tax FAQs and processed 609 requests for information relating to FATCA and CRS obligations. The desired outcomes were achieved, including robust compliance with regulatory and other requirements, a high reporting rate for the 2024 reporting year and timely submission of regulatory reports to the Ministry of Finance.

Cybercrime and Risk Management

Cybercrime prevention remained a key area of focus in response to the growing sophistication of cyber threats. During the year, the FSRA introduced new Cyber Risk Management Rules within the GEN Rulebook, establishing clearer minimum requirements for Relevant Persons and aligning the framework more closely with international standards.

We also launched a Cyber Threat Intelligence platform and published weekly newsletters highlighting emerging threats, vulnerabilities and indicators of compromise relevant to the financial services sector.

Alongside these efforts, we completed a Cyber Risk Management survey which provided a snapshot of cyber governance, technical controls and overall cyber resilience across authorised firms. This work was complemented by the implementation of a formal IT and cyber incident reporting framework, helping ensure structured reporting and consistent support throughout the lifecycle of incidents.

The FSRA also signed a Memorandum of Understanding (MoU) with the Executive Office for Control and Non-Proliferation (EOCN), strengthening information-sharing arrangements relating to targeted financial sanctions and supporting effective regulatory oversight.

ADGM

Enforcement Instant Insights

Enforcement Activity 2025

USD 9.24 million / AED 33.95 million	38	10	423	99.5%
Total financial penalties imposed	Total regulatory actions	Consumer alerts issued	Complaints received	Complaints handled within service standards

2 FINANCIAL PENALTIES

CATEGORY	NUMBER	VALUE
FSMR financial penalties	8	USD 8.97 million / AED 32.94 million
CRS / FATCA penalty actions	29	AED 1.00 million / USD 275,294
TOTAL	37	USD 9.24 million / AED 33.95 million

3 SIGNIFICANT ENFORCEMENT OUTCOMES

	2025
Cancellation of FSPs	1
Withdrawal of DNFBP registrations	1
Prohibition Orders issued	1
Entities subject to late fees	9

4 INVESTIGATIONS

	2025
New investigations commenced	8
Investigations concluded	4
Matters in investigative stage at year-end	11
Ongoing investigations carried over from 2024	10

5 REGULATORY ACTIONS

	2025
FSMR regulatory actions	9
CRS / FATCA penalty actions	29
TOTAL REGULATORY ACTIONS	38

What the Data Indicates

- Enforcement activity remained focused on serious misconduct, unauthorised activity and breaches of AML, CRS and FATCA requirements
- The FSRA continued to take decisive action where necessary, including cancelling an FSP, withdrawing a DNFBP registration and issuing a Prohibition Order
- Financial penalties were dominated by FSMR actions, which accounted for USD 8.97 million of the USD 9.24 million total
- Complaints handling remained strong, with 99.5% of complaints acknowledged, assessed and actioned within the required timeframe
- Consumer alerts and ongoing investigations reflected a continued focus on early intervention and protecting market participants

Enforcement

The Enforcement Department plays a critical role in safeguarding the integrity of ADGM's financial system through investigations, enforcement action and public communication of outcomes. In 2025, enforcement activity focused on addressing serious misconduct, deterring unauthorised activity and reinforcing compliance with regulatory standards, particularly in higher-risk and emerging sectors.

Investigations and Enforcement Outcomes

Enforcement outcomes during the year reflected a continued focus on misconduct with the potential to undermine market integrity, investor confidence and regulatory trust. Particular attention was given to unauthorised activity, breaches of anti-money laundering (AML) requirements, failures in tax reporting obligations and conduct of business failings.

A significant enforcement milestone occurred on 3 April 2025, when the FSRA took coordinated action against four parties involved in serious misconduct relating to unlicensed virtual asset activity in ADGM. These actions resulted in financial penalties totalling USD 8.85 million, the cancellation of an FSP and the prohibition of an individual from performing financial services activities in ADGM. This action sent a clear deterrent signal and reinforced the FSRA's zero-tolerance approach to unauthorised regulated activity.

Across the year, the FSRA also commenced eight investigations and concluded four, supporting a more proactive and targeted approach to enforcement.

Notable Enforcement Actions in 2025

In 2025, the FSRA finalised 38 regulatory actions and imposed 37 financial penalties totalling USD 9.24 million. These outcomes also included the cancellation of one FSP, the imposition of one Prohibition Order and the withdrawal of one DNFBP registration.

- February 2025: Withdrawal of the DNFBP registration of DNFBP (legal professional) for ongoing breaches of AML requirements.
- April 2025: Coordinated enforcement action against four parties involved in unlicensed virtual asset activity in ADGM, resulting in financial penalties totalling USD 8.85 million, the cancellation of an FSP and a Prohibition Order.
- 29 penalty actions for breaches of CRS and FATCA requirements, resulting in financial penalties of USD 275,289.
- Enforcement action against a further three DNFBPs to address a range of AML breaches.
- December 2025: Enforcement action against an Authorised Person to address AML breaches.

Complaints, Alerts and Public Awareness

The FSRA received and assessed 423 complaints during 2025, reflecting continued public and market engagement with the regulatory framework. In order to help protect market participants and improve transparency, we also issued ten Regulatory Alerts warning of potentially fraudulent activity and other emerging risks.

Cooperation and Inter-Agency Engagement

We maintained close cooperation with domestic and international regulators, law enforcement agencies and other competent authorities to address cross-border misconduct and unauthorised activity. This included referrals to UAE law enforcement agencies and engagement with UAE regulatory authorities regarding suspected unauthorised virtual asset activity. We also supported a range of domestic and international enforcement matters through information sharing, parallel investigations and investigative assistance, helping to strengthen regulatory outcomes across jurisdictions.

Through decisive enforcement action, transparent communication and strong cooperation with domestic and international partners, we continued to reinforce the standards to be met within ADGM, making clear where the boundaries lie and strengthening confidence that serious breaches will be identified and addressed appropriately.

Growth Through Sound Regulation and Cooperation

At a Glance

- Continued to develop the regulatory framework in line with market developments and international standards
- Introduced targeted reforms across virtual assets, prudential requirements, cyber risk and sustainable finance Strengthened cooperation with
- domestic and international regulators through MoUs, information sharing and joint initiatives
- Supported national priorities while reinforcing ADGM's position as a credible and internationally respected financial centre

In 2025, we continued to support the growth of ADGM through the refinement of our regulatory framework to ensure that it is clear, proportionate and aligned with international standards. As the financial ecosystem became larger and more complex, our focus was on ensuring that the regulatory framework evolved in step with the market, while remaining robust, recognisable and internationally credible.

During 2025, the FSRA progressed targeted policy and legislative enhancements, strengthened cooperation with domestic and international partners and contributed to national regulatory priorities. This helped ensure that ADGM remained open to responsible innovation and growth while maintaining the standards expected of an international financial centre, thereby providing firms operating in ADGM with a regulatory environment that is more certain, more consistent and better aligned with global expectations.

Policy and Legal: Instant Insights

Consultation papers published **9**

Consultation papers, surveys, and questionnaires completed for international standard-setters and regulator **2**

Rulebook amendments made **37**

Rulemaking instruments issued **10**

Initiatives **8**

Guidance documents issued **8**

Stakeholder engagements, including with other UAE authorities, industry bodies and general outreach **15**

Development of the Regulatory Framework

The Policy and Legal function plays a central role in ensuring that ADGM's regulatory framework remains robust, proportionate and responsive to change. In 2025, we continued to refine and enhance our framework in areas where market activity, supervisory experience and international developments pointed to the need for greater clarity, stronger safeguards or more appropriate treatments.

In that context, we also proposed and implemented enhancements across several priority areas, including:

- further alignment with the principles of international standards-setting bodies, including the BCBS, IOSCO and the IAIS
- the framework for virtual assets and Fiat-Referenced Tokens
- a strengthened cyber risk management framework
- the prudential framework for lower-risk firms
- funds reporting requirements
- in the area of climate risk, transition planning principles and other emerging international standards, alongside proposed requirements for authorised entities
- supporting further development and awareness of our capital markets framework through publishing new and updated guidance in the areas of virtual assets, restricted securities, digital asset management and listing applications and eligibility

These changes reflected the increasing sophistication of the market and supported a framework that remains capable of responding to new business models and emerging risks.

Alongside this, we continued to place emphasis on consultation and transparency. During 2025, we published nine consultation papers and held public outreach sessions to explain key legislative developments, gather feedback and support firms in preparing for future updates to the regulatory framework. Such updates were complemented by the FSRA continuing to engage with domestic and international industry bodies and associations to discuss industry developments and challenges.

The Policy and Legal function also continued to support national priorities and promote alignment with international standards. This included contributing to the work of the Financial Stability Council, preparing the semi-annual Financial Free Zone report and supporting our readiness for future international assessments and peer reviews. Doing so ensures that our framework continues to evolve in a way that gives firms greater certainty while keeping ADGM aligned with international standards and prepared for future developments.

Sustainable Finance

In 2025, we continued to advance our sustainable finance agenda through policy development, national coordination and engagement with international standards.

We undertook a consultation on the Principles for Climate Transition Planning, helping to establish clearer expectations for how firms should plan for and manage the transition to a lower-carbon economy. This work reflected growing international focus on transition planning, climate-related risk and the credibility of sustainability-related disclosures.

Alongside this, we continued to support the development of sustainability-related products and disclosures within ADGM. The focus remained on ensuring that these products and disclosures are credible, transparent and aligned with international best practice, helping to strengthen investor confidence and reduce the risk of greenwashing.

During the year, our International Affairs department played a leading role in coordinating the work of the UAE Sustainable Finance Working Group, supporting closer alignment across the UAE on sustainable finance policy and regulatory priorities.

The FSRA also continued to monitor developments in international standards and emerging market practices, including those proposed by bodies such as the International Organisation of Securities Commissions, IOSCO and Stability Board.

Doing so will help ensure that our regulatory framework remains relevant, internationally aligned and increasingly well-positioned to support the continued growth of sustainable finance with a framework that encourages innovation and investment while maintaining credibility and trust.

International Affairs: Instant Insights

International Affairs and Regulatory Cooperation

In 2025, we continued to strengthen our international relationships and deepen cooperation with peer regulators and foreign financial centres, reflecting the increasingly international nature of activity in or from ADGM.

We signed five Memoranda of Understanding with regulators in Azerbaijan, Bhutan, Hong Kong, Sweden and with a UAE regulatory agency. Thereby strengthening arrangements for supervisory cooperation, information sharing and cross-border engagement.

We also processed 123 requests for information with domestic and international regulators, including 46 requests made to fellow regulators and 77 requests received. These exchanges facilitate greater transparency and closer coordination on cross-border matters while supporting our authorisation, supervision and enforcement functions.

Alongside bilateral cooperation, we continued to play an active role in international regulatory dialogue. In 2025, in coordination with IOSCO, the FSRA hosted the Africa Middle East Regional Committee (AMERC).

Another major highlight of the year for us was hosting the 4th Global Financial Regulators Summit during Abu Dhabi Finance Week 2025. The Summit brought together senior regulators from across the MENA, European and Asian regions, together with invited representatives from major US financial institutions. Discussions focused on some of the most significant issues facing the global financial system, including the growth of private credit markets, increasing interconnectedness within non-bank financial intermediation and the implications of emerging technologies and new business models.

Supporting National and Regional Policy Priorities

Throughout the year, the FSRA hosted international delegations and external stakeholders, working closely with the other ADGM authorities to promote understanding of the regulatory framework, strengthen relationships with key international partners and reinforce our position not only as the financial services regulator of ADGM, but also as a trusted and active participant in international regulatory cooperation and policy development.

Risk and Strategy

The FSRA's risk management framework underpins how we identify, assess and manage our own risks across regulatory, organisational and operational aspects. It supports more informed decision-making and helps ensure that we can continue to deliver our statutory and strategic objectives as ADGM grows.

The FSRA applies the Three Lines of Defence model in relation to our own risk profile, with clear accountability for risk ownership, oversight and assurance across the organisation. Throughout the year, the Risk and Strategy function also improved the quality and timeliness of internal risk reporting through the further digitisation of risk processes and the introduction of enhanced dashboards.

A significant development in 2025 was the redesign of the FSRA Public Register. The updated register improved accessibility, usability and data quality, making it easier for firms, investors and the public to access information about authorised firms and individuals. The new register also strengthened transparency and supported more effective supervision.

We also continued to invest in upskilling our staff on risk-based regulation, crisis management, as well as ongoing work to strengthen our preparedness for potential operational and market-wide disruption, making the FSRA more resilient and better equipped to identify and respond in a timely and effective way to any risks that may crystallise.

Outcomes

- More informed and timely decision-making across the organisation
- Greater organisational resilience and adaptability
- Stronger visibility of emerging risks and control effectiveness
- A more connected and collaborative culture across the FSRA
- Stronger capability to supervise more complex and higher-impact firms
- A stronger pipeline of future leaders and specialist expertise

Industry Engagement and Outreach

We continued to prioritise targeted, user-friendly and pragmatic industry engagement in 2025. This was achieved through dedicated outreach sessions, industry forums and day-to-day supervisory engagement, where we provided firms and professional advisers with practical and clear insight into regulatory developments, supervisory priorities and approach, as well as emerging risks we have identified.

This engagement helped firms prepare for change, better understand regulatory expectations and identify issues earlier. It also reinforced our commitment to being an accessible and transparent regulator.

Key engagements during the year included:

- Annual FSRA Outreach session
- Annual Supervision Outreach Session
- Policy and Legal outreach sessions
- AML and FATCA/CRS awareness sessions
- Industry forums and targeted engagement with key sectors
- International engagements linked to Abu Dhabi Finance Week and IOSCO

Building the Future

At a Glance

- Continued to invest in people, leadership and specialist capability across the FSRA
- Supported the development of future leaders and specialist expertise, including among Emirati colleagues

STATISTICS

Number of Regulatory Staff as at December 2025	Number of UAE Nationals as at December 2025
89	22

During the year, we continued to invest in the people, leadership and culture needed to support the next phase of ADGM's development.

As the market becomes more complex, we recognised that effective regulation depends not only on rules and technology, but on the judgement, expertise, experience and adaptability of our people. Many of the colleagues who joined the FSRA in its early years are now leading teams, shaping policy and supervising some of the most complex firms in ADGM. At the same time, we have continued to bring in new talent with fresh perspectives and specialist expertise.

The focus during the year was on seeing people grow, giving them broader experience, more opportunities to lead and clearer pathways to build long-term careers.

Developing Capability and Leadership

In 2025, we placed greater emphasis on helping people develop across the organisation, not just within their own teams.

Colleagues were encouraged to take on new responsibilities, contribute to cross-FSRA projects and build experience in different areas of regulation. This helped create a stronger and more connected organisation, while broadening the experience of future leaders.

We also invested in technical and leadership development in areas where the market is changing most quickly, including digital assets, financial crime, cyber risk and data-led supervision, helping to build a deeper and more resilient leadership pipeline with people who understand both the detail of regulation and the wider picture.

Talent and Professional Development

We continued to invest in future talent through graduate programmes, mentoring, professional qualifications and structured development opportunities, and an ongoing commitment to developing our people.

Particular emphasis was placed on supporting Emirati colleagues and creating clearer pathways for progression. Several colleagues who joined us in junior roles have now progressed into specialist and leadership positions, reflecting the FSRA's commitment to developing people over time.

We also created more opportunities for informal learning through mentoring, secondments, shadowing and cross-team projects. Often, the most valuable development came not from formal training, but from giving people the chance to work on something new, take ownership and learn from others.

People in Focus

Developing our people remains central to delivering our regulatory priorities. In 2025, we continued to invest in talent across the FSRA, supporting career progression, deepening technical expertise and building future leadership capability.

The profiles below highlight a selection of colleagues whose journeys reflect the breadth of opportunities across the organisation and the impact of sustained investment in our people.

Saif Eisa AlQubaisi

Senior Specialist – Authorisation

Joined FSRA in 2019

Saif joined the FSRA as a graduate and has developed his career within the Authorisation division, building strong expertise in regulatory assessment and decision-making.

Over the past six years, his role has expanded through increasing responsibility and exposure to more complex and innovative business models, particularly in New Age Finance and Virtual Assets. This has strengthened his regulatory judgement, critical thinking and ability to assess evolving risks, alongside regular engagement with internal teams and industry stakeholders.

Saif has also contributed to broader regulatory initiatives, including policy development relating to virtual assets and Fiat-Referenced Tokens, as well as supporting the development of ADGM's SME financing platform, Numou. These experiences have enabled him to contribute to the delivery of responsive, risk-based regulatory frameworks that support market development.

Reflecting on his journey, Saif highlights the importance of continuous learning, collaboration and taking ownership as key drivers of his development.

"The FSRA provides a unique environment to learn, be challenged and grow. Staying curious, asking questions and taking initiative are key to building both confidence and capability over time."

Sara Al Mansoori

Senior Manager – Financial & Cybercrime Prevention

Joined FSRA in 2017

Sara joined the FSRA through the ADGM Graduate Programme and has built her career within the organisation over the past nine years, progressing across supervision, financial crime and regulatory coordination.

Her role has expanded steadily in both scope and impact, with responsibility for key workstreams at the ADGM and national level. She has contributed to cross-regulatory initiatives and represented the FSRA in high-level engagements, including playing a central role in preparations for the Financial Action Task Force (FATF) Mutual Evaluation.

Sara's work spans supervision, risk assessment and regulatory policy, alongside strong capability in stakeholder engagement and national coordination. Her contributions have supported the advancement of AML/CFT reforms and strengthened the FSRA's role in national and international regulatory forums.

Reflecting on her journey, Sara highlights the value of early responsibility, collaboration and continuous learning in shaping her career.

"The FSRA provides a unique platform to develop from the ground up. Taking ownership, staying curious and embracing opportunities can significantly accelerate career development"

Monique Elgin

Associate Director – Legal

Joined FSRA in 2021

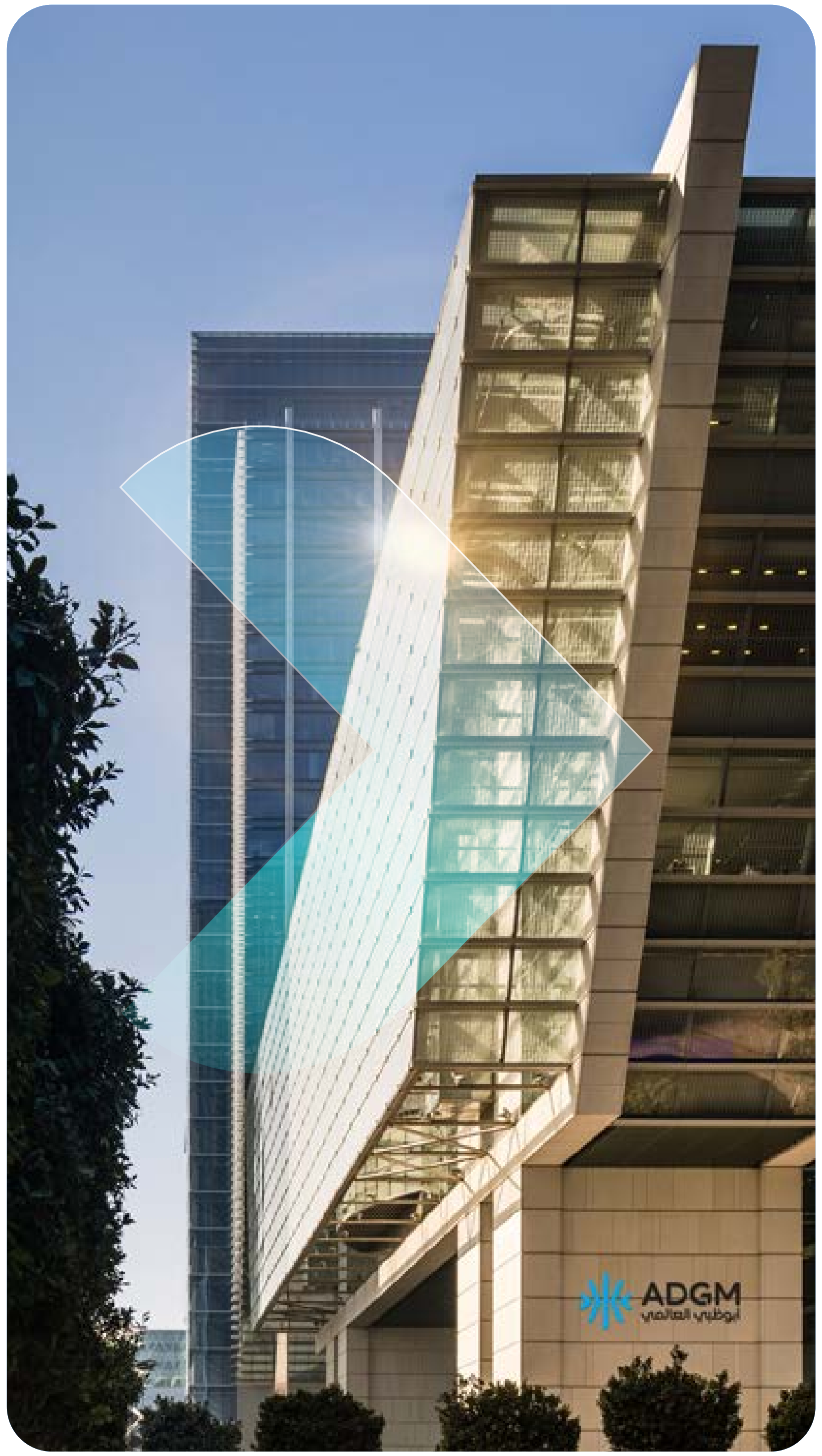
Monique joined the FSRA with international legal and regulatory experience, bringing a strong background in financial services and compliance.

Since joining, she has progressed from Senior Legal Counsel to Associate Director, leading work across AML and financial crime as well as emerging areas including sustainable finance, cyber risk and international tax transparency frameworks. Her role reflects the breadth of the FSRA's mandate, combining technical legal expertise with close engagement across industry and regulatory stakeholders.

Key highlights include her contribution to the Al Reem expansion project, supporting a complex system-of-laws transition, the design and launch of ADGM's Whistleblower Protection framework, and her role in developing the sustainable finance framework in the lead-up to COP28. These initiatives have supported the development of progressive, risk-based regulatory frameworks and strengthened ADGM's positioning in priority areas.

Monique credits the FSRA's collaborative and high-performing culture as central to her development, providing continuous opportunities to contribute to complex, high-impact work.

"The FSRA offers a rare combination of intellectual rigour, collaboration and purpose — an environment where you are constantly learning while contributing to something that truly matters."



Appendices

Financial Audit Report

FSRA

AUDITOR'S REPORT AND FINANCIAL STATEMENTS

31 DECEMBER 2025

Independent Auditor's Report

To: The Board of Directors of Abu Dhabi Global Market

Report on the Audit of the Financial Statements

Opinion

We have audited the financial statements of Financial Services Regulatory Authority (the "Authority") which comprise the statement of financial position as at 31 December 2025, and the statement of financial performance, statement of changes in equity and statement of cash flows for the year then ended, and notes to the financial statements, including material accounting policy information.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Authority as at 31 December 2025, and its financial performance and its cash flows for the year then ended in accordance with International Public Sector Accounting Standards (IPSASs) as issued by the International Public Sector Accounting Standards Board (IPSASB).

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are independent of the Authority in accordance with the International Ethics Standards Board for Accountants' International code of Ethics for Professional Accountants (including International Independence Standards) (the "IESBA Code") together with the ethical requirements that are relevant to our audit of the financial statements in the United Arab Emirates, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Responsibilities of Management and Those Charged with Governance for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with IPSASs, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Authority's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Authority or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Authority's financial reporting process.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional **skepticism** throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control.

- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.

- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Authority's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Authority to cease to continue as a going concern.

- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

For RAI Audit and Tax Services,

Sajjad Ahmad

Date: 08 May 2026
Abu Dhabi
United Arab Emirates

Financial Services Regulatory Authority
Statement of Financial Performance
For the year ended 31 December 2025

	Notes	2025 AED	2024 AED
Revenue			
Contributions from Abu Dhabi Global Market	4, 5, 18	**243,702,071**	68,087,003
Fee Income	6	**67,722,392**	52,145,797
Other income	17	**5,606,827**	6,490,003
Total revenue		**317,031,290**	126,722,803
Expenditure			
Shared services - Cost Allocation	5, 18	**56,749,361**	-
Salaries and other benefits	7	**109,085,301**	98,394,285
Consultancy and professional fees	8	**4,990,308**	5,242,181
IT and communication expenses	10	**10,387,584**	8,593,642
Amortisation	12	**3,545,987**	4,738,159
Depreciation	11	**8,865**	3,522
Events, sponsorships, and business travel	9	**3,251,222**	2,605,997
Appeal committees		**738,173**	752,559
Provision for expected credit losses	13.2	**614,375**	499,700
Other expenses		**86,571**	188,458
Total expenditure		**189,457,747**	121,018,503
Surplus for the year		**127,573,543**	5,704,300

The accompanying notes 1 to 24 form part of these financial statements.

Financial Services Regulatory Authority
Statement of Financial Position
For the year ended 31 December 2025

	Notes	2025 AED	2024 AED
ASSETS			
Non-current assets			
Computer equipment	11	**83,473**	85,438
Intangible assets	12	**3,513,115**	4,762,296
		3,596,588	4,847,734
Current assets			
Abu Dhabi Global Market account	5	**-**	8,562,007
Trade and other receivables	13	**61,687,264**	13,735,849
Cash and cash equivalents	14	**267,617,381**	79,013,880
		329,304,645	101,311,736
TOTAL ASSETS		**332,901,233**	106,159,470
EQUITY AND LIABILITIES			
EQUITY			
General reserve		**200,000,000**	72,426,457
TOTAL EQUITY		**200,000,000**	72,426,457
LIABILITIES			
Non-current liability			
Employees' end of service benefits	15	**12,533,246**	11,351,798
Current liabilities			
Abu Dhabi Global Market account	5	**4,337,388**	-
Trade and other payables	16	**116,030,599**	22,381,215
		120,367,987	22,381,215
TOTAL LIABILITIES		**132,901,233**	33,733,013
TOTAL EQUITY AND LIABILITIES		**332,901,233**	106,159,470

Ahmed Jasim Al Zaabi	Emmanuel Givanakis	Noora Almarzooqi
Chairman	Chief Executive Officer	Chief Financial Officer

The accompanying notes 1 to 24 form part of these financial statements.

Financial Services Regulatory Authority

Statement of Changes in Equity

For the year ended 31 December 2025

	General reserve AED	Accumulated surplus AED	Total AED
Balance at 1 January 2025	**72,426,457**	**-**	**72,426,457**
Surplus for the year	**-**	**127,573,543**	**127,573,543**
Transfer to General Reserve (note 4)	**127,573,543**	**(127,573,543)**	**-**
Balance at 31 December 2025	**200,000,000**	**-**	**200,000,000**
Balance at 1 January 2024	66,722,157	**-**	66,722,157
Surplus for the year	-	**5,704,300**	5,704,300
Transfer to General Reserve (note 4)	5,704,300	**(5,704,300)**	-
Balance at 31 December 2024	**72,426,457**	**-**	**72,426,457**

The accompanying notes 1 to 24 form part of these financial statements.

Financial Services Regulatory Authority

Statement of Cash Flows

For the year ended 31 December 2025

	Notes	2025 AED	2024 AED
Surplus for the year		**127,573,543**	5,704,300
Adjustments for:			
Amortisation	12	**3,545,987**	4,738,159
Depreciation	11	**8,865**	3,522
Provision for employees' end of service benefits	7, 15	**2,740,193**	2,701,255
Interest income from term deposits		**(4,096,102)**	(3,506,899)
Provision for expected credit losses	13.2	**614,375**	499,700
		130,386,861	10,140,037
Working capital changes:			
Trade and other receivables		**(47,260,185)**	(521,384)
Abu Dhabi Global Market account		**12,947,830**	(28,046,656)
Trade and other payables		**93,649,383**	2,726,336
Cash flow from operations		**189,723,889**	(15,701,667)
Interest received from term deposits		**2,790,498**	3,391,033
Employees end of service benefit paid	15	**(1,607,180)**	(675,545)
Net cash flow from/(used in) operating activities		**190,907,207**	(12,986,179)
INVESTING ACTIVITIES			
Additions to intangible assets	12	**(2,296,806)**	(2,675,648)
Additions to property and equipment	11	**(6,900)**	(88,960)
Net movement in term deposits	14	**(200,003,472)**	63,113,188
Net cash flow (used in)/from investing activities		**(202,307,178)**	60,348,580
(DECREASE) / INCREASE IN CASH AND CASH EQUIVALENTS		**(11,399,971)**	47,362,401
Cash and cash equivalents at l January		**79,013,880**	31,651,479
CASH AND CASH EQUIVALENTS AT 31 DECEMBER	14	**67,613,909**	79,013,880
NON-CASH TRANSACTION			
Transfer of the SME Financing Platform	5	**-**	12,636,592

The accompanying notes l to 24 form part of these financial statements

Financial Services Regulatory Authority

NOTES TO THE FINANCIAL STATEMENTS

For the year ended 31 December 2025

1. GENERAL INFORMATION

Financial Services Regulatory Authority (the "Authority") is an Authority established in the Abu Dhabi Global Market ("ADGM"), a leading financial centre established in the Emirate of Abu Dhabi pursuant to Federal Decree No (15) of 2013 and Abu Dhabi Law No (4) of 2013, as amended, in order to promote the Emirate of Abu Dhabi as a global financial centre, to develop the economy of the Emirate of Abu Dhabi and to make it an attractive environment for financial investments and an effective contributor to the international financial services industry.

The Authority is committed to operating a fair, efficient and responsive regulatory environment for its market participants and stakeholders both in the UAE and internationally.

The registered office of the Authority is at P.O. Box 111999, Abu Dhabi, United Arab Emirates.

These financial statements were authorized for issue by the Board of Directors on 8 May 2026.

Pursuant to Cabinet Decision No. (41) of 2023 (effective 24 April 2023), ADGM's geographical jurisdiction includes Al Maryah Island and Al Reem Island.

Management has assessed that there will be no impact of the corporate tax law on the "Authority'' as it is exempt from corporate tax.

2. BASIS OF PREPARATION OF FINANCIAL STATEMENTS

2.1 BASIS OF PREPARATION

Statement of compliance

The financial statements have been prepared in accordance with International Public Sector Accounting Standards (IPSAS). When an International Public Sector Accounting Standard does not address a particular issue, the relevant International Financial Reporting Standard has been applied.

The financial statements have been prepared under the historical cost basis.

The financial statements have been presented in United Arab Emirates Dirhams ("AED") which is the functional and presentation currency of Authority.

Going Concern

The financial statements have been prepared on a going concern basis as ADGM's financial support is available to the Authority in the form of contributions as and when required to enable it to meet its financial commitments when they fall due in the foreseeable future.

2.2 CHANGES IN ACCOUNTING POLICIES - IPSASs ISSUED AND EFFECTIVE AS OF 1 JANUARY 2025

The accounting policies adopted in the preparation of the Authority's annual financial statements for the year ended 31 December 2025 are consistent with those followed in the preparation of the Authority's annual financial statements for the year ended 31 December 2024 except for the following new standards, interpretation, and amendments effective from 1 January 2025. The Authority has not early adopted any other standard, interpretation, or amendments that has been issued but is not yet effective.

- IPSAS 43: Leases – effective 1 January 2025
- Amendments to IPSAS 43: Interest Rate Benchmark Reforms – Phase 2 – effective 1 January 2025
- IPSAS 44: Non-current assets held for sale and discontinued operations - effective 1 January 2025
- IPSAS 45: Property, plant & equipment – effective 1 January 2025
- IPSAS 46: Measurement – effective 1 January 2025

IPSAS 43

The Authority adopted IPSAS 43, Leases, from its effective date of 1 January 2025. This standard introduces a single lessee accounting model and requires a lessee to recognise right-of-use assets and lease liabilities for all leases, except for short-term leases and leases of low-value assets.
z As the Authority had no lease agreements in place prior to 1 January 2025, the adoption of IPSAS 43 had no impact on the opening balances of the financial statements. All lease agreements entered into on or after 1 January 2025 are accounted for in accordance with the requirements of IPSAS 43.

Under the new standard, at the commencement date of a lease, the Authority recognises a lease liability measured at the present value of the lease payments to be made over the lease term. A corresponding right-of-use asset is recognised at an amount equal to the lease liability, adjusted for any lease payments made at or before the commencement date, initial direct costs incurred, and an estimate of costs to dismantle and remove the underlying asset or to restore the site on which it is located.

The Authority has elected to apply the recognition exemptions for short-term leases (leases with a term of 12 months or less) and leases of low-value assets. For these leases, lease payments are recognised as an expense on a straight-line basis over the lease term.

ADGM

2.3 FUTURE CHANGES IN ACCOUNTING POLICIES - IPSASs ISSUED BUT NOT EFFECTIVE

Standards issued but not yet effective up to the date of issuance of the Authority's financial statements are listed below. The Authority intends to adopt these new and amended standards and interpretations, if applicable, when they become effective.

Standard	Description	Effective Date
IPSAS 47	Revenue: IPSAS 47 replaces IPSAS 9, 11, and 23, consolidating revenue recognition into a single standard with two models depending on whether a transaction is governed by a binding arrangement	1 January 2026
IPSAS 48	Transfer Expenses: IPSAS 48 establishes accounting guidance for transfer expenses (resource transfers where nothing is received directly in return), introducing models based on whether an enforceable obligation exists	1 January 2026
IPSAS 49	Retirement Benefit Plans	1 January 2026
Amendment to IPSAS 43	Lease Liability in a Sale and Leaseback Transaction	1 January 2026
Amendment to IPSAS 43	Concessionary Leases and Other Arrangements Conveying Rights over Assets: Provides guidance on concessionary leases (leases at below-market terms) and other non-lease arrangements conveying rights over assets, complementing IPSAS 43, 47, and 48	1 January 2027
IPSAS 50	Exploration for and Evaluation of Mineral Resources: Provides guidance on accounting for exploration and evaluation expenditures, including the recognition of exploration and evaluation assets	1 January 2027
IPSAS 51	Tangible Natural Resources Held for Conservation: Provides accounting guidance for tangible natural resources held primarily for conservation purposes, filling a reporting gap in public sector literature	1 January 2028
IPSASB SRS 1	Climate-Related Disclosures: Establishes disclosure requirements for climate-related risks and opportunities in public sector entities' general-purpose financial reports	1 January 2028
Amendments to IPSAS 1, IPSAS 3, and the Conceptual Framework	Amendments enhancing the clarity and consistency of materiality guidance throughout IPSAS Standards and the Conceptual Framework	1 January 2027

IPSAS 47 Revenue

IPSAS 47 requires an entity to determine at inception whether its revenue arises from a transaction with a binding arrangement, so that it can apply the appropriate accounting model. The principles within these models enable an entity to reflect the substance of its revenue transactions.
For an arrangement to be binding, it must be enforceable through legal or equivalent means. Enforceability can arise in various ways, so long as the mechanism(s) provide the entity with the ability to enforce the terms of the binding arrangement and hold the parties accountable for fulfilling their obligations.

Revenue from transactions without binding arrangements

- An entity assesses whether any of its rights in a transaction meet the definition of an asset and whether any obligations meet the definition of a liability.
- If there are no enforceable obligations, the inflow of resources (or right to inflow) is recognized as revenue immediately.
- If obligations exist, the entity recognizes revenue as (or when) those obligations are satisfied, measured at the amount of the increase in the entity's net assets.

Revenue from transactions with binding arrangements

An entity shall account for a binding arrangement using the binding arrangement accounting model if all the following criteria are met:

1. The parties to the binding arrangement have approved the binding agreement (in writing, orally, or in accordance with other customary practices) and are committed to perform their respective obligations.
2. The entity can identify each party's rights under the binding arrangement.
3. The entity can identify the payment term for satisfying each identified compliance obligation.
4. The binding arrangement has economic substance (i.e., the timing, amount, or nature of the future inflow of resources or service potential is expected to change as a result of the arrangement).
5. It is probable the entity will collect the consideration to which it expects to be entitled for satisfying its compliance obligations, in accordance with the terms of the binding arrangement.

When a binding arrangement does not meet all of the above criteria, any consideration received is recognized as revenue only when:

a. The entity has fully satisfied the compliance obligation related to that consideration, and the consideration from the resource provider is non-refundable; or

b. The binding arrangement has been terminated and the consideration received from the resource provider is non-refundable.

At the inception of a binding arrangement, an entity identifies each promised good or service (or bundle of goods or services) that is distinct, or a series of distinct goods or services that are substantially the same in characteristics and risks and that have the same pattern of use internally or transfer to the purchaser or a third-party beneficiary. Revenue is then recognized over time or at a point in time as those obligations are satisfied, reflecting the substance of the arrangement.

The timing of revenue recognition depends on whether the compliance obligations are satisfied over time or at a point in time, reflecting the substance of the binding arrangement. If a transaction does not meet the criteria for a binding arrangement, revenue is recognized when (or as) the entity satisfies any enforceable obligations, or immediately if no such obligations exist.

IPSAS 48 Transfer Expenses

IPSAS 48 establishes accounting guidance for transfer expenses (resource transfers where nothing is received directly in return), introducing models based on whether an enforceable obligation exists. It aims to align transfer expense accounting under IPSAS with the principles of IPSAS 47 Revenue.

Under IPSAS 48 requires that transfer providers recognize:

a. a right-of-use asset (control of the use of underlying asset) and

b. a transfer expense obligation for future transfer payments, whereas under IPSAS 19 an asset and liability were recognized only for finance transfers, not operating transfers.

IPSAS 48 requires measuring the transfer expense obligation at the present value of future transfer payments. Transfer providers can elect not to apply this model for:

a. Short-term transfers or low-value underlying assets, and

b. Transfers for which the underlying is low value.

Transfer expenses from transactions without binding arrangements

- An entity assesses whether any of its obligations in a transaction meet the definition of a liability.
- If there are no enforceable obligations, the outflow of resources (or right to outflow) is recognized as a transfer expense.
- If obligations exist, the entity recognizes the transfer expense as (or when) those obligations are satisfied, measured at the amount of the decrease in the entity's net assets.

An entity shall account for a binding arrangement using the binding arrangement accounting model if all the following criteria are met:

1. The parties to the binding arrangement have approved the binding arrangement (in writing, orally, or in accordance with other customary practices) and are committed to perform their respective obligations.
2. The entity can identify each party's rights under the binding arrangement from their respective obligations.
3. The entity can identify the payment term for satisfying each identified compliance obligation.
4. The binding arrangement has economic substance (i.e., the timing, amount, or nature of the future inflow of resources or service potential is expected to change as a result of the arrangement).
5. It is probable the entity will collect the consideration to which it expects to be entitled for satisfying its compliance obligations, in accordance with the terms of the binding arrangement.

When a binding arrangement does not meet all of the above criteria, any consideration received is recognized as revenue only when:

a. The entity has fully satisfied the compliance obligation related to that consideration, and the consideration from the resource provider is non-refundable; or

b. The binding arrangement has been terminated and the consideration received from the resource provider is non-refundable.

At the inception of a binding arrangement, an entity identifies each promised good or service (or bundle of goods or services) that is distinct, or a series of distinct goods or services that are substantially the same in characteristics and risks, and that have the same pattern of use internally or transfer to the purchaser or a third-party beneficiary. Revenue is then recognized over time or at a point in time as those obligations are satisfied, reflecting the substance of the arrangement.

IPSAS 49 Retirement Benefit Plans

IPSAS 49 establishes comprehensive accounting and reporting requirements for the financial statements of retirement benefit plans, with participants comprising current and former public sector employees and other eligible members. IPSAS 49 provides a principle-based approach to accounting by retirement benefit plans to provide a complete view of their financial activities, assets and obligations.

The standard applies to all retirement benefit plans, including defined contribution plans and defined benefit plans.

For defined contribution plans, the financial statements shall include:

- A statement of net assets available for benefits;
- A statement of changes in net assets available for benefits;
- Disclosures about contributions, benefits paid, and investment activities.

For defined benefit plans, in addition to the above, the financial statements shall include information about the actuarial present value of promised retirement benefits, distinguished between vested and non-vested benefits.

Assets of retirement benefit plans are measured at fair value. Liabilities, other than the actuarial present value of promised retirement benefits, are recognized and measured in accordance with relevant IPSAS.

Disclosures include the nature of the plan, significant actuarial assumptions, reconciliation of changes in the actuarial present value of promised benefits, and investment policies.

Management is currently in the process of assessing the impact of the above standards on the financial statements of the Authority. Management expects that the new standards and amendments will not have a significant impact on the Authority's financial statements.

2.4 ESTIMATION UNCERTAINITY AND JUDGEMENTS

The preparation of the Authority's financial statements requires management to make judgements, estimates and assumptions that affect the reported amounts in the financial statements, at the reporting date. However, uncertainty about these assumptions and estimates could result in outcomes that could require a material adjustment to the carrying amount of the asset or liability affected in the future.

Estimates

Provision for expected credit losses of financial assets

The Authority uses a simplified approach to calculate ECLs for trade receivables and contract assets. The allowance rates are based on days past due for groupings of various customer segments that have similar loss patterns. The allowance matrix is initially based on the Authority's historical observed default rates. The Authority will calibrate the matrix to adjust the historical credit loss experience with forward looking information. At every reporting date, the historical observed default rates are updated and changes in the forward-looking estimates are analysed.

The assessment of the correlation between historical observed default rates, forecast economic conditions and ECLs is a significant estimate. The amount of ECLs is sensitive to changes in circumstances and of forecast economic conditions. The Authority's historical credit loss experience and forecast of economic conditions may also not be representative of customer's actual default in the future.

Useful lives of property and equipment and intangible assets

The Authority's management determines the estimated useful lives of its property and equipment and intangible assets for calculating depreciation and amortization, respectively. This estimate is determined after considering the expected usage of the asset and physical wear and tear. Management reviews the residual value and useful lives annually and future depreciation / amortization charge would be adjusted, as applicable where the management believes the useful lives differ from previous estimates.

ADGM

Impairment of non-financial assets

The Authority reviews and tests the carrying value of non-financial assets when events or changes in circumstances suggest that there may be a reduction in the future service potential that can reasonably be expected to be derived from the asset. Where indicators of possible impairment are present, the Authority undertakes impairment tests, which require the determination of the fair value of the asset and its recoverable service amount.

The estimation of these inputs into the calculation relies on the used estimates and assumptions. Any subsequent changes to the factors supporting these estimates and assumptions may have an impact on the reported carrying amount of the related asset.

Judgements

Classification of General reserve (note 4)

Management has assessed and concluded that in order to create the general reserve, an appropriation should be made from the statement of financial performance through an unrestricted grant.

Revenue Recognition for Enforcement Penalties and Fines

The issuance of final notice of a fine does not, in itself, give rise to revenue. The assessment of probability of collection involves significant judgement and is based on available evidence including the fined party's financial position (including liquidation/insolvency where applicable), enforceable settlement arrangements (such as payment plans or guarantees), jurisdictional and crossborder enforceability, identifiable assets and historical recovery patterns. Where collection is not probable, no revenue or receivable is recognised and the matter is monitored and reassessed at each reporting date; revenue is recognised in the period collection becomes probable, and appropriate disclosures are made in accordance with IPSAS 1.

3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Revenue recognition

Contributions from Abu Dhabi Global Market ("ADGM")

Contributions from ADGM represents the net funds received from ADGM including the payments made by ADGM on behalf of the Authority which is offset by the payments made by the Authority on behalf of ADGM. These net contributions are credited to ADGM account. These contributions are made to meet the net expenses incurred by the Authority and consequently, the contributions are recognized as revenue in the statement of financial performance equivalent to the extent of the expense incurred for the period less other income. Other income excludes fines and penalties levied for the year.

Fee income

Fee income comprises revenue from authorisation, supervision, and other regulatory activities provided by the Authority. Revenue is recognised when the related performance obligation is satisfied, which is typically as the service is provided to the customer.

Application fees

Application fees for registration, authorisation, ad hoc services, withdrawals, and terminations are recognised as revenue at the point in time when the services are rendered.

Annual supervision fees

Annual supervision fees are recognised as revenue on a straight-line basis over the period to which they relate, reflecting the continuous nature of the supervisory services provided. Fee income received in respect of future periods is recognised as deferred income and presented within current liabilities in the statement of financial position until the related services are rendered.

Other income

Other income comprises of interest on bank deposits and regulatory fines which is recorded when earned.

Enforcement penalties and fines

Enforcement penalties and fines are recognised as revenue at a point in time only when a final and legally enforceable regulatory decision has been issued (including that the "Authority" has a present legal right to collect and any appeal or challenge periods have expired or been resolved) and a related receivable meets the IPSAS asset recognition criteria, including that collection is assessed as probable (more likely than not) at the reporting date and the amount can be measured reliably, in accordance with IPSAS 23.

Allocation of Shared Services Costs

The Authority receives certain support services from ADGM under a centralized shared services arrangement. These services include Technology Services, Finance, General Services, Human Capital, Procurement, Customer Relationship Management (CRM), and Legal services.

The costs of these shared services are allocated to the Authority by ADGM based on a systematic, rational, and consistently applied cost allocation methodology designed to reflect the actual consumption of services. Directly attributable costs are allocated based on identifiable usage, while indirect costs are allocated using appropriate and measurable cost drivers, including activity-based, capacity-based, and consumption-based drivers such as headcount, transaction volumes, effort estimates, or other relevant metrics.

Allocated shared services costs are recognised as operating expenses in the statement of financial performance in the period in which the services are consumed. The allocation does not include any profit margin and is intended solely to achieve an equitable recharge of costs incurred by ADGM in providing those services.

Management believes that the cost allocation methodology applied is reasonable and reflects the nature and extent of services received.

Property and Equipment

Property and equipment are stated at cost less accumulated depreciation and any impairment losses.

Depreciation is calculated on a straight-line basis over the estimated useful lives of assets as follows:

Estimated useful live	
Computer equipment	**3 years**

The carrying values of property and equipment are reviewed for impairment when events or changes in circumstances indicate the carrying value may not be recoverable. If any such indication exists and where the carrying values exceed the estimated recoverable amount, the assets are written down to their recoverable amount, being the higher of their fair value less costs to sell and their value in use.

Expenditure incurred to replace a component of an item of property and equipment that is accounted for separately is capitalised and the carrying amount of the component that is replaced is written off. Other subsequent expenditure is capitalised only when it increases future economic benefits of the related item of property and equipment. All other expenditure is recognised in the statement of financial performance as the expense is incurred.

An item of property and equipment is derecognised upon disposal or when no future economic benefits are expected from its use or disposal. Any gain or loss arising on derecognition of the asset (calculated as the difference between the net disposal proceeds and the carrying amount of the asset) is included in the statement of financial performance in the year the asset is derecognised.
The asset's residual values, useful lives and methods of depreciation are reviewed at each financial year end and adjusted prospectively, if appropriate.

Intangible assets

Intangible assets acquired separately are measured on initial recognition at cost. Following initial recognition, intangible assets are carried at cost less any accumulated amortization and accumulated impairment losses, if any. The useful lives of intangible assets are assessed as either finite or indefinite. Intangible assets with finite lives are amortized over the useful economic life and assessed for impairment whenever there is indication that the intangible asset maybe impaired.
Amortization of intangible assets is calculated on a straight-line basis over the estimated useful lives of the assets as follows:

Estimated useful life	
Software	**3 years**

The amortization period and the amortization method for an intangible asset with a finite useful life are reviewed at least at the end of each reporting period.

Gains or losses arising from the de-recognition of an intangible asset are measured as the difference between the net disposal proceeds and the carrying amount of the asset and are recognised in the statement of financial performance when the asset is derecognized.

Capital work in progress and software under development
Capital work in progress and software under development are stated at cost based on the percentage completed at the reporting date. The capital work in progress is transferred to the appropriate asset category and amortized in accordance with the above policies when development of the asset is completed and commissioned.

Financial instruments

Financial instruments include bank balances and cash, trade & other receivables and trade & other payables. Fair values of financial instruments are based on estimated fair values using methods such as net present values of future cash flows or by reference to the market value of similar instruments. The Authority uses the simplified approach for trade receivables as per IPSAS 41, and trade receivables and payables are recorded at the invoice amount as the effect of discounting is not material.

Trade and other receivables

Trade and other receivables are stated at original invoice amount less a loss allowance for any uncollectible amounts. An estimate for Expected Credit Loss is made when collection of the full amount is no longer probable. Specific Bad debts are written off when there is no possibility of recovery.

The Authority uses the simplified approach for Receivables as per IPSAS 41.

Trade and other payables

Liabilities are recognized for amounts to be paid in the future for goods received or services provided, whether billed by the supplier or not. The Authority measures short-term payables at the original invoice amount as the effect of discounting is not considered material.

Provisions

Provisions are recognised when the Authority has a present obligation (legal or constructive) as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a re liable estimate can be made of the amount of the obligation. Where the Authority expects some or all of a provision to be reimbursed, the reimbursement is recognised as a separate asset but only when the reimbursement is virtually certain. The expense relating to any provision is presented in the statement of financial performance, net of any reimbursement.
If the effect of the time value of money is material, provisions are discounted using a rate that reflects, where appropriate, the risks specific to the liability. Where discounting is used, the increase in the provision due to the passage of time is recognised as finance costs in the statement of financial performance.

Provisions are reviewed at each reporting date and adjusted to reflect the current best estimate. If it is no longer probable that an outflow of resources embodying economic benefits will be required to settle the obligation, the provision is reversed to the statement of financial performance.

Employees' end of service benefits and pension

The Authority provides end of service benefits to its expatriate employees. Entitlement to these benefits is usually based upon the employees' length of service and the completion of a minimum service period in accordance with the Abu Dhabi Global Market employment regulations (Employment Regulations 2019). The expected costs of these benefits are accrued over the period of employment.
With respect to its UAE national employees, the Authority contributes to a pension fund established by the Abu Dhabi Pension Fund calculated as a percentage of the employees' salaries. The Authority's obligations are limited to these contributions, which are recognized in the statement of financial performance when due.

Cash and cash equivalents

Cash and cash equivalents consist of cash in hand and bank balances, less deposits with maturity of more than three months.

Foreign currencies

Transactions in foreign currencies are initially recorded at the rate prevailing at the date of the transaction. Monetary assets and liabilities denominated in foreign currencies are retranslated at the spot rate of exchange prevailing at the date of the statement of financial position. All foreign exchange differences are taken to the statement of financial performance.

Non-monetary items that are measured in terms of historical cost in a foreign currency are translated using the exchange rates as at the dates of the initial transactions. Non-monetary items measured at fair value in a foreign currency are translated using the exchange rates at the date when the fair value is determined. The gain or loss on translation of non-monetary items measured at fair values is treated in line with the recognition of the gain or loss on the change in fair value of the item.

Offsetting

Financial assets and financial liabilities are only offset, and the net amount reported in the statement of financial position when there is legally enforceable right to offset the recognised amounts, and the Authority intends to settle on a net basis.

4. GENERAL RESERVE

Effective from 1 January 2019, fines levied by the FSRA in connection with breaches of ADGM regulations and rules, together with enforcement cost recoveries and litigation cost recoveries, are recognised on an accrual basis. Income from fines, interest income, enforcement cost recoveries and litigation cost recoveries are credited to the statement of financial performance in the year in which they are levied and were transferred to the litigation and enforcement reserve.

Effective from 13 July 2023, the Board resolved to establish a General Reserve in FSRA which replaced the litigation and enforcement reserve, and its balance of AED 3,113,188 was transferred to the General Reserve. The directors do not consider the General Reserve to be distributable. The General Reserve was established to address the potential contingencies that may arise as a result of FSRA's regulatory responsibilities. The level and adequacy of the General Reserve is reviewed annually by the CEO of the FSRA, and funding is derived from FSRA fines, interest on General Reserve term deposits, any surplus cash (subject to the Board's approval), and Government contributions exclusively for the General Reserve.

On 21 October 2025, pursuant to Article (6) of Abu Dhabi Law No. (4) of 2013, the Board of Directors of ADGM approved, by way of Written Resolution No. (22) of 2025, an increase in the FSRA General Reserve to AED 200,000,000 and set its maximum limit at 200% of FSRA's annual expenditure. This increase was funded from ADGM surplus funds without seeking additional government funding. During the year, an amount of AED 127,573,543 was transferred to the General Reserve from ADGM accumulated surplus.

ADGM

5. ABU DHABI GLOBAL MARKET ACCOUNT

	2025 AED	2024 AED
Balance at 1 January	**(8,562,007)**	32,121,242
SME Financing Platform transfer*	**-**	12,636,592
Contributions received during the year	**199,852,105**	14,767,162
Shared services - Cost Allocation	**56,749,361**	-
Contributions recognized as revenue during the year	**(243,702,071)**	(68,087,003)
Balance at 31 December	**4,337,388**	(8,562,007)

* Effective 31 December 2024, FSRA transferred the SME Financing Platform at AED 12,636,592 (note 12 and 18). This transaction did not involve any cash consideration and was adjusted with Abu Dhabi Global Market account.

Balance of Abu Dhabi Global Market account classified in the statement of financial position as:

	2025 AED	2024 AED
Current Assets	**-**	8,562,007
Current Liabilities	**4,337,388**	-

6. FEE INCOME

	2025 AED	2024 AED
Supervision Fees	**47,881,711**	37,070,654
Authorization & Application Fees	**19,646,039**	15,075,143
Adhoc Fees	**194,642**	-
	67,722,392	52,145,797

7. SALARIES AND OTHER BENEFITS

	2025 AED	2024 AED
Salaries and allowances	**74,932,282**	72,130,018
Employees' bonus	**25,088,800**	14,763,975
Outsourced services	**1,361,986**	4,057,811
Employees' end of service benefits (note 15)	**2,740,193**	2,701,255
Pension contribution (note 18)	**2,040,971**	1,869,213
Medical and life insurance	**2,651,896**	2,101,165
Staff leave salary	**213,071**	297,066
Training and others	**56,102**	451,725
Other expenses	**-**	22,057
	109,085,301	98,394,285

8. CONSULTANCY AND PROFESSIONAL FEES

	2025 AED	2024 AED
Consultancy fees	**1,954,984**	2,944,448
Legal fees	**1,818,237**	963,023
Subscription and membership fees	**1,156,655**	1,286,461
Professional services	**60,432**	48,249
	4,990,308	5,242,181

9. EVENTS, SPONSORSHIPS AND BUSINESS TRAVEL

	2025 AED	2024 AED
Business Travel	**2,511,838**	2,371,409
Conference and other events expenses	**586,873**	186,868
Sponsorships	**152,511**	47,720
	3,251,222	2,605,997

10. IT AND COMMUNICATION EXPENSES

	2025 AED	2024 AED
IT managed services	**5,342,594**	2,198,912
Software license and maintenance	**4,003,866**	6,220,446
Other IT operating expenses	**1,041,124**	174,284
	10,387,584	8,593,642

11. COMPUTER EQUIPMENT

	Capital work in progress AED	Computer equipment AED	Total AED
2025			
Cost:			
At 1 January 2025	**62,365**	**26,595**	**88,960**
Additions	**6,900**	**-**	**6,900**
At 31 December 2025	**69,265**	**26,595**	**95,860**
Accumulated depreciation:			
At 1 January 2025	**-**	**3,522**	**3,522**
Charge for the year	**-**	**8,865**	**8,865**
At 31 December 2025	**-**	**12,387**	**12,387**
Net book value:			
At 31 December 2025	**69,265**	**14,208**	**83,473**
2024			
Cost:			
At 1 January 2024	-	-	-
Additions	88,960		88,960
Transfer during the year	(26,595)	26,595	-
At 31 December 2024	62,365	26,595	88,960
Accumulated depreciation:			
At 1 January 2024	-	-	-
Charge for the year	-	3,522	3,522
At 31 December 2024	-	3,522	3,522
Net book value:			
At 31 December 2024	62,365	23,073	85,438

12. INTANGIBLE ASSETS

	Software under development AED	Software AED	Total AED
2025			
Cost:			
At 1 January 2025	**3,485,911**	**35,666,522**	**39,152,433**
Additions	**2,296,806**	**-**	**2,296,806**
Transfer to Software	**(3,005,983)**	**3,005,983**	**-**
At 31 December 2025	**2,776,734**	**38,672,505**	**41,449,239**
Accumulated amortization and impairment:			
At 1 January 2025	**-**	**34,390,137**	**34,390,137**
Charge for the year	**-**	**3,545,987**	**3,545,987**
At 31 December 2025	**-**	**37,936,124**	**37,936,124**
Net book value:			
At 31 December 2025	**2,776,734**	**736,381**	**3,513,115**
2024			
Cost:			
At 1 January 2024	13,474,399	35,638,978	49,113,377
Additions	2,675,648	-	2,675,648
Transfer to a related party*	-	(12,636,592)	(12,636,592)
Transfer to Software	(12,664,136)	12,664,136	-
At 31 December 2024	3,485,911	35,666,522	39,152,433
Accumulated amortization and impairment:			
At 1 January 2024	-	29,651,978	29,651,978
Charge for the year	-	4,738,159	4,738,159
At 31 December 2024	-	34,390,137	34,390,137
Net book value:			
At 31 December 2024	3,485,911	1,276,385	4,762,296

Software under development represents software systems and applications under developments and enhancements majorly FSRA connect.

*Effective 31 December 2024, the FSRA transferred the SME Financing Platform (Net book value AED 12,636,592) to Numou Limited ("Numou"), an entity owned by ADGM. No consideration was paid by Numou Ltd. For accounting purposes, this transfer was treated as a shareholder equity injection into Numou Ltd, resulting in a derecognition of the Platform's carrying amount in FSRA and a corresponding recognition in Numou Ltd. Since both entities are under common control, no gain or loss was recognized on the transfer.

13. TRADE AND OTHER RECEIVABLES

	2025 AED	2024 AED
Trade receivables	**51,695,699**	4,336,499
Less: Provision for expected credit losses (note 13.2)	**(1,493,929)**	(879,554)
Net Trade receivables	**50,201,770**	3,456,945
Advances to suppliers	**20,259**	-
Prepaid housing	**5,592,322**	6,397,543
Prepaid education	**1,758,370**	1,796,141
Net VAT receivable	**2,137,228**	1,865,329
Accrued interest income on bank deposits (note 13.1)	**1,305,603**	115,866
Other receivables and prepaid expenses	**671,712**	104,025
	61,687,264	13,735,849

Note 13.1

Accrued interest pertains to interest on fixed short-term deposits due on maturity.

Note 13.2

At 31 December 2025, trade receivables amounting to AED 1,493,929 (2024: AED 879,554) were impaired, based on management's assessment that these amounts are not recoverable. Movement in the provision for expected credit losses on trade receivables were as follows:

	2025 AED	2024 AED
At 1 January	**879,554**	379,854
Charge for the year	**614,375**	499,700
At 31 December	**1,493,929**	879,554

As at reporting date, the analysis of trade receivables and contract assets is as follows:

At 31 December 2025

	Total	Not due	1–90 days	91–180 days	181–270 days	271–360 days	Above 361 days
ECL rate		1%	3%	9%	15%	24%	50%
Estimated gross carrying amount (trade receivables)	**51,695,699**	47,588,255	856,749	223,083	211,317	1,286,358	1,529,937
Expected credit loss (loss allowance)	**1,493,929**	341,972	22,343	20,495	31,719	313,857	763,543

At 31 December 2024

	Total	Not due	1–90 days	91–180 days	181–270 days	271–360 days	Above 361 days
ECL rate		0%	0%	0%	25%	38%	100%
Estimated gross carrying amount (trade receivables)	4,336,499	-	2,125,542	420,998	9,257	1,461,692	319,010
Expected credit loss (loss allowance)	879,554	-	-	-	2,314	558,230	319,010

During the year ended 31 December 2025, management updated the estimation technique used to measure ECL on trade receivables and contract assets. Up to 31 December 2024, ECL was determined using a management-estimated provision matrix. From 1 January 2025, management applied a revised provision matrix developed using historical roll-rates (age-bucket migration analysis) and forward-looking information, in line with IPSAS ECL requirements.

This update represents a change in accounting estimate and has therefore been applied prospectively from 1 January 2025; comparative information has not been restated. Accordingly, the 2025 ECL and ageing matrix are not comparable to those presented for 2024.

14. CASH AND CASH EQUIVALENTS

	2025 AED	2024 AED
Bank balances	**6,543,909**	17,288,880
Term deposits	**261,073,472**	61,725,000
Cash and cash equivalents in the statement of financial position	**267,617,381**	79,013,880
Less: term deposits with original maturity over 3 months and less than 1 year	**(200,003,472)**	-
Cash and cash equivalents in the statement of cash flows	**67,613,909**	79,013,880

Term deposits are placed with a local bank in the UAE carrying an interest rate between 2.94% - 4.40% (2024: 4.17% – 5.11%)

The expected credit loss on bank balances is estimated to be immaterial as the Authority only deals with reputable banks with good credit ratings.

15. EMPLOYEES' END OF SERVICE BENEFITS

	2025 AED	2024 AED
Balance at 1 January	**11,351,798**	9,326,087
Charge for the year *	**2,740,193**	2,701,255
Transfer from ADGM	**48,435**	-
Employees' end of service benefits paid	**(1,607,180)**	(675,545)
Balance at 31 December	**12,533,246**	11,351,798

* Included in the charge of the year, end of service benefits costs of direct hire amounting to AED 2,717,454 (note 7) (2024: 2,656,700) and end of service benefits costs of outsourced staff amounting to AED 22,739. (2024: 44,555)

16. TRADE AND OTHER PAYABLES

	2025 AED	2024 AED
Accounts payable	**166,829**	1,112,874
Accrued expenses	**29,997,289**	20,131,789
Unearned revenue*	**84,302,238**	10,062
Advances from customers	**1,564,243**	1,126,490
	116,030,599	22,381,215

Trade and other payables are interest-free and settlement occurs in cash. Such amounts are expected to be paid within 30-60 days from the balance sheet date.

*Unearned revenue represents supervision fees billed in advance during 2025, for which the corresponding regulatory services will be rendered and revenue recognized in the financial year commencing 1 January 2026.

17. OTHER INCOME

	2025 AED	2024 AED
Regulatory Fines	**1,510,725**	2,983,104
Interest income	**4,096,102**	3,506,899
	5,606,827	6,490,003

The Authority recognised only those fines that met the revenue recognition criteria – Enforcement penalties and fines (refer note 3). Financial penalties that do not meet these criteria because an inflow is not more likely than not and/or the amount and timing cannot be measured reliably, are not recognised as other income, nor any related asset recognised

18. RELATED PARTY TRANSACTIONS AND BALANCES

Related party transactions represent transactions with the Government of Abu Dhabi, the ADGM, senior management of the Authority and companies in which they are principal owners or over which they exercise significant influence.

Transactions with related parties included in the statement of financial performance are as follows:

	2025 AED	2024 AED
Contributions recognized as revenue during the year (note 5)	**243,702,071**	68,087,003
Shared Services - Cost Allocation (note 5)	**56,749,361**	-
Pension contribution (note 7)	**2,040,971**	1,869,213

Balances with related parties included in the statement of financial position are as follows:

	2025 AED	2024 AED
Receivable from the Abu Dhabi Global Market (note 5)	**-**	8,562,007
Payable to the Abu Dhabi Global Market (note 5)	**4,337,388**	-
Balances held with banks	**267,617,381**	79,013,880

Other transactions with a related party are as follows:

	2025 AED	2024 AED
Transfer of software from FSRA to Numou Limited (note 12)	**-**	12,636,592
Contributions received from the Abu Dhabi Global Market (note 5)	**199,852,105**	27,403,754

19. COMMITMENTS AND CONTINGENCIES

Capital commitments as at 31 December 2025 were AED 267,242 (2024: AED 6,900). The Authority has no contingent liabilities.

20. FINANCIAL RISK MANAGEMENT OBJECTIVES AND POLICIES

Financial instruments by category

The Authority classifies its financial instruments in accordance with the applicable financial instruments standard (IPSAS 41) as follows:

	2025 AED	2024 AED
Financial assets at amortised cost		
Trade receivables (note 13)	**50,201,770**	3,456,945
Accrued interest income on bank deposits (note 13)	**1,305,603**	115,866
Cash and Cash equivalents (note 14)	**267,617,381**	79,013,880
	319,124,754	82,586,691
Financial liabilities at amortised cost		
Trade payables (note 16)	**166,829**	1,112,874
Accrued expenses and other payables (note 16)	**29,997,289**	20,131,789
Unearned Revenue (note 16)	**84,302,238**	10,062
Advanced from Customers (note 16)	**1,564,243**	1,126,490
	116,030,599	22,381,215

The activities of The Authority expose it to a variety of financial risks, market risk (including currency risk, interest rate risk, and other price risks), credit risk, and liquidity risk. The Authority's overall risk management program focuses on the unpredictability of financial markets and seeks to minimize potential adverse effects on its financial performance.

Currency risk

Foreign currency risk is the risk of fluctuation of the value of financial instruments due to changes in the foreign exchange rates.

The Authority manages its bank accounts, and most of its financial transactions are denominated in UAE Dirhams, which is the official currency of the United Arab Emirates. Therefore, management believes that the Authority has insignificant exposure to currency risk.

Interest rate risk

Interest rate risk arises from possible impact of changes in the interest rates on the value of financial instruments. The Authority is not exposed to the risk of changes in market interest rates because the Authority's term fixed deposits bear fixed interest rates.

The Authority has no borrowings or liabilities which are dependent on variable interest rates.

Credit risk

Credit risk is the risk that one party to a financial instrument will fail to discharge an obligation and cause the other party to incur a financial loss.

The Authority is exposed to credit risk on its debtor accounts and cash and bank balances. The Authority seeks to reduce the credit risk by monitoring its existing outstanding receivable balances. The Authority limits credit risk with regards to its bank balances by only dealing with reputable banks.

Maximum exposure to credit risk

	2025 AED	2024 AED
Trade receivables (note 13)	**50,201,770**	3,456,945
Accrued interest income on bank deposits (note 13)	**1,305,603**	115,866
Cash and Cash equivalents (note 14)	**267,617,381**	79,013,880
Total	**319,124,754**	82,586,691

Expected credit losses (ECL)

The Authority measures ECL for trade receivables and contract assets using a provision matrix (simplified approach), by grouping exposures based on shared credit risk characteristics and days past due. The loss rates are based on historical default experience and are adjusted for current and forward-looking information.

Liquidity risk

Liquidity risk is the risk that The Authority will encounter difficulty in meeting its obligations associated with financial liabilities. The Authority manages liquidity risk by maintaining sufficient cash reserves and ensuring that it has access to funding through its operational budget and government support, if required. The Authority's financial liabilities, such as trade and other payables, are due within one year, and management considers liquidity risk to be minimal.

21. FAIR VALUES OF FINANCIAL INSTRUMENTS

Financial instruments include financial assets and financial liabilities. Financial assets include cash and bank balances and accounts, other receivables and Due from Abu Dhabi Global Market. Financial liabilities include trade payables, other payables and Due to Abu Dhabi Global Market.

The fair values of the financial instruments are not materially different from their carrying values.

ADGM

22. DISCLOSURE OF AUDITORS' FEES

The statutory auditor fees are disclosed below:

	2025 AED	2024 AED
Fees for:		
• Audit of the Authority's financial statements	**37,000**	34,865
• Other non-assurance services	**-**	-
	37,000	34,865

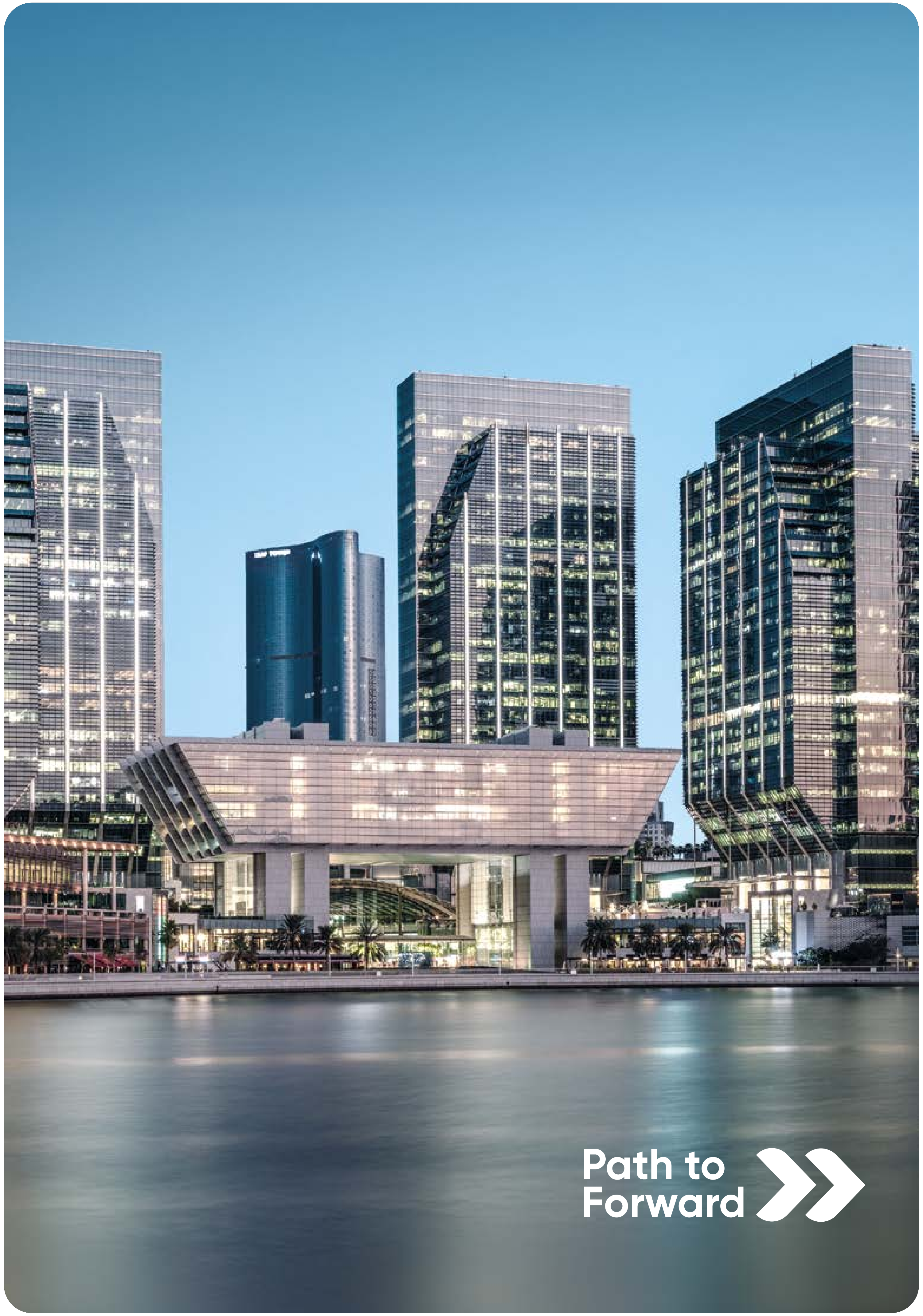
23. COMPARATIVE INFORMATION

Certain comparative figures were reclassified to conform with current year presentation and alignment with internal management reporting. Such reclassifications had no impact on the previously reported surplus or equity of the Authority.

24. SUBSEQUENT EVENT

Subsequent to the reporting date, on 28 February 2026, certain regional geopolitical developments occurred within the broader Gulf region. Management is closely monitoring developments in the UAE and the wider Gulf region and is assessing the potential implications for the Authority's operations, liquidity, financial position, and cash flows. As at the date of authorisation of these financial statements, no material impact on the Authority's operations, liquidity, or financial position has been identified.

END



Rulebook Amendments in 2025

FSRA Administered Rules and Regulations Amendments

In 2025, the FSRA implemented a number of amendments to its Rules and Regulations, including the following:

- Notice of Publication dated 2 January 2025 which implemented enhancements to the FSRA regulatory framework to align with international best practices enshrined in the Core Principles for effective banking supervision, issued by the Basel Committee on Banking Supervision.
- Notice of Publication dated 10 June 2025 which implemented amendments to the FSRA regulatory framework for digital assets.
- Notice of Publication dated 29 July 2025 which announced the implementation of amendments to the FSRA regulatory framework for Authorised Persons and Recognised Bodies in relation to cyber risk management.
- Notice of Publication dated 19 August 2025 which implemented amendments to the FSRA's prudential framework for Authorised Persons classified as Category 3B, 3C and 4 under the FSRA's Prudential – Investment, Insurance Intermediation and Banking Rulebook.
- Notice of Publication dated 25 September 2025 which implemented amendments to the FSRA's regulatory framework to require Fund Managers to comply with periodic reporting requirements in respect of each Fund that they manage.
- The Notice of Publication dated 31 October 2025 which implemented amendments to the FSRA regulatory framework governing Regulated Activities involving Fiat-Referenced Tokens.

Firms Authorised in 2025

	Authorised Person	License Date	
1	Investindustrial Advisors (MENA) Limited	10-Jan-25	January 8
2	Dexbridge Capital Ltd	13-Jan-25	
3	Meta Impact Capital Ltd	16-Jan-25	
4	Liwa Capital Advisors Ltd	20-Jan-25	
5	Blantyre Capital II Limited	21-Jan-25	
6	Tradition (Dubai) Limited	21-Jan-25	
7	Polen Capital Middle East Ltd	29-Jan-25	
8	Sapiens Alpha Limited	31-Jan-25	
9	Patrizia (Middle East) Limited	4-Feb-25	February 5
10	Yashaa Global Capital Ltd	12-Feb-25	
11	Kimmeridge Energy Management Company LLC	20-Feb-25	
12	Vizier Asset Management Company	26-Feb-25	
13	Infini Capital Management Limited	27-Feb-25	
14	Freedom Asset Management (Middle East) Limited	4-Mar-25	March 8
15	BlackRock Advisors (UK) Limited	13-Mar-25	
16	Clearlake Capital Group (Middle East) Ltd	13-Mar-25	
17	Tau Capital Limited	18-Mar-25	
18	Token Bay Capital Limited	21-Mar-25	
19	Brown Advisory Limited	24-Mar-25	
20	Hafeet Capital Limited	24-Mar-25	
21	Midbar Advisors Limited	26-Mar-25	

	Authorised Person	License Date	
22	GMB Limited	5-Apr-25	April 8
23	Dhabi Ltd (Finance House)	8-Apr-25	
24	Fidera EMEA Limited	9-Apr-25	
25	Harrison Street ME Limited	16-Apr-25	
26	Golub Capital Middle East Limited	21-Apr-25	
27	Apax Partners Middle East Limited	22-Apr-25	
28	Brevan Howard Capital Management Limited	29-Apr-25	
29	Kirkoswald Global Management Services (MENA) Ltd	30-Apr-25	
30	Ula Capital Ltd	5-May-25	May 13
31	Carta Middle East Limited	6-May-25	
32	Appian Capital Advisory Limited	09-May-25	
33	Fortress Investment Group (ME) Limited	9-May-25	
34	Brummer & Partners Asset Management (UK) Ltd	13-May-25	
35	M Capital Limited	14-May-25	
36	Sun Capital Advisory Ltd	14-May-25	
37	XBTO Middle East Limited	14-May-25	
38	Arab Dragon Capital Limited	23-May-25	
39	Demeter Tactical Investments (ME) limited	23-May-25	
40	Digital Climate (ME) Limited	23-May-25	
41	QCP Trading Middle East Limited	27-May-25	
42	Lone Star Europe Acquisitions Limited	28-May-25	

	Authorised Person	License Date	
43	Partners Group Middle East Limited	3-Jun-25	June 4
44	BurjX MENA Ltd.	11-Jun-25	
45	Ap3X Capital Limited	25-Jun-25	
46	Sculptor Capital Management Hong Kong Limited	26-Jun-25	
47	Oryx Global Partners Management Limited	1-Jul-25	July 4
48	Sandrock Capital Ltd	04-Jul-25	
49	Speedinvest Middle East Ltd	10-Jul-25	
50	Chenavari Investment Management (Middle East) Limited	24-Jul-25	
51	Lazard Gulf Limited	6-Aug-25	August 9
52	Adams Street ME Ltd	08-Aug-25	
53	Arolla Finance Limited	18-Aug-25	
54	Arini Capital Management (ME) Limited	19-Aug-25	
55	Premier Investment Partners Limited	20-Aug-25	
56	NewReef Capital Limited	26-Aug-25	
57	RuDo Digital Wealth Private Limited	28-Aug-25	
58	Hokma IQ Ltd	29-Aug-25	
59	Monroe Capital ME Limited	29-Aug-25	

	Authorised Person	License Date	
60	ACP ME Limited	04-Sep-25	September 13
61	ZE Transaction Solutions Ltd	8-Sep-25	
62	VantageBridge Partners Ltd	10-Sep-25	
63	Allianz Global Investors Middle East Limited	16-Sep-25	
64	QMM Ltd (previously kown as Q Capital Ltd)	16-Sep-25	
65	Betterhand IA Limited	17-Sep-25	
66	Tomasteed Alternative Credit Advisors Limited	17-Sep-25	
67	DWS International GmbH	23-Sep-25	
68	Universal Digital INTL Limited	25-Sep-25	
69	Bridgepoint ME Limited	29-Sep-25	
70	Energiare Limited	30-Sep-25	
71	HarbourVest Partners (GCC) Limited	30-Sep-25	
72	UBS AG	30-Sep-25	
73	Pharo Manarah Limited	3-Oct-25	October 6
74	Waha Investments Limited	13-Oct-25	
75	IMX Funds Limited	15-Oct-25	
76	Jefferies International Limited	17-Oct-25	
77	Virtus ME Ltd	22-Oct-25	
78	Amberstone Capital Ltd	23-Oct-25	

	Authorised Person	License Date	
79	CBC Group (ME) Limited	4-Nov-25	November 9
80	I.M. Mamlouk & Company Limited	7-Nov-25	
81	Albourne Partners Limited	11-Nov-25	
82	Two7 Capital Limited	14-Nov-25	
83	Tabadulat Limited	19-Nov-25	
84	Jane Street MENA Limited	20-Nov-25	
85	Peel Hunt Middle East Limited	21-Nov-25	
86	Lexington Partners ME Limited	25-Nov-25	
87	Circle Internet MEA Ltd.	27-Nov-25	
88	Julius Baer (Abu Dhabi) Ltd	4-Dec-25	December 8
89	Muzinich & Co (Middle East) Limited	4-Dec-25	
90	Primrose Capital Management (Middle East) Limited	10-Dec-25	
91	Hidden Road Partners CIV Middle East Limited	16-Dec-25	
92	Nahda Capital Partners Ltd	16-Dec-25	
93	South ME Limited 36	19-Dec-25	
94	BlueFive Asset Management Ltd	24-Dec-25	
95	Freedom Broker Global Markets Ltd	29-Dec-25	

MoUs Signed

No.	Source	Jurisdiction	Counterpart Authority	Date Signed	MoU Scope
1	International	Azerbaijan	Central Bank of the Republic of Azerbaijan	11/06/2025	Information Exchange
2	International	Bhutan	Gelephu Mindfulness City Authority	09/04/2025	Growth (incl Fintech)
3	International	Hong Kong	Hong Kong Securities & Futures Commission	14/05/2025	Supervision - Capital Markets
4	International	Sweden	Finansinspektionen Sweden	26/05/2025	Supervision - EU Alternative Investment Fund Managers
5	UAE	UAE	Executive Office for Control and Non Proliferation	29/12/2025	AML/CFT - Targeted Financial Sanctions

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