UNITED ARAB EMIRATES - DUBAI

Managing General Agents: A Guide to the Global MGA Landscape

DLA PIPER

Introduction

Managing General Agents (MGAs) have become one of the insurance industry's most dynamic growth stories, with the global market now estimated at approximately USD 150 billion of premium. Yet they remain surprisingly difficult to define – the MGA structure is usually not recognised by law, so in different jurisdictions they have to operate within a wide range of broader intermediary and delegated authority frameworks. A structure that is straightforward in one country can require a very different licensing, governance or contractual approach in another.

That complexity is why we created this guide. It covers 26 jurisdictions across the same core topics: licensing, passporting, ownership and control, insurtech, product governance, premium handling and capital requirements.

This guide reflects our understanding of the law and market practice in each jurisdiction as at July 2026. Regulation in this area continues to evolve and individual jurisdictions may have introduced changes since publication. For advice on a specific jurisdiction, please contact that jurisdiction's key contact, or your usual DLA Piper adviser.

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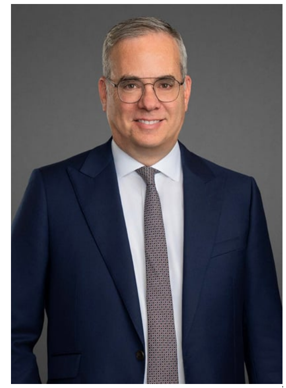

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MGA status and classification

Parameter	Summary
Dedicated MGA category	No
Average authorisation timeline	4-6 months
Passporting	No
Insurtech sandbox	Yes DIFC innovation testing license; ADGM fintech lab
Controller approval	Yes Fit & proper for controllers

The UAE doesn't have an onshore MGA regime. MGA-type operations are conducted through two separate free-zone regulatory frameworks: the Dubai International Financial Centre (DIFC), regulated by the Dubai Financial Services Authority (DFSA), and the Abu Dhabi Global Market (ADGM), regulated by the Financial Services Regulatory Authority (FSRA).

Each regime is independent, with its own authorization requirements, regulatory standards and supervisory approach. DIFC and ADGM require an "Insurance

Management" license, allow combined MGA/broking licenses, and provide no alternative license category for an entity to provide MGA services.

Authorization / licensing process and timeframe

In the DIFC, entities must obtain DFSA authorization to conduct insurance intermediation activities, including delegated underwriting. In the ADGM, FSRA authorization is required. Both regimes have sophisticated application processes that involve detailed assessment of business plans, governance arrangements, financial resources and key personnel.

In the ADGM, the entire process from application submission to final approval typically takes around 4-6 months. In the DIFC, the process from application submission to final approval typically takes around 4-5 months.

Passporting / cross-border rights

There is no passporting framework between the DIFC, ADGM, and onshore UAE. Each jurisdiction is treated as a separate regulatory territory. Entities wishing to operate across multiple UAE jurisdictions must obtain separate authorizations. There is no equivalent of EEA passporting, and cross-border activity must comply with the requirements of each relevant jurisdiction.

Insurtech considerations

Both free zones offer innovation-friendly frameworks. The DIFC operates an Innovation Testing Licence (ITL) that allows firms to test innovative financial services products in a controlled environment. The ADGM offers a fintech lab with similar objectives. Both frameworks provide reduced regulatory requirements during the testing phase and access to regulatory guidance and support.

Controller / ownership approval requirements

Both the DFSA and FSRA conduct thorough fit and proper assessments of controllers, senior management and key personnel. Approval is required for changes in control or significant ownership. The assessments cover integrity, competence, financial soundness and governance capability.

Product oversight and governance

Conduct of business rules apply in both the DIFC and ADGM, including requirements relating to product suitability, customer communication and fair treatment. While these frameworks are not identical to the EU's IDD-based POG regime, they impose comparable obligations on intermediaries to ensure that products are appropriate for the customers they're distributed to.

Premium handling and client money rules

Both the DFSA and FSRA impose insurance money segregation requirements on intermediaries handling insurance funds. Premiums and other insurance monies must be held in designated trust or segregated accounts, separate from the firm's own funds. Reporting and reconciliation obligations apply.

Capital and PII requirements

In the DIFC, the base capital requirement is USD30,000, calculated on an expenditure basis. In the ADGM, the base capital requirement is USD50,000, also on an expenditure basis. PII is required under both regimes. The specific capital calculation depends on the scope of authorized activities and the firm's expenditure profile.

Key additional considerations

The existence of two separate free-zone regimes creates both opportunity and complexity. Each regime is sophisticated and well-regarded internationally, but entities must carefully consider which jurisdiction best suits their target market and operational model.

The absence of passporting between DIFC, ADGM and onshore UAE means that each jurisdiction must be treated as a distinct market. Both regimes offer attractive features for MGA operations, including English-language regulatory frameworks, common-law-based legal systems and access to regional insurance markets.

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