POLAND

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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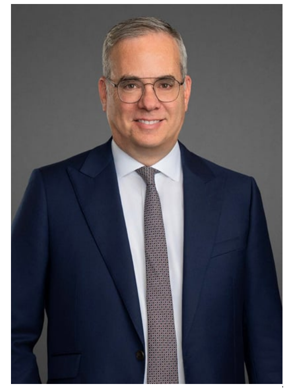

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LAST MODIFIED 22 SEPTEMBER 2026

MGA status and classification

Parameter	Summary
Dedicated MGA category	No
Average authorisation timeline	1 month
Passporting	Yes
Insurtech sandbox	No
Controller approval	No Post-acquisition notification

Poland's insurance intermediary framework, supervised by the *Komisja Nadzoru Finansowego* (KNF, the Financial Supervision Authority), categorizes intermediaries as either tied agents or multi-agents or brokers (operating on behalf of the client). Tied agents act on behalf of a single insurer, while multi-agents can represent multiple insurers simultaneously. A significant feature of the Polish regime is the prohibition on sub-agency, meaning that agents cannot delegate their distribution functions to sub-agents.

Authorization / licensing process and timeframe

The registration process in Poland is insurer-driven: it's the insurer, rather than the intermediary itself, that submits the registration to the KNF register. This process typically takes approximately 30 days from submission. The insurer is responsible for ensuring that the agent meets the applicable fitness and propriety, professional qualification, and financial standing requirements. The supervision of agents by the insurance company involves effectively verifying that they meet the conditions for carrying out agency activities. The insurance company provides support to its agents to ensure that their agency activities comply with the law and are in the best interests of customers.

Passporting / cross-border rights

Poland has fully implemented the IDD, and registered insurance intermediaries can exercise EEA passporting rights under both the freedom of establishment and freedom of services regimes. Poland's EU membership and growing insurance market make it an increasingly relevant jurisdiction for MGAs operating across Central and Eastern Europe.

Insurtech considerations

Poland doesn't currently operate a specific insurtech regulatory sandbox. However, the KNF has demonstrated openness to innovation in financial services. MGAs using innovative technology have to comply with the standard regulatory requirements applicable to insurance intermediaries.

Controller / ownership approval requirements

No prior approval of controllers or proposed owners of a tied agent or multi-agent is required. However, information regarding controllers must be notified to KNF following an acquisition of control.

It's the obligation of the insurance company (or companies) who have appointed the MGA to ensure that the data concerning its insurance agents in the register of agents is factually correct. Changes should be registered no longer than seven days after the insurance company becomes aware of them. The assessment is conducted through the insurer-led registration process.

Product oversight and governance

Poland has transposed the IDD's product oversight and governance (POG) requirements into national law. MGAs involved in product design or manufacturing must maintain POG frameworks covering target market identification, product testing, and ongoing distribution monitoring. The KNF actively supervises compliance with POG requirements.

Premium handling and client money rules

Client money rules apply to insurance intermediaries in Poland. Intermediaries handling premiums or claims funds on behalf of clients or insurers have to maintain appropriate segregation and accounting controls. The MGA's ability to collect and handle premium and claims monies, or to receive profit commissions from capacity providers is regulated by legislation implementing the IDD. Under local law, payments made in good faith by policyholders to agents are treated as having been made directly to insurers (ie there is a statutory risk transfer). The specific requirements are set out in the national legislation transposing the IDD and in KNF guidance.

Capital and PII requirements

Poland’s capital and PII requirements are aligned with the EIOPA guidance.

Key additional considerations

The prohibition on sub-agency is the most distinctive feature of the Polish regulatory landscape and must be carefully considered by MGAs planning to use intermediary networks. The insurer-driven registration process simplifies the regulatory burden on the MGA but creates a dependency on the insurer partner. Poland’s fast registration timeframe and full EEA passporting rights make it a practical option for MGAs targeting the Central and Eastern European market.

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