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CBUAE operational risk and resilience regulation

From compliance obligation to enterprise resilience transformation

October 2026

Evolving regulatory expectations on operational resilience

What has changed?

It is no longer about avoiding disruptions; it is about never stopping

The regulatory expectation is no longer limited to having business continuity and disaster recovery plans in place. It now requires **Licensed Financial Institutions (LFIs)** to ensure the resilience of **Critical Operations** by understanding the full set of interdependencies that enable those operations to continue through disruption.

مصرف الإمارات العربية المتحدة المركزي
CENTRAL BANK OF THE U.A.E.

OPERATIONAL RISK MANAGEMENT REGULATION (C 1/2026)

Key details

Issued date: February 3, 2026
Effective/in force date: **September 14, 2026**
Replaces: The previous Operational Risk Regulation and Standards from August 2018.

Who it applies to

All ***Licensed Financial Institutions (LFIs)*** that are juridical persons, including banks, insurance/reinsurance companies, and other financial entities regulated by the CBUAE.

Key incident reporting timelines

Within 4 hours:	Notice required for operational risk events affecting critical operations
Within 24 hours:	Summary report required on the event nature, recovery time & impact
Within 72 hours:	High-risk incident notification based on board-approved criteria

Key highlights

20 Total Articles

120 Total controls

49 Controls in scope of PoV

Note: The new CBUAE Operational Risk Management Regulation establishes 120 controls across 9 domains; **this POV focuses on 49 controls across 4 domains** (highlighted in table below), while the remaining domains can be addressed through the broader Deloitte team capability.

Sr.no.	Domain	# of Article	# of controls
1	Governance & Risk Framework	2, 4, 5, 6, 7	41
2	Change Management	12	6
3	Shari'ah Non-compliance	14	7
4	Reporting & Enforcement	15, 16, 17	14
5	Administrative Provisions	1, 18, 19, 20	3
6	**Operational Resilience**	3	**6**
7	**ICT & Cybersecurity / Data**	8, 10	**15**
8	**Incident Management & BCDR**	9, 11	**16**
9	**Third-Party Risk Management**	13	**12**
		20	**120**

CURRENT SUPERVISORY FOCUS

	CBUAE	LFIs
CBUAE supervisory request	*-Send Self-assessment to LFIs -Scope & timelines -Expected Submission*	
LFI Self-Assessment		*- Mobilize owners - Complete self-assessment - Validate responses - Compile evidence*
Market Review	*-Review submissions -Assess maturity levels -Aggregate market observations*	
Risk Themes	*-Identify common gaps -Spot concentration areas -Highlight risk themes*	
Compliance Requirement	*-Set industry standard -Set the timeline for the LFIs to be compliant against the regulation*	
Remediation Follow-up	*-Communicate priority expectations*	*-Remediation actions -Track progress, closure -Report to CBUAE*

Source: CBUAE Operational Risk Management Regulation, Circular No. 1/2026 (C1/2026), Articles 2–17; CBUAE Rulebook.

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Summary - CBUAE operational risk management regulation

Service map & LFI compliance obligations: What LFIs must now demonstrate

Domains under CBUAE regulation

1. Governance & Risk Framework
2. Change Management
3. Shari'ah Non-Compliance
4. Reporting Enforcement
5. Administrative Provisions
6. Operational Resilience
7. ICT & Cybersecurity / Data
8. Incident Management & BCDR
9. Third-Party Risk Management

Domains in-scope

The regulation sets minimum standards for LFIs to identify, withstand, and recover from disruption to their critical operations – embedding resilience, ICT/Cyber, BCDR, and third-party risk management as continuous obligations, not one-time controls.

Operational resilience

- Embed operational resilience in strategy
- Map critical operations & dependencies
- Plan for disruptions

ICT & dependency mapping

- Strengthen ICT governance
- Enhance cyber resilience
- Improve data compliance

BCDR & critical services mapping

- Strengthen incident response
- Coverage of mapped critical operations
- Strengthen testing, recovery targets, and disruption preparedness

3rd party resilience

- Strengthen outsourcing governance
- Enhance provider oversight
- Prepare exit contingencies

Source: CBUAE Operational Risk Management Regulation, Circular No. 1/2026 (C1/2026), Articles 2–17; CBUAE Rulebook.

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Implications for LFIs and Deloitte’s response

Deloitte point of view: what this means for LFIs

Why early action matters now

Most institutions are unlikely to start from zero. However, many will need to move beyond fragmented BC/DR, cyber, risk, and control activities toward an integrated resilience model centered on critical operations.

Our key takeaways

EXISTING FOUNDATIONS

Build on existing BCM, DR, ICT, cyber and risk capabilities while **integrating** them around **Critical Operations**

SERVICE-CENTRIC RESILIENCE

Move from siloed controls to end-to-end service resilience, enabled through Deloitte's **Service to Server (S2S) mapping approach** & dependency visibility

INCREMENTAL UPLIFT

Focus remediation on **governance**, **dependencies**, **TPRM**, **testing** and **evidence**, leveraging existing capabilities to accelerate experience

WHY EARLY ACTION MATTERS

Identify vulnerabilities early, prioritize remediation and **operationalize demonstrable resilience** ahead of regulatory scrutiny and testing

Why Deloitte?

End-to-end TPRM capability across design, assessment, remediation, monitoring, and technology enablement spanning across domains

Strong current market relevance, with ongoing central bank **resilience regulation and implementation support** across **~ 11 banks in the GCC market**.

Scalable integrated delivery model that connects advisory, implementation & technology to drive a more efficient and effective TPRM program

Deep **regional & international regulatory & implementation experience** across resilience-related frameworks & standards, including NESA, NIST, NCEMA, ISO 22301, etc.

Strong Operational Resilience Implementation experience across **Global and Middle Eastern clients**

Credible regulatory perspective, combining supervisory insight with **regional resilience framework development** experience.

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Deloitte’s approach to CBUAE’s requirements for operational resilience

Build on what you have. Bridge the gaps. Achieve compliance. Build long-term resilience

01 | Asses

assess the LFI’s current operational resilience posture & prioritise gaps

High-level activities:

- CBUAE regulatory gap assessment
- Current-state maturity assessment
- Critical operations & dependency assessment
- BCM/BIA/DR assessment
- Testing & exercise assessment
- Prioritize critical gaps
- Define target state and remediation roadmap

Key outcomes

- ✓ Current-state assessment
- ✓ Gap summary
- ✓ Implementation roadmap

02 | Design

Design LFI’s target operational resilience capability

High-level activities:

- Develop/enhance governance model
- Develop target operating model
- Develop operational resilience strategy
- Develop/enhance policies, procedures
- Define critical operations & resilience methodology
- Define resilience testing & scenario methodology
- Define TPRM resilience requirements for critical operations
- Define target-state metrics, kris

Key outcomes

- ✓ Target operating model
- ✓ Enhanced governance
- ✓ Policies & procedures
- ✓ Defined resilience methodologies

03 | Implement

Operationalize the requirements

High-level activities:

- Mapping of critical operations and dependencies
- Develop/refresh and implement IR, BCP, and DR plans
- Develop & execute BC/DR exercises to test severe-but-plausible scenarios
- Validate third-party resilience capabilities and test contingency & exit plans
- Incident management implementation

Key outcomes

- ✓ Operationalized resilience capabilities across critical operations
- ✓ Enhanced BCM/DR
- ✓ Improved incident management
- ✓ Streamlined TPRM

04 | Support

Provide LFIs with required support in ensuring continuous compliance

High-level activities:

- Operational resilience program maintenance /refresh
- Periodic regulatory assessment
- Continuous refresh of critical operations & dependency mappings
- Periodic BCP/DR, BIA refresh
- Ongoing resilience testing
- TPRM resilience monitoring
- Maintain resilience kris and action tracking

Key outcomes

- ✓ Sustainable resilience capability
- ✓ Ongoing advisory / regulatory change support

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Expertise with Enhanced Capabilities

We recognize that achieving readiness for CBUAE requirements demands a structured, well-governed, and execution-focused approach that brings together the right technical, regulatory, and operational expertise. Deloitte assembles multidisciplinary teams with deep experience across operational resilience, business continuity, disaster recovery, regulatory compliance, and program delivery to help clients translate regulatory expectations into practical, sustainable capabilities.

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