REGULATORY GATE

Licensing · Compliance · Risk

FOR VARA IPA HOLDERS

From In-Principle Approval to a full VARA licence

VARA lists IPA holders separately from licensed firms. To cross over, you must meet every condition VARA set in your approval. We help you close each one, and show the evidence.

23
firms hold a VARA IPA

20
licences issued in 2026

7
IPAs issued in September

What the rulebooks require of a licensed VASP

People

A full-time Compliance Officer with five years' experience, UAE resident, reporting to the Board.

An MLRO with two years of AML/CFT experience.

A CISO who is not the Compliance Officer.

CRM Rulebook I.C.1, III.A.1 · T&I Rulebook I.I.1

Policies and AML

Compliance policies, including business continuity and disaster recovery.

AML/CFT policies, risk-based due diligence and a route to report to the UAE FIU.

Travel Rule data before any transfer above AED 3,500.

CRM Rulebook I.C.2, Part III

Client assets and technology

Client virtual assets in separate wallets, one to one, with no rehypothecation unless the client consents and you are authorised.

Independent penetration testing at least once a year.

CRM Rulebook V.B.3–4 · T&I Rulebook I.E.1

Outsourcing and marketing

Tell VARA in advance about any material outsourcing arrangement.

Market only once licensed, and carry VARA's risk disclaimers.

Company Rulebook IV.H.3 · Marketing Regulations 2024

How Regulatory Gate helps

01 · Review
We map your IPA conditions and the rulebooks against what you have today.

02 · Build
Policies, manuals and risk assessments for your business.

03 · Support
Outsourced compliance and MLRO support while you hire.

04 · Check
A health check before VARA reviews you, with testing by Governance Genius.

Book a call about your IPA conditions
Share your conditions. Get a gap list and a plan.

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Figures from VARA's public register on 9 November 2026. Rule references checked against VARA's rulebooks on the same date. CRM: Compliance and Risk Management. T&I: Technology and Information.

General information, not legal advice. Regulatory Gate LLC, Dubai.