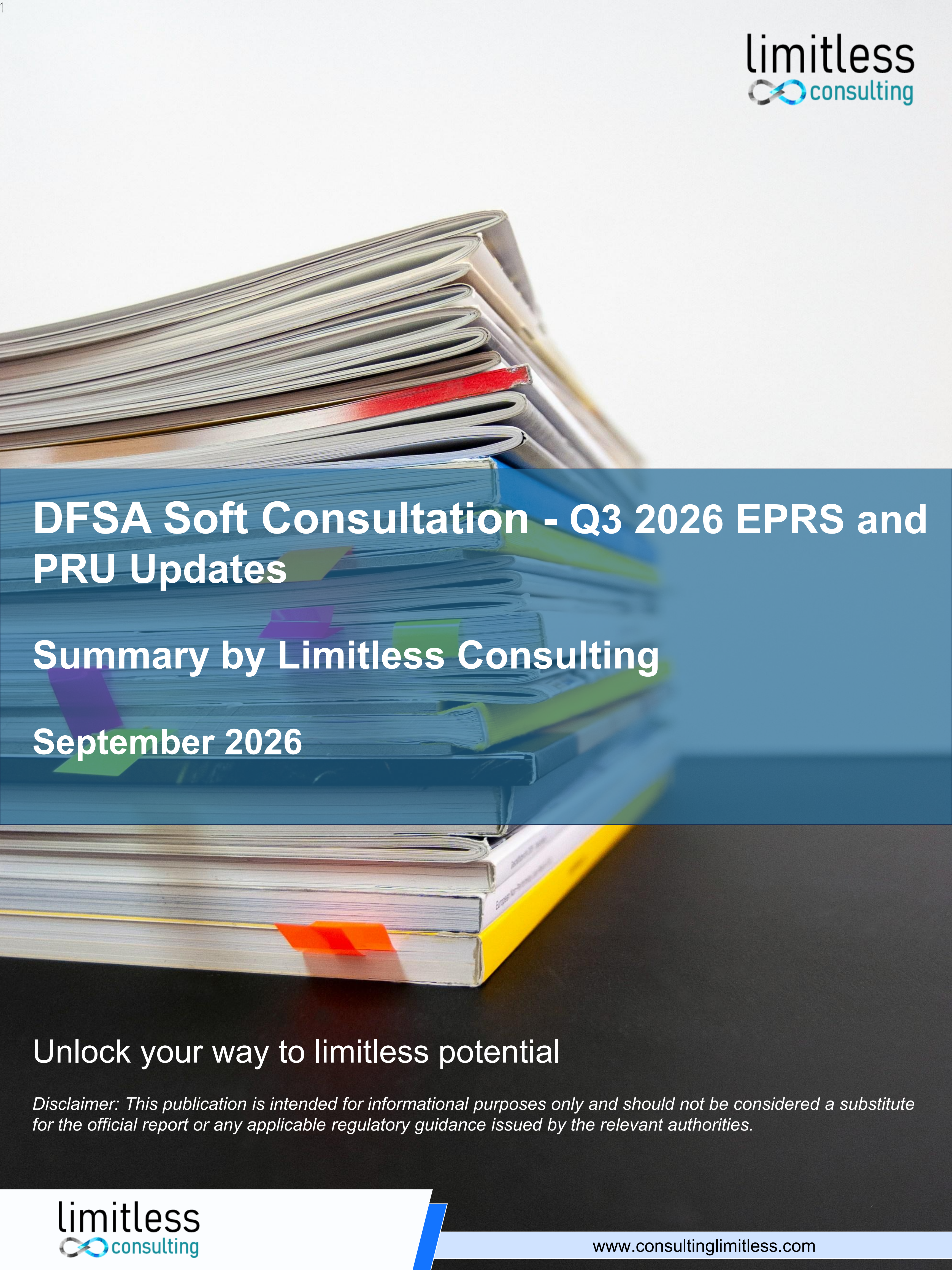


A large stack of books is the background of the cover. The books are of various colors, including white, red, blue, green, and yellow. Some books have tabs sticking out. The stack is slightly angled, showing the edges of many pages.

DFSA Soft Consultation - Q3 2026 EPRS and PRU Updates

Summary by Limitless Consulting

September 2026

Unlock your way to limitless potential

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DFSA Soft Consultation — Q3 2026 EPRS & PRU Updates

Executive Summary

On 17 August 2026, the DFSA issued a soft consultation letter inviting comments on proposed changes to EPRS reporting forms and PRU guidance ahead of the Q3 2026 reporting period.

Key changes set out in the consultation include

1. Introduction of the Activity Based Capital Requirement (ABCR) form
2. Introduction of the Safeguarded Assets form
3. Update to the Operational Risk Capital Requirement (ORCR) form
4. Update to the Interest Rate Risk in the Non-Trading Book (IRR-NTB) form
5. Reorganisation of the Capital Resources and Capital Requirements forms
6. Separation of the EBCM and Non-Bank Liquidity forms

1. New or Updated Capital & Risk Requirements

Three changes are driven by rules the DFSA has already finalised in earlier consultations (CP159, CP161, CP164), each applicable to a specific set of Prudential Categories.

Key changes

- Activity Based Capital Requirement (ABCR) – new charge using summary AUM, ASA and COH data (CP161)
- Operational Risk Capital Requirement (ORCR) – entirely new B150 calculation using three years of financial data (CP164)
- Interest Rate Risk in the Non-Trading Book (IRR-NTB) – updated B260 form, more granular buckets, 6 shock scenarios (CP159)

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Applicability

- ABCR applies to a subset of Domestic Cat 3A–3C firms only
- ORCR applies to Domestic Cat 1, 2 and 5 firms
- IRR-NTB applies to Domestic Cat 1 and 2 firms; Cat 1 is tested against all 6 shock scenarios

2. Form Restructuring – No New Data Required

Three further changes restructure existing EPRS forms for clarity – moving or consolidating data items, with no new underlying data required from firms.

Key changes

- B180 EBCM form split into a standalone EBCM sub-form (within B110) and a new B290 Non-Bank Liquidity Requirements form
- Capital resources and requirements consolidated into a single B110 form with sub-forms, plus an overview of the overall capital position
- Client asset safeguarding data consolidated into a single B400 Safeguarded Assets form, replacing fields scattered across B420 and B460
- This also supports firms completing the new ABCR, which draws on the same underlying data points

Applicability

- EBCM sub-form applies to a subset of Domestic Cat 2, 3 and 4 firms
- B290 Liquidity applies to Cat 3A–3D and 4; B400 applies to all firms providing Custody or holding a Client Asset endorsement

3. Applicability Checklist

Before reviewing the attached forms in detail, confirm which Prudential Category(ies) apply to our firm to identify which sections are relevant.

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By Prudential Category

- Cat 1 or 2 → ORCR (B150), IRR-NTB (B260), Risk Capital Requirement sub-form (B110)
- Cat 3A–3C (subset) → ABCR sub-form (B110), Safeguarded Assets (B400)
- Cat 2, 3, 4 (subset) → EBCM sub-form (B110); Cat 3A–3D and 4 → Non-Bank Liquidity (B290)

All Domestic Firms

- All Domestic firms complete the B110 overview (Base Capital Requirement input, remainder auto-calculated)
- Cat 5 firms use a simplified B110 version, split between Self-Financed and PSIAu exposures
- Any firm providing Custody, Managing a Collective Investment Fund, or holding a Client Asset endorsement completes B400
- Comments on any of the above are due to the DFSA by 30 August 2026

4. Recommended Next Steps

A clear path to review the attachments and respond to the DFSA before the comment deadline.

Action Items

- Confirm applicable Prudential Category(ies) and shortlist the relevant forms using the checklist above
- Review the Excel EPRS forms and Word PRU guidance in detail for each relevant form
- Identify unclear items or added operational burden and consolidate draft comments

Key Dates & Contact

- Submit consolidated comments to Philip Anderson (PAnderson@dfsa.ae) by 30 Aug 2026, copying Compliance and Finance leadership.