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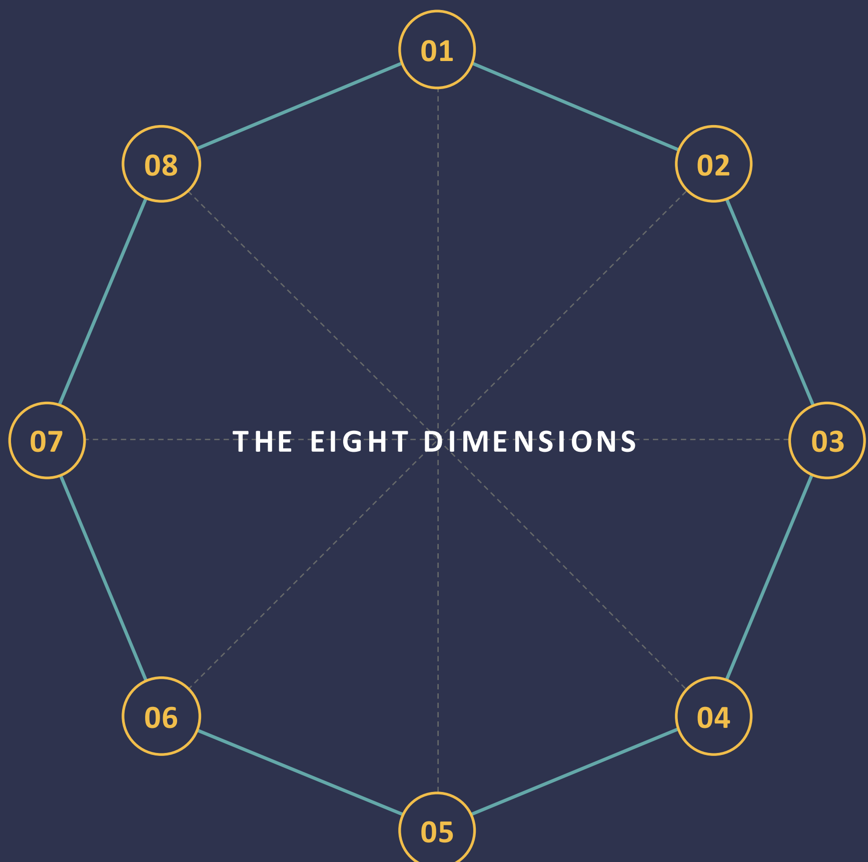
The GRC Maturity Index

Methodology, scoring and regulatory anchors.

A five-minute GRC diagnostic for UAE boards and executive teams.



WHAT'S INSIDE

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- **The eight dimensions** What it measures, each with a weight
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METHODOLOGY WHITEPAPER · JULY 2026

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What the Index measures and produces

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A management brief for boards, audit committees and executives

WHAT IT IS

The GRC Maturity Index is a five-minute online diagnostic that scores a UAE organisation's governance, risk and control posture across eight dimensions. It produces a composite maturity score, a per-dimension heatmap, a prioritised 90-day action list, and a regulator watchlist tuned to the respondent's profile.

WHY NOW

UAE boards and executives have been asked to professionalise faster than any other market in the region. Corporate Tax cycle 2, Pillar Two, the UAE Climate Law, ADX and DFM ESG mandates, ISO 42001 for AI and the 2024 IIA Global Standards all arrived within a two-year window. Boards need a defensible, comparable and repeatable way to answer: how mature is our GRC posture, and what is the highest-value thing to fix next?

THE GAP IT FILLS

The UAE boards have needed a productised, standards-anchored way to answer "how mature is our GRC posture?" without commissioning a bespoke engagement. The GRC Maturity Index is that answer.

AT A GLANCE

5 min
online diagnostic

8
weighted dimensions

5
maturity bands

4
output artefacts

This is not a survey. **It is a management brief.**

What the Index measures

Eight dimensions, each weighted to a composite score out of 100.

01 Governance Foundation — 15%

SCA CG Code 3/R.M/2020 (as amended) · UAE Family Business Law 37/2022 · CBUAE 83/2019

Board composition and independence, committee structure, delegation of authority, family governance and board diversity. Measures whether the board is set up to actually govern, not just meet.

02 Enterprise Risk Management — 15%

COSO ERM 2017 · ISO 31000:2018 · CBUAE 153/2018 · IIA Three Lines Model (2020)

Framework maturity, risk-register currency, board-approved risk appetite, emerging-risk tracking (AI, cyber, climate, geopolitical) and risk culture. Distinguishes a paper ERM from one that informs strategy.

03 Internal Audit Function — 15%

IIA Global Internal Audit Standards 2024 (effective Jan 2025) · SCA Article 47 · ADAA Audit Manual

Existence and independence, charter alignment with the 2024 Standards, risk-based plan discipline, resourcing and technology, external quality assessment. On paper versus aligned to the new global standard.

04 Compliance and Regulatory Monitoring — 12%

SCA · CBUAE · DFSA · ADGM FSRA · MoF · FTA · ESR (98/2024) · UAE Climate Law

Function ownership, obligations register, Corporate Tax controls, AML and sanctions rigour, horizon scanning. Reveals whether compliance scales with the volume of new UAE regulation.

The remaining four dimensions

Weights across all eight dimensions sum to one hundred.

05 Internal Controls over Financial Reporting

12%

SCA ICFR Circular (opinion from 2027, risk-management from 2028) · COSO 2013

Control documentation coverage, testing cadence, deficiency remediation, SCA ICFR readiness and close automation. Tracks readiness for the 2027 mandatory opinion regime.

06 IT Governance and Cyber Risk

12%

NESA / SIA IA Standards · CBUAE Cyber · DFSA · ADGM FSRA IT Risk (2024) · IIA Cyber Topical

Board-level cyber ownership, framework alignment, incident-response maturity, AI governance (UAE AI Charter, ISO 42001) and third-party cyber risk. Is cyber inside the risk conversation or still an IT problem?

07 ESG Governance and Sustainability

10%

SCA Article 76 · UAE Climate Law 11/2024 · IFRS S1 and S2 · ADX ESG · DFM ESG

Governance ownership, reporting-framework alignment, climate-risk and UAE Climate Law readiness, ESG in strategy and incentives, assurance readiness. The shift from ESG-as-PR to ESG-as-controlled-data.

08 Ethics, Culture and Third-Party Risk

9%

SCA Code of Conduct · ADGM Whistleblower Regulations 2024 · IIA Third-Party Topical (Dec 2026)

Code-of-conduct currency and training, whistleblowing-channel maturity, fraud-risk discipline, third-party risk management and culture measurement. The soft governance regulators probe first.

15 + 15 + 15 + 12 + 12 + 12 + 10 + 9 = 100. The composite maps to one of five maturity bands.

Eight dimensions. One composite view.

Weights sum to 100. The composite score maps to five maturity bands, from Ad-hoc to Optimised.

THE EIGHT DIMENSIONS

15% × 3 = 45 · 12% × 3 = 36 · 10% × 1 = 10 · 9% × 1 = 9 · Total = 100

How the score is built

Every question maps to a five-point maturity scale (Level 1 Ad-hoc to Level 5 Optimised). Each dimension has five questions; the dimension score is the arithmetic mean, normalised to a 0-100 range.

COMPOSITE SCORE

Weighted sum of the eight dimension scores.

$$15+15+15+12+12+12+10+9 = 100$$

FIVE MATURITY BANDS

0 – 20	Ad-hoc
21 – 40	Initial
41 – 60	Defined
61 – 80	Managed
81 – 100	Optimised

PRIORITY GAP DETECTION

Alongside the composite score, the tool ranks all eight dimensions and isolates the three lowest-scoring. Within each of those three it identifies the single weakest question, the one that pulled the dimension mean down furthest. Those three specific weaknesses become the anchor of the prioritised action list, so the respondent leaves with named gaps rather than a general grade.

Grounded in UAE, GCC and global standards

Every question maps to a specific standard. The full anchor set at a glance.

UAE REGULATORS AND EXCHANGES

SCA Chairman Decision 3/R.M/2020
UAE PJSC Corporate Governance Code

SCA ICFR Circular
Phase-in to end-2026; full opinion from 2027

SCA Chairman Decision 8/2021
Female board representation for listed PJSCs

CBUAE Circular 83/2019
Corporate Governance Regulation for banks

CBUAE Circular 153/2018
Risk Governance Framework for regulated entities

DFSA GEN Module, Chapter 5
DIFC senior-management responsibility and controls

ADX ESG Disclosure Guidance
31 KPIs aligned to GRI, SASB, TCFD, IFRS S-series

DFM ESG Reporting Guide
32 metrics for DFM-listed entities

UAE LAWS AND FRAMEWORKS

UAE Climate Law (Decree-Law 11/2024)
In force May 2025; compliance May 2026; penalties to AED 2M

UAE Corporate Tax (Decree-Law 47/2022)
0% to AED 375K, 9% above; FY from Jun 2023

UAE Family Business Law (37/2022)
Family charter, governance council, pre-emption

ESR (Cabinet Decision 98/2024)
ESR filings removed for FY from Jan 2023

UAE AI Charter (Jun 2024)
12 principles: governance, accountability, transparency

ADGM FSRA GEN Rulebook
SEO, Finance, Compliance and MLRO obligations

ADGM Whistleblower Regulations 2024
Reference standard for UAE whistleblowing

ADAA Law No. 14 of 2008 (as amended)
ADAA mandate over Abu Dhabi subject entities

GLOBAL STANDARDS

2024 IIA Global Internal Audit Standards
5 Domains, 15 Principles, 52 Standards; Cyber req Feb 2026

IIA Three Lines Model (2020)
Governance, first, second and third line

IFRS S1 and S2 (ISSB)
Sustainability and climate disclosure standards

COSO ERM 2017
Enterprise risk management framework

ISO 31000:2018
Risk management principles and guidelines

ISO 27001
Information Security Management System

ISO 22301
Business Continuity Management System

ISO/IEC 42001:2023
First certifiable AI management system

Four artefacts, every respondent

Cached to the response, so re-viewing is free.

01 Composite score and radar chart

The composite score (0-100), the maturity band and the eight-dimension radar chart in an on-screen report.

02 AI-generated executive summary

Up to 200 words framing where the respondent sits against a comparable UAE peer group (matched on sector, revenue band and listing status), with named regulatory anchors.

03 Prioritised 90-day actions

Three to five concrete actions, each with a specific owner (Board, Audit Committee, CFO, CAE, CISO) and a 30, 60 or 90-day horizon.

04 Regulatory watch

The three regulatory deadlines most relevant to the respondent over the next 24 months, each cited with a month and year.

Deliberately opinionated. **Not a survey, a management brief.**

The Middle East GRC Maturity Report

Every anonymised, opted-in response feeds the annual benchmark.

ANNUAL REPORT

Middle East GRC Maturity Report

FIRST EDITION

The first edition publishes once the initial collection set is complete, based on the first six to nine months of data. It is free for any UAE board director, audit committee chair or C-suite executive on the CLA Emirates mailing list; CLA Global member offices receive it in their research feed.

THE REPORT WILL INCLUDE

- Sector-averaged maturity scores across the eight dimensions
- Breakdowns by revenue band, listing status, and family vs non-family ownership
- The three most common priority gaps by sector and by size
- Emerging themes from the follow-up questions respondents asked the advisor
- Regulator watch: which UAE deadlines UAE organisations are most and least ready for, cut by size and listing status

About CLA Emirates

CLA Emirates is a member firm of CLA Global, with over 20 years in the UAE, more than 180 professionals, and a ranking of 8th nationally and 15th globally (IAB World Survey). CLA Emirates spans seven practice areas across two pillars.

Advisory

GRC · ESG · IPO Readiness

AI and Digital Transformation

Technology Consulting · Technology Assurance · Cybersecurity and AI Governance · ERP and Cloud Transformation

The GRC Maturity Index is built and maintained by CLA Emirates as the diagnostic entry point to that advisory relationship, applicable across UAE listed groups, family businesses, sovereign portfolio companies and privately-held organisations, and grounded in the standards mapped across this document.

CLA GLOBAL NETWORK

20+	years of UAE operations
180+	professionals in the UAE
8th / 15th	ranked nationally / globally (IAB)
235+	CLA Global offices, 89 countries
USD 2.5B+	CLA Global aggregate network revenue

Try the tool

For queries, discovery calls, or to request a preview of the annual report.

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Start the Assessment

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