Emirates

ICFR is not a **2027 problem**

The date most UAE boards have not priced in

1 January **2027**

Entities listed on ADX or DFM must publish an internal control report, with the external auditor’s opinion inside it.

FY 2026

The ICFR opinion must be an explicit part of the external auditor's engagement contract from the FY 2026 audit cycle.

That is the audit being scoped now.

The auditor's opinion is on management's assessment.

It does not replace it.

If nobody inside the organisation has carried out that assessment, there is nothing for an auditor to give an opinion on.

Emirates

IN SCOPE

Entities listed on **ADX or DFM**

EXEMPT

- Foreign listed companies ·
- Private joint stock companies ·
- Free zone issuers

ABU DHABI

Entities under the **Abu Dhabi Accountability Authority (ADAA)** have operated under their own ICFR requirement for years. This is newly public, not newly required.

Emirates

Three minutes will tell you where you stand.

ICFR Maturity Index

Free!

+971 50 528 2838

contact@CLAemirates.com