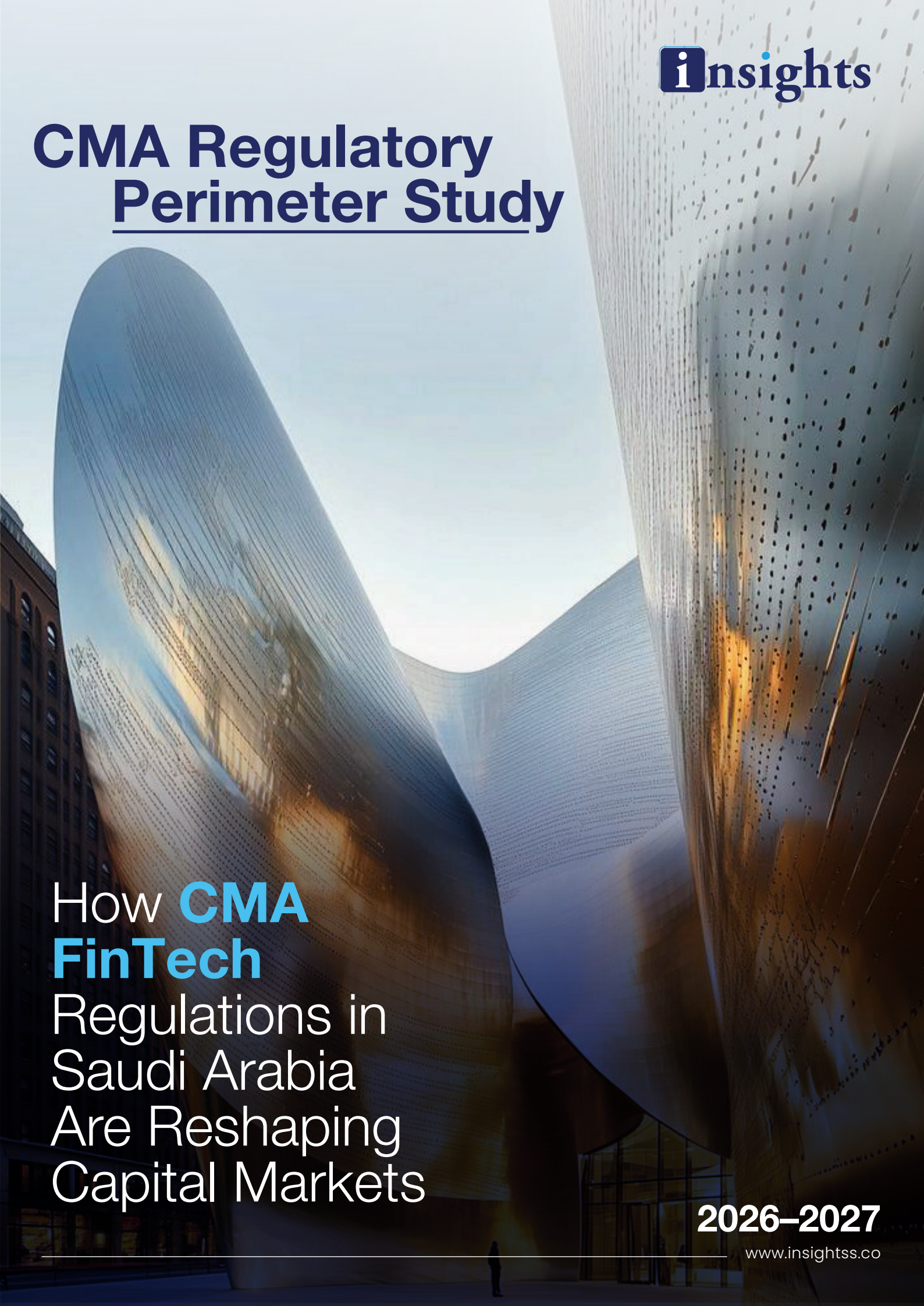

insights

CMA Regulatory Perimeter Study

How CMA FinTech Regulations in Saudi Arabia Are Reshaping Capital Markets

2026–2027

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CMA Regulatory Perimeter Study 2026–2027

How CMA FinTech Regulations in Saudi Arabia Are Reshaping Capital Markets

Data as of Q2 2026 (latest CMA Statistical Bulletin) · Updated November 2026

Innovation Without Governance Is Unsustainable

CMA fintech regulations in Saudi Arabia are entering a new phase. As financial technology reshapes investment services, digital wealth management, crowdfunding, and securities activities, the regulatory perimeter governing these innovations is expanding alongside the market itself. The numbers show how quickly this is happening: robo-advisory assets under management reached SAR 9.9 billion by the end of Q2 2026, up 128% year on year, and managed portfolios passed one million for the first time.

Recent initiatives by the Capital Market Authority (CMA) point in one direction. In March 2026 the CMA moved robo-advisory from the FinTech Lab into the Capital Market Institutions Regulations. In April and May 2026 it opened consultations on updated FinTech Experimental Permit (ExPermit) Instructions and on wider reform of securities business activities. In September 2025 it had already approved a framework for offering sukuk and debt instruments through crowdfunding platforms. Together these steps encourage innovation while strengthening governance, investor protection, and market integrity.

For financial institutions and fintech companies, the question is no longer whether regulation will evolve, but whether their governance, fintech compliance, and operating models can evolve with it.



At a Glance

215
licensed capital market institutions

were operating in Saudi Arabia at the end of 2025, up from 186 a year earlier and 86 in 2017. The CMA issued 32 new licenses in 2025.

in assets were managed through robo-advisory services at the end of **Q2 2026,** a **128%** increase year on year and 26.6% higher than **Q1 2026 (SAR 7.8 billion)**. The end-2025 figure was **SAR 6.4 billion.**

SAR 9.9
Billion

1.05
Million investment portfolios

were managed through robo-advisory platforms at the end of **Q2 2026,** compared with about **535,000** at the end of 2025 and **400,000** a year earlier.

was offered through debt instrument offering platforms in 2025, **up 48% on 2024**, and a further **SAR 2.6 billion** followed in **H1 2026**.

SAR 5.1
Billion

The CMA's 2026 regulatory updates

expand the scope of regulated fintech activities and introduce stronger expectations for governance, operational resilience, and business continuity.



A rapidly growing and evolving regulatory landscape continues to strengthen Saudi Arabia's financial ecosystem

Saudi Capital Market Regulation 2026:

The Scale of the Regulated Perimeter

A wider perimeter matters more when the market it covers is growing this fast. Assets under management in the Kingdom **grew 18%** in 2025 to exceed **SAR 1.2 trillion**, and the institutions licensed to manage, arrange, advise, and hold those assets have grown even faster in number.

Table 1: Saudi capital market indicators, latest available

Indicator	Latest figure	Period	Change / context
Institution Revenues	**SAR 20.8 bn**	FY2025	**+19.4%** year on year
Institution profits	**SAR 10.2 bn**	FY2025	**+16%** year on year
Assets under management (Kingdom)	**> SAR 1.2 tn**	End-2025	**+18%** year on year
Public investment fund assets	**SAR 245.5 bn**	Q2 2026	**+19.0%** vs **SAR 206.2 bn** in Q2 2025
Private investment fund assets	**SAR 755.7 bn**	Q2 2026	**+31.4%** vs **SAR 575.2** in Q2 2025
Listed sukuk and debt instruments	**SAR 750.0 bn**	Q2 2026	**+10.6%** vs **SAR 677.9** in Q2 2025
Main Market capitalization	**SAR 9.44 tn**	Q2 2026	**+3.4%** year on year
Individual investor portfolios (Main Market)	**15.22 million**	Q2 2026	**+9.4%** year on year; **7.55 million** individuals
International investors in the market	**≈ 161,000**	End-2025	**+8.8%** vs **147,800** in 2024
Fintech companies in the Kingdom (all regulators)	**371**	Aug 2026	**Target:** 525 by 2030

Sources:

CMA 2025 Annual Report; CMA Quarterly Statistical Bulletin Q2 2026; SAMA Governor remarks at Money20/20 Middle East (September 2026). Kingdom-wide AUM includes discretionary portfolios, so it is not the sum of the fund lines shown

The Regulatory Perimeter Is Expanding

Historically, regulatory compliance focused primarily on licensed capital market activities. Today, technological innovation has blurred the boundaries between financial services, requiring regulators to broaden their oversight.

The CMA's recent initiatives extend regulatory expectations beyond licensing to governance, operational resilience, technology controls, disclosure, and investor protection. The draft update to the FinTech ExPermit Instructions, which closed for consultation on 27 May 2026, broadens the definition of fintech to include technology-based products and services related to securities business and the capital market. It also proposes stricter supervision of authorized entities, new business continuity requirements, and a minimum three-month wait before an applicant can reapply after a rejection.

This shift reflects a move from regulating institutions alone to regulating the broader ecosystem in which digital financial services operate. Table 2 sets out the main milestones from 2025 to 2027.

Table 2: CMA regulatory timeline relevant to fintech, 2025–2027

Development	Status	Practical impact
Aug–Sep 2025		
Public consultation on the robo-advisory framework	Completed	Opened the route from sandbox to rulebook
Sep 2025		
Framework approved for sukuk and debt offerings through securities crowdfunding platforms, by institutions licensed for arranging	Approved	Debt crowdfunding moves into the main regulatory framework
Effective Feb 2026		
Main Market opened to all categories of non-resident foreign investors (announced 6 January; QFI framework removed from 1 February 2026)	In force	Wider investor base for platforms and funds
Mar 2026		
Robo-advisory services added to the Capital Market Institutions Regulations	Approved	Licensed managers can offer robo-advisory under CMA rules
Apr–May 2026		
Consultation on updated FinTech ExPermit Instructions (closed 27 May 2026)	Consultation closed; final text not confirmed	Broader fintech scope; governance and continuity duties

Apr–May 2026		
Development	**Status**	**Practical impact**
Consultation on amending Articles 5 and 18 of the Capital Market Law (closed 21 May 2026)	Consultation closed	Stronger cooperation with foreign regulators
May 2026		
Consultation on developing securities business activities: easing capital requirements and more flexibility for advising-only licensees (closed 17 June 2026)	Proposed; adoption not confirmed	Lower entry barriers for new license applicants

Sources:
CMA announcements and consultation notices; Argaam; Norton Rose Fulbright; Arab News; Pinsent Masons; Enterprise AM. Status reflects information available in November 2026.

Robo-Advisory Regulation in Saudi Arabia:
From Sandbox to Rulebook

Robo-advisory is where the data and the regulation meet most visibly. After a pilot in the CMA's FinTech Lab, the CMA approved amendments in March 2026 that allow capital market institutions licensed for managing investments, or for managing investments and operating funds, to provide robo-advisory services. Under the framework, institutions must notify the CMA in advance of portfolio construction strategies and any material updates. Portfolios must not be concentrated in a single asset or issuer, and foreign securities must be supervised by an equivalent regulatory authority.
The market the rules now govern has changed in scale. Table 3 shows assets under management and managed portfolios across the last seven quarters, and Figure 1 shows the two trends discussed below.

Table 3: Robo-advisory assets and portfolios, Q1 2025 to Q2 2026

Quarter	Portfolios (000)	AUM (SAR million)	AUM QoQ	AUM YoY	Avg. AUM per portfolio (SAR)
Q1 2025	385.1	3,916.7	**+14.0%**	–	10,172
Q2 2025	400.2	4,336.2	**+10.7%**	–	10,836
Q3 2025	511.7	5,435.2	**+25.3%**	–	10,622
Q4 2025	534.6	6,416.4	**+18.1%**	+86.8%	12,003
Q1 2026	580.4	7,824.6	**+21.9%**	+99.8%	13,480
Q2 2026	1,045.8	9,903.3	**+26.6%**	+128.4%	9,469

Sources:
CMA Quarterly Statistical Bulletin Q2 2026 (revised series covering fintech firms and licensed capital market institutions). QoQ, YoY, and average values are calculated from the published figures.

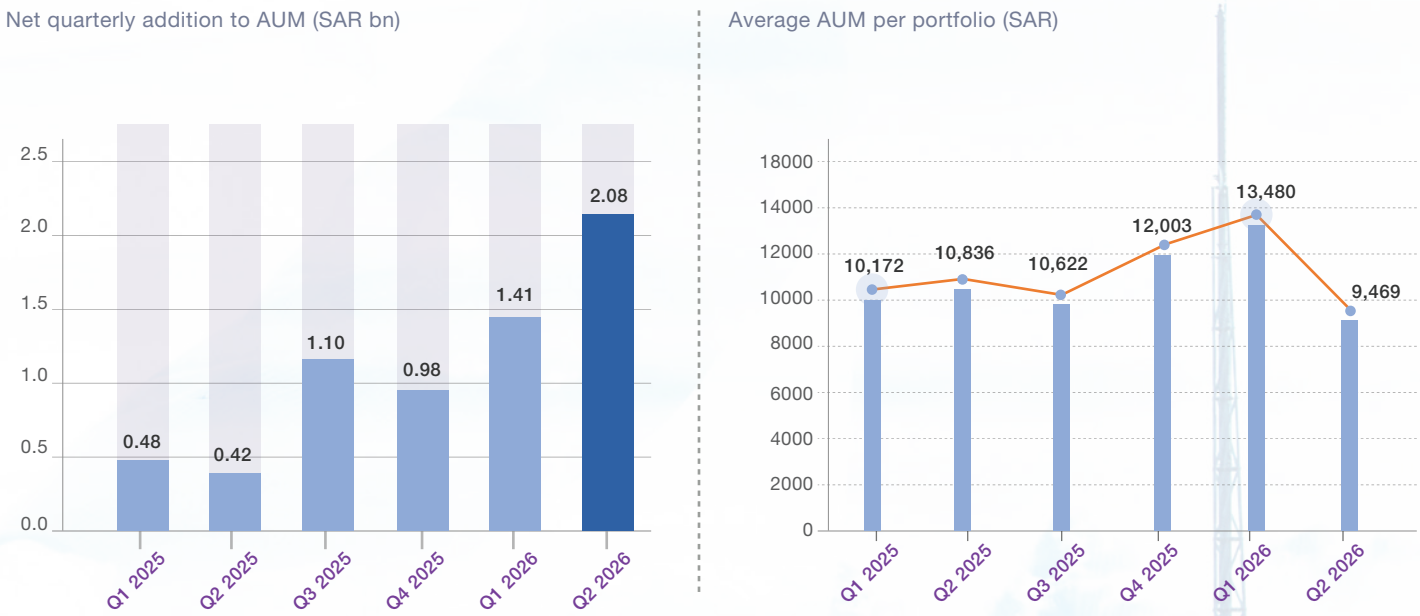


Figure 1: Net quarterly AUM additions and average AUM per portfolio.

Source: CMA data; calculations by Insights. Levels are in Table 3.

Two points stand out. First, growth is accelerating: quarterly additions to AUM rose from about SAR 1.0 billion in Q4 2025 to about SAR 2.1 billion in Q2 2026. Second, the average portfolio shrank from about SAR 13,500 to about SAR 9,500 in a single quarter, because portfolios rose 80% while assets rose 27%.

That pattern is consistent with a wave of smaller retail accounts joining the platforms, although the CMA bulletin does not give the cause, so this is our reading rather than a published finding. For compliance teams, a larger base of small retail clients raises the weight of suitability, disclosure, and complaint handling.

Debt Crowdfunding and Fintech Investment Platforms in Saudi Arabia

Debt-based activity is now the main engine of capital market crowdfunding. Sukuk offered through CMA-authorized debt instrument platforms sum-up more than SAR 5.1 billion in 2025, and H1 2026 added SAR 2.6 billion, about 10% more than H1 2025.

Table 4: Sukuk offered through debt instrument offering platforms

Quarter	Number of sukuk	Value (SAR million)	Year-on-year change in value
Q1 2025	1,513	1,270.9	–
Q2 2025	1,356	1,104.3	–
Q3 2025	1,838	1,436.0	–
Q4 2025	1,760	1,305.0	–
Q1 2026	1,522	1,240.7	–2.4%
Q2 2026	1,763	1,366.9	+23.8%

Sources:

CMA Quarterly Statistical Bulletin Q2 2026. FY2025 total of SAR 5,116 million is the sum of the four 2025 quarters.

Equity crowdfunding tells the opposite story. The number of authorized equity crowdfunding companies fell from one to zero in Q1 2026, and no funds were raised in either quarter of H1 2026, compared with about SAR 35 million raised across 2025. Capital market fintech is consolidating around debt, investment, and wealth products.

A fintech that lends to SMEs sits under SAMA, while one that offers investments sits under the CMA, and a firm that does both needs both authorizations. Mapping which activities fall under which regulator is therefore the first step in any regulatory gap assessment.

Fintech Compliance in Saudi Arabia:
What the Data Says About Investor Protection

As fintech platforms reach more retail investors, supervisory attention to investor protection and operational resilience rises with them. Table 5 compares Q2 2025 with Q2 2026.

Table 5: Fintech reach and investor-protection indicators

Indicator	Q2 2025	Q2 2026	Change
Qualified clients benefiting from fintech companies	18,490	23,508	+27.1%
Complaints about fintech services and products	139	293	+110.8%
All complaints received by the CMA	1,271	1,929	+51.8%
Complaints per 1,000 retail fintech clients	0.28	0.25	Slightly lower
Capital adequacy ratio of capital market institutions	26.1%	27.8%	+1.7 points

Sources:
CMA Quarterly Statistical Bulletin Q2 2026. The complaint rate is calculated by Insights from published counts; client and complaint definitions may not match exactly.

Fintech complaints more than doubled and now represent roughly 15% of all complaints received by the CMA. In fairness, the client base grew even faster, so complaints per client edged down. The message for boards is that absolute volumes, not just rates, shape supervisory attention. Firms that scale from hundreds of thousands to over a million clients need complaint handling, technology controls, and business continuity plans that scale with them.

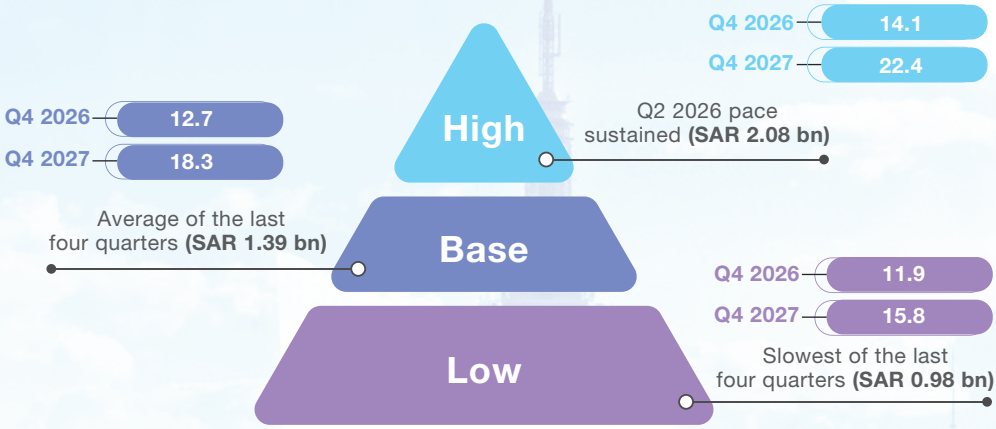
Outlook 2026–2027:
What to Expect from CMA Fintech Regulation

Published forecasts for Saudi fintech regulation itself are scarce, so the most reliable guide is the direction of the data and the regulatory pipeline. Fitch Ratings reported that Saudi asset management AUM exceeded US$340 billion in Q1 2026 and expects it to surpass US$400 billion by 2027. The National Fintech Strategy targets 525 fintech companies by 2030, against 371 in August 2026.

To make the trend concrete, Table 6 extends the CMA's robo-advisory series using three simple scenarios. These are Insights illustrations built on straight-line extrapolation of recent quarterly additions. They are not CMA or third-party forecasts and do not allow for market movements or regulatory change.

Table 6: Illustrative robo-advisory AUM scenarios (SAR billion)

Scenario	Assumption (quarterly net addition to AUM)	Q4 2026	Q4 2027
Low	Slowest of the last four quarters (SAR 0.98 bn)	11.9	15.8
Base	Average of the last four quarters (SAR 1.39 bn)	12.7	18.3
High	Q2 2026 pace sustained (SAR 2.08 bn)	14.1	22.4



Starting point: SAR 9.90 billion at the end of Q2 2026 (CMA). Q4 2026 is two quarters ahead and Q4 2027 is six quarters ahead.

Four items to watch through 2027:

Final ExPermit Instructions	We have not found confirmation that the updated Instructions have been issued, so the final scope, governance, and business continuity duties remain open.
Supervision of the robo-advisory rules	Advance notification of portfolio strategies and diversification limits will shape how new entrants launch products
Securities business reform.	If adopted, revised capital rules would lower entry barriers for new license applicants. The final text should be checked for any new technology governance requirements.
Effects of opening the market to foreign investors.	A wider investor base is likely to raise disclosure and conduct expectations for platforms serving them.

Four Executive Priorities for Financial Institutions

1

Monitor Regulatory Change Continuously

In April and May 2026 alone, the CMA ran at least three consultations at the same time: ExPermit Instructions, securities business activities, and the Capital Market Law. Compliance can no longer be treated as a periodic exercise. Institutions should establish formal processes to monitor consultations, assess their impact, and update internal frameworks proactively through structured regulatory change management.

2

Strengthen Governance Before Expansion

Governance expectations rise as fintech services become more sophisticated, and complaint volumes rise with client numbers. Boards and senior management should ensure that innovation initiatives are supported by appropriate risk oversight, accountability, and internal controls before a product scales.

3

Integrate Technology Risk with Regulatory Compliance

Robo-advisory platforms, digital investment services, and automated decision-making require technology governance to be integrated with compliance, cybersecurity, and operational resilience rather than managed separately. The CMA's robo-advisory rules require institutions to register an Information Technology Officer responsible for the technology systems behind the service, and the draft ExPermit update adds business continuity duties for permit holders. Together these make that integration a supervisory expectation.

4

Prepare for Regulatory Scalability

With robo-advisory portfolios passing one million and the fintech population heading toward 525 companies, scale is arriving faster than most operating models were designed for. Organizations that build scalable governance and compliance frameworks today will launch new digital products, enter regulated activities, and respond to future developments without significant operational disruption.

The Insights Perspective

Many organizations ask:

"Are our fintech products compliant with today's regulations?"

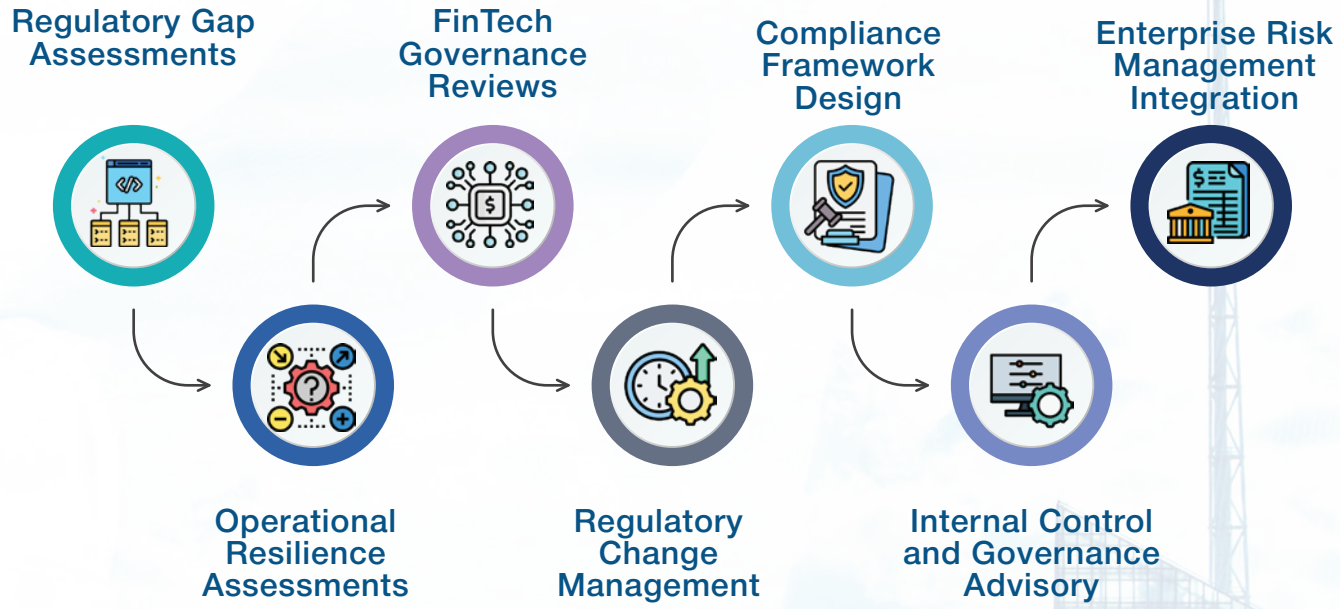
A more strategic executive question is:

"Is our governance framework capable of adapting as regulation continues to evolve?"

Regulatory compliance is no longer a one-time milestone. It has become an ongoing capability that enables sustainable innovation while maintaining investor confidence and market integrity.

How Insights Helps Organizations

At Insights Financial & Management Consulting, we support financial institutions, fintech companies, and capital market participants in strengthening regulatory readiness through:



Our approach helps organizations balance innovation with robust governance while remaining aligned with evolving CMA fintech regulations in Saudi Arabia.

Key Takeaway

Saudi Arabia's capital market is becoming more digital, more innovative, and more closely regulated. With robo-advisory assets near SAR 10 billion, over a million managed portfolios, and a regulatory perimeter still widening into 2027, organizations that treat regulation as a strategic enabler rather than a compliance obligation will be better positioned to innovate responsibly, build investor confidence, and compete in an increasingly sophisticated financial ecosystem.

Note

CMA bulletin series are periodically revised, so earlier-quarter figures may differ slightly from previously published values. Table 6 is an Insights illustration, not a forecast. This report is for general information and does not constitute legal or regulatory advice.

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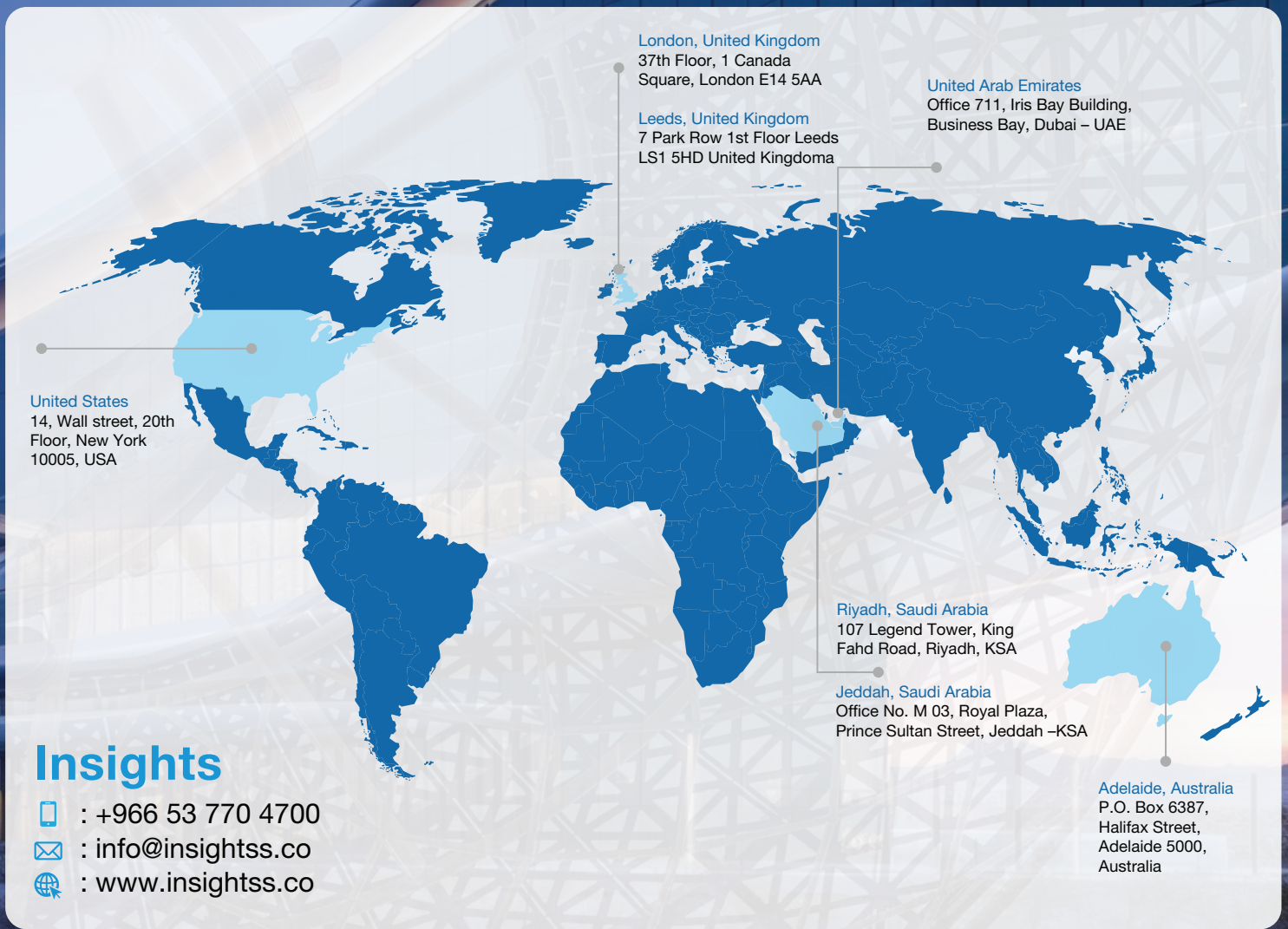

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