CONSULTATION PAPER NO. 9 OF 2026

Proposed Amendments to the Employment Regulations and the Non-Employee Work Permits

16 November 2026

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Introduction

Why are we issuing this paper?

The Abu Dhabi Global Market ("**ADGM**") Registration Authority (the "**Registrar**") has issued this Consultation Paper to invite public feedback on proposed amendments to the Employment Regulations 2024 (the "**Employment Regulations**"), together with related amendments to the Employment Regulations (Non-Employee Work Permit) Rules (the "**Non-Employee Work Permit Rules**") and the Employment Regulations (Fees) Rules (the "**Fees Rules**").

The proposed amendments are intended to clarify employer obligations in relation to employee work permits and employer sponsored residency visas, strengthen protections relating to wages and statutory rights, update parental leave entitlements, and align the subordinate rules with the revised framework for work permits.

The draft amendments are set out in the annexes and appendices to this Consultation Paper.

This Consultation Paper summarises the key proposed aspects of the amendments. The summaries provided should be read as an introduction to the amendments only – The precise details and specifics are contained in the annexures and appendices hereto.

Unless context requires otherwise, terms capitalised in this Consultation Paper should be taken to have the same meanings ascribed to them in the Employment Regulations and the related rules.

Who should read this paper?

The proposals in this Consultation Paper would be of interest to ADGM Employers, Employees, ADGM entities engaging Non-Employees, and any other stakeholders who may be affected by the Employment Regulations or the related work permit and fees rules. We also welcome feedback from other stakeholders, whether based in the ADGM or beyond.

How to provide comments

Comments must be submitted through the RA's Consultation Portal at https://raconsultations.adgm.com/. To submit feedback, individuals and entities are required to register for an account on the portal, which is a one-time process.

Please note that comments submitted to ra.consultation@adgm.com may not be considered. The email address ra.consultation@adgm.com should only be used for portal-related issues, such as registration, account access, and technical difficulties.

What happens next?

The deadline for providing comments on this proposal is **9 December 2026**.

Following receipt and review of any comments, consideration will be given to whether any modifications to the proposed amendments are required, and the ADGM Board of Directors ("**Board**") and the Registrar will then proceed to enact the proposals in their final form.

You should not act on the proposed amendments until such time as the final amendments to the Employment Regulations, the Non-Employee Work Permit Rules, the Fees Rules and any related guidance are issued on the ADGM website.

Key Features of the Proposed Amendments

1. Key features of the proposal include:

   a. introducing clearer timeframes and processes for cancellation of Employee Work Permits and Employer Sponsored Residency Visas, including an ability for an Employee to apply to the Registrar where the Employer has failed to complete cancellation, and introducing a late filing fee for delays in filing applications for renewal or cancellation of Employee Work Permits;

   b. updating certain leave entitlements, including paid Vacation Leave, Maternity Leave and Paternity Leave, and introducing related unpaid leave entitlements;

   c. introducing the Registrar's power to require attendance at a compulsory meeting where there are reasonable grounds to believe that Wages have not been paid in accordance with the Employment Regulations;

   d. introducing protections for Employees who assert statutory rights under the Employment Regulations;

   e. renaming and updating the Employment Regulations (Temporary Work Permit) Rules as the Employment Regulations (Non-Employee Work Permit) Rules, including revised definitions, obligations and contraventions for Non-Employee Work Permits; and

   f. updating the Employment Regulations (Fees) Rules to include fees for Employee Work Permits and Non-Employee Work Permits, and related late filing fees.

2. Drafts of the proposed amendments can be found in the annexes and appendices.

Proposed Amendments

Current Position

1. The Employment Regulations currently set out minimum employment standards for Employees in ADGM, including requirements relating to hiring, written Employment Contracts, wages, leave, parental rights, health and safety, discrimination, and termination.

2. The current framework regulates Employee Work Permits and Employer Sponsored Residency Visas, but further clarification is proposed regarding the consequences of delays in renewal or cancellation of the same.

3. Additionally, the Employment Regulations (Temporary Work Permit) Rules currently address work permits for Non-Employees, but the proposed amendments would rename those rules as the Non-Employee Work Permit Rules and clarify their application to persons performing work or providing services for an ADGM Entity for at least 30 consecutive calendar days.

4. The Registrar is therefore seeking feedback on whether the proposed amendments are clear, proportionate and practical for Employers, Employees and ADGM Entities engaging Non-Employees.

Proposed Features of Amendments

<u>Employee Work Permits, Employer Sponsored Residency Visas and cancellation process</u>

5. Section 4 of the Employment Regulations states that an Employer is responsible for obtaining, maintaining and paying the cost of the Employee's Employee Work Permit, Employer Sponsored Residency Visa and UAE identity card, where applicable.

6. Employers are prohibited from recovering costs and expenses from Employees in connection with obtaining, maintaining or cancelling an Employee Work Permit or Employer Sponsored Residency Visa, and from making cancellation conditional on the Employee waiving rights under the Employment Regulations or making any payment to the Employer.

7. The proposed amendments aim to clarify that Employers are required to cancel an Employee Work Permit and Employer Sponsored Residency Visa as soon as reasonably practicable following the Termination Date and, in any event, no later than 30 days after the Termination Date or any earlier period required by the relevant Competent Authority, unless otherwise permitted or agreed to in writing. The amendments would also enable an Employee to apply to the Registrar for cancellation of the Employee Work Permit and Employer Sponsored Residency Visa where the Employer has failed to do so, and would permit the Registrar, in certain circumstances, to facilitate the cancellation on the Employer's behalf.

Q1: DO YOU HAVE ANY CONCERNS WITH, OR FEEDBACK ON, THE PROPOSAL TO CLARIFY THE WORK PERMIT AND RESIDENCY VISA CANCELLATION TIMELINE OR THE INTRODUCTION OF THE EMPLOYEE-INITIATED CANCELLATION?

Compulsory meeting with the Registrar for unpaid wages

8. The proposed amendments would introduce a new section allowing the Registrar to require an Employer and Employee to attend a meeting where the Registrar has reasonable grounds to believe that Wages have not been paid in accordance with the Employment Regulations.

9. The Registrar would be required to give written notice of the meeting to the Employer and Employee, specifying the date, time and place of the meeting and the grounds on which the Registrar has exercised the power. Failure by an Employer to comply with this requirement would be subject to a fine.

Q2: DO YOU HAVE ANY CONCERNS WITH, OR FEEDBACK ON, THE PROPOSED INTRODUCTION OF THE COMPULSARY MEETING WITH THE REGISTRAR WHERE THE REGISTRAR HAS REASONABLE GROUNDS TO BELIEVE THAT WAGES HAVE NOT BEEN PAID IN ACCORDDANCE WITH THE EMPLOYMENT REGULATIONS?

Vacation Leave, Maternity Leave and Paternity Leave

10. It is proposed that the Employment Regulations be amended to expressly clarify that an Employee is entitled to be paid their Daily Wage during Vacation Leave. The intention is to make clear that the existing entitlement to paid Vacation Leave is calculated by reference to the Employee's Daily Wage.

11. It is also proposed that the Employment Regulations be amended to provide that a female Employee is entitled to unpaid leave of sixty-five (65) Working Days immediately following Maternity Leave. This proposed entitlement is intended to provide an additional period of leave following the paid Maternity Leave period, should the Employee choose to utilize it.

12. The amendments also propose to increase Paternity Leave from five (5) Working Days to fifteen (15) Working Days, and to introduce an additional unpaid leave entitlement of five (5) Working Days immediately following Paternity Leave.

13. The proposed amendments would also clarify that the entitlement to take Maternity Leave and Paternity Leave is available during an Employee's probationary period. This clarification relates only to the availability of leave during probation and does not alter the pay arrangements for those leave entitlements, which remain unavailable during the probationary

period.

Q3:	DO YOU HAVE ANY CONCERNS WITH, OR FEEDBACK ON, THE PROPOSED UNPAID LEAVE ENTITLEMENTS FOLLOWING MATERNITY AND PATERNITY LEAVE, OR THE INCREASED PATERNITY LEAVE ENTITLEMENTS?
Q4:	DO YOU HAVE ANY CONCERNS WITH, OR FEEDBACK ON, THE PROPOSAL TO CLARIFY THAT EMPLOYEES MAY TAKE MATERNITY LEAVE AND PATERNITY LEAVE DURING THEIR PROBATIONARY PERIOD?

Protection for assertion of statutory rights and general false statement contravention

14. It is proposed that a new section be introduced to protect Employees from being subjected to any detriment, including dismissal, because the Employee has asserted, or indicated an intention to assert, a right conferred by the Employment Regulations, or has alleged in good faith that the Employer has infringed such a right.

15. The proposed new section would allow an Employee to apply to the Court for a declaration and, where appropriate, compensation. The proposed compensation would be subject to a maximum of two (2) years' Wages, and the Court may also order the Employer to take specified steps to reduce or remedy the adverse effect of the breach.

16. It is also proposed that a new contravention be introduced to address the provision of false, misleading or deceptive information in connection with purported compliance with the Employment Regulations or any subordinate rules. The proposed provision would apply where a person knowingly, or recklessly, provides materially false, misleading or deceptive information to the Registrar.

Q5:	DO YOU HAVE ANY CONCERNS WITH, OR FEEDBACK ON, THE PROPOSED PROTECTIONS FOR EMPLOYEES WHO ASSERT ANY STATUTORY RIGHTS UNDER THE EMPLOYMENT REGULATIONS?

Proposed amendments to the Non-Employee Work Permit Rules

17. The Employment Regulations (Temporary Work Permit) Rules are proposed to be renamed as the Employment Regulations (Non-Employee Work Permit) Rules. The amendments would clarify that those Rules apply to every ADGM Entity that engages or intends to engage a Non-Employee, and would update the definition of Non-Employee to cover persons performing work or providing services for an ADGM Entity, or through a third party engaged by that ADGM Entity, for a period of at least 30 consecutive calendar days.

18. The Non-Employee Work Permit Rules would also clarify the responsibilities of ADGM Entities for obtaining, renewing and cancelling Non-Employee Work Permits, and would expressly prohibit ADGM Entities from recovering any related costs or expenses from the Non-

Employee. The proposed amendments would also clarify contraventions relating to failure to obtain, renew or cancel Non-Employee Work Permits within the relevant timeframes.

Q6:	DO YOU HAVE ANY CONCERNS WITH, OR FEEDBACK ON, ANY OF THE CLARIFICATIONS TO THE NON-EMLOYEE WORK PERMIT FRAMEWORK?

Proposed amendments to the Fees Rules

19. The Fees Rules are proposed to be updated to include separate schedules for Employee Work Permit fees and Non-Employee Work Permit fees. Schedule 1 would address fees for the issuance and renewal of Employee Work Permits, together with late filing fees for any delays in filing an application for the issuance of an Employee Work Permit. Schedule 2 would address Non-Employee Work Permit issuance, renewal and late filing fees.

Q7:	DO YOU HAVE ANY BROADER FEEDBACK ON THE PROPOSED AMENDMENTS THAT IS NOT COVERED BY THE QUESTIONS SET OUT ABOVE?

Proposed Amendments and Enactments

Regulations

Annex A	Proposed amendments to the Employment Regulations 2024 (editorial blackline)

Rules

Appendix 1	Employment Regulations (Non-Employee Work Permit) Rules 2026 (editorial blackline)
Appendix 2	Employment Regulations (Fees) Rules 2026 (editorial blackline)