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WHITE PAPER · UNITED ARAB EMIRATES

From Gratuity to Growth

What the UAE's workplace-savings shift requires from digital financial experiences

The UAE is moving end-of-service gratuity from a payment made when employment ends to money funded into an investment account while the employee is still working. The policy direction is easy to understand. The harder part is making the scheme work cleanly across payroll, investments, administration and the employee experience.

85%

of GCC employers still run unfunded end-of-service arrangements

WTW, 2025

91%

of UAE expatriates find a workplace savings plan appealing

BlackRock, 2026

57%

of UAE employers name lack of clarity on process as a barrier

WTW, 2025

August 2026

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The short version

In 2023, Cabinet Resolution No. 96 gave private-sector employers in the UAE an alternative to the traditional end-of-service gratuity model. Instead of building up the full liability and settling it when an employee leaves, an employer can make monthly contributions into regulated investment funds. DIFC had already moved to a funded workplace-savings model in 2020. Bahrain introduced mandatory employer contributions in 2024. Oman is expected to introduce a contributory system by 2027, while Saudi Arabia and Qatar are considering reform.

The funding change is the obvious part. The less obvious change is where investment risk now sits. Under Article 51 of the Labour Law, the employer carries the obligation. Under the savings scheme, a skilled employee who chooses a risk-based portfolio bears the investment losses personally and cannot claim those losses from the employer. For a private-sector workforce of more than five million people, most of whom have never previously had to make an investment decision in the UAE, that is a material transfer of responsibility.

The demand signal is strong. BlackRock's 2026 survey of 1,000 workers across the UAE and Saudi Arabia found that 93% of UAE nationals and 91% of expatriates considered a defined contribution workplace savings plan appealing. It also found that 90% of nationals and 86% of expatriates would join one if it were offered. Yet only 6% expected to rely on a workplace scheme in retirement.

That gap between interest and expected reliance is not explained only by the fact that the federal scheme is voluntary. In WTW's survey, 57% of UAE employers cited lack of clarity on processes as a barrier. BlackRock found uncertainty on the employee side as well: 36% did not know where to get unbiased information, 32% did not know how much they should be saving, and 26% were unclear about the retirement-savings options available to them.

These are operational and decision-support gaps, not just awareness gaps. The data needed to answer the questions already exists, but it is spread across payroll, fund administration, custody, asset management and HR. Unless somebody owns the combined answer, the employee is left to reconcile those pieces alone.

The argument of this paper is practical:

1. An employee's position under the new scheme depends on six separate figures or outcomes. They are parts of one financial position, but today they sit across different systems and owners.

2. Four of those six depend on uncertain investment returns. A forward-looking answer therefore needs to show a range of possible outcomes rather than one projected number. That requires stochastic modelling rather than a simple compound-interest calculation.

3. The UAE already has a useful disclosure framework for long-term retail savings products in Decision No. 49 of 2019. It does not legally apply to end-of-service funds, but the underlying principles transfer well and can be adopted voluntarily.

4. The calculation layer is common infrastructure rather than a source of competitive advantage for any one provider. The same engine is likely to be built five or ten times in this market over the next two years, on our estimate at an eight-figure aggregate cost, producing five or ten different answers to the same customer question.

PART 1

What actually changed

The old system

Article 51 of Federal Decree-Law No. 33 of 2021 is simple in formula and awkward in funding. An employee with at least one year of continuous service earns 21 days of basic salary for each of the first five years of service and 30 days for each year after that. The calculation uses basic salary only, excluding housing, transport and other allowances. The employer must settle the amount within 14 days after the employment contract ends.

The issue is that there are no ring-fenced assets behind the obligation. The amount owed rises with tenure and final basic salary, and the employer pays it from operating cash when the employee leaves. In accounting terms it is a defined benefit obligation; in operating terms it is a future cash call whose timing is driven by employee exits.

WTW has tracked this market since 2010. Its 2025 survey of 80 GCC employers, published in February 2026, found that 85% still operate unfunded arrangements. The proportion of organisations with end-of-service liabilities above USD 50 million has more than tripled over the past decade, from 6% to 20%. Employers cited headcount growth at 56%, longer tenure at 39%, and rising reference wages at 34% as the main drivers.

Only one in six employers in the survey considered the current arrangement highly effective at producing an adequate retirement outcome.

The new system

Cabinet Resolution No. 96 of 2023, effective from October 2023, created an alternative, with the detailed rules set out in Ministerial Resolution No. 668 of 2023. The headline change is simple. Operating it is not. Most of the implementation work sits in the details below.

THE MECHANICS THAT MATTER

Employer contribution. The employer contributes 5.83% of monthly basic salary for employees with under five years of service, rising to 8.33% after five years. The rates are designed to reflect the value of the statutory gratuity accrual.

Payment window. Contributions must reach the fund’s account within 15 days of the start of each Gregorian month. They cannot be deducted from salary. Missed payments can lead first to a work-permit freeze and then to administrative fines assessed per employee per month.

Not retroactive. Gratuity earned before enrolment stays outside the fund. It is calculated under Article 51 at the enrolment date using the employee’s basic salary at that date. The

> amount is then frozen, remains with the employer, and is paid separately when the employee leaves.
>
> **Voluntary contributions.** Employees can contribute up to 25% of annual salary through payroll deductions or a lump sum. Unlike the employer-funded portion, voluntary contributions and their investment returns can be withdrawn during employment, subject to the fund rules.
>
> **Fund choice.** Every approved provider must offer a capital-guarantee option. Providers can also offer risk-based funds at different risk levels and Shariah-compliant funds. Employees who do not make a choice default to the capital-guarantee option.
>
> **Who chooses.** Unskilled workers default into the capital-guarantee portfolio. Skilled workers - MoHRE occupational levels 1 to 5, with a post-secondary qualification and a minimum monthly salary of AED 4,000 - may choose risk-based portfolios and bear the investment losses themselves.
>
> **Exit.** An employer may apply to leave the scheme after at least one year, subject to MoHRE approval, no outstanding fines or disputes, and evidence of solvency. Contributions already paid into the scheme cannot be reclaimed.

Four fund managers are approved: Lunate, Daman Investments, First Abu Dhabi Bank and National Bonds. Employers in DIFC and ADGM sit outside the federal scheme and operate under their own regimes.

The transfer of investment risk

One provision has an outsized effect on the employee journey. A skilled employee who chooses a risk-based portfolio ‘bears any losses incurred during the investment’ and cannot claim those losses from the employer.

The enrolment journey is therefore doing more than collecting a fund preference. It is supporting a financial decision for which the employee bears the consequences. If that decision is made mainly from what is shown on screen, the quality of the calculation and explanation is part of the financial outcome, not simply a user-experience issue.

The regional context

The UAE is part of a broader regional move towards funded workplace savings. DIFC’s Employee Workplace Savings (DEWS) scheme launched in February 2020 and is mandatory within the centre. By October 2025 it had passed USD 1 billion in assets under administration, covering 2,726 employers and 74,323 registered members, with more than USD 340 million paid to former participants. Its structure includes a master trustee, a separate administrator and a separate investment adviser. The default option carries an all-in annual charge of roughly 1.33%. It is the closest thing the market has to a proven template, and it took five and a half years to reach USD 1 billion.

ADGM added a savings-plan option in April 2025. Bahrain made employer contributions to its Social Insurance Organisation mandatory in March 2024. Oman is expected to introduce a contributory system by 2027. Saudi Arabia and Qatar are exploring reform.

MoHRE ran a public consultation on the federal scheme that closed on 28 February 2026. Practitioners widely expect a phased mandate, likely by company size. As of publication, however, no timetable has been announced. Any specific date would be speculation.

PART 2

The adoption story

The voluntary nature of the federal scheme is an obvious reason for slow adoption. WTW's data supports that view: 66% of UAE employers named it as a barrier, and fewer than one in five organisations with unfunded liabilities said they were planning or even considering a funded model within three years.

The second barrier deserves more attention. Fifty-seven per cent cited lack of clarity on processes. That is a different kind of problem. The voluntary status is a policy question for the Cabinet; process clarity is an execution question that a competent provider could address this quarter, and the market has not yet done so clearly.

Employers are also fairly specific about what they want to add. WTW's survey points to voluntary employee contributions, named by 18%; employer matching, 13%; and a range of investment options including Shariah-compliant choices, 14%. Employers also mentioned digital access, communication channels, financial-wellness support and education around planning.

Taken together, those features describe a decision-support product, not a simple savings account. Employees are being asked whether to contribute more, which fund to choose, how much risk to take and whether the resulting balance is likely to meet a future need. The digital journey has to help them work through those questions while the decision is being made.

Demand is already visible

BlackRock's Read on Retirement: GCC 2026, based on 1,000 working individuals across the UAE and Saudi Arabia and published in June 2026, shows a clear gap between current confidence and longer-term preparedness. In the UAE, 78% of workers said they felt positive about their current financial position. At the same time, 59% said financial worries prevented them from planning for the future and 58% worried about outliving their savings.

Access to a workplace scheme makes a large difference. Expatriates with access to one were 43% more likely to feel prepared for retirement. Among expatriates surveyed, 82% of those with a workplace scheme felt prepared, compared with 39% of those without one.

Three findings are especially relevant for product teams.

36% did not know where to get unbiased information · **32%** did not know how much they should be saving · **26%** were unclear about which retirement-savings options were available

Those answers show where people are getting stuck. ‘How much should I save?’ can be modelled from a target, time horizon, contribution rate and return distribution. ‘What are my options?’ is a comparison across the fund menu. ‘Where can I get unbiased information?’ is partly a request for a neutral calculation rather than another sales message.

The industry has spent a decade treating this mainly as a financial-literacy problem and funding awareness campaigns. Much of it is actually a calculation problem: these questions have computable answers, and software can present them at the point where the employee has to make a decision.

PART 3

Six numbers that have to agree

Start with the employee rather than the system architecture. Take someone mid-career, seven years in the UAE, four years with the current employer, and enrolled in the scheme last year. The question they are likely to ask is simple: am I on track?

To answer that one question properly, the journey has to assemble six pieces of information that are currently owned in different places.

> **1. The frozen entitlement.** The Article 51 gratuity earned up to the enrolment date, calculated using basic salary at that date. It is fixed at enrolment, remains an unfunded employer liability, and is payable when the employee exits. Depending on the organisation, the number may sit in payroll, an actuarial valuation or a spreadsheet.
>
> **2. The funded balance.** Employer contributions made since enrolment, at 5.83% and then 8.33% after the five-year service point, plus investment returns and net of charges. This sits with the fund administrator.
>
> **3. The voluntary pot.** Employee contributions of up to 25% of annual salary. These may be invested differently from the employer’s money and have different liquidity because they can be withdrawn during employment, subject to fund rules.
>
> **4. The investment outcome.** This is a distribution, not a single number. The range depends on whether the employee selected the capital-guaranteed, risk-based or Shariah-compliant option. Outside the guarantee, the employee carries the investment downside.
>
> **5. Continuity.** What happens when employment ends: withdraw the money, leave it invested or move it. That decision changes the investment horizon, and the horizon changes the projection.
>
> **6. The life outcome.** What the first five items mean for the employee’s actual objective. The question is rarely ‘what is my balance?’ It is more likely to be ‘can I return home in eleven years?’, ‘will this cover two university educations?’ or ‘what happens if I stop working at sixty?’

Six components, five owners, and no single party accountable for making them agree. Payroll owns the first. The administrator owns the second and third. The asset manager owns the ingredients of the fourth. The fifth is a policy question with a data dependency. The sixth has no obvious owner at all. That is why an employee can be given a balance and still be left to work out the hardest part alone.

That is how an employee can receive a correct gratuity figure from HR, a correct fund balance in an app, a technically valid projection in a PDF and a different projection from an adviser. Each number may be defensible on its own. Put them next to each other and the customer sees inconsistency.

For the employer, the same fragmentation becomes an operational-control problem. During the transition, the business is running two tracks at once: a frozen pre-enrolment liability and a live contribution stream. Both have to be reconciled for every employee, every month, against payroll and within the 15-day payment window, with an audit trail.

The likely dispute areas are already visible in legal commentary: the calculation of pre-enrolment gratuity, the accuracy and timing of monthly contributions, and the allocation of investment gains and losses when employment ends. In each case, the practical question is whether two systems used the same facts and arrived at the same answer.

PART 4

The projection problem

Once investment returns affect four of the six outcomes, projection stops being a cosmetic feature. It becomes part of the financial decision. Most journeys take one of three shortcuts, and each has a problem.

Show nothing. Display the current balance and stop. This avoids making a forecast, but it gives the employee no basis for comparing funds or judging whether the current contribution rate is likely to be enough.

Show one growth rate. Use a line such as ‘assumes 6% per annum’. This is the default in most workplace-savings interfaces globally because it is easy to calculate and explain. It is also misleading for fund choice because it removes the range of outcomes. A single line makes the risk-based fund look strictly better than the capital-guaranteed fund, when the real decision is a trade-off between expected return and uncertainty.

Show a marketing number. Optimistic illustration is already off the table in the UAE for life insurance and family takaful, where the maximum gross investment rate used in an illustration is capped at three-month EIBOR plus 4%, rounded up to the next 0.5%. It is not yet explicitly regulated for end-of-service funds. That gap is not a good reason to design to a lower standard.

A more defensible design is to show a range of outcomes generated from a large number of scenarios. The employee can then see the trade-off directly: the capital-guaranteed fund produces a narrower range with a lower central outcome, while a risk-based fund produces a wider range with a higher central outcome. The useful next step is to connect that range to the employee’s actual objective.

That requires more than a compound-interest calculator. At minimum, five technical requirements follow.

Asset and liability modelling. Contributions depend on salary and tenure, including the step from 5.83% to 8.33% after five years. The frozen entitlement does not grow, while voluntary contributions can be withdrawn. The model therefore has three cash-flow streams with different rules interacting with the same investment outcome.

A real scenario generator. The model needs an economic scenario generator calibrated to an observable curve and capable of producing correlated paths across the asset classes actually held. Otherwise the range shown to the customer has no sound economic basis.

Fast enough for interaction. If an employee changes a voluntary contribution from 5% to 10% and then waits eight seconds for the chart to redraw, they stop exploring. That matters because exploration is where understanding happens. Overnight batch recalculation produces a statement; live recalculation supports a decision. In Kidbrooke's Skandia Life implementation in Sweden, 5,000 scenarios across 720 monthly time steps are recomputed within the customer journey.

Reproducible. The same inputs on the same day should produce the same answer. That requires seeded scenario sets, versioned assumption files and a stored record of what was shown, to whom, and when. If the output later has to be explained in a complaint or dispute, this becomes essential.

One engine across channels. The employer portal, employee app, adviser interface and call-centre tools should all return the same number for the same person on the same day. Separate implementations of the same financial logic will drift over time, particularly when each channel is built by a different team against a different release cycle.

PART 5

A specification, not a wish list

If this is going into an RFP for a workplace-savings experience in the UAE, the requirements below are the ones that separate a system that will hold up from one that is likely to need rebuilding in eighteen months.

NO.	REQUIREMENT	WHY IT MATTERS
R1	**One calculation engine behind every channel**	Divergent numbers across channels are the most common and most damaging failure in this product category.
R2	**Sub-second stochastic projection under interactive load**	Exploration is where comprehension happens. Latency kills exploration.
R3	**Dual-track entitlement modelled natively**	The frozen Article 51 amount and the funded balance are one person’s money and must be projected together.
R4	**Fund choice modelled, not listed**	Each option needs a projected distribution and a plain statement of what the employee gives up by choosing it.
R5	**Shariah as a constraint on the model, not a label on a fund**	A compliant fund reached through non-compliant optimisation is a compliance finding waiting to happen.
R6	**Arabic and English at parity, RTL native**	This cannot be a translation layer over an English chart. The chart itself has to mirror for RTL.
R7	**Explainability on demand**	Every figure needs a ‘why’ that a call-centre agent can read aloud and a regulator can inspect.
R8	**Multi-currency and repatriation**	For expatriates, the most common question is what the balance will be worth when converted and taken home. An AED-only projection does not answer it.
R9	**Snapshot and retention**	Store what was displayed, with the assumption-set version, for the length of the dispute window.
R10	**Employer-side reconciliation**	Match the contribution file to payroll for each employee and surface exceptions before the 15-day deadline, not after it.

R5 needs particular attention because it is easy to satisfy at product level and miss at model level. Offering a Shariah-compliant fund is relatively straightforward. The surrounding advice and modelling also need to be Shariah-consistent. If glidepath logic, rebalancing rules or projection assumptions were designed for a conventional asset universe and a compliant fund was added later, the recommendation is not compliant even though the product is. In a market where a meaningful share of employees will select the Shariah path, that distinction will eventually be examined.

PART 6

Borrow the standard that already exists

There is already a useful precedent in the UAE, although it sits in a different rulebook. The rules were written for life insurance and family takaful rather than end-of-service funds, but they address the same basic problem: how to show a retail customer a long-term financial projection without hiding uncertainty or charges.

Insurance Authority Board of Directors' Decision No. 49 of 2019, which remains part of the Central Bank rulebook, requires among other things that guaranteed and non-guaranteed values are defined and shown separately. Protection benefit, cash value, net asset value, maturity value and surrender value must be displayed distinctly and net of all charges, while premiums are shown gross. A company cannot require a passport, visa or bank account before producing an illustration, and a free-look period of at least 30 calendar days applies.

Article 10 goes further than separation. It requires at least two scenarios, built on different sets of clearly defined assumptions, so that variability in investment returns is actually illustrated, and it caps the maximum gross investment rate used in those calculations at three-month EIBOR plus 4%, rounded up to the next 0.5%. Article 7 requires that all documents which can be provided to the client are available in Arabic and another language of the client's choosing.

Those rules do not legally bind an SCA-approved end-of-service fund. The products and regulators are different. The reasoning, however, transfers directly: separate what is certain from what is uncertain, disclose charges rather than hiding them inside a flattering headline number, and do not make access to an illustration dependent on progressing through a sales process.

That changes how ambitious this looks. Showing a range of outcomes is not a novel standard that a workplace-savings provider would be inventing. It is the settled expectation one rulebook over, for a long-term savings product sold to many of the same customers through many of the same distribution channels.

Providers do not need to wait for a new rule before applying those principles to workplace savings. The logic of Decision 49 transfers even though the rule itself does not, so it offers a practical baseline for how projections can be presented and retained.

There is a defensive reason to do this now. The public consultation closed in February 2026, and a mandate is widely expected. If providers spend the interim using single-rate projections and a disclosure standard arrives later, the retrofit will be expensive, visible and badly timed because it will land just as a phased mandate is likely to accelerate employer onboarding.

There is also a commercial reason. Being first to show an honest range is a differentiator. An HR director comparing four providers does not need to understand an economic scenario generator to notice that three providers show a confident single line while one shows a range with the assumptions underneath. In a market where lack of unbiased information is already a barrier, that difference matters.

Build, buy, or reuse

Most institutions will initially frame this as a build-versus-buy decision. The more useful architecture question is which capabilities genuinely need to be proprietary and which are common infrastructure.

The employee app needs a projection. The employer portal needs the same calculation at an aggregated level. The adviser or broker tool needs it again with more inputs exposed. That often means three teams, three backlogs and three slightly different definitions of ‘projected balance’. Within a year, they disagree. When that happens in front of a customer, the institution has to explain which answer is correct.

The provider should own the areas in which customers and employers actually experience differentiation: the fund range, fees, service model, distribution relationships, institutional credit and the quality of the journey. The Monte Carlo engine is not the competitive advantage. Neither is the gratuity formula, which comes from published law, nor the contribution scheduler or the 15-day payment reconciliation. Every engineering hour spent rebuilding those common capabilities is an hour not spent on the areas that actually compete.

The market already makes this distinction elsewhere in the stack. FAB launched its end-of-service funds with Apex Group handling fund administration, Aurem providing the technology platform and Deutsche Bank Securities providing custody. National Bonds uses Standard Chartered as administrator and custodian. Custody is not treated as a source of differentiation; it is treated as specialist infrastructure.

The calculation layer can be assessed on the same basis. Customers see its output on screen, so it feels like product. Underneath, however, the core requirement is common: consistent asset and liability modelling, stochastic projection, assumptions management and an auditable answer across channels.

Timing matters as much as cost. If a phased mandate is introduced, the constraint will not be capital, funds or appetite. It will be onboarding capacity: how many employers a provider can take through selection, enrolment, employee communication and the first contribution cycle in a quarter. A provider that already has the decision layer working can spend that period onboarding. A provider still building the projection service cannot.

PART 8

What to do in the next two quarters

If you are an employer

Get the liability number right. If you cannot state the Article 51 exposure to the nearest million, you are not yet in a position to evaluate the scheme. One in five GCC organisations in WTW’s survey now carries more than USD 50 million of end-of-service liabilities.

Run the old and new tracks side by side. Model the frozen pre-enrolment liability and the future contribution stream over five years for a representative sample of employees. The answer can look very different for a long-tenure workforce with fast salary growth than for a high-churn workforce. This is arithmetic, not strategy, and it takes a week.

Write the employee explanation before enrolment starts. Much of the 57% ‘lack of clarity’ problem is downstream of this. Employees need to see what happened to the gratuity they had already earned, what is now going into the fund, and what they can and cannot choose. If they cannot see what happened to their accrued gratuity, they are likely to assume the worst before HR has a chance to explain it.

Test the actual employee journey. Ask providers what the employee sees, not just what the fund returned or what the sales deck says. Ask for the enrolment flow, fund-choice screen and annual statement in Arabic and English. Then ask whether the number in the employee app is the same number the call-centre agent will see and explain.

If you are a provider, bank or insurer

Separate the record from the decision. Administration, custody and recordkeeping are solved problems with credible vendors. The decision layer is not solved, and it is the part the employee actually touches. It needs deliberate ownership of the calculations, assumptions and explanations that sit on top of the records.

Pick a disclosure standard and publish it. Decision 49 is a practical template even though it does not apply directly. Separate guaranteed from non-guaranteed outcomes and put the assumptions under the chart.

Instrument the journey around one metric. Logins and app-store ratings tell you whether the service is being used, but the more important measure is whether employees change their contribution rate after seeing a projection. That is the only engagement number that maps directly to a better outcome for the member and more assets for the provider.

Build Arabic and RTL in the first sprint, not the fourth. Retrofitting bidirectional layout into charts and interaction patterns later is expensive and error-prone. Arabic should be part of the product architecture, not a translation phase at the end.

If you are a life insurer, notice the overlap. The engine that projects an end-of-service balance under uncertainty is the same engine that produces a compliant illustration under Decision 49 and supports a protection or savings journey. Build it once for the workplace and you have the capability for the rest of the book.

PART 9

What we still do not know

The market is moving faster than the public data. A few gaps matter enough that they should remain explicit rather than being filled with estimates.

There are no published federal enrolment figures. MoHRE and the SCA have not published the number of employers or employees enrolled in the federal scheme. Adoption estimates therefore rely on employer surveys and market inference. The USD 100 billion figure often quoted in market commentary is an estimate of the total end-of-service liability pool, not measured assets under management, and should not be presented as AUM.

The mandate has not been announced. The consultation closed on 28 February 2026 and practitioners expect a phased rollout, probably by company size. There is no published timetable. Any stated date is an opinion, not confirmed policy.

There is no federal fee benchmark. DEWS discloses an all-in default charge of roughly 1.33%, but there is no equivalent published comparison across the four approved federal funds. Until there is, employers cannot run the fee comparison that matters most to their employees.

No one knows who will write the projection standard, or whether anyone will. MoHRE owns the labour relationship, the SCA licenses the funds, and the Central Bank owns the insurance conduct rules that provide the closest existing precedent. Those are three plausible authors, but none has announced an intention to take it on. That is why a sensible voluntary disclosure framework is preferable to waiting for certainty.

About this paper

Kidbrooke builds the calculation layer between financial data and customer-facing journeys. KidbrookeONE provides asset and liability modelling and stochastic simulation through a single API, allowing an institution’s employee app, adviser tools and employer portals to use the same underlying calculations.

Kidbrooke was founded in Stockholm in 2011 as a quantitative finance consultancy and became a software business in 2019. Clients include Skandia Life and Max Matthiessen in Sweden, and HAYAH Insurance in Abu Dhabi.

The point of this paper is not that every institution should use the same vendor. It is that this class of calculation is common infrastructure and should be treated accordingly. The same engine is likely to be built five or ten times in this market by teams that have each been told it is a two-sprint job. If that happens independently across providers and channels, inconsistent answers will appear at exactly the point where employees are being asked to make a real investment decision, often for the first time in their lives.

We welcome challenge and discussion from employers, providers, advisers and technology teams working on this market.

Sources

All figures in this paper are traceable to the sources below. Where a figure comes from Kidbrooke client work, it is identified as such in the text.

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