EXECUTIVE BRIEF · BOARD & CEO LEVEL

Launching a Closed Private Fund, Governed, Compliant, and Powered by Our System

A one-page path from idea to first close under Saudi CMA rules, with a clear role for technology.

The case in four numbers

Closed-ended

Fixed term, capital committed, no on-demand redemptions

Private placement

Offered to qualified investors, not the general public

CMA notice

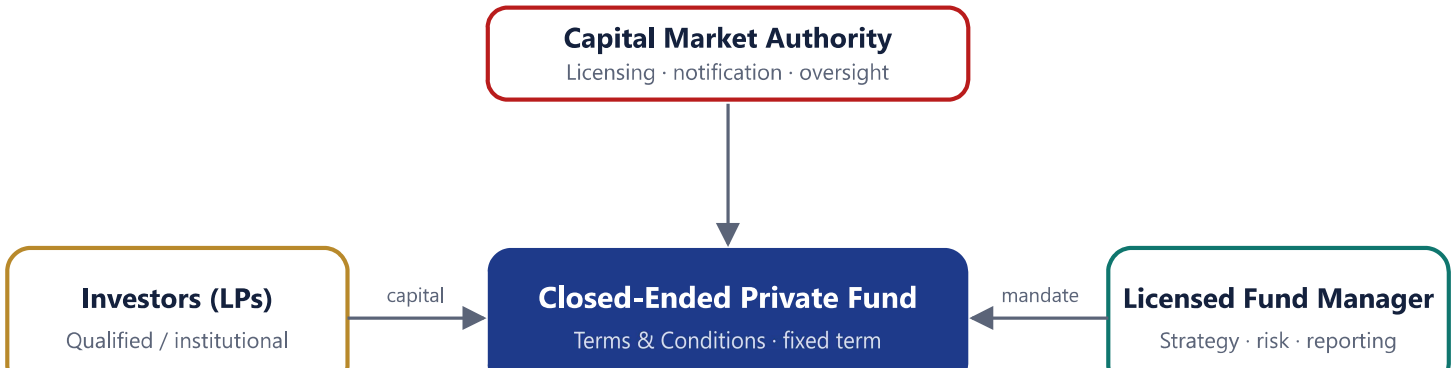
Manager notifies the CMA and obtains a no-objection notice before offering

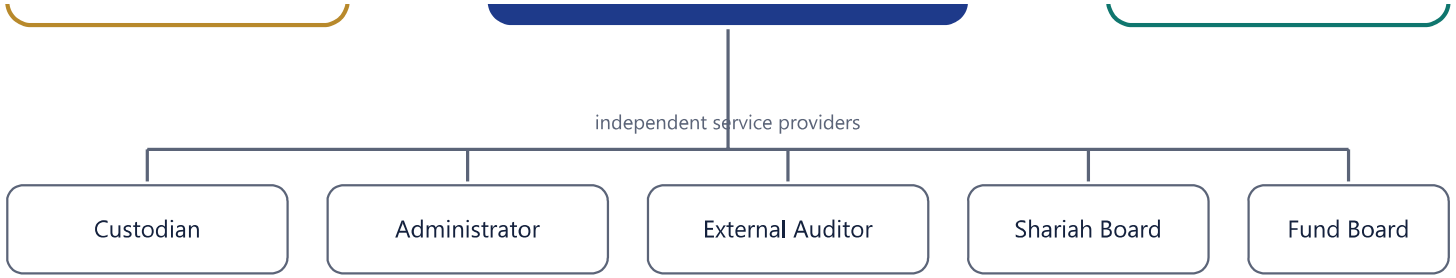
50% cap

Retail holders may not exceed half of a closed-ended private fund's units (July 2025 amendment)

1. Fund structure: who does what

Every box below is a control point the regulator and investors will ask about.

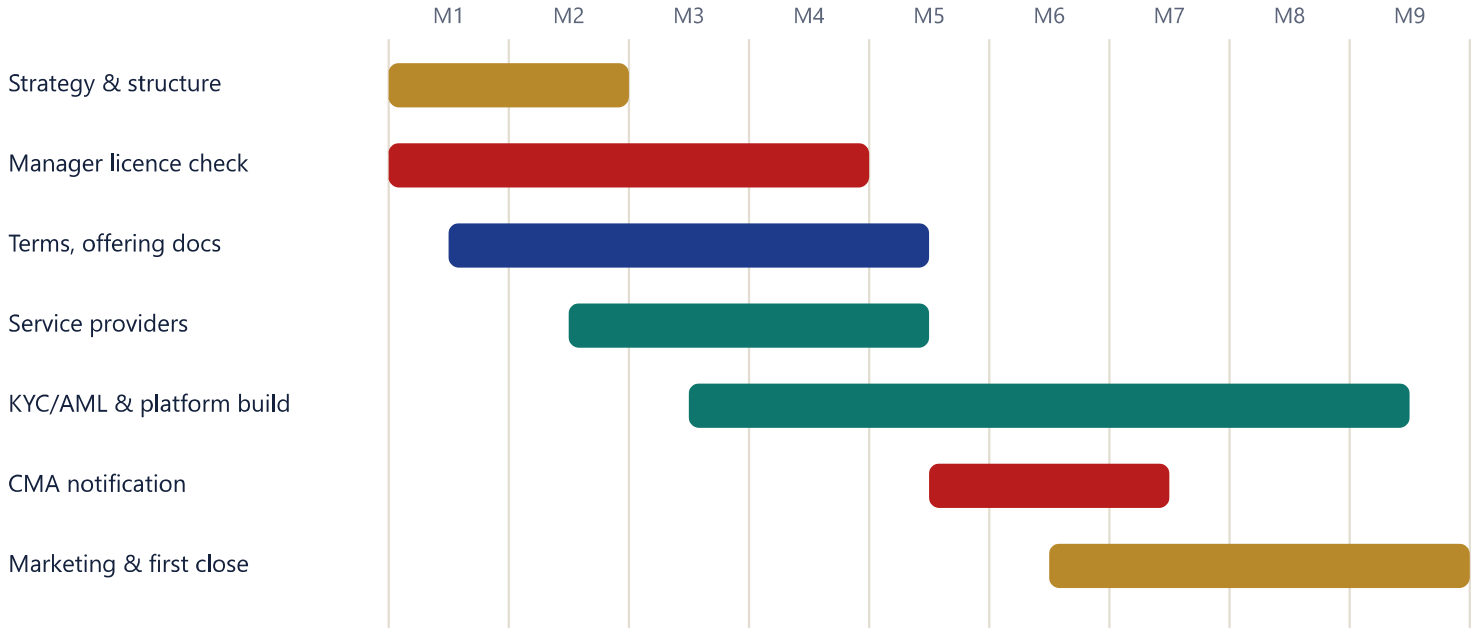




Shariah board is only needed if the fund is positioned as Shariah-compliant. A fund board is required for some fund types, such as private real estate funds. Confirm with counsel.

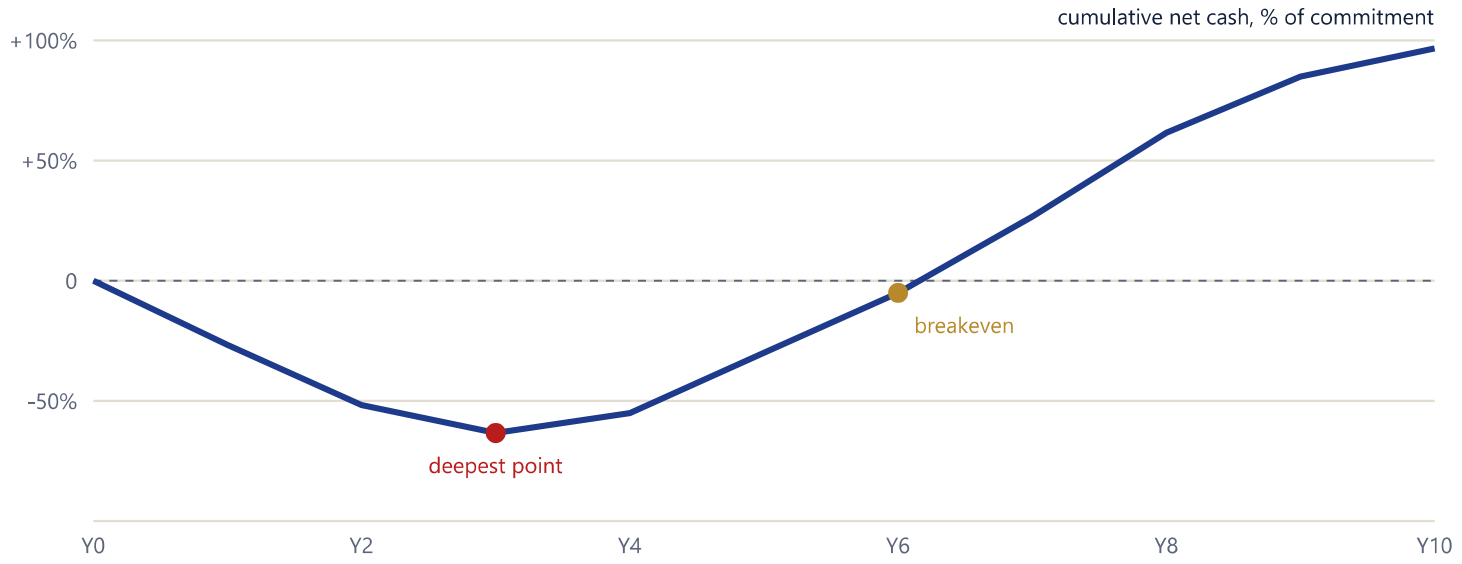
2. Indicative launch roadmap

About 9 months from decision to first close. Durations are planning assumptions, not regulator commitments.



3. What an investor's money looks like: the J-curve

Illustrative only. Closed funds show negative cash flow early (fees, investments), then returns on exits.



4. Risk heat map for the CEO

Risk	Level	Control
Offering or marketing before CMA notice	High	Hard gate in the system: no investor materials released until approval is logged
Performance claims that cannot be evidenced	High	Every number tied to audited source; legal review before publishing
Liquidity promised in a closed fund	Medium	Terms & Conditions define exit routes; marketing copy must match

Retail concentration above 50%	Medium	Automated unit-holder monitoring, including transfers
KYC/AML gaps	Medium	Digital onboarding with audit trail and sanctions screening
Valuation and reporting errors	Lower	Independent administrator and auditor; system reconciles to both

5. Where our system creates the edge

Onboard

Digital KYC/AML, investor eligibility checks, e-signature of subscription documents

Comply

Rules engine and compliance calendar; approvals and filings in one audit trail

Report

Capital calls, distributions, NAV and quarterly LP reports from one data source

Source

Deal pipeline and due-diligence workflow feeding the investment committee

Before this reaches a regulator or investor

The live page at estethmari.com/investment-fund shows headline figures (US$2.4B AUM, 18.7% net IRR, CMA and DFSA status, a Big Four audit, and 340+ portfolio companies). Please verify every one against documents you can produce. Several details also need cleaning up: the page calls 18.7% “net” while its footnote says returns are gross of fees, and it mentions “standard liquidity terms” and “enhanced liquidity” for what should be a closed-ended fund. Unsupported performance or licence claims in fund marketing are the fastest way to attract regulatory attention.

Decisions needed from the CEO

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1. Approve the structure: closed-ended private fund under a licensed manager (own licence, or partnership with an already licensed manager).
2. Appoint legal counsel and confirm the target investor base (qualified/institutional only, or limited retail).
3. Approve the service-provider shortlist: custodian, administrator, auditor, Shariah board if needed.
4. Freeze external performance claims until audited evidence is assembled.

Sources: Saudi CMA Investment Funds Regulations and the 9 July 2025 amendments, as summarised by Baker McKenzie and others; Al Tamimi on private fund pathways. This brief is a planning aid, not legal advice. Charts are illustrative. Confirm requirements, including UAE (DFSA/ADGM) and Qatar rules, with licensed counsel.