Digisoul · LoanOS

The AI-Governance Readiness Checklist *for MENA NBFIs*

Ten questions a board should be able to answer before putting AI anywhere near a regulated lending decision — drawn from ISO/IEC 42001 discipline and Egypt's own regulatory instruments. Answer each with evidence, not intention: the document, the owner, the log entry.

LOANOS · PLANNED · IN DEVELOPMENT

Digisoul — the MENA AI enablement ecosystem · ISO/IEC 42001:2023-certified AIMS (Reg. No. IAC9519986925, IACUS) Version 1.0 · July 2026

Part one — authority and *explainability*

1 **Who approves each regulated action — and where is that approval recorded?** ☐ Evidenced ☐ Gap

For every AI-assisted step (a score used in underwriting, a collections contact, a notice sent), name the accountable human owner and the system of record for the approval. "The team reviews it" is not an answer; a named role and an audit entry are.

MAPS TO · ISO/IEC 42001 ACCOUNTABILITY & HUMAN-OVERSIGHT CONTROLS

2 **Can any automated decision adversely affect an individual without human review?** ☐ Evidenced ☐ Gap

Egyptian data-protection practice and responsible-AI expectations both point the same way: significant decisions about individuals should carry meaningful human oversight. Check for silent automation — auto-declines, auto-limits, auto-blacklisting.

MAPS TO · PDPL 151/2020 PRINCIPLES · HUMAN-IN-THE-LOOP DESIGN

3 **Can a credit officer — and an auditor — read the reasons behind every score?** ☐ Evidenced ☐ Gap

Explainability is not a data-science luxury; it is what makes a decision defensible in front of a customer, an internal auditor, and a supervisor. If the top factors behind a score cannot be produced on request, the model is not ready for regulated use.

MAPS TO · MODEL EXPLAINABILITY & DOCUMENTATION DISCIPLINE

4 **Is there a model registry — and does anything deploy without documented approval?** ☐ Evidenced ☐ Gap

List every model touching the lending lifecycle: purpose, owner, version, approval date, review date. A model that is not in the registry should not be able to reach production. Shadow AI — tools adopted team-by-team — belongs on this list too.

MAPS TO · ISO/IEC 42001 AI-SYSTEM INVENTORY & LIFECYCLE CONTROLS

5 **Where does personal data actually live — and who can prove it?** ☐ Evidenced ☐ Gap

Residency is a design property, not a policy sentence. For each system in the lending stack, state the physical hosting location, the processor, and the legal basis — aligned to PDPL Law 151/2020 and its 2025 executive regulations, with the PDPC licensing horizon in view.

MAPS TO · PDPL 151/2020 + EXECUTIVE REGULATIONS · DATA RESIDENCY

Part two — conduct, audit and *disclosure*

6 ### Are consent and contact-frequency limits enforced by the system, or by habit?

☐ Evidenced ☐ Gap

Collections conduct is now formally regulated territory — FRA Board Decision 278/2025 established registration and conduct controls for collecting non-bank dues. If outreach caps and consent checks live in a supervisor's memory rather than a gate the system enforces, they will fail exactly when volume peaks.

MAPS TO · FRA BD 278/2025 · GOVERNED COLLECTIONS CONDUCT

7 ### Is every action written to an audit trail that no one can quietly edit?

☐ Evidenced ☐ Gap

An append-only, hash-chained audit — model outputs, human approvals, consent checks, outbound documents — is what turns "we believe" into "we can show". Test it: pick one loan from last month and reconstruct its full decision history in under an hour.

MAPS TO · IMMUTABLE AUDIT & ROLE-BASED ACCESS DISCIPLINE

8 ### Do your technology providers sit inside the regulatory perimeter?

☐ Evidenced ☐ Gap

Egypt's fintech outsourcing register (FRA Board Decision 141/2023, as amended by BD 68/2025) governs providers serving non-bank financial activities, and legal e-signing runs exclusively through ITIDA-licensed certificate service providers. Ask every vendor where they stand on both.

MAPS TO · FRA BD 141/2023 · E-SIGNATURE LAW 15/2004 (ITIDA)

9 ### Can you evidence your ESG disclosure duties from your operating record?

☐ Evidenced ☐ Gap

FRA Decrees 107 and 108 of 2021 put annual ESG disclosure on NBFIs above the size threshold, with TCFD climate reporting at larger sizes — and gender-disaggregated portfolio data is increasingly what development-finance lenders ask for first. Reporting compiled by hand each year is a symptom; reporting produced from the governed record is the cure.

MAPS TO · FRA 107/108 OF 2021 · GENDER-LENS & DFI REPORTING

10 ### If the regulator asked tomorrow, could you show the whole system on one page?

☐ Evidenced ☐ Gap

The final test is composure: one diagram of the lending lifecycle, the models in it, the human gates on it, the audit under it, and the named owners around it. If assembling that picture would take weeks, the governance is in people's heads — not in the operating system.

MAPS TO · ISO/IEC 42001 MANAGEMENT-SYSTEM EVIDENCE

Why Digisoul can publish this. Digisoul's AI Management System is independently certified to ISO/IEC 42001:2023 (Reg. No. IAC9519986925 · IACUS · issued 8 Nov 2025 — verify at app.iacus.org). LoanOS, our governed AI lending operating system for MENA non-bank lenders, is designed around the same discipline: five modules — Recover, Decide, Verify, Comply, Operate — on one auditable spine, with a human gate on every regulated action. LoanOS is **planned and in development**; its governance is designed *informed by* ISO/IEC 42001 and NIST AI RMF.

Score below eight? That is normal — and fixable.

We brief selected lenders, partners and investors on governed AI lending. Bring this checklist; leave with a gap map.

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Sources & notes. FRA statistics release of 14 May 2026 and FRA Q4-2025 quarterly report (sector context); FRA Board Decision 278/2025 (Official Gazette, 21 Jan 2026); FRA Board Decision 141/2023 as amended by BD 68/2025; PDPL Law 151/2020 and its 2025 executive regulations; E-Signature Law 15/2004 (ITIDA); FRA Decrees 107/108 of 2021. This checklist is an orientation aid, not legal advice — validate every regulatory interpretation with counsel. No performance figures are claimed for LoanOS.