



National Council for Artificial
Intelligence, Quantum Computing,
and Emerging Technologies



Egyptian Center for Responsible AI

Arab Republic of Egypt
National Council for Artificial Intelligence,
Quantum Computing, and Emerging Technologies
Egyptian Center for Responsible AI

GUIDE TO

EGYPT NATIONAL AI GOVERNANCE FRAMEWORK



March 2026

GUIDE TO EGYPT'S NATIONAL AI GOVERNANCE FRAMEWORK

Edition: 2.0
Status: Approved for Publication
Date: March 2026
Prepared by: The Egyptian Center for Responsible Artificial Intelligence (ECRAI)
Under the auspices of the National Council for Artificial Intelligence,
Quantum Computing, and Emerging Technologies

Document Control & Administration

Document Information

Attribute	Details
Document Title	Guide to Egypt's National AI Governance Framework
Document ID	EG-NCAI-GOV-FW-2026-02
Classification	PUBLIC
Owner	National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies
Custodian	Egyptian Center for Responsible AI (ECRAI)
Applicability	All

Version Control

Version	Date	Author / Contributor	Description of Change
0.1	Aug 2025	Drafting Committee (ECRAI)	Initial structural draft and comparative analysis
0.8	Oct 2025	Drafting Committee (ECRAI)	Governance Philosophy and Main Directions
1.0	Jan 2026	Drafting Committee (ECRAI)	Final Version for Public Consultation
1.5	Feb 2026	Government, Private Sector and International Organizations	Integration of feedback from the Public Consultation
1.8	Feb 2026	Drafting Committee (ECRAI)	Harmonization and proofreading
2.0	March 2026	NCAI	Final Release

Authorization

This document acts as the Guide for AI Governance in Egypt. It has been reviewed for legal and technical consistency and authorized for release by:

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Date: March 15, 2026

Foreword

Crafting Our Digital Destiny: A Vision for Responsible AI in Egypt

Throughout history, Egypt has stood as a cradle of civilization and a beacon of knowledge, gifting humanity with foundational advancements in science, engineering, and governance. Today, as the world stands at the juncture of Artificial Intelligence revolution—a transformation likely to eclipse all preceding industrial shifts—Egypt once again affirms its resolve to be, not merely a passive consumer of technology, but an active architect of this new era.

We recognize that Artificial Intelligence holds immense potential to catalyze inclusive economic growth, modernize public services, and address our most pressing national challenges. Yet, we are equally cognizant of the profound ethical responsibilities and complex risks it entails. Our national commitment is clear: the advancement of technology must never come at the expense of our national sovereignty, our cherished societal values, or the fundamental constitutional rights of our citizens.

This Guide to the Egyptian National AI Governance Framework serves as a foundational blueprint reflecting our commitment to responsible AI development. It presents a thoughtful and pragmatic governance philosophy, termed “State as Orchestrator,” and embraces a “Strategic Hybrid” approach. This approach not only aims to foster the necessary infrastructure for digital growth but also diligently establishes essential safeguards for high-risk applications, ensuring both innovation and accountability.

This document is more than a regulatory manual; it is a foundation for trust. By defining clear, predictable pathways for compliance—from ethical impact assessments to rigorous technical audits—we are creating an environment where local and international innovators can build with confidence, and where the Egyptian people can adopt AI with assurance that their safety and privacy are paramount.

We invite our partners across the private sector, academia, and the international community to engage deeply with this Guide. Together, we will construct a resilient, thriving AI ecosystem that reflects the authenticity of our civilization and our future ambitions.

Raafat Hindy

Minister of Communications and Information Technology

Chairman, National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies

Executive Summary

Egypt's National AI Governance Framework (the Framework) is the suite of all AI Governance instruments and publications that establishes a comprehensive, sovereign, and human-centric approach to governing artificial intelligence across the public and private sectors. Rooted in Egypt's constitutional values and aligned with global best practices, the Framework positions Egypt as a regional anchor in responsible AI, serving as a conduit between the Arab region and Africa on the one hand, and the global digital economy, on the other hand.

AI is recognized as a strategic national priority capable of transforming public services, driving economic growth, and strengthening national resilience. However, realizing this potential requires a governance model that ensures safety, trust, and accountability while enabling innovation. The Framework responds to this challenge by articulating a balanced approach: the State as Orchestrator, simultaneously enabling AI adoption through infrastructure, data, and capacity building, while safeguarding society through clear regulatory protections — especially for high-risk systems.

The National AI Governance Framework Architecture

To ensure clarity, regulatory certainty, and effective implementation, stakeholders must distinguish between the hierarchy of documents that form the ecosystem:

- **THE FRAMEWORK (The Suite):** The comprehensive umbrella term referring to the collection of all Governance instruments. It includes the National Strategy, this Guide, the National Guidelines for Trustworthy and Responsible AI, and future Guidelines and sectoral regulations.
- **THIS GUIDE (The Architect):** The strategic document that defines WHAT is governed— setting the Risk Tiers, the “Dual-Check” compliance logic, and the institutional architecture.
- **THE GUIDELINES (the National Guidelines for Trustworthy and Responsible AI):** The first operational outcome of the Framework. It defines HOW to act, serving as the reference manual for Trustworthy and Responsible AI.
- **FUTURE PRODUCTS:** Subsequent operational documents will address specific domains, including Generative AI Risk Management, Child Protection in AI, and Sectoral Compliance Manuals.

A Strategic, Evidence-Based Foundation

The Framework builds on a decade of legislative and strategic progress, encompassing the Egyptian Constitution, the Personal Data Protection Law, the Cybercrime Law, and the National AI Strategies (2021 & 2025). It incorporates global standards from UNESCO, OECD, ISO/IEC, and emerging practices from leading jurisdictions, while tailoring these to Egypt's socio-economic and institutional context.

It defines a clear regulatory architecture consisting of:

- **National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies** – the central policy body and strategic architect.
- **The Egyptian Center for Responsible AI (ECRAI - MCIT)** – responsible for operationalizing the Governance Framework.
- **Information Technology Industry Development Agency (SECC – ITIDA)** – responsible for conducting or overseeing Technical Evaluation, Verification, and Validation (TEVV) and accrediting private-sector audit firms.
- **National Telecom Regulatory Authority NTRA and EGCERT** – responsible for AI telecom-related issues, cybersecurity measures and accreditation, and approval of AI-embedded devices.
- **Personal Data Protection Center PDPC** – responsible for personal data and privacy issues.
- **The Advisory Committee** – represents stakeholders advocating for societal, sectoral and academic interests.
- **Sectoral Regulators** – responsible for domain-specific enforcement and conformity assessments.

The Risk-Based Approach

The Regulations under this Framework are proportionate to the potential for harm. This Guide classifies AI systems into four risk distinct tiers:

- **Tier 1: Prohibited (Red):** Systems posing unacceptable risks to sovereignty or fundamental rights.
- **Tier 2: High Risk (Orange):** Critical infrastructure and biometrics. [Mandatory “Dual-Check” Compliance]
- **Tier 3: Limited Risk (Yellow):** Chatbots and deepfakes. [Transparency & Labeling]
- **Tier 4: Minimal Risk (Green):** Standard software tools. [Voluntary Code of Conduct]

A Living, Adaptable Framework

Recognizing the rapid evolution of AI, this Guide sets out an implementation roadmap and establishes mechanisms for continuous adaptation, including AI landscape scanning, annual reviews, a growing regulatory library covering guidelines, technical standards, and sectoral policies.

Table of Contents

Document Control & Administration	3
Foreword	4
Executive Summary	5
1. Preamble & Strategic Context	9
1.1 Preamble	9
1.2 The Legislative and Strategic Heritage	9
1.3 Strategic Vision	10
1.4 The Regulatory Architecture	11
1.5 The Governance Philosophy	11
1.6 The AI Actors	12
1.7 Scope and Applicability	12
2. The National Institutional Architecture	13
2.1 Egypt's Hybrid AI Governance Model.	13
2.2 The Central Policy Hub (NCAI)	13
2.3 The Executive Arm (ECRAI - MCIT)	14
2.4. The Technical Conformity Body (SECC)	14
2.5. Security, Safety & Type Approval (NTRA & EG-CERT)	15
2.6. Personal Data & Privacy Protection (PDPC)	15
2.7. Sectoral Compliance (Sector Regulators)	16
2.8. The External Advisory Committee	16
3. Core Ethical Principles	18
3.1 The Normative Foundation	18
3.2. Societal Impact & Inclusivity.	18
3.3. Operationalizing the Core Ethical Principles	19

4. The Risk Management Model	21
4.1 The Risk-Based Approach	21
4.2. Risk Classification	21
4.3 General Purpose AI (GPAI)	22
5. The «Dual-Check» Compliance Model	23
5.1 The Lifecycle Governance Approach	23
5.2 Ex-Ante: The Gatekeeping Phase	23
5.3 Ex-Post: The Oversight Phase	24
5.4 The «Frugal AI» Policy	24
6. Strategic Enablers & Ecosystem Readiness	25
6.1 The «State as an Orchestrator» Commitment	25
6.2 Human Capital: Building an AI-Ready Workforce	25
6.3 The Data Ecosystem: Quality & Sovereignty	26
6.4 Infrastructure: The Sovereign Core	26
6.5 Funding & Investment Incentives	27
7. International & Regional Positioning	27
7.1 The «Multi-Tiered» Alignment Strategy	27
7.2 Facilitating Global Interoperability (Export Readiness)	28
7.3 Import/Export Controls for Sensitive AI	29
8. Roadmap & Future Regulatory Architecture	29
8.1 The «Living Framework» Approach	29
8.2 Phase 1 Agenda	30
8.3 Continuous Monitoring & Adaptation	31
9. Conclusion	31

1. Preamble & Strategic Context

1.1. Preamble

This Guide was developed through a rigorous, evidence-based process, supported by a comprehensive comparative study of leading global AI governance models. It draws upon the insights of the UNESCO AI Readiness Assessment Methodology (RAM) and the OECD Artificial Intelligence Review of Egypt conducted in 2025 and 2024 respectively, which provided a comprehensive diagnostic of Egypt’s institutional, legal, and technical readiness. The resulting framework reflects a carefully calibrated national approach, inspired by global best practices, while remaining fully aligned with Egypt’s development priorities, institutional capacities, and socio-economic realities. It embodies Egypt’s Governance Philosophy of “the State as Orchestrator,” in which the government plays a proactive role in enabling AI through infrastructure, data, and capacity-building efforts, while also establishing robust regulatory safeguards for high-risk applications.

This Guide to the effective Governance of AI systems represents a milestone in Egypt’s ongoing journey to build a resilient, forward-looking digital economy. It reflects the belief that effective AI Governance is not an obstacle to progress, but rather a prerequisite for sustainable innovation, public trust, and national resilience. The successful implementation of the Guidelines, Standards, and compliance mechanisms established in the Governance Framework will directly inform the drafting of the Egyptian AI Law, ensuring that permanent legislation is grounded on practical market reality.

1.2. The Legislative and Strategic Heritage

The AI Governance Framework is not a standalone initiative, but rather a natural continuation of a comprehensive national effort that has unfolded over the past decade. Egypt has already laid strong legal and policy foundations through a package of constitutional, legislative, and institutional initiatives as the Framework is designed to fully comply with all legislations enacted by the Egyptian legislator.

Legislative Foundation:

- **The Constitution of Egypt (2014):** Preserves the right to privacy and data protection.
- **Anti-Cyber and Information Technology Crimes Law (No. 175 of 2018):** Provides the legal framework for combating cyber-enabled threats.
- **Personal Data Protection Law (PDPL) (No. 151 of 2020):** Regulates the collection, processing, and cross-border transfer of personal data in line with international standards.
- **Fintech Law (No. 5 of 2022):** Explicitly enables the application of AI in non-banking financial services under a supervised regulatory framework.
- **Telecommunications Regulation Law (No. 10 of 2003):** Governs the digital infrastructure and spectrum usage essential for AI connectivity and deployment.

- **Labor Law (No. 12 of 2003):** Regulates employment relationships and protects workforce rights during organizational restructuring and modernization.
- **Child Law (No. 12 of 1996, rev. No. 126 of 2008):** protecting the child rights and ensuring a safe environment for growing up.

Strategic Evolution:

- **National AI Strategy 1.0 (Launched: 2021):** Guided the integration of AI into national development priorities.
- **Egyptian Charter for Responsible AI (Issued: 2023):** Established ethical principles tailored to the country's societal and cultural context.
- **National AI Strategy 2.0 (Launched: 2025):** Set a roadmap for large-scale implementation, infrastructure development, and ecosystem readiness.

1.3. Strategic Vision

In alignment with **Egypt Vision 2030** and the **National Artificial Intelligence Strategy 2.0 (2025–2030)**, Egypt envisions an AI ecosystem that serves as a catalyst for inclusive growth, national resilience, and societal well-being.

The strategic vision of the AI Governance Framework is:

“To establish a globally interoperable, sovereign, and human-centric AI Governance Framework that positions Egypt as the regional hub for Responsible AI innovation, bridging the African and Arab worlds with the global digital economy.”

To achieve this, Egypt commits to a governance model that is:

- **Human-Centric:** Ensuring that technology serves humanity, not the inverse.
- **Sovereign:** Reducing reliance on external systems by fostering local innovation and “Frugal AI” capabilities.
- **Trustworthy:** Built on a foundation of safety, security, and rigorous risk management to ensure public confidence.

1.4. The Regulatory Architecture

It is important to emphasize that this Guide is the architect of **Egypt's national AI Governance Framework**. Given the complexity, dynamicity and diversity of AI systems and applications, this document outlines the overall vision, principles, and structure for AI Governance.

This Guide is complemented by a series of regulatory instruments that, together with the collection of binding laws, policies, and sector-specific regulations governing artificial intelligence in Egypt, form the integral Egyptian AI Governance Framework.

To ensure robust AI Governance, this document is supported by other instruments covering three distinct levels of details:

- **Guidelines** (The Operational Layer): Offering practical recommendations for HOW to act, serving as the reference manual for Trustworthy and Responsible AI.
- **Standards** (The Specification Layer): Defining precise technical metrics to ensure quality, consistency, and alignment with international benchmarks.
- **Sectoral AI Regulations** (The Compliance Layer): Providing specific rules to manage AI risks and uphold ethical principles within specific industries such as Healthcare, Education, Finance, and Banking.

Through this comprehensive architecture, Egypt reaffirms its strategic commitment to the responsible, safe, and ethical deployment of AI.

1.5. The Governance Philosophy

Under the philosophy of “State as Orchestrator”, the government does not act merely as a regulator but plays a dual, proactive roles:

- **Enabler**: The state actively enables AI innovation, creativity, and adoption through infrastructure, data availability, and capacity building.
- **Guardian**: Simultaneously, the state establishes robust regulatory safeguards for high-risk applications to protect society and national values.

This approach is evidence-based, supported by a comprehensive comparative study of global AI governance frameworks¹, ensuring that the Framework is inspired by global best practices, yet fully aligned with Egypt's institutional capacities and socio-economic realities.

1. Global AI Governance Frameworks Comparative study – December 2025

1.6. AI Actors

This Guide distinguishes between three distinct categories of actors, each assuming specific roles and responsibilities:

- 1. Government (G):** Public sector institutions that deploy (or develop) AI systems for public services or internal operations. For all types of AI systems, these entities are held to be compliant with the Core Ethical Principles (bias mitigation, transparency, and accountability), due to their direct impact on citizens.
- 2. Enterprise (E):** Private sector organizations involved in developing (or deploying) AI systems. Their regulatory compliance follows a “risk-based” approach, with binding requirements for high-risk systems and guiding measures for lower-risk systems.
- 3. Community (C):** Civil society organizations and citizens. They are supported through awareness initiatives that help them understand the opportunities and challenges—particularly those posed by generative AI. The community is also empowered with guardrails for rights of explanation, redress, and responsible use.

1.7. Scope and Applicability

To ensure legal certainty and comprehensive oversight, Egypt’s AI Governance Framework defines clear boundaries regarding who, where, and what is regulated.

- **Geographic Scope:** The AI Governance Framework applies to all AI systems that impact the Egyptian market or citizens, whether developed domestically or overseas, by Egyptian nationals or by foreign providers placing systems on the Egyptian market.
- **Regulated Activities:** The Framework regulates both the commercial supply of AI (“Placing on the Market”) and its operational deployment (“Putting into Service”), ensuring oversight over both vendors and users.
- **Institutional Scope:** The Framework is designed to guide and regulate the responsible development and use of AI across both the Government and Enterprises. It establishes common principles, processes, and standards that apply to governmental entities, state-owned enterprises, and private organizations, ensuring a coherent and harmonized approach to AI Governance nationwide.
- **Technological Scope:** The Framework regulates the application of AI, including Traditional AI, Generative AI (LLMs), and General Purpose AI (GPAI), while providing clear exemptions for National Security, R&D, and Regulatory Sandboxes, as per the provisions of the AI Governance Framework. The applied regulations encompass both horizontal and general scope as well as topic-specific and sector-specific domains.

2. The National Institutional Architecture

2.1. Egypt's Hybrid AI Governance Model.

To manage the complexity of AI across diverse sectors, Egypt adopts a Governance model (Figure 1) that balances centralized policymaking with distributed auditing and enforcement.

This structure separates the functions of design of Policies (Centralized Policy) from their execution (Distributed Operationalization).

- **The Designer (Policy):** Sets the national strategy, risk definitions, and technical standards and regulations to ensure consistency.
- **The Executor (Operationalization):** Existing sectoral regulators apply these standards within their specific domains, ensuring that rules are context-aware (e.g., medical AI is judged by medical experts). In addition to sectoral regulators, core principals shall be audited by the corresponding audit departments in the sector and the corresponding audit departments at the national level (e.g., EGCERT-NTRA, SECC-ITIDA, PDPC).

2.2. The Central Policy Hub (NCAI)

The **National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies** serves as the supreme strategic body for AI Governance in Egypt.

Mandate: It is responsible for:

- Issuing the National AI Strategy, AI Ethical Principles, and AI Governance Policies and Standards.
- Collaborating closely with the Supreme Council of Digital Society and the Supreme Council for Cybersecurity to ensure the full integration of national AI Policies.
- Coordinating efforts across government ministries to ensure alignment and effectiveness.

Role: The “Architect” that defines the overarching vision and priorities.

2.3. The Executive Arm (ECRAI - MCIT)

The **Egyptian Center for Responsible AI (ECRAI)** operates as the implementation and technical executive arm of the NCAI.

Mandate: It is responsible for operationalizing the AI Governance Framework in coordination with the different actors of the Governance Framework.

Key Functions:

- Developing policies, technical standards, and guidelines (e.g., bias audit protocols) to be presented to NCAI.
- Providing technical advisory to government entities.
- Capacity development of governmental entities.
- Managing the AI Audit Lab/ Regulatory Sandboxes to support governmental entities
- Leading Institutional Capacity building, tutoring, and empowerment programs in the field of AI Governance.

2.4. The Technical Conformity Body (SECC)

In coordination with the Egyptian Center for Responsible AI (ECRAI), the Software Engineering Competence Center (SECC) — affiliated with ITIDA — is designated as the primary National Conformity Assessment Body (CAB) for AI software.

Mandate: It is responsible for:

- **Technical Auditing:** Conducting or validating the “Technical Audit (TEVV)” for private sector companies developing or deploying High-Risk systems.
- **Accreditation:** Licensing private-sector audit firms to perform third-party conformity assessments based on national standards.
- **Certification:** Issuing the “Technical Conformity Certificate” required for the market entry of High-Risk systems.

2.5. Security, Safety & Type Approval (NTRA & EG-CERT)

To ensure the integrity of AI infrastructure and connected devices, the **National Telecommunications Regulatory Authority (NTRA)** and the **Egyptian Computer Emergency Readiness Team (EG-CERT)** play a vital role.

Mandate: It is responsible for:

- **Type Approval (NTRA):** Responsible for the verification and licensing of hardware and connected devices (IoT, Edge AI) that embed AI capabilities, ensuring they meet national safety and spectrum standards.
- **Cybersecurity (EG-CERT):** Validates the cybersecurity resilience of High-Risk AI systems against adversarial attacks (e.g., model poisoning, evasion) as part of the conformity assessment process.

2.6. Personal Data & Privacy Protection (PDPC)

The **Personal Data Protection Center (PDPC)** serves as the guardian of citizen data rights within the AI ecosystem.

Mandate: It is responsible for:

- **Data Compliance:** Audits AI systems for compliance with the Personal Data Protection Law (PDPL), specifically regarding data minimization, purpose limitation, and consent.
- **Privacy Impact Assessments (DPIA):** Reviews the data privacy components of the Ethical Impact Assessment (EIA) for systems processing sensitive personal information.

2.7. Sectoral Compliance (Sector Regulators)

Enforcement and Compliance is decided and executed, in coordination with NCAI, by the competent authorities already governing their respective sectors. These authorities are responsible for adapting the national AI Governance Framework to their industries and conducting conformity assessments.

Key Sectoral Regulators and Key Actors include:

- **Financial Services:** Central Bank of Egypt (CBE) and Financial Regulatory Authority (FRA).
- **Healthcare:** Egyptian Drug Authority (EDA) and Ministry of Health.
- **Telecommunications:** National Telecommunications Regulatory Authority (NTRA).

2.8. The External Advisory Committee

To prevent regulatory fragmentation and ensure the uniform and inclusive application of the national AI Governance Framework, the NCAI will establish a permanent **Multi-Stakeholder Advisory Committee**. This body serves as the formal interface between the NCAI, Sectoral Regulators, and the broader AI ecosystem

Mandate: This committee is mandated to bridge the gap between national strategy and sectoral reality. It brings together Sectoral Regulators and external stakeholders to provide objective feedback, represent diverse stakeholder perspectives, and ensure that Sectoral Regulations are harmonized with the National AI Governance Framework.

Key Functions:

- **Sectoral Harmonization & Regulatory Alignment:** Facilitating direct coordination with Sectoral Regulators to integrate specific industry regulations into the National AI Governance Framework, preventing conflict between national mandates and sectoral rules.
- **Stakeholder Consultation & Feedback:** Serving as the primary channel for gathering and synthesizing views from industry leaders, civil society, and academia to ensure Governance decisions reflect the realities of the market and public interest.
- **Impact Assessment & Monitoring:** Tracking the practical application of National AI Governance Framework across different sectors and providing the NCAI with evidence-based recommendations to adjust policies for better adoption and compliance.

THE EGYPTIAN AI GOVERNANCE FRAMEWORK- STRUCTURE LAYERING

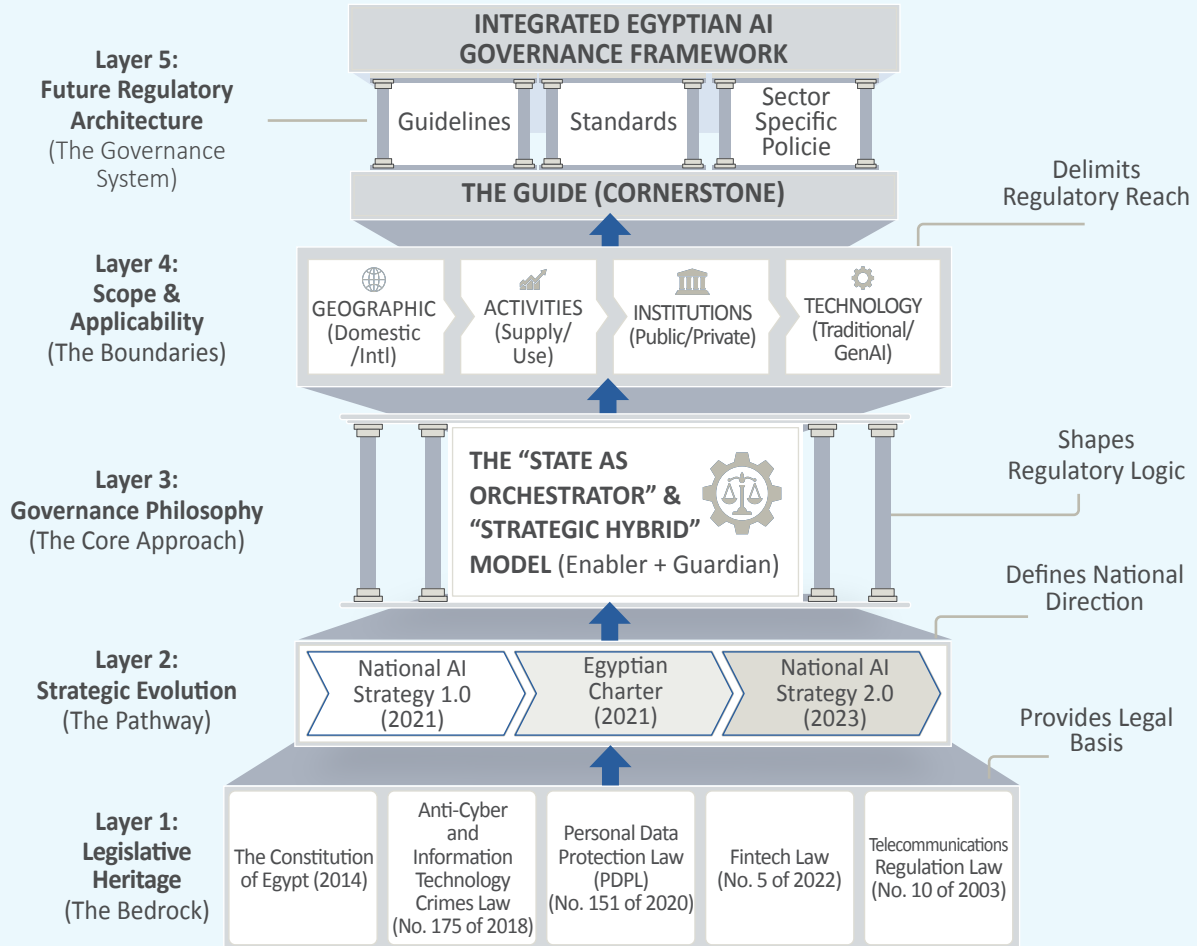


Figure 1: Egyptian AI Governance Framework – Structural Layering

3. Core Ethical Principles

3.1. The Normative Foundation

Egypt's AI Governance Framework does not operate in a vacuum. It operationalizes the ethical values already adopted in the **Egyptian Charter for Responsible AI (2023)** and aligns with international normative frameworks, including the **UNESCO Recommendation on the Ethics of AI** and **OECD Principles**. While the Charter defines the ethical aspirations of the nation, this Framework establishes the regulatory mechanisms required to ensure their realization.

3.2. Societal Impact & Inclusivity.

The AI Governance Framework addresses societal impact through a categorical breakdown of key priorities that include:

Gender Equality:

- Promote equal representation of women in the AI workforce and leadership roles.
- Implement safeguards to prevent AI-enabled gender discrimination or bias in algorithmic decision-making.

Child Protection:

- Prioritize the safety and rights of children in digital environments, ensuring AI systems interacting with minors are designed with age-appropriate safeguards.

Cultural Diversity:

- Ensure that AI systems respect and reflect Egypt's cultural heritage and linguistic nuances, preventing the erasure of local context by generic global models.

3.3. Operationalizing the Core Ethical Principles

To transition from “Principles” to “Practice”, this Guide establishes the following Governance mandates (Figure 2) for all AI actors (Government, Enterprise, and Community), and in full compliance with the Egyptian legal framework. These mandates serve as the basis for the supplementary Regulations and Guidelines, including the National Guidelines for Trustworthy and Responsible AI.

Ethical Principle	Operational Governance Mandate based on the Charter
1. Human-Centeredness	<p>Prioritizing AI systems that enhance human capabilities rather than replacing human labor. If job displacement is inevitable, implementing measures to ensure a fair transition for workers, such as training and access to new opportunities; Focus government AI goals on citizen well-being, inclusive prosperity, and economic growth.</p>
2. Fairness	<p>Implementing mechanisms to protect vulnerable groups by checking for data bias, ensuring development of team diversity, and periodically tuning system parameters; Providing clear avenues for individuals adversely affected by an AI system to challenge outcomes based on understandable information about the decision logic; Ensuring foreign models introduced to the market are trained using relevant local data and adhering to Egyptian customs and norms.</p> <p>Promoting equal representation of women and youth in the AI workforce and leadership roles, and ensuring AI systems do not perpetuate gender discrimination or marginalization, in alignment with the UNESCO Recommendation on the Ethics of AI.</p>
3. Accountability	<p>Ensuring ultimate responsibility for AI behavior lies with natural or legal persons; Keeping human oversight central to regulatory frameworks; Mandating that government AI projects undergo thorough pre-approval impact assessments—weighing benefits against non-AI alternatives—and are supervised by appropriate bodies like MCIT; Ensuring projects are developed by qualified entities with diverse teams and are preceded by pilots with specific success criteria.</p>

4. Security and Safety

Adopting a systematic risk management approach spanning the entire AI lifecycle—including design, deployment, and operation—to ensure systems are robust and secure under various conditions of use or misuse; Maintaining “Final Human Determination”; Ensuring authorized individuals have the power to modify, stop, or retire the system if necessary; Enforcing strict data protocols, including pre-authorization for use, anonymization or encryption of personally identifiable data, and obtaining written consent.

5. Transparency and Explainability

Mandating that end-users are informed when they are interacting with an AI system rather than a human. Developers must provide explainable solutions, opting for simpler models with higher explainability over complex ones if minimum quality is not compromised, and clearly communicating any tradeoffs between accuracy and explainability to project sponsors; Promoting public awareness and capacity-building programs for technical and non-technical groups regarding AI opportunities and challenges. The Framework guarantees individuals’ right to challenge unfair AI-driven decisions and receive meaningful explanations

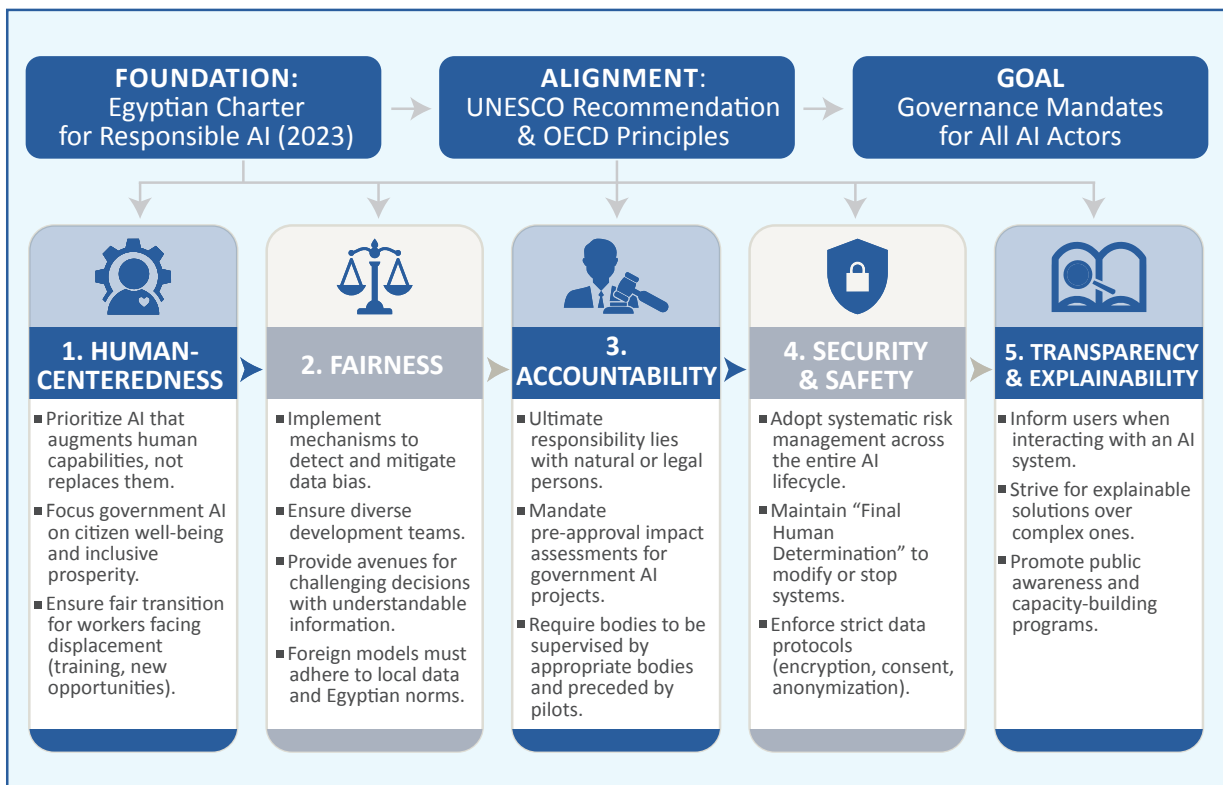


Figure 2: Core Ethical and Governance Principles

4. The Risk Management Model

4.1. The Risk-Based Approach

To balance safety with innovation, Egypt adopts a **Risk-Based Regulatory Approach**. Regulation is not applied uniformly to the technology itself, but proportionately to the context and impact of its application.

The determination of risk is based on four objective criteria:

- **Scale:** The number of people affected.
- **Scope:** The vulnerability of the population (e.g., children, patients).
- **Irreversibility:** The ability to undo the harm (e.g., financial loss is reversible; loss of life is not).
- **Probability:** The likelihood of adverse impact.

4.2. Risk Classification²

This Guide categorizes AI systems into four distinct tiers, each with specific compliance obligations:

- **Tier 1: Prohibited AI Systems (Unacceptable Risk)**

AI systems that create an unacceptable risk to individuals' safety, livelihoods, or fundamental rights—such as those involving social profiling, the exploitation of children, or manipulative behavioral interference—are prohibited.

- **Tier 2: High-Risk AI Systems**

AI systems classified as 'high risk' to safety, health, and fundamental rights must undergo both pre- and post-conformity assessments. In addition to meeting ethical standards, they are required to comply with all applicable legal and regulatory obligations.

- **Tier 3: Limited Risk AI Systems**

Limited-risk AI systems—such as tools used for functionality, development, or performance—must adhere to the AI ethics principles in this document. This category also covers systems with specific transparency or deception risks, including chatbots, emotion-recognition tools, and generative AI (e.g., deepfakes). These applications must comply with transparency requirements, such as disclosing machine interaction and labeling or watermarking AI-generated content.

2. Detailed Guidelines will be issued to further explain the methodology and examples of AI risk-based classification.

- **Tier 4: Minimal or No Risk AI Systems**

Minimal-risk AI systems—those with no meaningful impact on rights or safety, such as spam filters, video games, inventory tools, or predictive maintenance—face no additional regulatory obligations. Their use remains voluntary and governed by existing laws, though adherence to ethical best practices is encouraged.

The classification outcome of AI systems must be recorded in the AI risk registry, detailing the specific “context” and “capability” triggers that determine its tier.

4.3. General Purpose AI (GPAI)

Special consideration is given to General Purpose AI (GPAI) models—such as Large Language Models—that can be adapted for a wide range of tasks.

- **Systemic Risk Models:** Large-scale widespread harm might stem from the application of powerful GPAI with capability and contextual triggers impacting high-risk use cases and disrupting society at large. In such a case, GPAI is reclassified as **Tier 2 (High-Risk)** and becomes subject to stricter scrutiny regarding cybersecurity and adversarial testing.
- **Standard GPAI:** Subject to **Tier 3** transparency requirements, including the documentation of training, data provenance and copyright compliance³.

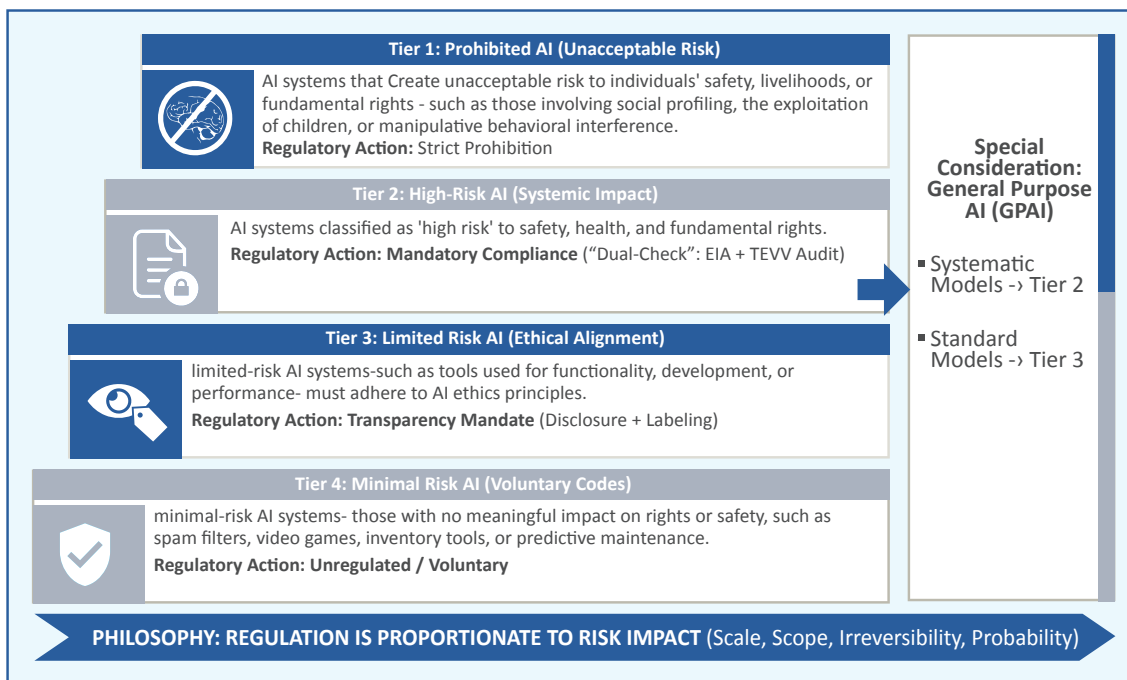


Figure 3 : The Risk-Based Regulatory Model

3. Dedicated Guidelines will be issued for GenAI applications in government and community contexts to clarify both the opportunities and the associated challenges of these technologies.

5. The “Dual-Check” Compliance Model

5.1. The Lifecycle Governance Approach

Effective Governance cannot be a one-time “gatekeeping” event. To ensure safety in a rapidly evolving technological landscape, Egypt mandates a **Lifecycle Governance Approach**⁴ (Figure 4). Compliance obligations extend from the initial design phase through to deployment, operation, and eventual decommissioning.

For **Tier 2 (High-Risk)** systems, this Guide mandates a “**Dual-Check**” **Compliance Model**, consisting of two assessments that take place **at the Ex-Ante phase (Pre-Deployment): AI Ethical Impact Assessment (AIEIA) and Technical Conformity Assessment (Technical Audit); and at the Ex-Post phase (post-deployment): in the form of monitoring the operation in the real environment.**

Although mandatory only for high-risk models, this methodology is recommended for all AI systems to promote ethical and responsible use.

5.2. Ex-Ante: The Gatekeeping Phase

Before a High-Risk AI system can be placed on the Egyptian market or put into service, the Provider must successfully complete two mandatory assessments:

Step 1: The AI Ethical Impact Assessment (AIEIA)

- **Focus: Societal & Ethical Strategic Compliance.**
- **Purpose:** To qualitatively evaluate the system’s potential impact on fundamental rights, societal values, and national interests before technical development is finalized.
- **Methodology:** Providers must conduct a documented assessment identifying potential risks related to bias, discrimination, job displacement, and full alignment with the Egyptian Charter for Responsible AI.
- **Mandate:** This assessment serves as the “Ethical License” to proceed with development.
- **Authority in Charge:** ECRAI-MCIT, SECC-ITIDA

Step 2: The Technical Conformity Assessment (Technical Audit)

- **Focus: Technical Safety & Performance.**
- **Purpose:** To quantitatively verify that the system functions as intended and meets safety standards.
- **Methodology:** Providers must utilize the TEVV (Test, Evaluate, Verify, Validate) methodology⁵ to stress-test the system against adversarial attacks, verify accuracy thresholds, and validate cybersecurity resilience.
- **Mandate:** This assessment serves as the “Technical License” for market entry. It must be conducted in accordance with recognized international and national standards.
- **Authorities in Charge:** SECC-ITIDA, EGCERT-NTRA, PDPC

MCIT and its affiliates will provide the necessary support to SMEs and startups to minimize the burden of compliance and facilitate market entry and innovation.

4. AI Lifecycle Governance is detailed in “Egypt National Guidelines for Trustworthy and Responsible AI”

5. The TEVV methodology is detailed in “Egypt National Guidelines for Trustworthy and Responsible AI”

5.3. Ex-Post: The Oversight Phase

Compliance does not end at deployment. Recognizing that AI models can drift or behave unpredictably over time (e.g., “Concept Drift”), the Framework mandates continuous post-market surveillance.

- **Continuous Monitoring:** Providers must establish automated systems to monitor model performance and detect deviations in accuracy or fairness in real-time.
- **Incident Reporting:** Providers are legally obligated to report “Serious Incidents” —defined as breaches of safety, fundamental rights, or critical infrastructure security — to the relevant Sectoral Regulator within a specified timeframe.
- **Feedback Loops:** Insights from monitoring must feed back into the design process, triggering re-assessments or system updates if risk levels rise.

5.4. The “Frugal AI” Policy

As part of the technical conformity process, Egypt introduces a sustainability measure: the Frugal AI Assessment⁶.

- **The “Comply or Explain” Mandate:** To balance innovation with sustainability, the Frugal AI requirement follows a “Comply or Explain” methodology. Developers of High-Risk systems must prioritize lightweight models (e.g., small language models) where technically feasible.
- **Justification:** If a resource-intensive model is selected, the provider must document the technical justification (e.g., accuracy benchmarks, reasoning capabilities) demonstrating why a frugal alternative was insufficient.

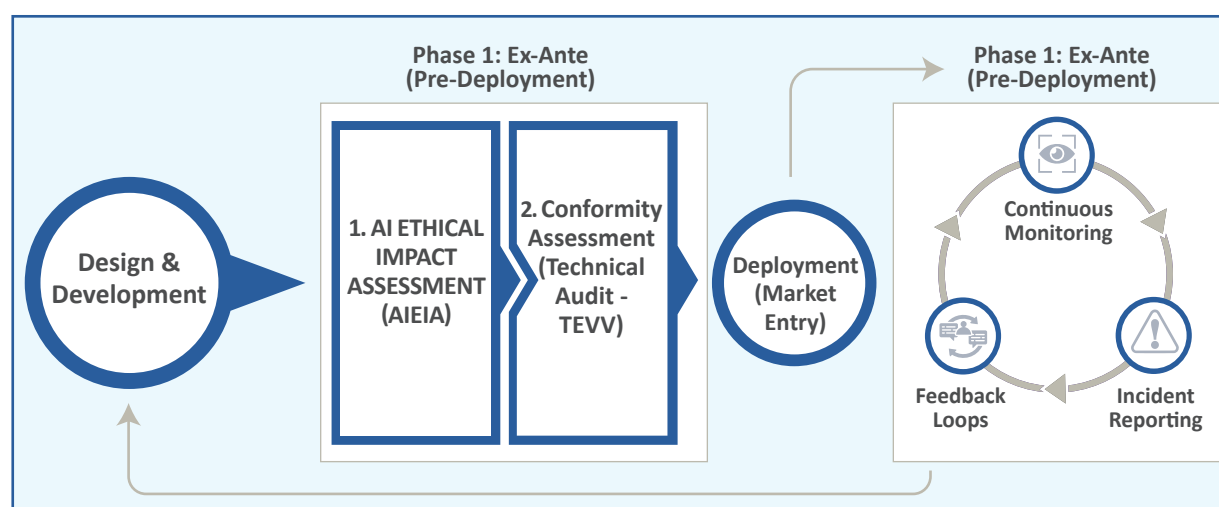


Figure 4: Dual-Check Compliance Model

6. More details are provided in the National Guidelines for Trustworthy and Responsible AI

6. Strategic Enablers & Ecosystem Readiness

6.1. The “State as Orchestrator” Commitment

Effective Governance requires more than just rules; it requires the capacity to follow them. Consistent with the philosophy of “**The State as Orchestrator**”, Egypt commits to actively invest in the foundational pillars—Human Capital, Data, and Infrastructure—necessary to support a thriving, responsible AI ecosystem.

The Government, in collaboration with the private sector, actively drives the **Democratization of AI Resources**, and serves as the primary enabler, reducing barriers to entry so that compliance becomes a competitive advantage rather than a burden.

6.2. Human Capital: Building an AI-Ready Workforce

To bridge the gap between regulatory requirements and technical reality, the Guide mandates a multi-track approach for talent development:

- **Institutional Leadership (Chief AI Officers):** To ensure clear accountability, organizations (particularly in the government and high-risk enterprises) are required to establish clear governance roles, such as appointing and certifying a **Chief AI Officer (CAIO)** or an equivalent authority/mechanism responsible for strategic AI priorities and compliance.
- **Public Sector Readiness:** The **National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies**, in collaboration with the Ministry of Communications and Information Technology will implement mandatory **AI Governance Training** for public servants involved in procurement and oversight, ensuring they possess the skills to conduct Impact Assessments and manage AI contracts.
- **Public Sector Capacity Building:** To strengthen institutional readiness, ministries and government agencies will establish internal AI governance units, supported by continuous professional development programs. These programs will focus on ethics, risk management, procurement, oversight practices, and responsible AI adoption across public services.
- **National Capacity Building:** The **National Council for Artificial Intelligence, Quantum Computing, and Emerging Technologies**, in collaboration with the Ministry of Higher Education, will integrate “AI Ethics & Governance” into university curricula to produce a pipeline of “socio-technical” experts capable of navigating this new regulatory landscape.

6.3. The Data Ecosystem: Quality & Sovereignty

Recognizing data as the essential fuel for AI, the Framework establishes mechanisms to unlock data value while ensuring sovereignty and quality:

- **Data Sovereignty & Localization:** The Framework reinforces the **Personal Data Protection Law (PDPL)** by mandating a license to control cross-border transfer of critical government and sensitive citizen data, ensuring it is stored and processed subject to the Egyptian jurisdiction.
- **National Data Trusts:** To solve the data scarcity challenge, the State will facilitate the creation of **Secure Data Sharing Platforms (Data Trusts)**⁷. These platforms will provide developers with access to high-quality, anonymized, and representative Arabic datasets, reducing bias and training costs.
- **Data Quality Standards:** The Framework mandates that data used for High-Risk systems must meet stringent quality attributes—Accuracy, Completeness, Consistency, and Relevance—to prevent “Garbage In, Garbage Out” scenarios.
- **Protecting Intellectual Property and Cultural Data:** The Framework aligns with Egyptian intellectual property rights laws and regulations. Concerning AI training data, the Framework ensures that Arabic-language models and generative AI systems respect the rights of content creators, thereby preventing unauthorized exploitation of Egypt’s cultural, literacy, and media heritage, and requires Providers of General Purpose AI (GPAI) to maintain detailed documentation of the copyrighted materials used in model training.
- **Output Ownership:** The State recognizes the distinction between human-authored and AI-generated works. Specific Guidelines regarding the copyrightability of AI-generated content will be issued as Regulatory Guidelines, adhering to the principle that copyright requires human creative intervention.

6.4. Infrastructure: The Sovereign Core

To prevent technological dependency, the State commits to providing the computational infrastructure required for sovereign AI:

- **Sovereign Cloud:** The deployment of **National Data Centers** and **High-Performance Computing (HPC)** facilities to host critical government AI workloads, ensuring security and resilience.
- **Enabling Frugal AI:** The State promotes the adoption of **Frugal AI**—an approach focused on maximizing value with minimum computational and energy costs. By prioritizing efficient models, Egypt aligns its AI development with national sustainability goals and reduces reliance on expensive hardware.

7. Reference to the Open Data Policy: <https://ai.gov.eg/SynchedFiles/en/Resources/Open20%Data20%Policy.pdf>

6.5. Funding & Investment Incentives

To accelerate the transition to Responsible AI, the State will align financial incentives with Governance goals:

- **Smart Procurement:** The government will prioritize the procurement of AI solutions that are certified compliant with this Framework, using its purchasing power to create a market for ethical AI.
- **Compliance Support:** Financial incentives and technical support will be directed toward SMEs and startups to help them navigate the conformity assessment process, ensuring that regulation does not stifle innovation.

7. International & Regional Positioning

7.1. The “Multi-Tiered” Alignment Strategy

Egypt recognizes that AI governance is a global challenge requiring coordinated action. However, national interests demand an approach that navigates the “Compliance Divide” between different global blocs.

To achieve this, the Framework adopts a **Multi-Tiered Alignment Strategy** (Figure 5), positioning Egypt as a strategic bridge:

- **Global Level (Normative Alignment):** Egypt aligns its high-level ethical principles with the **UNESCO Recommendation on the Ethics of AI** and the **OECD AI Principles**. This ensures that Egypt remains a responsible member of the international community, committed to human rights and democratic values in the digital age.
- **Regional Level (Strategic Leadership):** As a leader in the **African Union (AU)** and the **League of Arab States**, Egypt actively drives the harmonization of regional governance standards. This Framework serves as a model for the region, promoting unified data policies that prevent fragmentation and foster a cohesive African and Arab digital market.
- **Technical Level (Standardization):** To ensure interoperability, Egypt adopts universally recognized technical standards from **ISO/IEC** (e.g., ISO 42001) and **ITU**. This purely technical alignment ensures that Egyptian AI systems are compatible with global supply chains.

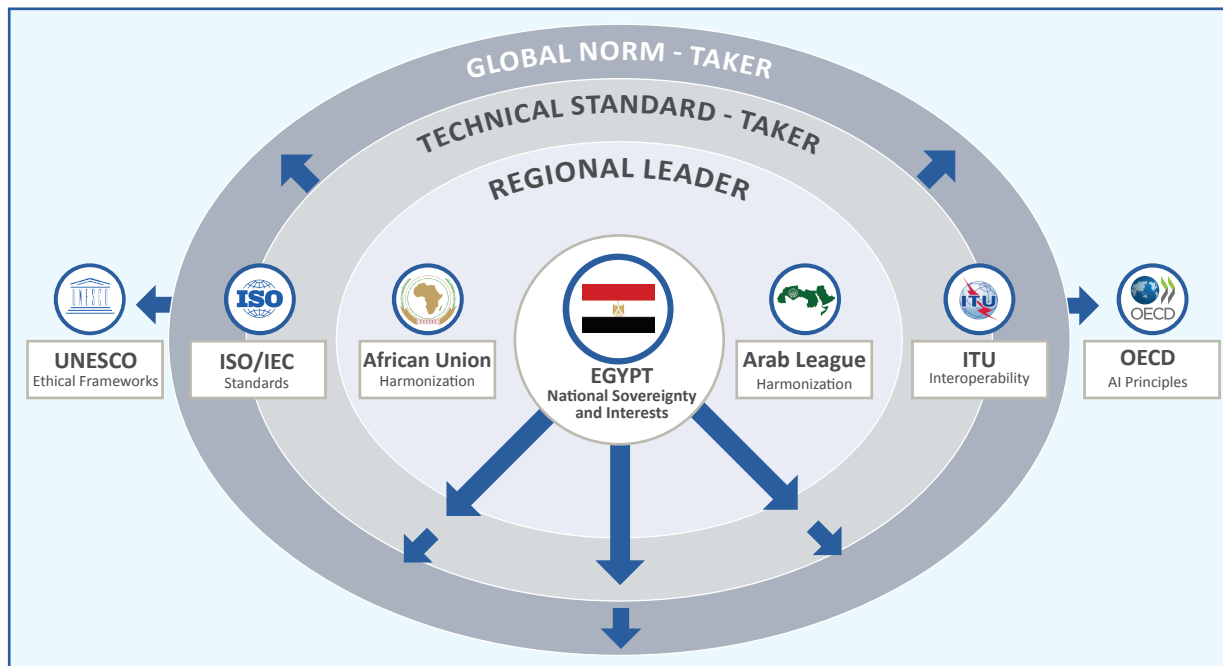


Figure 5 : International and Regional Positioning Strategy

7.2. Facilitating Global Interoperability (Export Readiness)

A key objective of the “State as Orchestrator” is to transform Egypt from an AI consumer to an AI producer. To achieve this, the regulatory environment must facilitate, not hinder, exports.

- **Mutual Recognition:** The State will seek **Mutual Recognition Agreements (MRAs)** with key trading partners (e.g., the EU, GCC). By aligning our **Conformity Assessment** procedures with international norms and standards (such as the EU AI Act, ISO 42001 standard), we ensure that an AI system certified in Egypt can be accepted in global markets without duplicative retesting.
- **Cross-Border Data Flows:** The Framework supports secure cross-border data flows essential for innovation, provided they comply with the **PDPL** and do not compromise national data sovereignty.

7.3. Import/Export Controls for Sensitive AI

While promoting trade, the State maintains strict sovereign control over critical technologies.

- **Dual-Use Technologies:** In line with national security interests, the Framework imposes strict export controls on “Dual-Use” AI technologies (e.g. advanced surveillance systems, autonomous weaponry, or high-performance foundation models).
- **Licensing Regime:** The export of such sensitive technologies requires a **Specific License** from the relevant national security authorities, ensuring that Egyptian technology is not used in violation of international law or Egypt’s diplomatic interests.

8. Roadmap & Future Regulatory Architecture

8.1. The “Living Framework” Approach

Egypt recognizes that AI is a rapidly evolving field. Therefore, this Framework is designed not as a final rigid block, but as an “**evolving mansion**”. It marks the beginning, not the end, of the regulatory journey.

Implementation will follow a **Phased Roadmap** to ensure the market can adapt without disruption, allowing for “Quick Wins” to build momentum while laying the foundation for long-term maturity.

- **Phase 1: Foundation (Months 1-12):** Establishment of the Responsible AI Center, publication of the first batch of Guidelines such as the Risk Classification Guidelines, and launch of the AI Audit Lab/ Regulatory Sandbox to test “Soft Law” mechanisms.
- **Phase 2: Operationalization (Months 12-24):** Activation of mandatory Conformity Assessments for High-Risk sectors and deployment of the Sovereign Cloud infrastructure.
- **Phase 3: Maturity & Alignment (Months 24+):** Full sectoral integration, international mutual recognition of standards, and the transition to a dedicated AI Legislative Act, if proved more suitable.

8.2. Phase 1 Agenda

As the cornerstone of Egypt's AI Governance, this Guide outlines the vision and principles. To address the technical complexity of diverse AI applications, the National AI Governance Framework will be complemented by a series of **Supplementary Instruments**. The Agenda of Phase 1 includes:

- **Risk Classification Guidelines:** A detailed guide providing the definitive methodology and thresholds for classifying AI systems into the four risk tiers (Prohibited, High, Limited, Minimal), crucial for determining compliance obligations.
- **AI Systems Assessment Readiness Tool:** A technical self-assessment tool designed to evaluate a specific AI model or system against national standards for safety, robustness, and performance (TEVV) before deployment.
- **AI Enterprise Readiness Assessment Tool:** An organizational maturity assessment model to evaluate governance structures, workforce capability, and internal policies required to manage AI responsibilities effectively (Enterprise Readiness Level).
- **Safe Use Guidelines for AI Applications for Children:** A specialized guide addressing the unique risks AI poses to minors, including data privacy, exposure to harmful content, and age-appropriate design standards.
- **Generative AI Guidelines for Government & Individuals:** Operational guidelines for the responsible use of LLMs and Generative AI, covering prompt engineering, fact-checking, copyright respect, and data leakage prevention.
- **Government Procurement Guidelines for AI Systems:** A mandatory reference for government entities purchasing AI solutions, defining technical specifications, ethical stipulations, and vendor compliance requirements to ensure public money buys responsible AI.
- **Responsible AI Audit Lab/ Regulatory Sandbox:** The establishment of a physical and digital sandbox/lab environment to conduct audits and conformity assessments for High-Risk systems.
- **Frugal AI Playbook:** A practical technical guide for designing and optimizing AI systems to minimize computational load and energy consumption, supporting the national sustainability mandate.

8.3. Continuous Monitoring & Adaptation

To ensure the Framework remains effective against emerging threats (such as Agentic AI or Deepfakes), the State establishes a **Dynamic Feedback Loop**.

- **Horizon Scanning:** The NCAI will maintain a “Technology Watch” function to anticipate future risks.
- **Annual Review:** The Framework and its risk tiers will be reviewed annually to ensure they remain relevant to the pace of technological change.

9. Conclusion

Through this Framework, the Arab Republic of Egypt reaffirms its position as a proactive architect of its digital destiny. By balancing the rigor of state sovereignty with the agility of market innovation, Egypt establishes a governance model that is globally interoperable, regionally adaptable, and uniquely tailored to national priorities.

This is a commitment to the future: ensuring that the power of Artificial Intelligence is harnessed to drive inclusive growth, protect societal values, and secure the nation’s leadership in the digital age.

