



BANK OF SOUTH SUDAN (BoSS)

Office of the Governor

September 18, 2026

CIRCULAR NO.1/ BoSS/OoG/9/2026

CIRCULAR ON PREVENTION OF SSP CURRENCY HOARDING AND SPECULATIVE FOREIGN EXCHANGE ACTIVITIES

TO:

All Licensed Banks
All Licensed Foreign Exchange Bureaus
All Licensed Money Transfer and Remittance Companies
All Businesses and Corporate Entities Engaged in Foreign Exchange Transactions
All Other Persons in Foreign Exchange Transactions

The Bank of South Sudan (BoSS), in exercise of its statutory mandate under Section 12 of the Bank of South Sudan Act, 2011 as amended 2023 and Section 154 of the Banking Act, 2012 as amended 2023, and in furtherance of its responsibility for monetary and financial stability, price stability, the integrity and orderly functioning of the foreign exchange market, and the safeguarding of the value of the South Sudan Pound (SSP), hereby issues this Circular.

The Bank has observed practices involving the deliberate accumulation, withholding and diversion of South Sudan Pounds and foreign currency from the formal financial system, including speculative foreign exchange activities that have the potential to create artificial scarcity, distort exchange-rate formation, undermine confidence in the national currency and contribute to inflationary pressures.

The Bank of South Sudan therefore issues the following directives, which shall take effect immediately.

1. PURPOSE

The purpose of this Circular is to:

- a) prevent deliberate hoarding of SSP for speculative or market-manipulative purposes;
- b) discourage excessive and unjustified withdrawal and retention of currency outside the formal financial system;
- c) promote the orderly circulation of SSP throughout the economy;
- d) strengthen transparency and discipline in the foreign exchange market;
- e) prevent speculative activities that create artificial scarcity or distort exchange-rate formation;

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- f) strengthen the effectiveness of monetary and foreign exchange policy;
- g) protect the public and businesses from practices that contribute to artificial price increases; and
- h) support monetary, financial and economic stability in the Republic of South Sudan.

2. DEFINITION OF CURRENCY HOARDING

For purposes of this Circular, currency hoarding means the deliberate and excessive accumulation, withholding, concealment or retention of SSP or foreign currency outside the formal banking and authorised foreign exchange system where such conduct is intended, or has the effect, of:

- a) creating or contributing to artificial scarcity of currency in the financial system;
- b) influencing or manipulating exchange rates;
- c) facilitating speculative foreign exchange trading;
- d) circumventing the regulated foreign exchange market; or
- e) disrupting the orderly functioning of the monetary or foreign exchange system.

2.1 Legitimate Currency Holdings

For the avoidance of doubt, the legitimate possession or holding of SSP or foreign currency for genuine personal, business, operational, transactional, or other lawful purposes shall not, by itself, constitute currency hoarding.

The Bank of South Sudan shall assess the nature, purpose, frequency, scale and circumstances of transactions when determining whether conduct constitutes prohibited hoarding or speculative activity.

3. SPECULATIVE FOREIGN EXCHANGE ACTIVITIES

For purposes of this Circular, speculative foreign exchange activities include transactions or arrangements undertaken primarily for the purpose of manipulating, influencing, or profiting from artificial movements in exchange rates or creating an artificial shortage of foreign currency.

Such activities may include:

- a) accumulating foreign currency solely for speculative resale;
- b) deliberately withholding foreign currency from the market with the intention of influencing its price;
- c) engaging in repeated foreign exchange transactions without a legitimate underlying economic purpose;
- d) conducting foreign exchange transactions through unauthorised dealers;
- e) using intermediaries, agents or related parties to circumvent applicable foreign exchange requirements; and
- f) any other arrangement designed to manipulate or disrupt the orderly functioning of the foreign exchange market.

4. PROHIBITED PRACTICES

With immediate effect, no person or entity shall:

- a) deliberately hoard SSP for the purpose of creating artificial scarcity or influencing market conditions;
- b) deliberately accumulate or withhold foreign currency for the purpose of manipulating exchange rates;
- c) engage in foreign exchange business without the requisite licence or authorisation;
- d) buy, sell or exchange foreign currency through unauthorised dealers;
- e) conduct or facilitate foreign exchange transactions outside authorised channels for the purpose of circumventing applicable laws, regulations or Bank directives;
- f) conceal, misrepresent or materially understate significant currency or foreign exchange holdings where disclosure is required by law or by the Bank of South Sudan; or
- g) undertake any other activity prohibited under applicable law, regulation or directive of the Bank of South Sudan.

5. OBLIGATIONS OF COMMERCIAL BANKS

All licensed commercial banks shall:

- a) strengthen monitoring of significant cash withdrawals, deposits and movements of SSP and foreign currency;
- b) identify unusual, excessive or unexplained patterns of currency accumulation or movement;
- c) ensure that foreign exchange transactions are conducted only through authorised channels;
- d) maintain effective Know-Your-Customer (KYC), customer due-diligence and Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT) controls;
- e) monitor transactions that may indicate speculation, market manipulation or attempts to circumvent the formal financial system;
- f) report suspicious and other reportable transactions to the competent authorities in accordance with applicable laws;
- g) maintain complete and accurate records of significant cash and foreign exchange transactions; and
- h) provide the Bank of South Sudan with any information, reports, and records it lawfully requires.

6. OBLIGATIONS OF FOREIGN EXCHANGE BUREAUX

All licensed foreign exchange bureau shall:

- a) conduct foreign exchange business strictly within the scope of their licenses;
- b) comply with all applicable Bank of South Sudan regulations, directives, and reporting requirements;
- c) maintain complete records of all foreign exchange transactions;
- d) refrain from dealing with unauthorised foreign exchange dealers;
- e) monitor transactions that appear designed to facilitate speculative or manipulative activities; and
- f) immediately report suspicious transactions and other reportable activities in accordance with applicable laws.

7. LARGE CASH AND FOREIGN EXCHANGE TRANSACTIONS

All regulated institutions shall comply with applicable requirements concerning the reporting and monitoring of large cash transactions and foreign exchange transactions.

Where the Bank of South Sudan determines that additional reporting is necessary to safeguard monetary and financial stability, it may prescribe additional reporting thresholds, frequencies, formats and information requirements.

No regulated institution shall knowingly facilitate the concealment, splitting, structuring or layering of transactions for the purpose of avoiding applicable reporting requirements.

8. RESPONSIBILITY OF BOARDS AND SENIOR MANAGEMENT

The Board of Directors and senior management of each regulated institution shall ensure that adequate internal controls, treasury procedures, compliance systems, and reporting mechanisms are established to prevent:

- a) unauthorised foreign exchange activities;
- b) deliberate currency hoarding for speculative purposes;
- c) market manipulation;
- d) circumvention of Bank of South Sudan regulations, circulars and directives;
- e) misuse of the institution's facilities for speculative foreign exchange activities.

The Chief Executive Officer and Chief Financial Officer shall maintain appropriate systems to monitor and report material currency and foreign exchange exposures.

9. REPORTING TO THE BANK OF SOUTH SUDAN

The Bank of South Sudan may require any regulated institution or other person subject to its lawful supervisory authority to submit information relating to:

- a) SSP cash holdings;
- b) foreign currency holdings;
- c) foreign exchange transactions;
- d) significant cash withdrawals and deposits;
- e) foreign exchange positions;
- f) counterparties to significant transactions; and
- g) any other information relevant to the Bank of South Sudan monetary, foreign exchange or financial stability functions.

All information submitted to the Bank of South Sudan shall be complete, accurate and submitted within the prescribed period.

10. SUPERVISION AND MARKET SURVEILLANCE

The Bank of South Sudan shall strengthen its supervision and market-surveillance activities to identify and address practices that may undermine the stability and integrity of the monetary and foreign exchange system.

In accordance with applicable law, the Bank of South Sudan may:

- a) conduct on-site inspections and compliance reviews;
- b) examine books, accounts, records, and transaction documentation;
- c) review cash and foreign exchange positions;
- d) require the production of relevant information and supporting documents;
- e) investigate suspected violations of applicable laws, regulations, and Bank directives; and
- f) coordinate, where appropriate, with the Financial Intelligence Unit, law-enforcement agencies, and other competent authorities.

All regulated institutions and persons subject to a lawful request by the Bank of South Sudan shall provide full cooperation and timely access to the required information and records.

11. SANCTIONS AND ENFORCEMENT

Any person or entity that violates this Circular or applicable laws, regulations and directives relating to foreign exchange and monetary operations shall be subject to the applicable sanctions and enforcement measures provided by law.

Depending on the nature and seriousness of the violation, such measures may include:

- a) administrative sanctions and monetary penalties;
- b) suspension or revocation of a licence or authorisation;
- c) restrictions on access to foreign exchange facilities;
- d) referral to the Financial Intelligence Unit and/or competent law-enforcement authorities;
- e) seizure, confiscation, or forfeiture where expressly authorised by law; and
- f) criminal prosecution and any other sanctions prescribed by law.

Where a violation is committed by, or with the knowledge, approval or connivance of, a director, manager, officer, employee or agent, the responsible individual may be subject to liability in accordance with applicable law.

12. PUBLIC RESPONSIBILITY

The Bank of South Sudan calls upon members of the public and businesses to:

- a) conduct foreign exchange transactions only through licensed and authorised channels;
- b) refrain from dealing with unauthorised foreign exchange dealers;
- c) avoid speculative practices that contribute to artificial scarcity or exchange-rate instability;
- d) maintain appropriate records for significant foreign exchange transactions; and
- e) report suspected currency hoarding, unauthorised foreign exchange activities and market manipulation to the Bank of South Sudan or other competent authorities.

13. COMPLIANCE REVIEW

All institutions and entities covered by this Circular shall immediately review their existing cash-management, treasury and foreign exchange arrangements and take all necessary measures to ensure compliance.

Any institution or entity that is uncertain whether a particular transaction or arrangement falls within the scope of this Circular shall seek written clarification from the Bank of South Sudan before entering or continuing such transaction or arrangement.

14. SUPERCESSION

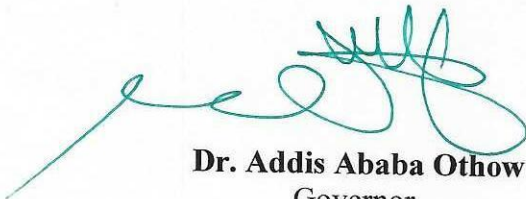
Upon its effective date, this Circular shall supersede and replace any previous circular or directive issued by the Bank of South Sudan on currency hoarding to the extent that such previous instrument is inconsistent with this Circular.

15. EFFECTIVE DATE

This Circular shall take effect immediately upon issuance and shall remain in force until amended, replaced, or revoked by the Bank of South Sudan.

The Bank of South Sudan reserves the right to issue additional directives, guidelines and reporting requirements as may be necessary to maintain monetary and financial stability and ensure the orderly functioning of the foreign exchange market.

Issued under the authority of the Governor on this day 18th Month Sept, 2026.


Dr. Addis Ababa Othow
Governor,
Bank of South Sudan



COPIED TO:
Hon. Minister of Finance and Planning
Hon. Minister of Petroleum
Hon. Minister of Trade and Industry
Financial Intelligence Unit
National Revenue Authority
Inspector General of Police
Relevant Sector Regulators