



AI, Machine Learning & Big Data 2026

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Trends

Artificial intelligence (“AI”), big data and machine learning are driving the Singapore economy. Advances in mobile computing and increasingly widespread internet and social media usage, among other factors, have contributed to the availability of large volumes of data, which are increasingly being analysed by machine-learning algorithms to make predictions or decisions.

The adoption of AI has been identified by the Government as one of the nine key trends that will move the digital economy in Singapore over the next three to five years.¹ In 2019, the Government launched a National Artificial Intelligence Strategy, aiming to establish Singapore as a leader in developing and deploying scalable, impactful AI solutions in sectors that are highly valuable and pertinent to both citizens and businesses by 2030.² There will be an initial tranche of five “National AI Projects” in the high socio-economic impact sectors of border security, logistics, healthcare, education management and estate management.

In 2023, the renewed National Artificial Intelligence Strategy 2.0 was launched, where AI is now seen as a “necessity” rather than just “good to have”. Singapore will ensure that its population understands how to harness AI effectively, while at the same time taking differentiated approaches to manage the risks to and from AI, ranging from regulatory moves to voluntary guidelines.³

Key initiatives to build Singapore’s AI capabilities include:

- (a) the 2017 launch of AI Singapore, a National AI programme that aims to enhance Singapore’s AI capabilities, nurture local talent and build an ecosystem of AI start-ups and companies developing AI products;
- (b) the provision of Government grants and incentives, such as the AI and Data Analytics (“AIDA”) Grant offered by the Monetary Authority of Singapore (“MAS”), which aims to promote the adoption and integration of AIDA in financial institutions, as well as a \$150 million Enterprise Compute Initiative (announced in the Government’s 2025 Budget) for eligible companies to be partnered with major cloud service providers to access AI tools and computing power, together with expert consultancy services;⁴ and

- (c) the launch of the AI Verify Foundation in June 2023, comprising members from both government and industry, to develop AI testing tools to promote the responsible use of AI.⁵

Various governmental and regulatory agencies have also issued policy papers setting out their views on matters relating to AI and big data, and have invited stakeholder feedback on certain policy issues and proposals by way of consultation exercises. Recent examples include:

- (a) the Infocomm Media Development Authority (“IMDA”) and Personal Data Protection Commission’s (“PDPC”) Model Artificial Intelligence Governance Framework (“Model AI Framework”). The Model AI Framework is the first in Asia and is intended to provide guidance to private sector organisations for the purpose of addressing key ethical and governance issues that may arise from their deployment of AI solutions;
- (b) a research paper titled “Data: Engine for Growth – Implications for Competition Law, Personal Data Protection, and Intellectual Property Rights”, published by the Competition & Consumer Commission of Singapore (“CCS”, formerly the Competition Commission of Singapore) in collaboration with the Intellectual Property Office of Singapore (“IPOS”);
- (c) the “Principles to Promote Fairness, Ethics, Accountability and Transparency (“FEAT”) in the Use of Artificial Intelligence and Data Analytics in Singapore’s Financial Sector”, issued by the MAS, provide a set of generally accepted principles for the use of AIDA in decision-making related to providing financial products and services;
- (d) the MAS’s Veritas Initiative, which will enable financial institutions to evaluate their AIDA solutions against the FEAT principles;⁶
- (e) the PDPC’s publication of Advisory Guidelines on Use of Personal Data in AI Recommendation and Decision Systems on 1 March 2024 (“PDPC’s Guidelines on AI”);
- (f) the IMDA and AI Verify Foundation’s joint publication of the Model AI Governance Framework for Generative AI on 30 May 2024, which sets out key issues for the public and policymakers to address, spanning misinformation to accountability across the AI development chain to intellectual property (“IP”) infringement; and
- (g) the IMDA’s publication of the Model AI Governance Framework for Agentic AI on 26 January 2026, a first-of-its-kind framework which provides guidance on how to deploy agents responsibly, recommending measures to mitigate risks while emphasising that humans are ultimately accountable.⁷

Internationally, Singapore has also entered into agreements with other nations⁸ to strengthen and develop AI research and collaboration efforts. In October 2023, Singapore and the US made efforts to deepen cooperation in AI by making their AI governance frameworks interoperable (mapping Singapore’s AI Verify to the US NIST AI Risk Management Framework), establishing a bilateral AI Governance Group and pledging to increase exchanges and programmes to deepen research and technical collaborations in AI.⁹ Singapore has since continued to align our AI governance testing framework with other countries, mapping the AI Verify Framework to the newly-launched ISO/IEC 42001:2023 so that companies may practically demonstrate alignment with the ISO standard without onerous cost.¹⁰

In terms of wider efforts in the region, the Association of Southeast Asian Nations’ (“ASEAN”) Guide on AI Governance and Ethics was published in February 2024 to provide practical guidance for organisations in the region that wish to design, develop and deploy traditional AI technologies in commercial and non-military or dual-use applications.¹¹ This guide was enhanced in January 2025 with the release of the Expanded ASEAN Guide on AI Governance and Ethics – Generative AI, which sets out the opportunities and risks of generative AI and recommended policy actions for ASEAN to adopt generative AI responsibly.¹²

Singapore, together with Rwanda, has also led an initiative amongst the Digital Forum of Small States to publish the AI Playbook for Small States in September 2024 – an anthology of best practices from members

on how they have each implemented AI strategies and overcome challenges particular to small states (e.g., limited resources, access to data and talent, and small domestic markets).¹³

The Singapore courts have also had the opportunity to address issues raised by the use of algorithms in the context of cryptocurrency. In the case of *B2C2 Ltd v Quoine Pte Ltd* [2019] 4 SLR 17 (“*B2C2 v Quoine*”), the Singapore International Commercial Court (“SICC”) had to determine the appropriate application of legal principles to a cryptocurrency exchange where trading was conducted via an algorithmic system as opposed to direct human action.

The algorithmic program in *B2C2 v Quoine* was found by the SICC to be “deterministic” in nature, with “no mind of [its] own”, but “[a] mere machine [...] carrying out actions which in another age would have been carried out by a suitably trained human”. However, the SICC (per Simon Thorley J) opined that the ascertainment of knowledge in cases where computers have replaced human action will develop in the future as disputes arise as a result of such action, particularly in cases where the computer in question is “creating artificial intelligence” and can be said to have “a mind of its own” (*B2C2 v Quoine* at [206] to [209]). This was affirmed by the majority of the Court of Appeal on appeal, in *Quoine Pte Ltd v B2C2 Ltd* [2020] 2 SLR 20.

In the legal sector, the Supreme Court of Singapore issued a Guide on the Use of Generative AI Tools by Court Users, which sets out steps that lawyers and litigants-in-person must adhere to when using generative AI tools to prepare court documents.¹⁴ The Ministry of Law has also published (in March 2026) a Guide for Using Generative AI in the Legal Sector.¹⁵

Ownership/protection

The Singapore Government has sought to facilitate the protection of IP rights in AI technologies, to help innovative enterprises bring AI products to market faster. As the IP landscape is still evolving, especially where it comes to the use of copyrighted materials for training generative AI systems, on 28 February 2024, IPOS, together with the Singapore Management University Centre for AI & Data Governance, published a report titled “When Code Creates: A Landscape Report on Issues at the Intersection of Artificial Intelligence and Intellectual Property Law”, which collates the treatment of selected key IP issues across various jurisdictions.¹⁶ Some of these pertinent issues are discussed below.

Protection for AI technologies

Under section 13 of the Patents Act 1994, for an invention to be patentable, it must satisfy three conditions:

- (a) the invention must be new;
- (b) involve an inventive step; and
- (c) be capable of industrial application.

Companies considering the possibility of patent protection for AI inventions *per se* may wish to note that potential issues may arise because mathematical methods, i.e., algorithms *per se*, are not considered inventions, and solving a generic problem such as using the method in controlling a system is unlikely to cross the threshold.

That said, IPOS also stated in its IP and Artificial Intelligence Information Note that where the patent application relates to the application of a machine learning method to solve a specific problem in a manner that goes beyond the underlying mathematical method, the application could be regarded as an invention.¹⁷

Apart from the protection of AI solutions under patent law, the source code of a computer program may also be protected by copyright. Section 13(1)(b) of the Copyright Act 2021 expressly provides that “literary work” includes a “computer program” for the purposes of the Copyright Act 2021.

In the context of AI, a couple of further issues may become increasingly relevant. These are: (i) rights in relation to data; and (ii) rights in relation to works generated by AI.

Exception for text and data mining

The Singapore Government has observed, in the Singapore Copyright Review Report (issued 17 January 2019), that text and data mining and its applications are crucial elements that fuel economic growth and support Singapore's drive to catalyse innovation in the digital economy. Text and data mining refers to the use of automated techniques to analyse text, data and other content to generate insights and information.

However, those involved in such activities risk infringing copyright law, as the initial phase of the work typically involves incidentally extracting or copying data from large quantities of material that may be protected by copyright.

In this light, section 244 of the Copyright Act 2021 allows the copying of copyrighted materials for the purpose of computational data analysis, including for the development and verification of machine learning models, provided that certain conditions are satisfied. One such condition involves the user having lawful access to the materials that are copied (e.g., not to circumvent paywalls). Notably, the exception in question does not distinguish between commercial and non-commercial use.

Protection of AI-generated works

At this juncture, it remains to be seen how IP laws may be applied to protect AI-generated works. Under the present IP legal framework, a number of issues are likely to arise with respect to the protection of AI-generated works. Programs capable of generating such works already exist and are in use. For instance, natural language processing models, such as ChatGPT, are frequently used by students and organisations to generate content.¹⁸

The Singapore courts have recognised that, under existing Singapore copyright law, only natural persons may be considered authors of works, although legal persons, like companies, may own the copyright in works. It is therefore necessary to be able to attribute the creative elements of a work to a natural person in order for copyright to vest.¹⁹ Under the present statutory regime, the courts have further observed that "in cases involving a high degree of automation, there will be no original work produced for the simple reason that there are no identifiable human authors",²⁰ where authorship is defined in terms of the exercise of independent, original or creative intellectual efforts.²¹

To provide guidance to organisations, in August 2025 the IPOS issued a factsheet on how Singapore law treats AI-generated content, listing factors that would increase or decrease the likelihood of the AI-generated content qualifying for copyright protection.

Antitrust/competition laws

The Competition Act 2004 ("Competition Act") establishes a general competition law in Singapore. The Competition Act generally prohibits:

- (a) anti-competitive agreements (the section 34 prohibition);²²
- (b) the abuse of a dominant position (the section 47 prohibition);²³ and
- (c) mergers and acquisitions that substantially, or may be expected to substantially, lessen competition within any market in Singapore (the section 54 prohibition).²⁴

The CCS is the statutory authority responsible for administering and enforcing the Competition Act.

Competition issues pertaining to AI and big data have been the subject of various studies²⁵ by the CCS.

Anti-competitive agreements and concerted practices facilitated by algorithms

Among the topics discussed in one of the CCS's papers²⁶ is anti-competitive agreements and concerted practices facilitated by algorithms.

In the paper, the CCS recognised the need to balance efficiency gains against the increased risk of collusion. In this regard, the CCS has identified several concerns in relation to algorithms providing new means of fostering collusion. First, monitoring algorithms may enhance market transparency and organisations may be able to automatically extract and evaluate real-time information concerning the prices, business decisions and market data of competitors. Second, algorithms increase the frequency of interaction between organisations and the ease of price adjustments, as automated pricing algorithms may be able to automate the decision process of colluding organisations so that prices react simultaneously and immediately to changes in market conditions.²⁷ On 1 October 2025, the CCS, in collaboration with the IMDA, launched the AI Markets toolkit, which allows both AI model developers and AI model deployers to self-assess whether their AI models and business practices are in compliance with the Competition Act and the Consumer Protection (Fair Trading) Act 2003.²⁸

The CCS has identified certain concerns about whether the existing competition enforcement framework is adequately equipped to deal with future developments involving algorithms. The main concern lies in how algorithms may lead to greater instances of tacitly collusive equilibriums (i.e., collusive agreements being reached without any explicit communication between competitors) that may fall outside the current scope of competition enforcement.²⁹

Board of directors/governance

On 21 January 2020, the IMDA/PDPC published the second edition of its Model AI Framework.³⁰ The Model AI Framework sets out common definitions and principles relating to the responsible use of AI. Adoption of the Model AI Framework is on a voluntary basis.

The Model AI Framework comprises guidance on four key areas, including organisations' internal governance structures and measures. The Model AI Framework also expressly recognises that “[t]he sponsorship, support, and participation of the organisation's top management and its Board in the organisation's AI governance are crucial”. One of the suggested practices includes establishing a coordinating body that has relevant expertise and proper representation from across the organisation to oversee the ethical deployment of AI.

Briefly, the principles set out in the Model AI Framework across the four key areas include the following:

- (a) **Internal governance structures and measures:** organisations should ensure that there are clear roles and responsibilities in place for the ethical deployment of AI, as well as risk management and internal control strategies.
- (b) **Determining AI decision-making models:** organisations should consider the risks of using a particular AI model based on the probability and severity of harm and determine what degree of human oversight would be appropriate based on the expected probability and severity of harm.
- (c) **Operations management:** organisations should take steps to understand the lineage and provenance of data, and the quality of their data, as well as the transparency of the algorithms chosen.
- (d) **Stakeholder interaction and communication:** organisations should take steps to build trust and maintain open relationships with individuals regarding the use of AI, including steps such as general disclosure, increased transparency, policy explanations and careful design of human–AI interfaces.

Complementing the Model AI Framework is the Implementation and Self-Assessment Guide for Organisations, a companion guide that aims to help organisations assess the alignment of their AI governance practices with the Model AI Framework, as well as the Compendium of Use Cases, which features organisations that have implemented accountable AI practices.

In order to assure the public that AI systems are fair, explainable and safe, Singapore launched AI Verify in May 2022, a self-assessment AI governance testing framework and toolkit for organisations containing both software for technical tests and a series of questions for process checks. AI Verify does not use

pass-fail standards, but enables organisations to be more transparent about the performance of their AI systems.³¹ The AI Verify Foundation was subsequently launched in June 2023 with the goal of boosting AI testing capabilities to meet the needs of companies and regulators globally.³²

On 30 May 2024, the AI Verify Foundation and IMDA launched the Model AI Governance Framework for Generative AI.³³ The framework expanded on the existing Model AI Framework, which only covers “Traditional AI” (which makes predictions based on existing/historical data instead of creating new content), by proposing nine dimensions to support a comprehensive and trusted Generative AI ecosystem. Since then, recognising agentic AI as the next evolution of AI, the IMDA published the Model AI Governance Framework for Agentic AI on 22 January 2026. This framework establishes four key dimensions that organisations deploying agentic AI should address:³⁴

- (a) assessing and bounding risks upfront by selecting appropriate agentic use cases and placing limits on agents’ powers;
- (b) making humans meaningfully accountable for agents by defining significant checkpoints at which human approval is required;
- (c) implementing technical controls and processes throughout the agent lifecycle; and
- (d) enabling end-user responsibility through transparency and education/training.

Regulations/government intervention

At present, Singapore does not have legislation governing the use of AI in general (unlike the proposed EU AI Act), but has voluntary guidelines for individuals and businesses, such as the Model AI Framework. There is also no dedicated regulator that oversees the use of AI and its regulation is governed by sectoral regulators where applicable.

Protection of personal data

The use of datasets in conjunction with AI applications has the potential to raise data protection (“DP”) issues, especially where such datasets contain personal data.

The Personal Data Protection Act 2012 (“PDPA”) sets out the general DP framework, which governs the collection, use and disclosure of personal data by private sector organisations in Singapore. It operates alongside sectoral laws and regulations, such as those issued by the MAS for the financial sector.

Under the PDPA’s general DP framework, there are presently 10 main obligations, with one more obligation (i.e., the Data Portability Obligation) to come into force in the future. Since the enactment of the PDPA, the general DP framework has largely operated as a consent-based regime. In this regard, the “consent obligation” under the PDPA requires an organisation to obtain an individual’s consent before the collection, use or disclosure of personal data, unless an exception applies.³⁵

Importantly, the amendments to the PDPA under the Personal Data Protection (Amendment) Act 2020 introduced numerous revisions to the consent framework, including recognising the presence of deemed consent under certain circumstances, as well as expanding the range of the exceptions to consent under the PDPA, so as to empower businesses to use data for innovation.

In the PDPC’s Guidelines on AI, the PDPC encourages the use of anonymised data, as far as possible. Anonymised data is no longer personal data (and therefore not governed by the PDPA). According to the PDPC’s Advisory Guidelines on the PDPA for Selected Topics, data would be considered anonymised if there is no serious possibility that an individual could be re-identified, taking into consideration both:

- (a) the data itself, or the data combined with other information to which the organisation has or is likely to have access; and
- (b) the measures and safeguards implemented by the organisation to mitigate the risk of re-identification.

Organisations would have to be mindful that technological advancements may increase the risk of re-identification of a dataset, which was previously anonymised, and thereby be considered personal data.³⁶ Organisations would also have to weigh the trade-offs with using anonymised data when developing or training AI systems (such as model accuracy, repeatability or reproducibility of results).³⁷

Cybersecurity

The Cybersecurity Act 2018 establishes the framework for the oversight and maintenance of national cybersecurity in Singapore and imposes duties and obligations on computer systems designated as critical information infrastructure (“CII”). The Cybersecurity Act 2018 operates alongside the Computer Misuse Act 1993 (“CMA”), which criminalises cyber activities such as hacking, denial-of-service attacks, infection of computer systems with malware, and other sector-specific regulatory frameworks. On 11 April 2022, the licensing framework for cybersecurity service providers came into effect,³⁸ along with the Cybersecurity (Cybersecurity Service Providers) Regulations 2022. The licensing framework, which covers cybersecurity service providers offering penetration testing services and managed security operations centre monitoring services, aims to improve the standard of cybersecurity service providers, and address the information asymmetry between such providers and consumers.

The Cybersecurity (Amendment) Act 2024 (“Amendment Act”) was passed in mid-2024. At the time the Cybersecurity Act 2018 was enacted, providers of essential services tended to own and control the CII used for continuous delivery of the essential services they were responsible for. To keep up with the evolving business landscape, the Amendment Act expands the Cyber Security Agency of Singapore’s (“CSA”) oversight beyond CII owners to: (1) essential service providers who use CII owned by a third party; (2) major foundational digital infrastructure service providers (i.e., cloud-computing service providers and data centre facility service providers); (3) entities of special cybersecurity interest; and (4) owners of systems of temporary cybersecurity concern. Since 31 October 2025, the provisions relating to essential service providers who use CII owned by a third party and owners of systems of temporary cybersecurity concern have come into effect.

Separately, the CSA published the Guidelines and Companion Guide on Securing AI Systems on 15 October 2024, which set out recommended practices for owners of AI systems to follow in order to secure the AI systems throughout their life cycle.³⁹ The guidelines highlight that while AI systems are software systems and vulnerable to classical cybersecurity threats such as supply chain attacks and intrusion or unauthorised access, malicious actors may also employ novel methods of attack such as Adversarial Machine Learning that set out to distort the AI system’s behaviour. The Companion Guide provides practical mitigation measures for decision makers, AI practitioners and cybersecurity practitioners to address cybersecurity risks to AI systems.

On 22 October 2025, the CSA announced a public consultation on an addendum to the Guidelines and Companion Guide on Securing AI Systems to cover agentic AI systems. The addendum outlines how risks can be identified and assessed based on the capabilities of agentic AI systems and provides practical controls to mitigate risks across the development lifecycle.

Protection from Online Falsehoods and Manipulation Act 2019 (“POFMA”)

Singapore is one of many jurisdictions to have enacted laws to deal with fake news and misinformation. The POFMA, which came into effect on 2 October 2019, seeks to, among others, prevent the electronic communication of false statements of fact in Singapore. In particular, it is an offence under the POFMA for a person to make or alter an automated computer program (i.e., a “bot”) with the intention of using it to communicate false statements of fact in Singapore.

Regulation of autonomous motor vehicles

The Singapore Government has also recognised the potential benefits that AI may bring to the

transportation sector and has sought to facilitate trials involving autonomous vehicles. In 2017, the Road Traffic Act 1961 was amended to include specific definitions relating to autonomous vehicles.⁴⁰

Furthermore, the Road Traffic (Autonomous Motor Vehicles) Rules 2017 (“Autonomous Vehicles Rules”) were introduced to regulate the trials of autonomous vehicles. Parties interested in trialling autonomous vehicles must submit an application to the Land Transport Authority (“LTA”). In granting a party the authorisation to conduct these trials, the LTA retains the discretion to impose conditions, such as the autonomous vehicle to be accompanied by a safety driver that has been trained to take full control of the autonomous vehicle when required, and the geographical area in which the trial may be conducted.⁴¹

Generative AI/foundation models

In 2023, the IMDA published a discussion paper titled “Generative AI: Implications for Trust and Governance”, which set out six key risks of generative AI and good governance approaches to mitigate those risks.⁴² This was followed by a second discussion paper, “Cataloguing LLM Evaluations”, which sets out baseline evaluation and testing approaches for large language models (“LLMs”).⁴³

In May 2024, the Model AI Governance Framework for Generative AI was released by the AI Verify Foundation and IMDA. The framework sets out actions to be taken across nine dimensions below to address the risks posed by generative AI, while continuing to facilitate innovation.⁴⁴ At the same time, “Project Moonshot”, one of the world’s first evaluation toolkits for LLMs, was released for public use.

Accountability: responsibility should be allocated based on the level of control each person has in the generative AI development chain.

Data used in model training: there is a need for open dialogue and guidance between policymakers and relevant stakeholders on how personal data laws and copyright laws apply to data used in model training.

Trusted development and deployment: there is a need to adopt common safety practices and standardise disclosure about generative AI models to facilitate comparability across models and incentivise safer model use.

Incident reporting: there is a need for AI developers to report safety vulnerabilities in their AI systems and then act pre-emptively to patch the system. Organisations should also report to regulators incidents of a certain severity arising from their use of AI systems.

Testing and assurance: policymakers and international standards organisations (e.g., International Organisation for Standardisation) should develop common standards for AI testing to ensure quality and consistency.

Security: new testing tools must be developed to address the risks specific to generative AI.

Content provenance: users should be aware that they are interacting with AI-generated content to reduce the risk of misinformation, so technical solutions such as digital watermarking and cryptographic provenance should be explored, in tandem with public education on verifying the authenticity of content.

Safety and alignment Research & Development (“R&D”): there should be investment in R&D, with more AI safety R&D institutes set up to conduct alignment research in tandem with AI companies. AI safety R&D institutes should cooperate globally to optimise limited resources and keep pace with commercial developments.

AI for public good: Responsible use of AI should go beyond risk mitigation and actively seek to improve people’s lives. Governments should partner companies and communities on digital literacy initiatives, drive innovation in the industry (especially among SMEs), upskill the workforce and redesign jobs, and ensure AI is environmentally sustainable.

In February 2025, the IMDA and AI Verify Foundation launched the Global AI Assurance Pilot to help codify emerging norms and best practices around technical testing of generative AI applications, which has since

been expanded to become the Global AI Assurance Sandbox. They have also published a Starter Kit for Testing LLM-Based Applications for Safety and Reliability, a set of voluntary guidelines that consolidates emerging best practices and methodologies for testing LLM-based applications for safety and reliability.⁴⁵

Separately, the MAS has partnered with the industry in developing a framework for the responsible use of generative AI in the financial sector under the Project MindForge⁴⁶ and has published a whitepaper on Emerging Risks and Opportunities of Generative AI for Banks.⁴⁷ The consortium has since also published an AI Risk Management Executive Handbook,⁴⁸ an AI Risk Management Operationalisation Handbook and AI Risk Management Implementation Examples.

Generative AI is also being used to increase access to justice, where it will be used to assist self-represented litigants in the Small Claims Tribunal.⁴⁹

AI in the workplace

With a small and ageing population, the use of AI and automation is necessary for Singapore to preserve its competitive edge over other economies. At present, automation of jobs is being used to combat the shrinking workforce in areas that rely heavily on manual labour, such as sanitation.⁵⁰ The Singapore Government has also introduced measures to encourage the adoption of AI automation, such as through the Enterprise Development Grant.⁵¹ The IMDA also developed and published “A Guide to Job Redesign in the Age of AI” to help companies manage AI’s impact on employees and prepare for the future of work.⁵²

Implementation of AI/big data/machine learning into businesses

As part of facilitating the adoption of AI by businesses, Singapore is also focused on new initiatives to enhance skillsets in AI among the country’s workforce. One government initiative, “AI for Everyone”, is freely available to the public and seeks to introduce students and working adults to the potential of AI technologies. Furthermore, Singaporeans can make use of the TechSkills Accelerator programme, a SkillsFuture initiative driven by the IMDA to develop their competencies in the ICT sector, which includes fields such as AI, software development, data analytics and cybersecurity. Other efforts by the IMDA include working with industry partners and enterprises to upskill employees with AI and encourage fluency in AI.⁵³

Civil liability

The civil liability regime for AI is in its nascent stages in Singapore. The courts are examining how existing legal frameworks (e.g., contractual, tortious, equitable and property law principles) apply to risk and liability issues concerning AI.

For example, in the landmark case of *Quoine Pte Ltd v B2C2 Ltd* [2020] 2 SLR 20, which involved smart contracts and the autonomous algorithmic trading of digital tokens, the existence of a contractual relationship between buyers and sellers when executing a trade on the digital token exchange was recognised by the Court of Appeal. Accordingly, the Court of Appeal applied traditional contractual principles of unilateral mistake and breach of contract to a contractual relationship represented by a smart contract.

In the meantime, studies on the applicability of Singapore law to AI systems are underway, with the Singapore Academy of Law’s Law Reform Committee (“LRC”) establishing a Subcommittee on Robotics and AI in 2020 to consider and make recommendations on the above. With respect to civil liability, the LRC published the “Report on the Attribution of Civil Liability for Accidents Involving Autonomous Cars”, proposing and discussing possible frameworks for determining liability on the basis of negligence, strict liability and no-fault liability in the context of self-driving vehicles.

Criminal issues

The CMA

Although not specific to AI, the CMA is the main legislation in Singapore that prescribes a list of criminal offences relating to computer material or services (which may be relevant to AI systems), which includes, among others, unauthorised access (e.g., hacking), unauthorised modification of computer material (e.g., infection of IT systems with malware) and unauthorised obstruction of the use of computers (e.g., denial-of-service attacks).

In 2021, the LRC also published the “Report on Criminal Liability, Robotics and AI Systems”, which discusses potential risks posed to humans and property by the use of robotics and AI systems, and examines whether and how Singapore’s criminal laws and principles of criminal liability may apply in such situations.

Discrimination and bias

The Model AI Framework sets out principles for the ethical use of AI in the private sector, including addressing problems relating to bias within AI systems by means of:

- (a) training staff dealing with AI systems to interpret AI model output and decisions to detect and manage bias in data; and
- (b) using reasonable effort to assess and manage the risks of inherent bias and inaccuracy of datasets used for AI model training through ensuring data quality, using different datasets for training, testing and validation, and the periodic reviewing and updating of datasets.

For more information on the Model AI Framework, please refer to the “Board of directors/governance” section. The IMDA has also embarked on a study (in partnership with nine countries) to test LLMs for bias stereotypes across different cultures.⁵⁴

National security and military

The Ministry of Defence (“MINDEF”) and the Singapore Armed Forces have been harnessing AIDA to enhance servicemen’s safety during training sessions and field operations.⁵⁵ Examples include the fielding of unmanned ground vehicles for logistics support, deploying automatic detection and classification of runway damage with the use of drones, deploying coastal security systems equipped with advanced video analytics and employing detection analytics to hunt cyber threats.⁵⁶

Singapore, like many other countries, must also navigate both multilateral and unilateral export control regimes when it comes to the high-performance computing resources (i.e., GPUs) for AI model training and inference. While Singapore is not legally obliged to enforce the unilateral export control measures of other countries, the Singapore Government has stated that all companies operating in Singapore must take into account such export control measures that apply to their international business activities, and must conduct their business transparently.⁵⁷ The Singapore Government will take the necessary enforcement action if Singapore laws have been breached (e.g., false declarations are made to Singapore authorities).

Conclusion

Singapore continues to support the use of AI with funding, training and guidance from regulators. With growing international interest in this area as more countries release guidelines, hold public consultations and even introduce legislation regulating the use of AI, Singapore continues to monitor developments around the world to harness the most effective uses of the technology, in a way that maximises its benefits and minimises the risk of harm to any person.

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