## Aug 2025 – Regulatory Update on Al

#### Content:

Al Regulatory Developments in the Past Year

- European Union
- China
- United States
- Australia
- Hong Kong
- Singapore
- United Kingdom

Conclusion

Appendix – Status of Global AI regulatory landscape

#### Dear Friends,

Time flies. The past 12 months have seen significant developments in the global landscape of artificial intelligence (AI) regulations, characterised by a mix of concrete legislative action and evolving governmental stances. While the U.S. has a notable AI policy reversal with the new administration, regions like the EU and China have continued to implement their comprehensive regulatory frameworks. It's crucial for businesses to understand these diverging paths and stay tuned to ensuring compliance and responsible AI deployment across different markets.

Hope you will find the information in this issue useful for your AI deployment!

### AA & T Consulting

### Al Regulatory Developments in the Past Year

The past year has been marked by a mix of legislative action, policy shifts, and the continued implementation of voluntary frameworks across the globe.

#### European Union (EU)

The landmark AI Act entered into force in August 2024, with its provisions being applied in a phased approach. Key dates include the prohibition of certain AI systems as of February 2025 and the application of rules for General-Purpose AI (GPAI) models in August 2025. The European Commission has also published further guidance, including the "AI Continent Action Plan" and the "General-Purpose AI Code of Practice," and a new litigation has been brought against TikTok and X under the AI Act.

#### China

China has continued to expand its multi-layered regulatory framework. In March 2025, the Measures for Labelling AI Generated Content were released, making it mandatory to label AI-generated content explicitly and implicitly as of September 2025. In April 2025, new national standards were released to enhance the security and governance of generative AI, with an effective date of November 1, 2025.

### United States (U.S.)

In the U.S., the regulatory landscape remains a mix of voluntary frameworks and state-level legislation. President Trump's Executive Order in January 2025 rescinded the previous administration's order, shifting the federal focus from AI safety to enhancing "America's global AI dominance". Despite this, many states have introduced or enacted their own AI-related legislation, and a new frontier model public safety bill was passed in New York in June 2025.

#### Australia

Australia continues to rely on existing laws and a voluntary ethical framework. However, in September 2024, the government launched a proposal paper for introducing mandatory "guardrails" for high-risk AI settings.

#### Hong Kong

Hong Kong also maintains a voluntary approach, with no dedicated AI regulation. It has, however, released a revised Ethical Artificial Intelligence Framework in July 2024 and a new Generative AI Technical and Application Guideline in April 2025.

## Aug 2025 – Regulatory Update on Al

#### Singapore

Singapore has not introduced any specific Al laws. It continues to promote a balanced approach through frameworks like the Model Al Governance Framework and the Al Verify toolkit, with a new draft framework for Generative Al published in 2024.

#### United Kingdom (U.K.)

The U.K. has shifted from its previously non-binding approach. While it does not yet have a dedicated AI regulation, the King's Speech in July 2024 proposed a set of binding measures on AI. Additionally, a Private Member's Bill was reintroduced in March 2025, which proposes a new "AI Authority".

Country/Region	Type of Framework at 1 August 2025
Australia	Voluntary / Pending mandatory
China	Mandatory
EU	Mandatory
Hong Kong	Voluntary
Singapore	Voluntary
U.K.	Voluntary / Pending mandatory
U.S.	Voluntary / State-level mandatory

A brief summary of the status of each country/ region is set out above. For more details, please refer to the appendix.

#### Conclusion

The past year demonstrates a divergence in global approaches to AI governance rather than a unified convergence trend. While the U.S. has pulled back from a federal mandate on AI safety, other significant economies, including the EU and China, have doubled down on their respective regulatory paths.

This means that clients operating internationally must navigate complex rules of different regions, from the EU's strict, risk-based classifications to China's multi-layered content and data regulations, and the varied, sector-specific laws in other regions. Proactively adapting AI governance strategies to these disparate frameworks is essential to ensuring compliance and responsible innovation in a globally interconnected market.

#### How can AA & T Consulting help?

If you need any help regarding risk or governance assessment on your AI deployment, feel free to contact us by phone (+852 9181 8659 (HK); +61 452 371 753 (Aus.)), or by email to advisory@aathk.com

### Aug 2025 – Regulatory Update on Al

#### Appendix: Status of Global AI regulatory landscape

Status of the AI regulatory development in the following countries/regions at 1 August 2025:

Area	Time	Status	Source:
Australia	Current Status (1 Aug 2025)	<ul> <li>No dedicated artificial intelligence regulation.</li> <li>Rely on existing laws on data protection, intellectual property, employment, competition, consumer protection and sector-specific regimes.</li> <li>Adopted voluntary AI Ethics Principles by Australian Government on: Human, societal and environmental wellbeing; Human-centred values; Fairness; Privacy protection and security; Reliability and safety; Transparency and explainability; Contestability; Accountability (first published in 2019)</li> </ul>	2
	Sep 2024	The Australian Government launched its Policy for the Responsible Use of AI in Government and released a proposal paper for introducing mandatory guardrails for AI in high-risk settings, along with Voluntary AI Safety Standards (VAISS).	3
	Nov 2024	The Privacy and Other Legislation Amendment Bill 2024 passed, introducing enhanced transparency requirements in privacy policies for automated decision-making.	5

https://www.digital.gov.au/sites/default/files/documents/2024-10/Policy%20for%20the%20responsible%20use%20of%20Al%20in%20government%201.1.pdf

https://www.aph.gov.au/Parliamentary\_Business/Bills\_LEGislation/Bills\_Search\_Results/Result?bld=r7249

<sup>&</sup>lt;sup>1</sup> Herbert smith Freehills Kramer: Al Tracker Australia (1 August 2025); available at: <a href="https://www.hsfkramer.com/insights/reports/ai-tracker/australia">https://www.hsfkramer.com/insights/reports/ai-tracker/australia</a>

<sup>&</sup>lt;sup>2</sup> Australia's (8) Al Ethics Principles by Department of Industry, Science and Resources; available at: <a href="https://www.industry.gov.au/publications/australias-artificial-intelligence-ethics-principles/australias-ai-ethics-principles">https://www.industry.gov.au/publications/australias-artificial-intelligence-ethics-principles/australias-ai-ethics-principles</a>

<sup>&</sup>lt;sup>3</sup> Voluntary Al Safety Standard (5 September 2024) by Department of Industry, Science and Resources of Australian Government; available at: <a href="https://www.industry.gov.au/publications/voluntary-ai-safety-standard">https://www.industry.gov.au/publications/voluntary-ai-safety-standard</a>; and <a href="https://www.industry.gov.au/sites/default/files/2024-09/voluntary-ai-safety-standard.pdf">https://www.industry.gov.au/sites/default/files/2024-09/voluntary-ai-safety-standard.pdf</a>

<sup>&</sup>lt;sup>4</sup> Policy for the responsible use of AI in government by Digital Transformation Agency of Australian Government (1 September 2024); Available at: <a href="https://www.digital.gov.au/policy/ai/policy">https://www.digital.gov.au/policy/ai/policy</a>

<sup>&</sup>lt;sup>5</sup> Privacy and other Legislation Amendment Bill 2024 (Nov 2024) by Parliament of Australia; available at:

### Aug 2025 – Regulatory Update on Al

China	Current	China does not have a single unified AI regulation, the EU AI Act	6
	Status (1 Aug	• It has multi-level legal framework with various regulations on specific AI applications and principles.	7
	2025)	Key regulations include	/
		- Administrative Provisions on Deep Synthesis in Internet-based Information Services《互联网信息服务深度 合成管理规定》; effective 10 Jan 2023	
		- Interim Measures for the Management of Generative Al Services (生成式人工智能服务管理暂行办法):	
		effective 15 Aug 2023 - Measures for Labelling Al Generated Content 《人工智能生成合成内容标识办法》; effective 1 Sep 2025	
		- Regulations on Recommendation Algorithms (互联网信息服务算法推荐管理规定): This regulation, effective 1 Mar 2022,	
		Other laws affecting AI includes data related laws, such as the Cybersecurity Law, the Personal Information	
		Protection Law, the Data Security Law, the Copyright Law.	
	3 Nov 2022	Administrative Provisions on Deep Synthesis in Internet-based Information Services《互联网信息服务深度合成管理	8
	(effective 10	规定》: This Administrative Provisions issued on 25 November 2022 by Cyberspace Administration Office of China,	
	Jan 2023)	Ministry of Industry and Information Technology, and Ministry of Public Security and effective 10 January 2023, set out responsibilities of the deep synthesis services providers in data security, user registry, algorithm audit, data protection etc.; and prohibits producing, publishing or spreading fake news.	
	13 Jul 2023	Interim Measures for the Management of Generative Al Services (生成式人工智能服务管理暂行办法): On 13 July	9
	(effective 15	2023, the Cyberspace Administration of China (CAC), the National Development and Reform Commission, the	
	Aug 2023)	Ministry of Education, the Ministry of Science and Technology, the Ministry of Industry and Information Technology, the Ministry of Public Security, and the National Radio and Television Administration jointly released this AI Interim Measures, the first comprehensive administrative regulation on the management of Generative AI services, effective 15 August 2023, outlined requirements on data security, algorithm transparency, and content control for generative AI technologies like large language models.	

<sup>&</sup>lt;sup>6</sup> Herbert Smith Freehills, AI Tracker website: "Mainland China" (1 Aug 2025); Available at: <a href="https://www.hsfkramer.com/insights/reports/ai-tracker/prc">https://www.hsfkramer.com/insights/reports/ai-tracker/prc</a>

<sup>&</sup>lt;sup>7</sup> Whtie & Case: Al Watch: global regulatory tracker website: China (29 May 2025); Available at: <a href="https://www.whitecase.com/insight-our-thinking/ai-watch-global-regulatory-tracker-china">https://www.whitecase.com/insight-our-thinking/ai-watch-global-regulatory-tracker-china</a>

<sup>&</sup>lt;sup>8</sup> Administrative Provisions on Deep Synthesis in Internet-based Information Services《互联网信息服务深度合成管理规定》issued by Cyberspace Administration Office of China, Ministry of Industry and Information Technology, and Ministry of Public Security (25 November 2022); available at: <a href="https://www.gov.cn/zhengce/zhengceku/2022-12/12/content\_5731431.htm">https://www.gov.cn/zhengce/zhengceku/2022-12/12/content\_5731431.htm</a>

<sup>&</sup>lt;sup>9</sup> Interim Measures for the Management of Generative Al Services (生成式人工智能服务管理暂行办法) issued by the Cyberspace Administration of China, the National Development and Reform Commission and various Ministries and Department (13 July 2023); Available at: <a href="https://www.cac.gov.cn/2023-07/13/c">https://www.cac.gov.cn/2023-07/13/c</a> 1690898327029107.htm

### Aug 2025 – Regulatory Update on Al

14 Mar 2025 (effective 1 Sep 2025)	Measures for Labelling AI Generated Content 《人工智能生成合成内容标识办法》: On 14 March 2025, the CAC released this labelling measure. effective 1 September 2025. It will be mandatory to implicitly and explicitly label AI-generated content. Explicit labels are required for those that are easily perceived by users and must be added to text, audio, images, videos, and virtual scenes, while implicit labels are embedded within the file's metadata.	10
25 Apr 2025 (effective 1 Nov 2025)	On 25 April 2025, the State Administration for Market Regulation and the Standardization Administration of China jointly released three national standards aimed at enhancing the security and governance of generative AI. These standards will officially take effect on 1 November 2025.	
	The three standards are:  1. Cybersecurity Technology - Generative AI Data Annotation Security Specification (网络安全技术生成式人工智能数据标注安全规范): This standard outlines requirements regarding security, staff management, security measures validation and evaluation on data labelling process, platform and tools.	11
	2. Cybersecurity Technology - Security Specification for Generative AI Pre-training and Fine-tuning Data (网络安全 技术 生成式人工智能预训练和优化训练数据安全规范): It outlines requirements and evaluation criteria for ensuring the security of datasets used in the pre-training and fine-tuning phases of generative AI development.	12
	3. Cybersecurity Technology - Basic Security Requirements for Generative AI Service (网络安全技术 生成式人工智能服务安全基本要求): This standard establishes security requirements for generative AI services, encompassing user data security assessments, data protection measures, and the safeguarding of training models and datasets.	13

https://content.mlex.com/Attachments/2025-05-23\_CZT297CHX8R49J68/SAMR\_NSA\_Basic\_Security\_Requirements\_GenAl\_service.pdf

<sup>&</sup>lt;sup>10</sup> The "Measures for Labeling Artificial Intelligence-Generated Content" 《人工智能生成合成内容标识办法》issued by the Cyberspace Administration of China (CAC) released (14 March 2025); available at: <a href="https://www.cac.gov.cn/2025-03/14/c\_1743654684782215.htm">https://www.cac.gov.cn/2025-03/14/c\_1743654684782215.htm</a>

<sup>11</sup> Cybersecurity Technology—Generative Artificial Intelligence Data Annotation Security Specification (网络安全技术生成式人工智能数据标注安全规范) issued by the State Administration for Market Regulation and the Standardization Administration of China (25 April 2025); Available at:

https://content.mlex.com/Attachments/2025-05-23\_CZT297CHX8R49J68/SAMR\_NSA\_GenAl\_data\_annotation\_security\_specification.pdf

<sup>&</sup>lt;sup>12</sup> Cybersecurity Technology—Security Specification for Generative Artificial Intelligence Pre-training and Fine-tuning Data (网络安全技术 生成式人工智能预训练和优化训练数据安全规范) issued by the State Administration for Market Regulation and the Standardization Administration of China (25 April 2025); Available at: <a href="https://content.mlex.com/Attachments/2025-05-23">https://content.mlex.com/Attachments/2025-05-23</a> CZT297CHX8R49J68/SAMR\_NSA\_Security\_Specification\_GenAl\_pre-training\_fine-tuning\_Data.pdf

<sup>&</sup>lt;sup>13</sup> Cybersecurity Technology—Basic Security Requirements for Generative Artificial Intelligence Service (网络安全技术 生成式人工智能服务安全基本要求) issued by the State Administration for Market Regulation and the Standardization Administration of China (25 April 2025); Available at:

### Aug 2025 – Regulatory Update on Al

EU	Current	The EU AI Act is the landmark piece of legislation, entered into force on 1 August 2024, but its provisions are	14
	Status (1 Aug 2025)	<ul> <li>being applied in phases. It adopted risk-based approach and classified AI models into 4 different risk categories. Please refer to the details below. The AI Act is designed to protect people's fundamental rights, establish a harmonised market, and create a supportive environment for innovation and investment.</li> <li>From 2 February 2025, all providers and deployers of AI systems have been obliged under the EU AI Act to ensure a sufficient level of AI literacy of their staff dealing with those AI systems.</li> <li>On 9 April, 2025, the European Commission published the "AI Continent Action Plan" (here). The Plan intends to enhance AI capabilities in the EU by promoting initiatives.</li> <li>On 7 May 2025, the EC published its Q&amp;A providing further guidance on the compliance and enforcement of the AI literacy requirement.</li> <li>On 10 July, 2025, the European Commission published the final version of the "General-Purpose AI Code of Practice" (the "Code") (here). The Code is intended to help providers of "General Purpose AI models" to comply with obligations contained in the EU AI Act relating to transparency, safety and security, and intellectual property.</li> </ul>	15
	Feb 2025	<b>Litigation under the EU AI Act:</b> SOMI v TikTok and X: In February 2025, the Dutch Foundation for Market Information Research (SOMI) <u>brought four collective actions</u> in Germany against X and TikTok under the AI Act. SOMI claimed that TikTok's addictive design manipulates young users, violating the AI Act's prohibition on manipulative AI. Similar allegations have been made against X.	16
	1 Aug 2024	The EU AI Act is the landmark piece of legislation, entered into force on 1 August 2024, but its provisions are being applied in phases. It adopted risk-based approach and classified AI models into 4 different risk categories. The AI Act is designed to protect people's fundamental rights, establish a harmonised market, and create a supportive environment for innovation and investment.	17

https://www.whitecase.com/insight-our-thinking/ai-watch-global-regulatory-tracker-european-union

<sup>&</sup>lt;sup>14</sup> Herbert Smith Freehills, AI Tracker website: European Union (1 Aug 2025); Available at: <a href="https://www.hsfkramer.com/insights/reports/ai-tracker/eu">https://www.hsfkramer.com/insights/reports/ai-tracker/eu</a>

<sup>&</sup>lt;sup>15</sup> Whtie & Case: Al Watch: global regulatory tracker website: European Union (21 July 2025); Available at:

<sup>&</sup>lt;sup>16</sup> Herbert Smith Freehills, AI Tracker website: European Union (1 Aug 2025); Available at: <a href="https://www.hsfkramer.com/insights/reports/ai-tracker/eu">https://www.hsfkramer.com/insights/reports/ai-tracker/eu</a>

<sup>&</sup>lt;sup>17</sup> Summary and timeline of EU AI Act from EU website (n.d.); Available at: 1) Timeline: <a href="https://digital-strategy.ec.europa.eu/en/policies/regulatory-framework-ai">https://digital-strategy.ec.europa.eu/en/policies/regulatory-framework-ai</a>; 2) Risk categories: <a href="https://digital-strategy.ec.europa.eu/en/policies/regulatory-framework-ai">https://digital-strategy.ec.europa.eu/en/policies/regulatory-framework-ai</a>; 2)

<sup>&</sup>lt;sup>18</sup> EU AI Act (1 Aug 2024); Available at: <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1689">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1689</a>

### Aug 2025 – Regulatory Update on Al

- 1) **Phased approach:** Some key effective dates are:
- **2 February 2025:** Prohibitions on certain AI systems (e.g., social scoring, untargeted scraping of internet/CCTV for facial recognition databases, emotion recognition in workplaces/education) came into effect. Organisations must also ensure adequate AI literacy among employees involved in AI use and deployment.
- 2 August 2025: Provisions for General-Purpose AI (GPAI) models apply, including information obligations for providers and transparency requirements for AI-generated content (e.g., deepfakes must be labelled). Rules governing AI Act penalties also come into effect.
- **2 August 2026:** Obligations for high-risk Al systems (e.g., in critical infrastructure, education, employment, law enforcement, migration) start to apply.
- 2 August 2027: Obligations apply for high-risk AI systems brought into scope via other EU product safety legislation (e.g., medical devices).
- 2) Risk categories: It classifies AI systems into 4 risk categories:
- **Minimal risk**: This category includes most AI systems, such as AI-enabled recommender systems and spam filters, and have no special obligations.
- Specific transparency risk (or Limited risk): This category includes AI systems like chatbots, that must disclose to users that they are interacting with a machine. Providers of generative AI have to ensure that AI-generated content is identifiable, clearly and visibly labelled, namely deep fakes and text published with the purpose to inform the public on matters of public interest.
- High risk: Al systems in this category are subject to strict obligation before they can be put on the market, including adequate risk mitigation systems, high quality of data sets minimising discriminatory outcomes, logging activities ensuring traceability, detailed documentation, clear user information, human oversight, and a high level of robustness, accuracy, and cybersecurity.
- **Unacceptable risk:** This category includes AI systems considered a clear threat to the safety, livelihoods and rights of people and are banned. The AI Act prohibits eight practices, namely:
  - harmful AI-based manipulation and deception
  - harmful AI-based exploitation of vulnerabilities
  - social scoring
  - Individual criminal offence risk assessment or prediction
  - untargeted scraping of the internet or CCTV material to create or expand facial recognition databases
  - emotion recognition in workplaces and education institutions
  - biometric categorisation to deduce certain protected characteristics
  - real-time remote biometric identification for law enforcement purposes in publicly accessible spaces

### Aug 2025 – Regulatory Update on Al

Current	Hong Kong does not currently have a dedicated AI regulation. Companies or organisations should work under the	19
Status (1 Aug	existing framework of laws and regulations, overseen by various government bodies and regulators, including the	20
2025)	Digital Policy Office, the Privacy Commissioner for Personal Data, the Commerce and Economic Development	
	Bureau, the Intellectual Property Department, the Financial Services and the Treasury Bureau, the Securities and	
	Futures Commission, the Hong Kong Monetary Authority, the Insurance Authority, the Mandatory Provident Fund	
	Schemes Authority, and the Accounting and Financial Reporting Council etc.	
	Certain harmful AI practices, particularly those that infringe personal data rights, intellectual property, or national security, are expressly prohibited under prevailing laws. In addition, several sector-specific policy statements have	
	been published, notably in banking and finance, healthcare, and insurance, signalling Hong Kong's intention to embed ethical AI standards within key industries.	
Jul 2024	In July 2024, the Digital Policy Office published the Ethical Artificial Intelligence Framework (Version 1.4). The Framework is for voluntary adoption by the private sector. It sets out ethical principles, an Al governance model, an Al lifecycle guide, and an impact assessment template. It encourages organisations to embed ethical principles, assess Al risks, and integrate Al governance into existing risk management and project governance processes.	21
Apr 2025	On 15 April 20205, the Digital Policy Office (DPO) released the Hong Kong Generative Artificial Intelligence Technical and Application Guideline. It aims to provide practical operational guidance for technology developers, service providers, and users in the application of generative AI technology. It covers the scope and limitations of applications, potential risks and governance principles of generative AI technology, including technical risks such as data leakage, model bias, and errors that need to be addressed.	22
	Status (1 Aug 2025)	Status (1 Aug 2025)  existing framework of laws and regulations, overseen by various government bodies and regulators, including the Digital Policy Office, the Privacy Commissioner for Personal Data, the Commerce and Economic Development Bureau, the Intellectual Property Department, the Financial Services and the Treasury Bureau, the Securities and Futures Commission, the Hong Kong Monetary Authority, the Insurance Authority, the Mandatory Provident Fund Schemes Authority, and the Accounting and Financial Reporting Council etc.  Certain harmful AI practices, particularly those that infringe personal data rights, intellectual property, or national security, are expressly prohibited under prevailing laws. In addition, several sector-specific policy statements have been published, notably in banking and finance, healthcare, and insurance, signalling Hong Kong's intention to embed ethical AI standards within key industries.  Jul 2024  In July 2024, the Digital Policy Office published the Ethical Artificial Intelligence Framework (Version 1.4). The Framework is for voluntary adoption by the private sector. It sets out ethical principles, an AI governance model, an AI lifecycle guide, and an impact assessment template. It encourages organisations to embed ethical principles, assess AI risks, and integrate AI governance into existing risk management and project governance processes.  Apr 2025  On 15 April 20205, the Digital Policy Office (DPO) released the Hong Kong Generative Artificial Intelligence Technical and Application Guideline. It aims to provide practical operational guidance for technology developers, service providers, and users in the application of generative AI technology. It covers the scope and limitations of

https://www.digitalpolicy.gov.hk/en/our\_work/data\_governance/policies\_standards/ethical\_ai\_framework/doc/HK\_Generative\_Al\_Technical\_and\_Application\_Guideline\_en.pdf; and other references available at: https://www.digitalpolicy.gov.hk/en/our\_work/data\_governance/policies\_standards/ethical\_ai\_framework/

<sup>&</sup>lt;sup>19</sup> Herbert Smith Freehills, AI Tracker website: Hong Kong (1 Aug 2025); Available at: <a href="https://www.hsfkramer.com/insights/reports/ai-tracker/hong-kong">https://www.hsfkramer.com/insights/reports/ai-tracker/hong-kong</a>

Whtie & Case: AI Watch: global regulatory tracker website: Hong Kong (6 June 2025); Available at: <a href="https://www.whitecase.com/insight-our-thinking/ai-watch-global-regulatory-tracker-hong-kong">https://www.whitecase.com/insight-our-thinking/ai-watch-global-regulatory-tracker-hong-kong</a>

<sup>&</sup>lt;sup>21</sup> Ethical Artificial Intelligence Framework (Version 1.4) by the Digital Policy Office of Hong Kong (July 2024); Available at: <a href="https://www.digitalpolicy.gov.hk/en/our\_work/data\_governance/policies\_standards/ethical\_ai\_framework/doc/Ethical\_AI\_Framework.pdf">https://www.digitalpolicy.gov.hk/en/our\_work/data\_governance/policies\_standards/ethical\_ai\_framework/doc/Ethical\_AI\_Framework.pdf</a>

<sup>&</sup>lt;sup>22</sup> Generative AI Technical and Application Guideline by the Digital Policy Office of Hong Kong (15 April 2025); Available at:

### Aug 2025 – Regulatory Update on Al

	1 -		23
Singapore	Current	No dedicated Al regulation	23
	Status (1 Aug 2025)	<ul> <li>Relies on sectoral guidance from various authorities and commissions, including the AI Verify Foundation, Infocomm Media Development Authority (IMDA), Personal Data Protection Commission (PDPC), Advisory Council on the Ethical Use of AI and Data, Monetary Authority of Singapore (MAS), Competition and Consumer Commission of Singapore, Ministry of Health</li> <li>To strike a balance between AI innovation and safeguarding public interest, the Singapore government developed various frameworks and tools to guide AI development, including:</li> </ul>	24
		- The Model Al Governance Framework (2019, updated in 2020), providing guidance to private sector to address	
		key ethical and governance issues in deploying AI solutions - AI Verify, an AI governance testing framework and toolkit designed to help organisations validating the performance of their AI systems against AI ethics principles through standardised tests The National Artificial Intelligence Strategy 2.0³ (first launched in 2019, updated in 2023) (NAIS 2.0), outlined Singapore's ambition and commitment to building a trusted and responsible AI ecosystem, driving innovation and growth through AI, and empowering its people and businesses to understand and engage with AI - The AIVF and IMDA developed a draft Model AI Governance Framework for Generative AI (2024 Framework), to expand on the 2020 Framework by addressing new issues that have emerged from Generative AI and providing guidance on suggested practices for safety evaluation of Generative AI models.	25
U.K.	Current	The UK does not currently have a dedicated AI regulation. Companies and organisations must apply existing laws on	26
	Status (1 Aug 2025)	data protection, intellectual property, employment, competition, consumer protection and other sector-specific regimes.	27
		In April 2023 the government published its AI policy white paper, opting for an outcomes-based approach rather than	
		a single omnibus law. It outlined five principles consisting of safety, security and robustness; transparency and	

<sup>&</sup>lt;sup>23</sup> Herbert Smith Freehills, AI Tracker website: Singapore (1 Aug 2025); Available at: <a href="https://www.hsfkramer.com/insights/reports/ai-tracker/singapore">https://www.hsfkramer.com/insights/reports/ai-tracker/singapore</a>

<sup>&</sup>lt;sup>24</sup> Whtie & Case: Al Watch: global regulatory tracker website: Singapore (13 May 2024); Available at: <a href="https://www.whitecase.com/insight-our-thinking/ai-watch-global-regulatory-tracker-singapore">https://www.whitecase.com/insight-our-thinking/ai-watch-global-regulatory-tracker-singapore</a>

<sup>&</sup>lt;sup>25</sup> References to Singapore's key Al Governance Framework, verification tool and Al Strategy: a) The Model Al Governance Framework is available here.; b) Details of Al Verify are available here.; c) The National Artificial Intelligence Strategy 2.0 is available here.; d) The draft Model Al Governance Framework for Generative Al is available here.

<sup>&</sup>lt;sup>26</sup> Herbert Smith Freehills, AI Tracker website: The U.K. (1 Aug 2025); Available at: https://www.hsfkramer.com/insights/reports/ai-tracker/uk

<sup>&</sup>lt;sup>27</sup> Whtie & Case: Al Watch: global regulatory tracker website: The U.K. (25 March 2025); Available at: <a href="https://www.whitecase.com/insight-our-thinking/ai-watch-global-regulatory-tracker-united-kingdom">https://www.whitecase.com/insight-our-thinking/ai-watch-global-regulatory-tracker-united-kingdom</a>

## Aug 2025 – Regulatory Update on Al

	explainability; fairness; accountability and governance; and contestability and redress. In February 2024, the government further asked regulators to show how they will interpret five core AI principles within their own remits.  However, on 17 July 2024, the King's Speech proposed a set of binding measures on AI, which deviates from the previous agile and non-binding approach. The Digital Information and Smart Data Bill was also announced, which will be accompanied by reforms to data-related laws, to support the safe development and deployment of new technologies (which may include AI). It is yet to be implemented.	28
Sep 2024	The UK signed its first international treaty with the Council of Europe addressing AI risks, focusing on protecting human rights, democracy, and the rule of law.	29
Apr 2024	In April 2024, the UK (AI Safety Institute) and the US signed landmark AI Safety agreement to work together on testing advanced AI.	30
Mar 2025	The Artificial Intelligence (Regulation) Bill, a Private Member's Bill, was reintroduced in the House of Lords, proposing a new "AI Authority" and codifying AI principles into binding duties.	31
June 2025	The new Data (Use and Access) Act 2025 introduces significant changes to data law in the UK, with implications for application of AI technology.	32

https://assets.publishing.service.gov.uk/media/6697f5c10808eaf43b50d18e/The\_King\_s\_Speech\_2024\_background\_briefing\_notes.pdf

<sup>&</sup>lt;sup>28</sup> Digital Information and Smart Data Bill announced in the King's Speech (P.39) (17 July 2024); Available at:

<sup>&</sup>lt;sup>29</sup> Press release of the UK Government on "First international treaty addressing AI risks" (September 2024); available at: <a href="https://www.gov.uk/government/news/uk-signs-first-international-treaty-addressing-risks-of-artificial-intelligence">https://www.gov.uk/government/news/uk-signs-first-international-treaty-addressing-risks-of-artificial-intelligence</a>

<sup>&</sup>lt;sup>30</sup> BBC News "Al Safety: UK and US sign landmark agreement" by Liv McMahon & Zoe Kleinman (2 April 2024); available at: <a href="https://www.bbc.com/news/technology-68675654">https://www.bbc.com/news/technology-68675654</a>

<sup>&</sup>lt;sup>31</sup> The Artificial Intelligence (Regulation) Bill (March 2025); Available at: https://bills.parliament.uk/publications/59353/documents/6094

<sup>&</sup>lt;sup>32</sup> Summary of new Data (Use and Access) Act 2025 (June 2025); Available at: <a href="https://www.gov.uk/guidance/data-use-and-access-act-2025-data-protection-and-privacy-changes">https://www.gov.uk/guidance/data-use-and-access-act-2025-data-protection-and-privacy-changes</a>

U.S.	Current Status (1 Aug 2025)	<ul> <li>Currently, there is no comprehensive federal legislation or regulations in the US that regulate the development of AI or specifically prohibit or restrict their use. Regulation is a mix of executive orders, voluntary frameworks (like NIST AI Risk Management Framework), and state-level initiatives. Many states have introduced or enacted AI-related legislation, addressing specific concerns like deepfakes in elections, data privacy, and government use of AI.</li> </ul>	34
		<ul> <li>President Trump issued an Executive Order for "Removing Barriers to American Leadership in Al" ("Removing Barriers EO") in January 2025, that rescinds President Biden's Executive Order for the Safe, Secure, and Trustworthy Development and Use of Al ("Biden EO"). It calls for federal departments and agencies to revise or rescind all policies, directives, regulations, and other actions taken under Biden's Executive Order 14110 of October 30, 2023 (Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence) that are "inconsistent" with "enhanc[ing] America's global Al dominance." Many policies were already in place from the Biden Executive Order, and it remains to be seen what the extent of the changes will be.</li> <li>The White House Blueprint for an Al Bill of Rights, issued under Biden, asserts guidance around equitable access and use of Al systems. The Al Bill of Rights provides five principles and associated practices to help guide the design, use and deployment of "automated systems" including:1) safe and effective systems; 2) algorithmic discrimination and protection; 3) data privacy; 4) notice and explanation; and 5) human alternatives, consideration and fallbacks. Since the Removing Barriers EO did not specifically revoke the Al Bill of Rights, Al developers may keep these principles in mind when designing Al systems.</li> <li>Several leading Al companies – including Adobe, Amazon, Anthropic, Cohere, Google, IBM, Inflection, Meta, Microsoft, Nvidia, Open Al, Palantir, Salesforce, Scale Al, Stability Al – have voluntarily committed to "help move toward safe, secure, and transparent development of Al technology. These companies committed to internal/external security testing of Al systems before release, sharing information on managing Al risks and investing in safeguards.</li> </ul>	35

Page **1 1** 

<sup>&</sup>lt;sup>33</sup> Whtie & Case: Al Watch: global regulatory tracker website: The U.S. (21 July 2025); Available at: <a href="https://www.whitecase.com/insight-our-thinking/ai-watch-global-regulatory-tracker-united-states">https://www.whitecase.com/insight-our-thinking/ai-watch-global-regulatory-tracker-united-states</a>

<sup>&</sup>lt;sup>34</sup> Summary of AI regulation by States from National Conference of State Legislatures (NCSL) website (updated in July 2025); Available at: <a href="https://www.ncsl.org/technology-and-communication/artificial-intelligence-2025-legislation">https://www.ncsl.org/technology-and-communication/artificial-intelligence-2025-legislation</a>

<sup>&</sup>lt;sup>35</sup> Executive Order for "Removing Barriers to American Leadership in AI" issued by White House (January 2025); Available at: <a href="https://www.whitehouse.gov/presidential-actions/2025/01/removing-barriers-to-american-leadership-in-artificial-intelligence/">https://www.whitehouse.gov/presidential-actions/2025/01/removing-barriers-to-american-leadership-in-artificial-intelligence/</a>

<sup>&</sup>lt;sup>36</sup> Blueprint for an AI Bill of Rights issued by (Biden's) White House (October 2022); Available by: <a href="https://bidenwhitehouse.archives.gov/ostp/ai-bill-of-rights/">https://bidenwhitehouse.archives.gov/ostp/ai-bill-of-rights/</a>

### Aug 2025 – Regulatory Update on Al

12 Jun 2025	The New York legislature passed the Responsible Al Safety & Education ("RAISE") Act (S 6953), a frontier model public safety bill that would establish safeguard, reporting, disclosure, and other requirements for large developers of frontier Al models.	37
Throughout 2024 and early 2025	Numerous state-level actions have been taken, including Colorado's broad AI Act, New Hampshire criminalizing malicious deepfakes, Tennessee's Ensuring Likeness, Voice, and Image Security Act (ELVIS Act), Maryland's rules for AI use in state government, and California's package of AI laws (some effective January 2026).	38

Note: The information contained this document is general in nature and is not intended to address any particular circumstances of individuals or entities. Although we endeavor to provide accurate and timely information, there is no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act upon such information without appropriate professional advice after a thorough examination of the particular situation.

website: The U.S. (21 July 2025); Available at: https://www.whitecase.com/insight-our-thinking/ai-watch-global-regulatory-tracker-united-states

<sup>&</sup>lt;sup>37</sup> Responsible Al Safety & Education ("RAISE") Act (S 6953) passed by New York State, US (12 June 2025); Available at: <a href="https://www.nysenate.gov/legislation/bills/2025/S6953/amendment/A">https://www.nysenate.gov/legislation/bills/2025/S6953/amendment/A</a>

<sup>&</sup>lt;sup>38</sup> a) Colorado AI Act (July 2024): Available at: <a href="https://www.whitecase.com/insight-alert/newly-passed-colorado-ai-act-will-impose-obligations-developers-and-deployers-high;">https://www.akingump.com/en/insights/ai-law-and-deployers-high;</a> b) Hampshire regulation on AI and criminalizing malicious deepfakes by Akin (2024); <a href="https://www.akingump.com/en/insights/ai-law-and-regulation-tracker/new-hampshire-imposes-new-regulations-on-ai-and-criminalizes-deepfakes;">https://www.akingump.com/en/insights/ai-law-and-regulation-tracker/new-hampshire-imposes-new-regulations-on-ai-and-criminalizes-deepfakes;">https://www.akingump.com/en/insights/ai-law-and-regulation-tracker/new-hampshire-imposes-new-regulations-on-ai-and-criminalizes-deepfakes;</a> c) Executive Order, "Catalyzing the Responsible and Productive Use of Artificial Intelligence" issued by Maryland State Government, the U.S. (8 January 2024); Available at: <a href="https://governor.maryland.gov/Lists/ExecutiveOrders/Attachments/31/EO%2001.01.2024.02%20Catalyzing%20the%20Responsible%20and%20Productive%20Use%20Of%20Artificial%20Intelligence%20in%20Maryland%20State%20Government\_Accessible.pdf;</a> d) Whtie & Case: AI Watch: global regulatory tracker