



Compliance & Risks

Webinar

Bird's Eye View of Global AI Regulations: ***US, EU, UK, Singapore and China***

26th February, 2025



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Compliance & Risks



100K⁺
Regulations

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Agenda

- 01.** Examination of AI regulations in the EU, UK, Singapore and in the US and China
- 02.** How evolving AI laws impact businesses across industries
- 03.** Key trends shaping global AI policy in the US & China
- 04.** Best practices for compliance and risk management in different jurisdictions





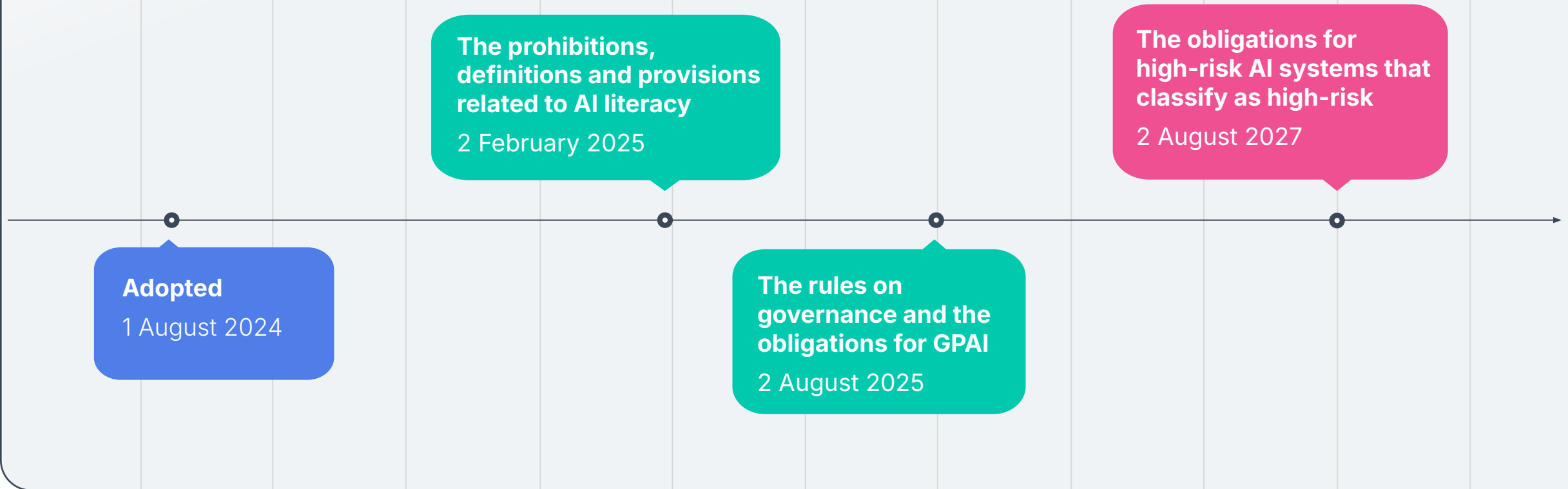
Overview of the European Union Artificial Intelligence Act

- The EU AI Act (Regulation (EU) 2024/1689))
- The world's first comprehensive AI law
- Part of the strategic vision of Europe' Digital Strategy
- Main goal: AI systems are developed and deployed responsibly within the EU



Timeline

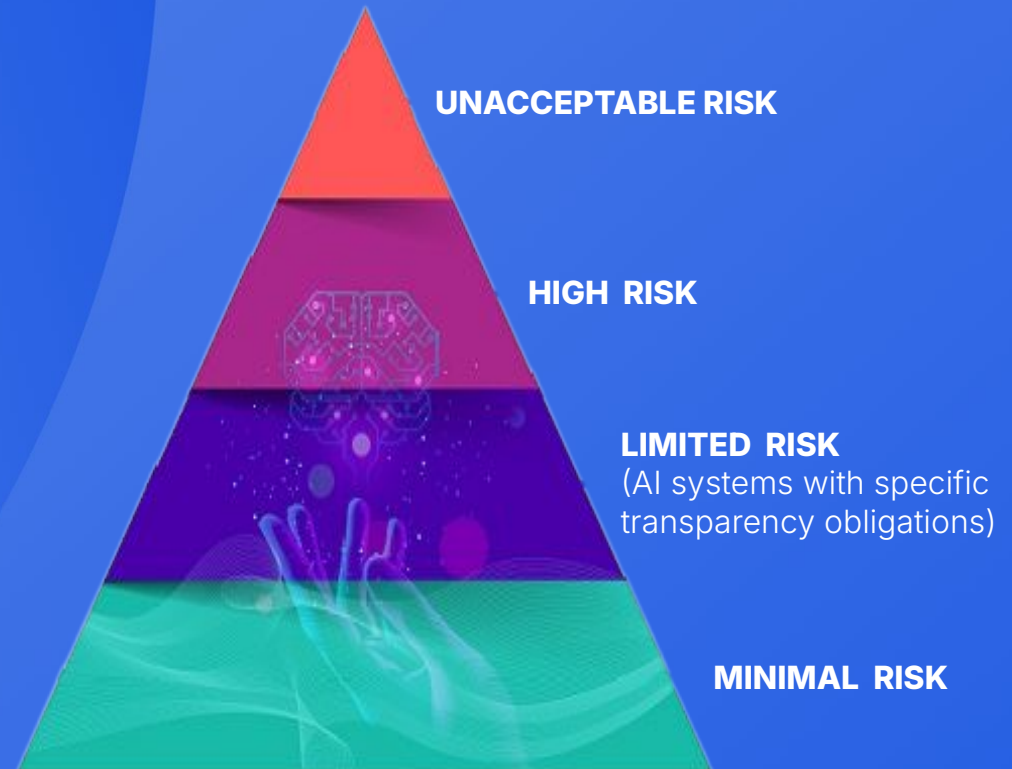
When will the EU AI Act be fully applicable?





The European Union Risk-Based Approach

- As of 2 February 2025, the ban on prohibited AI systems has been enforced
- Risk-Based Tiers: Unacceptable, High, Limited, Minimal
- Recent Update: Revised guidelines for general-purpose AI models (as of *January 2025*)



Prohibited AI Systems (Article 5)

- Subliminal manipulation
- Exploitation of vulnerability
- Social scoring
- Predictive policing based on profiling
- Unauthorized facial recognition databases
- Emotion recognition in specific contexts
- Biometric categorization for sensitive attributes
- Real-time remote biometric identification in public spaces for law enforcement

These prohibitions are designed to protect fundamental rights and ensure AI is used responsibly

High-Risk Classification (Article 6)

AI systems classified as high-risk if:

- it is embedded as a safety component in a product, or constitutes such a product itself;
- it is intended for a high-risk use case that could impact safety or fundamental rights.

Annex III

Specific High-Risk AI
Use Cases

Non-Risk AI Systems

- Minimal potential to cause harm or impact fundamental rights
- Adopt voluntary codes of conduct
- Transparency requirements
- Designed for specific, narrow tasks without significantly affecting health, safety, or fundamental rights

Virtual Assistants

Chatbots

Content Generation
Tools

EU Database for High-Risk Systems (Annex III)

Data entered by providers/Authorised representatives

Data entered by deployer

Data accessible and publicly available



Key Compliance Requirements

- Conduct risk assessments for high-risk AI systems
- Ensure transparency and explainability of AI decisions
- Maintain human oversight in critical applications
- Adhere to data governance and cybersecurity standards
- Penalties: Up to 7% of global annual turnover



What are the penalties for infringement?

Member States' Responsibilities:

- Must impose **effective, proportionate, and dissuasive penalties** for AI rule violations.

Penalty Thresholds:

- **Up to €35M or 7%** of worldwide annual turnover (whichever is higher) for:
 - Prohibited practices
 - Non-compliance with data requirements
- **Up to €15M or 3%** of worldwide annual turnover for:
 - Other regulatory non-compliance
- **Up to €7.5M or 1.5%** of worldwide annual turnover for:
 - Providing incorrect, incomplete, or misleading information to authorities
- **SMEs:** Lower threshold applies; **Other companies:** Higher threshold applies.



General-Purpose AI Model Providers:

- **Up to €15M or 3%** of worldwide annual turnover for:
 - Non-compliance with Commission obligations or measures

EU Institutions' Accountability:

- Expected to **lead by example** and comply with AI rules.
- The **European Data Protection Supervisor (EDPS)** can impose fines for non-compliance.

Latest Updates

- Guidelines on Prohibited AI Practices, as Defined by the AI Act, 4 Feb 2025
- Guidelines on AI System Definition to Facilitate the First AI Act's Rules Application, 6 Feb 2025
- Withdrawal of AI Liability Directive, 11 Feb 2025
- AI Continent Action Plan covering AI Factories in Europe as well as the Apply AI strategy, 11 Feb 2025
- Briefing on AI Factories, 14 Feb 2025



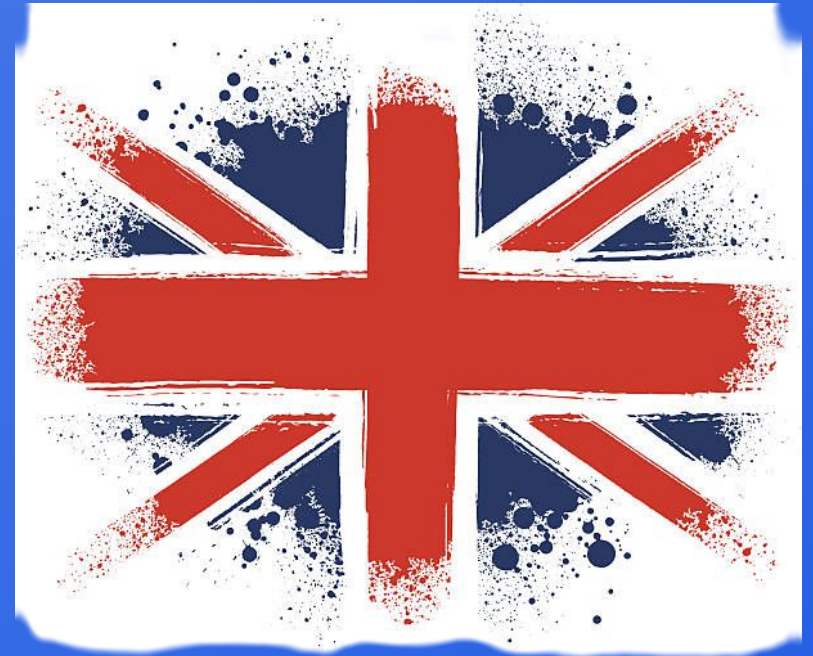
The United Kingdom Pro-Innovation Approach

Key Characteristics

- The UK adopts a **principles-based approach** to AI regulation, unlike the EU's **prescriptive AI Act**.
- Balances **oversight** with **AI competitiveness**, but risks a "**race to the bottom**."
- No **single AI law**—regulation relies on **existing laws** (e.g., data protection, IP, consumer protection, human rights).

Five Cross-Sectoral AI Principles

1. Safety, security, and robustness
2. Transparency and explainability
3. Fairness
4. Accountability and governance
5. Contestability and redress



A Pro-innovation Approach to AI Regulation, Whitepaper, March 2023

Current UK AI Regulatory Framework

- National AI Strategy (Published on Sept 2021; Updated Dec 2022)
- Cyber Security and Resilience Bill (Jul 2024)
- Framework Convention on AI and Human Rights (Sept 2024)
- AI Playbook for the UK Government (Feb 2025)
- International AI Safety Report (Feb 2025)
- AI Opportunities Action Plan (Jan 2025)

The AI Safety Bill

- Targets frontier models
- (GPT-5, Claude 3)
- Mandatory pre-deployment testing by AI Safety Institute
- Codifies voluntary developer commitments
- (e.g., safety frameworks)
- Expected Royal Assent: Q3 2025



Singapore Sectoral and Agile Approach

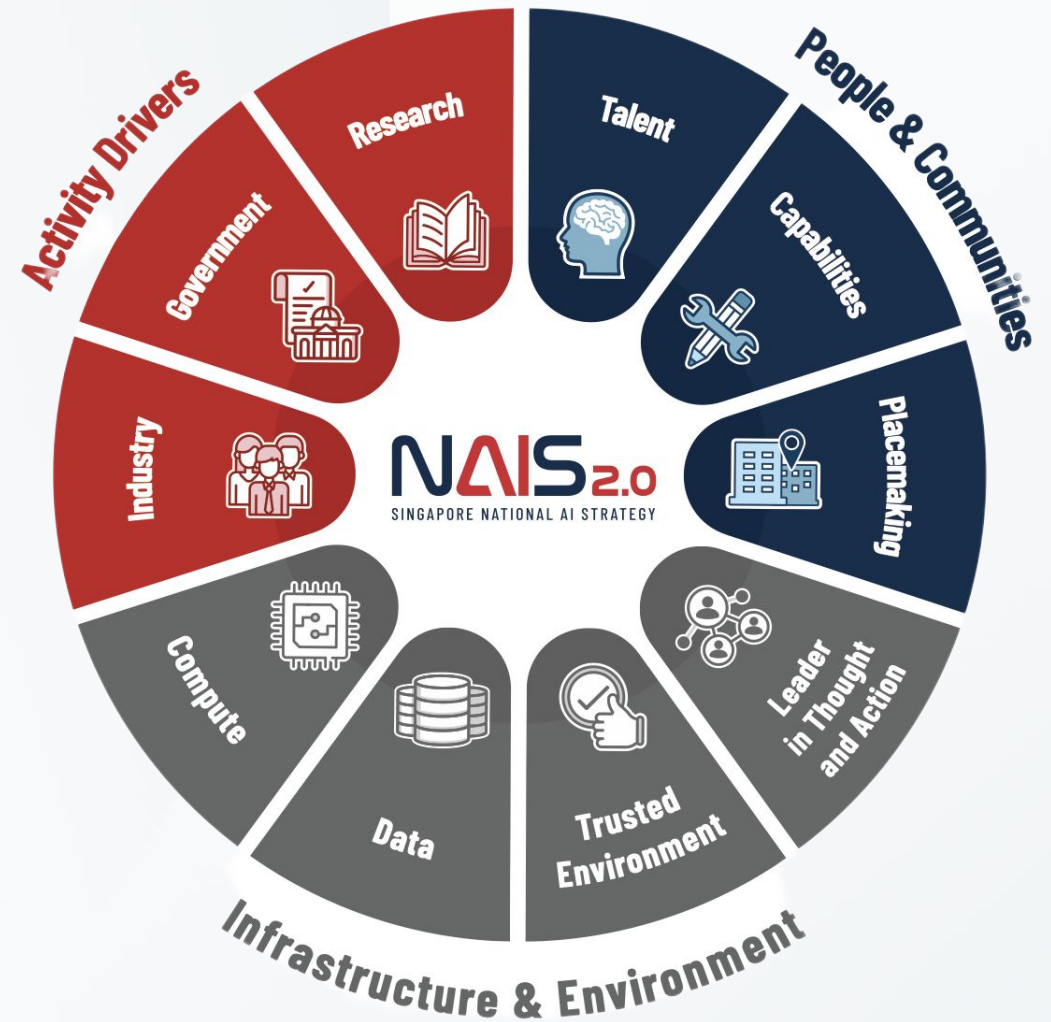
- Third Country in the Global AI Index
- Global Leader on AI Infrastructure
- Lack of Overarching Legislation Regulating AI
- Lack of Legally Binding Effect
- Regulatory Sandbox Approach



Singapore's motto is "Majulah Singapura," or "Onwards, Singapore."

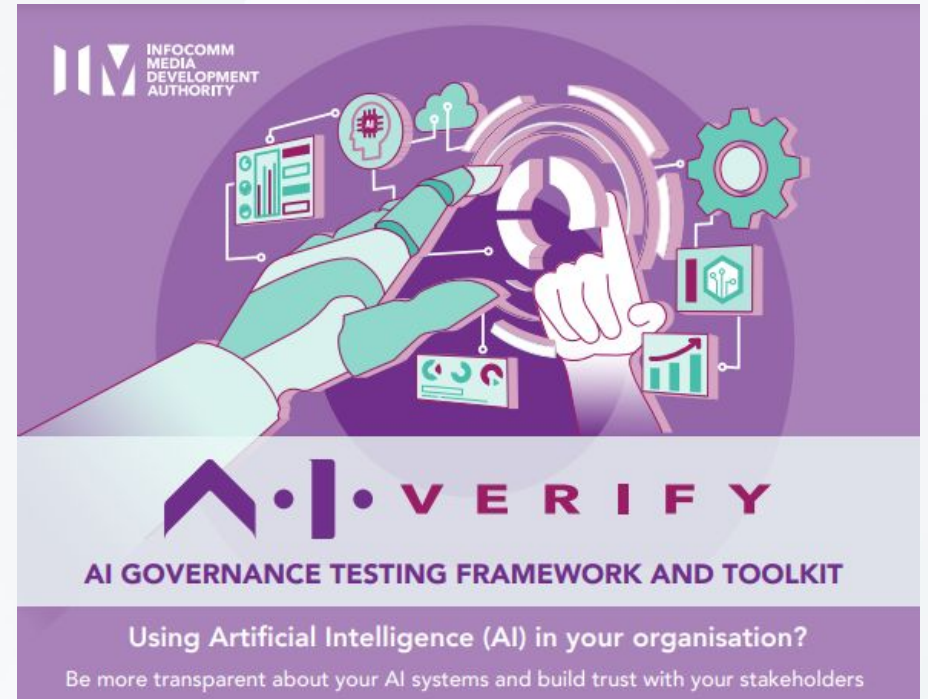
National AI Strategy (NAIS 2.0)

- **Action 1:** AI Center of Excellence(CoEs)
- **Action 2:** Strengthen the AI start-up Ecosystem
- **Action 3:** Improve Public Service Productivity
- **Action 4:** Update national AI R&R plans to Sustain Leadership in Selected Research Areas
- **Action 5:** Attract world's top AI Creators
- **Action 6:** Boost AI Practitioner Pool to 15,000
- **Action 7:** Intensify Enterprise AI Adoption for Industry Transformation
- **Action 8:** Upskill Workforce Through Sector-Specific AI Training Programmes
- **Action 9:** Establish an Iconic AI Site to co-locate AI Creators and Practitioners
- **Action 10:** Significantly increase High-Performance Compute in Singapore
- **Action 11:** Build capabilities in Data Services and Privacy-Enhancing Technologies
- **Action 12:** Unlock Government Data to Serve the Public Good
- **Action 13:** Ensure Fit-For-Purpose Regulatory Environment for AI
- **Action 14:** Raise Security and Resilience Baseline for AI
- **Action 15:** Establish Singapore as an International Partner on AI Innovation and Governance



AI Verify - AI Governance Testing Framework

- Voluntary AI governance assessment tool
- Open-source and globally accessible since 2023
- Led by AI Verify Foundation for international collaboration
- Based on 11 international AI ethics principles:
 - Transparency
 - Explainability
 - Repeatability / Reproducibility
 - Safety
 - Security
 - Robustness
 - Fairness
 - Data Governance
 - Accountability
 - Human Agency and Oversight
 - Inclusive Growth, Societal & Environmental Well-Being



Model AI Governance Framework for Traditional AI

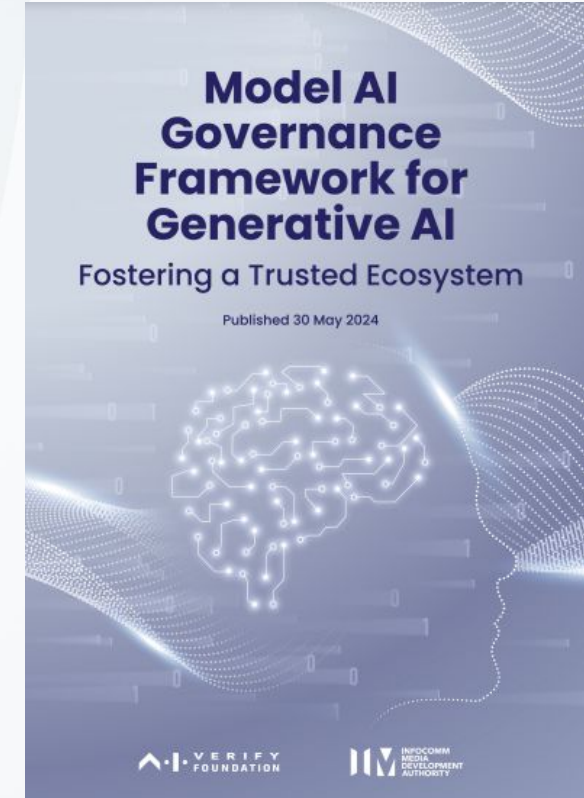
- Adopted on 2019 and updated in 2020 for Traditional AI
- Based on two high-level guiding principles that promote trust in AI and understanding of the use of AI technologies:
 - *Explainability, Transparency and Fairness*
 - *Human-Centric*
- Adopted internationally by OECD, WEF, and leading companies.



Organisations should ensure that AI decision-making processes are explainable, transparent and fair, while AI solutions should be human-centric.

Model AI Governance Framework for Generative AI

- Adopted on 30 May 2024 for Generative AI
- There are 9 dimensions which the Framework proposes to be looked at in totality, to foster a trusted ecosystem:
 1. Accountability
 2. Data
 3. Trusted Development and Deployment
 4. Incident Reporting
 5. Testing and Assurance
 6. Security
 7. Content Provenance
 8. Safety and Alignment Research & Development (R&D)
 9. AI for Public Good



Cyber Security Agency (CSA) of Singapore

Guidance on the Security of AI Systems

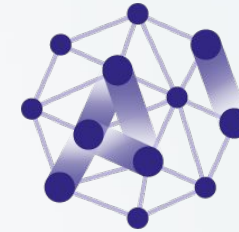
Guidelines on Securing AI Systems, October 2024

Companion Guide on Securing AI Systems, October 2024



*These were launched at the Singapore International Cyber Week
in October 2024*

New Initiatives in AI Safety



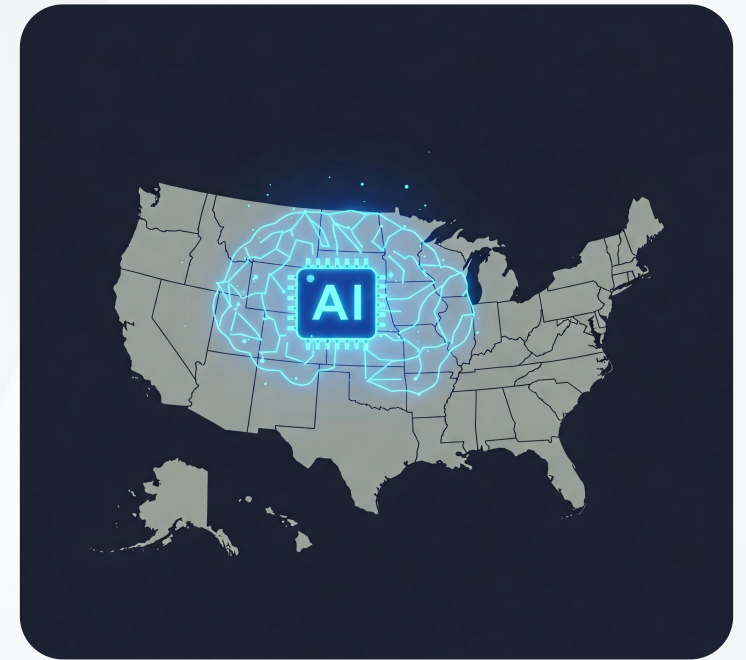
AI ACTION SUMMIT

Singapore announced new AI Safety initiatives at the global AI Action Summit in *France*, **10 February 2025**

1. Global AI Assurance Pilot for best practices around technical testing of generative AI (GenAI) applications
2. Joint Testing Report with Japan
 - **10 Languages:** Cantonese, English, Farsi, French, Japanese, Kiswahili, Korean, Malay, Mandarin Chinese, Telugu
 - **5 Harm Categories:** Violent Crime, Non-Violent Crime, IP, Privacy, Jailbreaking
3. Publication of the Singapore AI Safety Red Teaming Challenge Evaluation Report
 - **4 LLMs:** Aya, Claude, Llama, SEA-LION

Key Trends in the US AI Regulatory Landscape

- Innovation
- Deregulation
- Strategic Competition
- Ethical AI
- Sector Specific Initiatives
- State-Led Initiatives



Challenges for Business in the US AI Regulatory Landscape

- Comprehensive AI Regulation
- Ethical AI
- Employee Concerns
- Implications of AI Infrastructure
- Best Industry Practises
- Cost of Compliance



US: AI Regulation at a Federal Level

Contrasting approaches by administrations has resulted in a lack of a comprehensive AI legislation but rather a grouping of fragmented policy documents, EO's and so forth.

National Artificial Intelligence Initiative Act of 2020 (NAII): NAII established a coordinated, multi-agency effort to advance AI research, development, and deployment across various sectors. Was seen as a "milestone".

Executive Order on "Safe, Secure, and Trustworthy Development and Use of AI" and the AI Bill of Rights: Former Biden policies which aimed to encourage ethical AI and mitigate risk which was rescinded by Trump upon taking office.

2025: EO Removing Barriers to American Leadership in Artificial Intelligence.

US: AI Regulation at a State Level

Increasing level of activity including but not limited to:

- Colorado AI Act (EIF: February 2026)
- California AB 2013 (Gen AI) & SB 942 (AI Transparency Act) (EIF: January 2026)
- Utah AI Policy Act (EIF: May 2024)

Full summary of these bills and others available in C2P

Trends to keep an eye on?

- High Risk Systems
- Generative AI
- Consumer Protection
- Crossover with DP
- "Patchwork"



What should businesses in the US AI Sphere be watching out for?

- Long term planning and what that looks like - RAPID changes.
- Balancing over-regulation and innovation
- The cost of compliance - audits, data governance etc.
- Being competitive on a global scale
- Ethical Implications

Sanctions/Enforcement - Where are we?

- Increased enforcement
- FTC Actions
- EEOC Settlements
- Limited Precedent
- Prioritisation of "High Risk" breaches

Key Trends in the Chinese AI Regulatory Landscape

- Targeted Approach
- Generative AI/Deep-fakes
- Security
- Specific Application
- Content Control
- Risk-Based Approach



China: AI Landscape & Current State of Play

Comprehensive AI legislation noted to be under development with Chinese authorities who are actively working on the legislation following an ode in May 2024 whereby the State Council made reference to a “Draft AI Law” in its documents

China has published vertical legislation in this area which includes but is not limited to:

- [Draft AI Labelling Measures Regulation](#)
- [Measures for Generative AI Services](#)
- [Regulations on the Administration of Deep Synthesis Internet Information Technology](#)
- [Internet Information Service Algorithmic Recommendation Management Provisions](#)

Ministry of Industry and Information Technology and three other government departments released a 2024 edition of guidelines for building a system of comprehensive standards for the artificial intelligence (AI) industry.



China: AI Landscape & Current State of Play

Over 50 national and industry standards are to be formulated by 2026. TC260 have already published a guide [here](#).

Regional & local laws in the area of AI have been published relating to AI in an attempt to encourage AI ecosystems and innovation including but not limited to:

- [Hong Kong \(China\): Artificial Intelligence Medical Devices \(AI-MD\), Guidance Document, TR-008, January 2024](#)
- [Regulations for the Promotion of the Development of the Artificial Intelligence Industry in Shanghai Municipality](#)
- [Beijing Municipal Governmental AI & New Materials Innovation Strategy](#)

China: AI Landscape & Current State of Play (cont'd)

Updated Import/Export Regulations have affected the AI related exports. [China's Regulations on the Export Control of Dual-Use Items](#) relates to goods, technologies, and services that can be used for both civilian and military purposes.

Scope:

- AI-driven autonomous systems:
- Advanced semiconductor development components

What impact does this have on my business?

- Compliance Burden
- Licensing Requirements
- Potential Disruptions to the Supply Chain
- Market Access
- Restricted Technologies

Companies are required to be proactive in light of the export control regulations as these regulations are significant and multifaceted.



China: AI Landscape & Current State of Play (cont'd)

China: Artificial Intelligence Safety Standard System, Draft Announcement No. 18, 2025

- Proposed January 2025
- Consultation finished 21st February 2025
- Addresses core safety risks across the entire AI lifecycle
- Comprehensive Approach: personal and industrial use cases
- Establishes testing and evaluation procedures.



China: AI Landscape & Current State of Play (cont'd)

Generative AI systems which are used by the public are prohibited if they are trained on data and information sources which are contrary to core socialist values set out by the CCP. (Important to note for businesses operating in the Chinese market)

This is why many Western AI systems, trained on the Western internet, are not available to the public in China. Drawn to recent attention regarding Deepseek

China & the EU align on principle here regarding the prohibition of certain practices under the EU AI Act i.e predictive policing compared the contrasting jurisdictional approach the US has taken whereby there are currently no explicit technologies banned under US Federal Law.

Do Generative AI Systems Require Approval to Deploy?

Yes. China's AI regulations mandate the registration of certain AI systems in a central database maintained by the government. This includes:

- **Generative AI systems:** AI that creates new content, like text or images, and is available to the public.
- **Deep synthesis AI systems:** AI used to create synthetic content, such as deepfakes.
- **Recommendation algorithms:** AI used by online platforms to provide personalized recommendations to users.

This registration requirement allows the government to track and oversee the development and deployment of these AI systems, ensuring they comply with relevant regulations and do not pose risks to society or national security.

This was legislated for in the Interim Measures for the Management of Generative Artificial Intelligence Services 2023 and 302 have been registered so far. Information regarding this can be found [here](#).

Does China Require the Implementation of AI Literacy Measures?

At this current moment in time, the Chinese government does not legislate for any binding AI literacy measures comparable to Article 4 of the EU AI act - something it has in common with it's US counterpart.

Does China enforce any transparency measures when it comes to AI?

Yes, China requires that any use of AI to create, publish and share AI generated content must comply with transparency requirements. This includes requiring the labelling and marking of certain types of AI content.

Questions?



Lets Talk



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