SLC ADVISORY · NOVEMBER 2026 EDITION

AI GOVERNANCE AT A GLANCE

8 jurisdictions. Different rules. One governance system.

STATUS
Binding law
Phased · law coming · layered
Voluntary framework

WHAT'S NEXT · DATES TO DIARISE

15 Nov 2026
China: comments close on draft AI technology-export catalogue

2 Dec 2026
EU: legacy-system transition ends for machine-readable AI marking

From 22 Jan 2027
S. Korea: earliest date fines and investigations may begin

2 Dec 2027
EU: Annex III high-risk duties apply, including HR and credit uses

2 Aug 2028
EU: Annex I product-safety high-risk duties apply

China CN — BINDING

KEY RULES Generative AI Measures (2023) · algorithm filing · AI-content Labelling Measures (Sep 2025) · Cybersecurity Law AI clause (Jan 2026)

LATEST **NEW** Draft export-catalogue revision: 23 AI technologies (16 Oct 2026); pre-export registration applies now. [CAC · NPC · MOFCOM · MOST]

► **Label AI-generated content; verify filing where applicable; review controlled technology transfers.**

Japan JP — ACT · NO FINES

KEY RULES AI Promotion Act (in force Sep 2025): cooperation duty, no penalties · AI Guidelines for Business v1.2 (Mar 2026, voluntary)

LATEST **NEW** Second AI Basic Plan adopted (14 Jul 2026) · AISI evaluation guide v1.20 expands coverage of AI agents (7 Jul 2026). [Cabinet Office · MIC · METI · AISI]

► **Map AI use to the Business Guidelines; prepare to cooperate with government information requests.**

South Korea KR — BINDING · FINES PAUSED

KEY RULES AI Basic Act + Enforcement Decree (in force 22 Jan 2026): high-impact AI (e.g. energy, hiring, health), generative-AI labelling, local representative

LATEST Fines and investigations deferred for at least one year (not before 22 Jan 2027), except serious harm. [MSIT]

► **Classify high-impact use, meet generative-AI transparency duties and use the transition period to prepare.**

Singapore SG — VOLUNTARY

KEY RULES IMDA Model AI Governance Framework · AI Verify testing toolkit · sector guidance (e.g. MAS for finance) · PDPA applies to personal data

LATEST **NEW** Agentic AI Framework v1.5 (updated Jun 2026): bound agent risks upfront and keep humans meaningfully accountable. [IMDA]

► **Before deploying an AI agent, limit access and autonomy, require human approval for high-impact actions, and log activity.**

Malaysia MY — LAW COMING

KEY RULES National AI Governance & Ethics Guidelines (AIGE, voluntary) · PDPA for personal data

LATEST **NEW** AI Malaysia Berhad launched (28 Jul 2026) · Minister to Dewan Rakyat (29 Oct 2026): risk-based AI Governance Bill completed, going to Cabinet, tabling early 2027. [Ministry of Digital · Bernama]

► **Benchmark against AIGE now and prepare for risk classification and incident reporting under the coming Bill.**

European Union EU — BINDING · EXTRATERRITORIAL

KEY RULES EU AI Act, amended by Reg. (EU) 2026/1744 (in force 27 Jul 2026) · fines: €35m/7% (prohibited practices), €15m/3% (operator obligations)

LATEST Article 50 transparency applies from 2 Aug 2026; generative AI already on the market must add machine-readable marking by 2 Dec 2026 · high-risk: Dec 2027 / Aug 2028. [EUR-Lex]

► **Assess whether you are a provider or deployer; disclose chatbots and mark synthetic content where Article 50 requires it.**

United States US — VOLUNTARY · STATE LAWS APPLY

KEY RULES NIST AI Risk Management Framework 1.0: Govern · Map · Measure · Manage, plus Generative AI Profile (2024)

LATEST NIST AI RMF is voluntary and being revised under the White House AI Action Plan · critical-infrastructure profile concept note (Apr 2026). [NIST · White House]

► **Map each US use case to NIST AI RMF and check state AI laws where you deploy.**

United Arab Emirates UAE — LAYERED

KEY RULES Federal PDPL (Decree-Law No. 45 of 2021) · DIFC Regulation 10 on personal data in autonomous systems

LATEST **NEW** One national AI and Data Authority approved (14 Jun 2026) · DIFC proposed tighter privacy-by-design and certification rules for AI. [UAE Cabinet · DIFC]

► **Inventory AI using personal data; in DIFC, document privacy-by-design and appoint an Autonomous Systems Officer if required.**

CROSSING BORDERS · APPLY THE SCOPE TEST BEFORE THE MAP

SLC framework example

1. **Who has which legal role? Identify provider, deployer, importer and distributor before assigning duties.**
2. **Where is the system offered, used or its output used? E.g. the EU AI Act reaches you if your AI's output is used in the EU, wherever you are based.**
3. **What crosses the border? Test personal-data transfers and controlled AI technology separately from the AI-use rules.**

WORKED EXAMPLE · CHINA → GERMANY

An employee in **China** uses an AI tool to draft an email to a colleague in **Germany**. Does the EU AI Act apply? **Technically yes**: the output is used in the EU. But duties are light: email drafting is minimal risk, and internal emails need no AI label. The real checks: **AI literacy**, **approved tools only**, personal data rules (PIPL, GDPR) and **confidentiality**.

ONE SPINE · THE 4P · SIX ACTIONS

One governance system, across jurisdictions.

People
1 Name accountable owner (Leadership)
2 AI literacy for every user

Process
3 AI inventory, incl. shadow AI
4 Risk-classify before go-live; set owner and incident escalation

Programs
5 Written AI policy: use, limits, escalation, monitor, reviewed on schedule

Partnerships
6 Internal and External: e.g. vendor AI assessment and contract clauses with AI suppliers

Anchor: ISO/IEC 42001:2023 (certifiable AIMS standard) helps evidence governance across jurisdictions · Ref: EU AI Act · NIST AI RMF · OECD AI Principles · local laws

Suter Lim & Co

On Monday, write down one name.

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