

Table 1. Comparison of voluntary AI ethics/governance frameworks in Southeast Asia

Criteria	Malaysia	Indonesia	Singapore	ASEAN
Primary objective	To establish responsible AI practices to benefit multiple groups of stakeholders, based on ethical principles.	To provide value references and ethical principles as guidelines for business actors and electronic system organizers.	To provide a ready-to-use tool to assist organizations in deploying AI solutions responsibly.	To provide practical guidance to public- and private-sector organizations developing and deploying AI systems in the region.
Stakeholder focus	All stakeholders within the system – end users, policymakers, and developers.	Public and private sector operators.	Organizations deploying AI systems.	Policymakers and industry.
Guiding principles	7 principles – fairness, reliability, privacy, inclusiveness, transparency, accountability, and human benefit.	9 principles including inclusivity, security, accessibility, transparency, credibility, data protection, and sustainability.	5 high-level principles – explainable, transparent and fair AI decisions; and human-centric solutions.	7 principles – transparency and explainability, fairness, safety, human-centricity, privacy, accountability, robustness.
Implementation approach	Stakeholder-specific recommendations for voluntary adoption alongside existing laws.	Directive tone – encourages compliance.	Detailed operational guidance on key issues with practical steps for implementation.	Recommendations on national level and regional level for governments, and broad range of considerations to be tailored to organization's nature of services.

Legal status	Voluntary and non-binding guidelines.	As a circular ("Surat Edaran"), the Circular on AI Ethics is technically non-binding, but refers to obligations under existing binding laws.	Voluntary and non-binding guidelines.	Voluntary and non-binding guidelines.
International alignment	Explicitly refers to OECD AI Principles and UNESCO's Recommendations on the Ethics of AI and other international frameworks, as well as the ASEAN AI Guide.	Primary focus on national context.	Explicitly refers to the European Commission's High-Level Expert Group and OECD Expert Group on AI, and references principles from numerous other frameworks in the appendix.	References global frameworks such as UNESCO's Recommendation on the Ethics of AI and the EU's Ethics Guidelines for Trustworthy AI, while maintaining the ASEAN context.
Enforcement mechanisms	Not directly enforceable; guidance-based.	Potential enforcement through existing laws (although the chances of direct enforcement are unlikely at the present moment).	Not directly enforceable; guidance-based.	Not directly enforceable; serves as a regional reference.