



Singtel Group Responsible AI (RAI) Framework and Policy

Artificial Intelligence (AI), especially Generative AI (Gen AI), offers significant opportunities for Singtel Group. To fully realise its potential, the Group is committed to developing and deploying AI responsibly - anchored in ethical practices and proactive risk management including driving sustainable growth, foster innovation and enhance customer experience in a fast-evolving digital world.

To ensure ethical and transparent AI adoption, the Group studied global best practices and regulatory trends and launched Singtel Group Responsible AI (RAI) Framework and Policy in April 2025. This initiative establishes governance structures, formalises RAI principles and operational safeguards across the Group and its operating companies (OpCos), and enables the Group to adopt and scale AI in a responsible and sustainable manner.

Aligned with international standards such as ISO/IEC 42001 on AI Management Systems ([link](#)), ISO/IEC 42005 on AI System Impact Assessment ([link](#)), NIST AI Risk Management Framework (RMF) ([link](#)) and Singapore's Model AI Governance Framework for Generative AI ([link](#)), the Singtel Group RAI Framework and Policy covers all in-house and client-facing AI use cases, third-party AI products and services (including embedded AI capabilities), and use of Gen AI tools.

Underpinning the Framework and Policy are 10 core RAI principles organised by 3 key dimensions:

A. Conformance and Risk Mitigation:

1. Governance, Oversight and Accountability: Establish clear roles and responsibilities across the AI lifecycle, with defined ownership and decision-making authority.
2. Risk Management: Identify, evaluate, mitigate and monitor risks throughout AI lifecycle.
3. Regulatory and Policy Alignment: Ensure compliance with evolving legal and industry standards.

B. Trustworthy Development:

4. Fairness: Prevent bias and promote equitable outcomes.
5. Privacy and Security: Protect personal data and system integrity.
6. Ethical Use and Sustainability: Ensure technologies are designed and deployed to benefit society and promote sustainability.
7. Data Quality: Emphasise the use of accurate, complete and representative data.
8. Transparency: Promote explainability and informed consent.



C. Continuous Oversight:

9. Collaboration and Sharing: Facilitate and build internal and external partnerships.
10. Monitoring and Contestability: Enable ongoing evaluation and user recourse to ensure adherence to RAI principles and accountability.

The Group has put in place a robust governance structure based on a Three Line of Defence model to enable RAI:

- Line 1 Defence: Business and technical teams responsible for executing Singtel Group RAI Framework and Policy.
- Line 2 Defence: Oversight and review by OpCo and Group-level governance functions (e.g. AI & Data Governance, Risk, Cybersecurity).
- Line 3 Defence: Independent assurance through internal or external audits, with findings reported to the Board.

This structure is supplemented by existing Group and OpCo working groups (e.g. Group AI Practice Forum, OpCo AI Champions) that facilitate knowledge sharing and strategic coordination and alignment across the Group.

The Singtel Group RAI Framework and Policy also define key requirements and processes to be implemented throughout the AI use case lifecycle: initial analysis, impact and risk assessments, architectural design, model development, deployment and post-deployment operations and monitoring. High impact AI use cases are subject to enhanced scrutiny to ensure sufficiency in measures and controls to mitigate risk and requires mandatory approval by Group or OpCo management. This ensures that all AI initiatives meet rigorous standards set out in the said policy.

To enable continuous improvement, the Singtel Group RAI Framework and Policy incorporate performance metrics as well as audit and assurance mechanisms, which track AI adoption, monitor effectiveness of controls and measures, and manage risks holistically. The Group is also investing in building internal capabilities to enable our people to confidently adopt and innovate through AI in their work.

The Singtel Group RAI Framework and Policy reflect the organisation's vision and commitment to ethical AI development and proactive risk mitigation, while ensuring our people are empowered to innovate with AI solutions and Gen AI tools, and harnessing AI's potential responsibly and sustainably. The Group remains committed to advancing the responsible use of AI as the technology evolves.

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