

AIMING FOR FAIR COMPETITION AND CONSUMER PROTECTION: LAUNCH OF COMPETITION & CONSUMER COMMISSION OF SINGAPORE'S AI MARKETS TOOLKIT

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I. INTRODUCTION

1. On 8 October 2025, the Competition & Consumer Commission of Singapore ("**CCS**") launched the AI Markets Toolkit (the "**AIM Toolkit**").
2. Developed in collaboration with the Infocomm Media Development Authority ("**IMDA**"), the AIM Toolkit is designed to help developers and deployers of Artificial Intelligence ("**AI**") systems assess potential competition and consumer protection considerations in the development and use of the software.

II. THE AIM TOOLKIT

3. The AIM Toolkit is a voluntary competition and consumer compliance software, which aims to help organisations minimize the risk of inadvertently engaging in anti-competitive behaviour or inadvertently engaging in unfair practices. Upon completion of the (a) Self-Assessment Process Checks and (b) Technical Tests, a report summarising the results and recommendations will be generated.¹
4. The CCS recommends running the toolkit during significant milestones of the AI lifecycle, including the initial deployment of the AI model, before releasing the developed AI model, and when implementing major changes in business policy.
5. Of significant note is that the AIM Toolkit is run on the organisation's local system, and not online. As such, third parties, including CCS and IMDA, will not be able to see the results of the assessment, nor will they have access to the information and models uploaded onto the Toolkit.²

¹ Competition & Consumer Commission of Singapore website, "AI Markets Toolkit Fact Sheet" (1 October 2025), <<https://www.ccs.gov.sg/resources/ai-markets-toolkit/fact-sheet>> ("*Fact Sheet*") (accessed 15 October 2025) at para 3.

² Competition & Consumer Commission of Singapore website, "AIM Toolkit FAQ" (26 September 2025), <<https://www.ccs.gov.sg/resources/ai-markets-toolkit/aim-toolkit-faq>> ("*FAQ*") (accessed 15 October 2025) at FAQ 3.

(a) Self-Assessment Process Checks

6. The Self-Assessment Process Checks consist of a series of questions relating to the AI model(s) being tested, the business practices of the organisation, and planned deployment and uses of the AI model in the organisation. The questions are based on the following eight principles:
 - a. Pro-competitive algorithms - To ensure that the algorithms in the AI software do not encourage anti-competitive behaviour, such as price collusion or predatory pricing;
 - b. Accessibility - To prevent unfair restrictions on access to the inputs needed to develop and deploy AI products, and to prevent mandatory data collection practices;
 - c. Flexibility - To promote cross-system operability between AI software, by allowing information to be moved between different AI systems with little to no barriers;
 - d. Fairness - To treat all groups equally. This includes discriminating or favouring specific brands or products without objective reason;
 - e. Transparency - To ensure transparent and accurate communication about the capabilities of the AI system, without misleading or deceiving any parties;
 - f. Diversity - To promote variety in the AI models offered, and encouraging engagement and participation from the open-source community;
 - g. Accountability - To establish a clear chain of responsibility, and processes to address any issues related to AI; and
 - h. Accuracy - To ensure that the AI software outputs results which are reliable and consistent.

(b) Technical Tests

7. The AIM Toolkit also conducts two Technical Tests on the AI model, which requires the AI model, testing dataset, and ground truth datasets to be uploaded into the Toolkit. The results can help organisations to better understand the AI models they are using. The two technical tests are for:
 - a. Explainability - To analyse how different factors influence an AI model's output. For example, a model that is heavily influenced by prices from competitors may have this highlighted as a potential factor that may raise competition concerns; and
 - b. Fairness - To evaluate how accurately the AI model predicts the output for different users with different self-selected traits. For example, an AI model which results in more false positives for downstream competitors may raise competition concerns.

III. CONSIDERATIONS WHEN DEPLOYING AI MODELS FOR BUSINESS USE

8. AI is a fast-developing technology which, if harnessed properly and carefully, can add value to businesses and organisations. Though businesses may be eager to adopt it quickly to stay ahead of the competition, it is important to ensure that the technology is used in an ethical and responsible manner.
9. The AIM Toolkit is a tool which can help businesses use AI responsibly. It protects the market from anti-competitive behaviour and consumers from unfair practices. As the AIM Toolkit is meant to be a self-assessment tool, the CCS has stated it will not endorse businesses for using the Toolkit.³ However, in the event of infringement of competition or consumer protection laws, the CCS may take into consideration evidence of use of the AIM Toolkit, such as reports generated from the Toolkit, as a mitigating factor.⁴
10. If you have any queries relating to the AIM Toolkit or require any advice on competition law in Singapore, please do not hesitate to contact our Partners, Mr. Tan Tee Jim, SC (tanteejim@leenlee.com.sg) or Mr. Jasper Lim (jasperlim@leenlee.com.sg).

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³ Fact Sheet at para 6.

⁴ FAQ at FAQ 10.